



## Port Health & Environmental Services Committee

**Date:** TUESDAY, 19 SEPTEMBER 2017  
**Time:** 10.30 am  
**Venue:** COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

**Members:**

Jeremy Simons (Chairman)	Deputy Wendy Hyde
Deputy Keith Bottomley (Deputy Chairman)	Deputy Henry Jones
Deputy John Absalom	Vivienne Littlechild
Caroline Addy	Andrew McMurtrie
Alexander Barr	Andrien Meyers
Adrian Bastow	Deputy Brian Mooney
Peter Bennett	Deputy Joyce Nash
Tijs Broeke	Henrika Priest
Peter Dunphy	Deputy Richard Regan
Mary Durcan	Deputy Elizabeth Rogula
Deputy Kevin Everett	John Scott
Anne Fairweather	Pooja Suri Tank
Alderman David Graves	Michael Welbank
Graeme Harrower	Mark Wheatley
Christopher Hill	Deputy Philip Woodhouse
Deputy Tom Hoffman	Vacancy

**Enquiries:** Sacha Than  
tel. no.: 020 7332 3419  
sacha.than@cityoflondon.gov.uk

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

**John Barradell**  
**Town Clerk and Chief Executive**

# **AGENDA**

## **Part 1 - Public Agenda**

1. **APOLOGIES**
2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
3. **MINUTES**  
To agree the public minutes and summary of the meeting held on 4 July 2017.  
  
**For Decision**  
(Pages 1 - 10)
4. **OUTSTANDING ACTIONS**  
Report of the Town Clerk.  
  
**For Information**  
(Pages 11 - 14)
5. **RESPONSE TO RESOLUTION ARISING FROM ANNUAL WARDMOTE: WARD OF DOWGATE**  
Report of the Director of Markets and Consumer Protection.  
  
**For Information**  
(Pages 15 - 34)
6. **EXTENDING BURIAL SPACE AT THE CITY OF LONDON CEMETERY (THE SHOOT)**  
Report of the Director of Open Spaces.  
  
**For Decision**  
(Pages 35 - 44)
7. **ELECTRIC VEHICLE CHARGING**  
Report of the Transportation and Public Realm Director  
  
**For Information**  
(Pages 45 - 68)
8. **MIDDLESEX STREET AREA ENHANCEMENT PHASE 2: PETTICOAT LANE MARKET IMPROVEMENTS AND PUBLIC REALM**  
Joint report of the Director of the Built Environment and the Director of Markets and Consumer Protection.  
  
**For Information**  
(Pages 69 - 84)

9. **BUSINESS HEALTHY STRATEGY 2017-20**  
Report of the Director of Community and Children's Services.
- For Information**  
(Pages 85 - 100)
10. **IMPACT OF THE UK LEAVING THE EU (BREXIT) ON PORT HEALTH & PUBLIC PROTECTION**  
Report of the Director of Markets and Consumer Protection.
- For Decision**  
(Pages 101 - 114)
11. **DRAFT CODE OF PRACTICE FOR DECONSTRUCTION AND CONSTRUCTION SITES EIGHT EDITION 2017**  
Report of the Director of Markets and Consumer Protection.
- For Decision**  
(Pages 115 - 202)
12. **LOW EMISSION NEIGHBOURHOOD ANNUAL UPDATE**  
Report of the Director of Markets and Consumer Protection
- For Information**  
(Pages 203 - 234)
13. **MARKETS AND CONSUMER PROTECTION BUSINESS PLAN 2017-2020: PROGRESS REPORT (PERIOD 1)**  
Report of the Director of Markets and Consumer Protection.
- For Information**  
(Pages 235 - 260)
14. **PORT HEALTH & PUBLIC PROTECTION RISKS**  
Report of the Director of Markets and Consumer Protection.
- For Information**  
(Pages 261 - 268)
15. **PERIOD 1 (APRIL-JULY) CEMETERY & CREMATORIUM BUSINESS PERFORMANCE UPDATE**  
Report of the Director of Open Spaces
- For Information**  
(Pages 269 - 282)

16. **DEPARTMENT OF THE BUILT ENVIRONMENT RISK MANAGEMENT - PERIODIC REPORT**  
Report of the Director of the Built Environment.
- For Information**  
(Pages 283 - 292)
17. **RESOLUTION OF THE POLICE COMMITTEE**  
Resolution of the Police Committee.
- For Information**  
(Pages 293 - 296)
18. **ILLEGAL STREET TRADING**  
The Director of Markets and Consumer Protection to be heard.
- For Information**
19. **RESOLUTION OF THE ECONOMIC CRIME BOARD**  
Resolution of the Economic Crime Board.
- For Information**  
(Pages 297 - 298)
20. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
21. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**  
Any items of business that the Chairman may decide are urgent.
22. **EXCLUSION OF THE PUBLIC**  
MOTION – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

## **Part 2 - Non-public Agenda**

23. **NON-PUBLIC MINUTES**  
To agree the non-public minutes of the meeting held on 4 July 2017.
- For Decision**  
(Pages 299 - 300)
24. **WASTE COLLECTION, STREET CLEANSING AND ANCILLARY SERVICES CONTRACT EXTENSION DECISION**  
Report of the Director of the Built Environment.
- For Decision**  
(Pages 301 - 314)



25. **DEBT ARREARS - PORT HEALTH AND ENVIRONMENTAL SERVICES PERIOD  
ENDING 30 JUNE 2017**

Joint report of the Director of the Built Environment, the Director of Markets and Consumer Protection and the Director of Open Spaces.

**For Information**  
(Pages 315 - 324)

26. **REPORT OF ACTION TAKEN**

Report of the Town Clerk.

**For Information**  
(Pages 325 - 328)

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

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

This page is intentionally left blank

## PORT HEALTH & ENVIRONMENTAL SERVICES COMMITTEE

**Tuesday, 4 July 2017**

Minutes of the meeting of the Port Health & Environmental Services Committee held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Tuesday, 4 July 2017 at 1.45 pm

### **Present**

#### **Members:**

Jeremy Simons (Chairman)	Graeme Harrower
Deputy Keith Bottomley (Deputy Chairman)	Deputy Tom Hoffman
Deputy John Absalom	Deputy Wendy Hyde
Caroline Addy	Vivienne Littlechild
Alexander Barr	Andrew McMurtrie
Adrian Bastow	Andrien Meyers
Peter Bennett	Deputy Joyce Nash
Tijs Broeke	Henrika Priest
Peter Dunphy	Deputy Elizabeth Rogula
Mary Durcan	John Scott
Anne Fairweather	Mark Wheatley
Alderman David Graves	

#### **Officers:**

Sacha Than	- Town Clerk's Department
Carl Locsin	- Town Clerk's Department
Jenny Pitcairn	- Chamberlain's Department
Julie Smith	- Chamberlain's Department
Paul Chadha	- Comptroller & City Solicitor's Department
Carolyn Dwyer	- Director of Built Environment
Jim Graham	- Department of Built Environment
Steve Presland	- Department of Built Environment
Richard Steele	- Department of Built Environment
David Smith	- Markets & Consumer Protection Department
Jon Averbs	- Markets & Consumer Protection Department
Ruth Calderwood	- Markets & Consumer Protection Department
Peter Davenport	- Markets & Consumer Protection Department
Donald Perry	- Markets & Consumer Protection Department
Steve Playle	- Markets & Consumer Protection Department
Colin Buttery	- Director of Open Spaces
Warren Back	- City Surveyor's Department
Nia Morgan	- City Surveyor's Department

The Chairman welcomed the Chief Commoner who was in attendance at the meeting.

1. **APOLOGIES**

Apologies for absence were received from Deputy Henry Jones, Pooja Suri Tank, and Mark Wheatley.

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

Tijs Broeke declared an interest due to working for Ford Motor Company.

3. **MINUTES**

**RESOLVED** – That the public minutes and non-public summary of the meeting held on 9 May 2017 be approved.

**Vote of Thanks:** At this point in proceedings, the Chairman called upon Deputy Joyce Nash, to deliver a Vote of Thanks to the immediate past Chairman. Deputy John Absalom, seconded the motion.

**RESOLVED UNANIMOUSLY** – That the Members of the Port Health and Environmental Services Committee wish to record their sincere thanks to:

WENDY MEAD, CHIEF COMMONER

who has shown enthusiasm and dedication for the duration of her time as Chairman since May 2014.

During her tenure as Chairman of the Committee, Wendy oversaw the implementation and development of various schemes aimed at improving the quality and cleanliness of streets across the City of London. The fruits of this labour have been officially recognised across the waste and cleansing industry and our services have received external recognition for our Public Conveniences, Street Environment and Enforcement services, Green Fleet Management, Cycle Safety, Recycling and various innovative, high profile campaigns.

However, the ones which stand out were the hotly contested Chartered Institute of Waste Management's outright National Winner Clean Britain Awards (2015) and the Keep Britain Tidy Local Authority of the Year Award (2016). Wendy was with us at the award ceremonies and it was clear that along with the rest of our group she was very proud of the recognition the City of London had received.

Reinforcing this external recognition and our own positive view of our services, there has also been some hard evidence from various litter surveys conducted by Keep Britain Tidy, who have inspected our streets and consistently found them to be cleanest in the UK.

Wendy has also overseen a continued increase in throughput at the Heathrow Animal Reception Centre that has resulted in a corresponding rise in income to record levels.

She has supported the Trading Standards Team by attending the annual conference and hosting national workshops at Guildhall. *Operation Broadway*, the ground-breaking project to tackle investment fraud, jointly headed with the City of London Police, deservedly won a Police award, and the scheme has since been expanded across London.

More recently, Wendy opened the enlarged and refurbished Port Health office at London Gateway, the new container terminal on the Thames that is the most advanced and fastest growing port in the UK.

In addition to all this, Wendy has been a dedicated supporter of the Port Health Rowing Team both in ceremonial and competitive events, encouraging them to trounce the Port of London Authority in many races!

And so in taking leave of Wendy Mead as their Chairman, Members of this Committee wish to thank her for her service and excellent leadership and to wish her every possible success in the future.

The Chief Commoner thanked Members of the Committee for the three years in which she was Chairman noting the amazing work carried out to improve life for people in the City of London and along the river.

Following the Port Health and Environmental Services Committee's Annual River Inspection and visit to the Heathrow Animal Centre on 30 June 2017, the Chairman thanked Robert Quest, Assistant Director Animal Health and Welfare and his team for hosting Members of the Committee and Cassandra Goddard for her work in arranging the logistics for the day. The Chairman explained that it was an informative and useful day for Members.

### **Matters Arising**

#### **Coffee Cup Recycling**

A Member raised the point that Members of the Court of Common Council were still not using the coffee cup recycling facilities in the Members' Room and in some instances were not emptying their cups before disposal. It was asked if signage could be posted in the Members' Room to address this issue. In response, the Chairman explained that a note had been circulated to Members to ask that they use the recycling facilities and asked Officers to look into the signage in the Members' Room.

#### **Massage Parlours and Sex Establishments**

The Director of Markets and Consumer Protection explained that further to the report submitted to the May meeting of the Port Health and Environmental Services Committee on action taken against non-compliant massage parlours and sex establishments, four of six premises had been inspected thus far, and of those four premises, one would be monitored closely over the coming months.

In response to the Chairman's request for an update on the premises owned by the City Corporation, and were in breach of a covenant in their lease, the Comptroller and City Solicitor explained that a forfeiture notice had been served

on the tenant requiring compliance, and that steps were being taken to monitor the situation.

**4. OUTSTANDING ACTIONS**

The Committee received the current list of outstanding actions.

Noise Pollution from the London Underground

The Director of Port Health and Public Protection explained that a meeting with TfL and Ward representatives had taken place, during which ten questions were asked by the Barbican Association. It was reported that there had been some improvement in noise levels and the expectation was that these improvements would continue, however some aspects would not be addressed until 2023 and further meetings would be taking place with TfL.

The Director of Port Health and Public Protection explained that an update note from the meeting would be circulated to Members of the Barbican Association. In response to a request from the Chairman, it was agreed that this note would also be sent to the Members of the Port Health and Environmental Services Committee.

Impact of Brexit

A Member raised the point that it had been confirmed at the May meeting of the Committee that a report on the impact of Brexit would be brought before the Committee at its September meeting and asked that this be added to the list of outstanding actions.

**RESOLVED** – That the outstanding actions be noted.

**5. WARDMOTE RESOLUTION**

The Committee considered a resolution from the Grand Court of Wardmote in respect of poor air quality in the Ward of Dowgate and across the City.

The Director of Port Health and Public Protection confirmed that a report would be produced and brought before Members at the September meeting, and following this would be sent to the Ward of Dowgate. The report would include information from the air quality Annual Status Report, together with monitoring results from both within Dowgate and the surrounding area. Members agreed it would be useful for Nomura to be invited to the September meeting of the Committee.

**RESOLVED** – That the Committee receive the resolution from the Grand Court of Wardmote.

**6. INTRODUCTION TO THE AMEY MANAGER**

The Interim Account Director for AMEY, Richard Yates gave a presentation to the Committee on the challenges and problems encountered over the past twelve months with the City's cleansing contract and future plans to resolve these issues.

The Interim Account Manager sought to reassure Members that although there had been failings in the past year due to cost cutting measures within AMEY, recent improvements had been made and in May 2017, 11 of the 12 KPIs had been met. The Interim Account Manager explained to Members that the contract with the City Corporation was extremely important to AMEY and they were committed to ensuring performance would not suffer.

In response to Members' questions, the Interim Account Director confirmed the following:

- That replacement brooms had been ordered thus ensuring that quality of equipment used was not compromised.
- That the one outstanding KPI was the most demanding of the targets and required a number of contingency plans in place in order for it to be achieved.
- That although he had joined AMEY in a temporary capacity in order to address the recent failings, it was hoped that he would later join the team permanently and that there would not be any further issues.

The Chairman thanked the Interim Account Director for demonstrating AMEY's commitment to their contract with the City Corporation.

**RESOLVED** – That the Committee note the Presentation.

**7. PORT HEALTH & PUBLIC PROTECTION BUSINESS PLAN 2017-2020**

The Committee considered a report of the Director of Markets and Consumer Protection which sought approval of the 2017-2020 Business Plan of the City of London's Port Health and Public Protection Division.

**RESOLVED** – That the Committee approve the Port Health and Public Protection Business Plan 2017-2020 including the updated 'Summary Risk Register' at Appendix A.

**8. PUBLICATION OF THE CITY OF LONDON CORPORATION'S AIR QUALITY SUPPLEMENTARY PLANNING DOCUMENT**

The Committee considered a report of the Director of Markets and Consumer Protection which sought approval of the City of London Corporation's Air Quality Supplementary Planning Document (SPD), new supporting SPD Consultation and Adoption Statements.

In response to a Member's question on ensuring that the air quality measures are adopted by those carrying out building work within the Square Mile, the Director of Markets and Consumer Protection explained that whilst the team do not carry out physical inspections of the construction sites, compliance is checked during the construction phase. The Chairman suggested that this question be tabled at the next Planning and Transportation meeting.

**RESOLVED** – That the Committee:

- a) approve the amended SPD and new supporting SPD Consultation and Adoption Statements, subject to any comments received; and

- b) recommend to the Planning and Transportation Committee that the SPF is adopted.

**9. ILLEGAL STREET TRADING**

The Committee received a report of the Director of Markets and Consumer Protection which sought approval on an action plan to stop illegal street traders. It was explained that there had been an increase in violence from illegal street traders when asked to cease their activities and this has resulted in a need for police assistance.

The Comptroller and City Solicitor explained that counsel's opinion had been sought to identify effective enforcement options available to the City when dealing with persistent illegal street traders. There were three options available to the City Corporation:

- Criminal behaviour orders
- Anti-social behaviour injunctions
- Prohibitory injunctions

The Comptroller and City Solicitor outlined the three options and explained that whilst the most appropriate form of enforcement would be dependent on the relevant facts in each individual case, criminal behaviour orders were the most cost effective method and would be adopted wherever possible.

A Member reported their concerns on the recent violence carried out by illegal street traders using an example of assault carried out in the Ward of Bridge and Bridge Without and added that there may be an element of organised crime associated with these traders such as human trafficking and funding organised crime. It was noted that the Council of Westminster had eradicated illegal street trading by introducing a number of measures to tackle this behaviour.

The Chairman explained that a police presence is required when confronting illegal street traders and with recent events within London requiring police resources, the traders and illegal ice cream vans were taking advantage of this situation by increasing their numbers. The Chairman confirmed that police resources were needed to address this issue, particularly in light of the recent escalation of violence and asked that a note be sent to the Police Committee to request assistance from the City of London Police.

In response to a Member's question on the use of signage to warn tourists and other persons on illegal street trading and whether this could be expedited and moved from the long term to short term actions, the Director of Port Health and Public Protection explained that although the current focus was on direct action, this would be looked into, as would the use of leafleting.

The Director of Port Health and Public Protection agreed to provide an oral update on this area at the September meeting and a written report for the November meeting.

**RESOLVED** – That the Committee agree:



- a) the recommended course of action detailed in paragraph 30 of the report before Members;
- b) and that a note of this discussion be sent to the next meeting of the Police Committee.

**10. CEMETERY & CREMATORIUM PERFORMANCE 2016/17**

The Committee considered a report of the Director of Open Spaces which updated Members on the performance of the Cemetery and Crematorium Performance 2016/17.

In response to Members' questions, the Director of Open Spaces explained:

- That the IT issues reported had improved over the past three months.
- That the number of burials had increased slightly over the previous year.
- That the Cemetery has an open approach with regards to funeral arrangements and it is open to all regardless of religion, the Superintendent and Registrar at the Cemetery endeavours to remain aware of different funerary offers in the market and strives to offer similar services within the cemetery.
- That the team try to remain flexible in their approach, for example offering a range of burial times.
- That the cemetery offers an open day on an annual basis.
- In order to address future capacity, an area of land has recently been converted to provide burial space for the coming decades. The cemetery also offers re-use of sites older than 75 years which is an innovative way of working.
- That a request would be made via the Gateway process to replace the cremator units

A Member explained that a Fund Manager had recently been speaking to a number of London Boroughs in relation to gathering information on their burial data and this may be of interests to officers.

The Chairman noted that there was considerable interest in the operation of the Cemetery and Crematorium and asked that a visit be organised in the autumn for Members of the Committee.

**RESOLVED** – That the Committee note the report.

**11. DEPARTMENT OF THE BUILT ENVIRONMENT (CLEANSING SERVICES) BUSINESS PLAN PROGRESS REPORT FOR PERIOD 3 (DECEMBER - APRIL), 2016/17**

The Committee considered a report of the Director of the Built Environment which set out progress made during December 2016 – April 2017 against the Department of the Built Environment Business Plan, and updated the Committee on the 2016/17 year end outturn position for the Department of the Built Environment services covered by the Committee.

The Chairman congratulated the officers who had received the enforcement officer of the year award from Keep Britain Tidy.

**RESOLVED** – That the Committee note the report.

**12. SQUARE MILE COFFEE CUP CHALLENGE UPDATE**

The Committee considered a report of the Director of the Built Environment which set out the results of the Cleansing Services' campaign regarding the recycling of disposable coffee cups during April 2017. The Director of Cleansing reported that the half a million target had been achieved in April, and the campaign now has a second target of five million cups by the end of 2017.

In response to a Member's question on whether recycling bags could be made available to Barbican residents for garden waste, the Director of Cleansing agreed to look into this.

**RESOLVED** – That the Committee note the report.

**13. AIR QUALITY ANNUAL STATUS REPORT**

The Committee considered a report of the Director of Markets and Consumer Protection which set out the statutory annual status report demonstrating progress in relation to air quality, the full report had been placed in the Members' Room.

In response to Members' questions, the Director of Markets and Consumer Protection confirmed the following:

- That one would expect a decrease in NO<sub>2</sub> levels following the removal of all motor traffic except buses from the Bank Junction area and further information in relation to the monitoring results would be provided in September to the Committee.
- That the levels of NO<sub>2</sub> are lower in areas away from the roads, but the results of data from road-sides are typical of the City and there are a number of plans in place to improve air quality.

**RESOLVED** – That the Committee note the report.

**14. REVENUE OUTTURN 2016/17**

The Committee received a joint report of the Chamberlain, the Director of the Built Environment, the Director of Markets and Consumer Protection, and the Director of Open Spaces which compared the revenue outturn for the services overseen by the Committee in 2016/17 with the final budget for the year.

**RESOLVED** – That the Committee note the report and the proposed carry forward of underspendings to 2017/18.

**15. REPORT OF ACTION TAKEN**

The Committee received a report of the Town Clerk which advised Members of action taken by the Town Clerk, in consultation with the Chairman and Deputy Chairman, since the last meeting of the Committee, in accordance with Standing Order No. 41(b).

Members praised the content of the report, but asked that the correct etiquette when addressing letters be followed in future.

**RESOLVED** – That the Committee note the report.

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

The following questions were raised by Members of the Committee:

Saturday Morning Working

A Member reported that there had been recent noise disturbances caused by Saturday morning working and asked whether the Barbican Association had received the copy of the current consultation.

The Port Health and Public Protection Director confirmed that the consultation had been circulated to Members of the Association and if there were any further consultations, they would be duly notified. The Port Health and Public Protection Director added that a report on this would be brought before the September Committee.

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

The Chairman reported that Port Health and Environmental Services Committee ties and badges could be purchased from the Port Health and Public Protection Director.

The Chairman encouraged Members to attend the Member Development Briefings arranged by the Town Clerk's Department and voiced his disappointment on the low turn out at one of the sessions.

The Chairman explained that the 2019 committee dates were currently being arranged and all future Port Health and Environmental Services Committees would be morning meetings.

**18. EXCLUSION OF THE PUBLIC**

**RESOLVED** – That under Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part 1 of Schedule 12A of the Local Government Act.

**19. NON-PUBLIC MINUTES**

**RESOLVED** – That the non-public minutes of the meeting held on 9 May 2017 be approved.

**20. OPERATION OFFSPRING - PROGRESS REPORT ON TAKING OPERATION BROADWAY BEYOND THE CITY OF LONDON**

The Committee considered a report of the Director of Markets and Consumer Protection which sought approval on endorsing the proposal set out within the report.

**RESOLVED** – That the Committee endorse the proposal set out within the report.

21. **CITY'S CASH - RELOCATION OF CITY'S SALT STORE FROM SMITHFIELD  
GENERAL MARKET - GATEWAY 2 UPDATE**

The Committee considered a report of the City Surveyor which updated Members on the current position in relation to the City's Salt Store and sought approval on proceeding to the next gateway.

**RESOLVED** – That the Committee agree to the proposals set out within the report.

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

There were no questions.

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

There was no other business.

**The meeting ended at 3.33 pm**

-----

Chairman

**Contact Officer: Sacha Than**  
**tel. no.: 020 7332 3419**  
**sacha.than@cityoflondon.gov.uk**

## Port Health & Environmental Services Committee – Outstanding Actions

Item	Date	Action	Officer(s) responsible	To be completed/ progressed to next stage	Progress Update
1.	23 May 2016	<b>Noise Pollution from the London Underground</b>	Director of Port Health and Public Protection	Ongoing	<p>The Chairmen of the Port Health &amp; Environmental Services and the Planning &amp; Transportation Committees wrote to TfL in July 2016 to request that the issue of noise in the City of London from the London Underground be looked into as a priority and this was circulated for all Committee Members' information.</p> <p>A detailed report had been circulated to Members in early 2017 and at the Port Health and Environmental Services Committee on 9 May 2017. A meeting with TfL took place on 22 June with Ward representatives. An update note from the meeting was sent to Members of the Committee from the Director of Port Health and Public Protection on 3 August 2017.</p>
2.	20 July 2016	<b>Provision of charging facilities for electric vehicles</b>	Director of the Built Environment	September 2017	<p>The provision of charging facilities for electric vehicles in car parks and at taxi ranks across the City of London from 2017 would be reviewed and reported back the Committee.</p> <p>The Committee received an update report at the 9 May Port Health and Environmental Services Committee, and it was agreed that a further strategy report would be brought before the Committee in the autumn.</p>

Item	Date	Action	Officer(s) responsible	To be completed/ progressed to next stage	Progress Update
3.	22 Nov 2016	<b>Middlesex Street Area Enhancement – Phase 2</b>	Director of Transportation and Public Realm	October 2017	<p>Members requested to be kept informed of the progress of Phase 2 of the Middlesex Street Area works to enhance Petticoat Lane Market and the central section of Middlesex Street between Sandys Row and St Botolph Street.</p> <p>At the Port Health and Environmental Services Committee on 9 May 2017, Members were advised that a working group had been set up and this project would be going to gateway three in October.</p>
4.	4 July 2017	<b>Impact of Brexit</b>	Director of Port Health and Public Protection	September 2017	Members asked that a report on the impact of Brexit be brought before the Port Health and Environmental Services Committee at its September meeting.
5.	4 July 2017	<b>Visit to the Cemetery and Crematorium</b>	Director of Open Spaces	Autumn 2017	There was a considerable interest in the operation of the Cemetery and Crematorium and Members of the Port Health and Environmental Services Committee asked that a visit be organised in the autumn of 2017.
6.	4 July 2017	<b>Garden Waste Recycling Bags for Barbican Residents</b>	Assistant Director, Cleansing	TBC	A Member asked if recycling bags at the Barbican could be made available for Barbican residents to dispose of garden waste.
7.	4 July 2017	<b>Illegal Street Trading</b>	Director of Port Health and Public Protection	TBC	A Member asked whether the use of signage to warn tourists and other persons on illegal street trading, particularly on bridges, could be made into a short term action.



This page is intentionally left blank



<b>Committee</b>	<b>Dated:</b>
Port Health and Environmental Services	19 <sup>th</sup> September 2017
<b>Subject:</b> Response to resolution arising from Annual Wardmote: Ward of Dowgate	<b>Public</b>
<b>Report of:</b> Director of Markets and Consumer Protection	<b>For Information</b>
<b>Report author:</b> Ruth Calderwood, Air Quality Manager	

## Summary

At the Grand Court of Wardmote on Tuesday 9th May 2017, a resolution was passed that the Ward of Dowgate expressed concern about poor air quality, with a request that the City Corporation redouble its efforts to reduce levels of air pollution in the City.

This report provides a response to that resolution. It contains the work plan for the Air Quality Team for 2017/18. The plan demonstrates the wide range of work being undertaken to both improve local air quality and help people to reduce exposure to air pollution. This report also details action being taken by the Mayor of London over the next few years. Actions being implemented by both the City Corporation and Mayor of London will result in measurable air quality improvements in the Ward of Dowgate, and across the City more widely, over the next few years. The Air Quality Team will continue to monitor air quality across the City to assess the impact of the various schemes.

Given its profile and importance to the organisation, the City of London Corporation is in the process of increasing its efforts to reduce poor air quality across the Square Mile with the provision of additional resources.

## Recommendation

Members are asked to:-

- note the report, and;
- note that the report will also be sent to Members of the Ward of Dowgate, pursuant to the resolution submitted by that Ward to the Grand Court of Wardmote and referred on to this Committee for consideration by the Court of Common Council, whom the Grand Court of Wardmote had tasked with responding.

## **Main Report**

### **Background**

1. At the Grand Court of Wardmote on Tuesday, 9th May 2017, the following resolution was passed.

“That the Ward of Dowgate expresses concern about the continued poor air quality in the Ward (and across the City) and asks the City of London Corporation to redouble its efforts to reduce the poor air quality and to report to the Ward of Dowgate on the progress of its programme of works within six months with comparative information from air quality readings”.

2. Air quality in the City currently meets the health based limits for all pollutants except nitrogen dioxide. Levels of fine particles (PM<sub>10</sub>) are met everywhere except Upper and Lower Thames Street. Air pollution is largely a product of combustion. In the City the main source is diesel vehicles. Emissions from construction sites, boilers, generators and combined heat and power plant also contribute to local levels of pollution.

### **Ward of Dowgate**

3. Dowgate is a small ward to the south of the City. Given the size and location of the Ward it is very difficult to deliver air quality improvements specific to this area. Like everywhere in the City, the air quality in the ward will vary depending on the proximity to busy roads. Upper Thames Street, which runs through the ward, forms part of a key east-west route through the City. It carries a large number of vehicles and, as a result, experiences high levels of nitrogen dioxide.
4. Nitrogen dioxide (NO<sub>2</sub>) and fine particles (PM<sub>10</sub>) are both measured on Upper Thames Street. Concentrations are typical for a busy road in the City. The introduction of the cycle superhighway has led to a decrease in levels of pollution, as evidenced in Figure 1 and Figure 2. The horizontal line represents the health based limit value of 40 µg/m<sup>3</sup>, below which there is no impact on health.

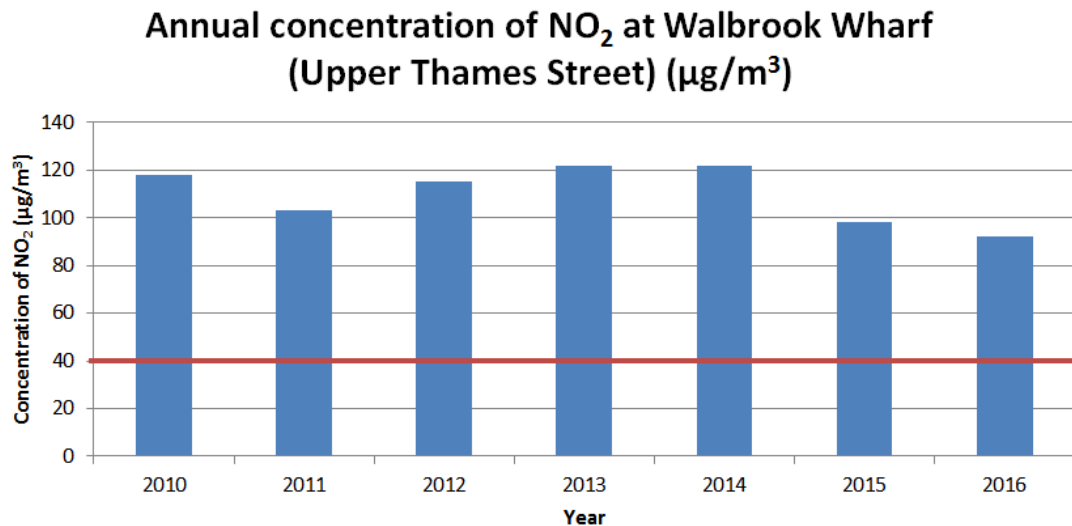


Figure 1

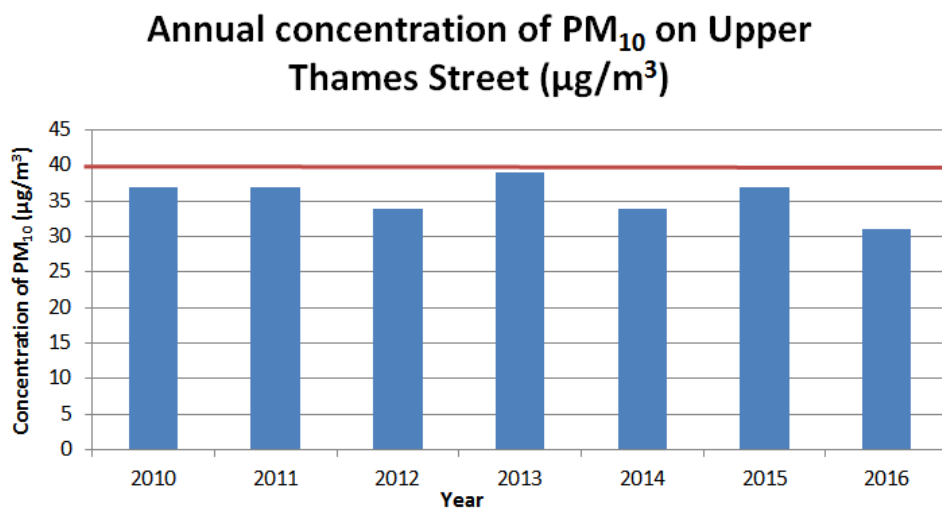


Figure 2

5. Nitrogen dioxide monitoring commenced in Cannon Street, opposite the entrance to the mainline station, in 2016. This was to measure the impact on air quality of the traffic management scheme at Bank junction. This road also carries a large number of vehicles. The annual average concentration in 2016 was 78µg/m<sup>3</sup>.
6. The City Corporation has been running its CityAir air quality business engagement programme for a number of years. One of the City's main business air quality champions is in the Ward of Dowgate. Nomura International has been an active participant in the CityAir business engagement scheme for a number of years and hosted a business Air Quality Champions event in 2014. Nomura International is also a previous winner of the City Corporation Sustainable City award for Air Quality.

7. Staff at Nomura measured nitrogen dioxide concentrations at their building in 2014/15. The annual average concentrations at their loading bay, which faces Upper Thames Street was  $57 \mu\text{g}/\text{m}^3$ . The annual average concentration on their garden terrace, which faces the River Thames was  $36 \mu\text{g}/\text{m}^3$ . These results highlight how rapidly nitrogen dioxide concentrations decrease from the roadside.

### **Action being taken by the City Corporation to improve air quality across the Square Mile**

8. The City Air Quality Strategy 2015 – 2020 provides the main framework for the delivery of air quality policy at the City Corporation. Annual reports are produced which demonstrate progress with actions to deal with air pollution. The reports also contain the latest monitoring data. The annual report for 2016 was presented to the July Port Health and Environmental Services Committee and is available on the City Corporation web site [www.cityoflondon.gov.uk/air](http://www.cityoflondon.gov.uk/air)
9. The location of the Square Mile means that air quality in the City is heavily influenced by external factors. Consequently, the City Corporation is not able to take action in isolation to improve air quality to an acceptable level. Much of the work of the Air Quality Team therefore involves collaboration, influence and the demonstrating of leadership and innovation. Appendix 1 contains the Air Quality Team Plan for 2017/18, which details action being taken in each area. A report will be produced on progress with actions in the plan in early summer 2018. This is part of the City Corporation's annual statutory reporting obligations.

### **Air quality monitoring**

10. A key part of the work undertaken by the Air Quality Team is air quality monitoring. Appendix 2 contains a map of current monitoring locations. The amount of monitoring undertaken has increased significantly over the past few years due to the greater interest and focus on air quality in the City.
11. Nitrogen dioxide is currently being measured around Bank to assess the impact of the traffic management scheme which was implemented in May 2017. The results are not conclusive to date. Roadside concentrations of nitrogen dioxide are affected by the weather, and the number and type of vehicles on the road. Vehicle numbers are influenced by the many street works, road closures and diversions that occur in the City at any given time. Consequently, a few months' data will be required to draw any firm conclusions about the impact of the scheme on local air quality.

### **Regional policies that will improve air quality in the Square Mile**

12. The Mayor of London is responsible for improving air quality across London and is introducing several policies and programmes that will lead to a measurable improvement in air quality in the Square Mile over the next few years:

- On October 23<sup>rd</sup> 2017, there will be an extra charge on vehicles entering the Congestion Charge Zone that do not meet Euro 4/IV emission standards. These are vehicles that were registered before 2005
- 'Zero emission capable' taxis are being introduced from 2018
- An ultra-low emission zone will be in force in the Congestion Charge Zone in 2019. An extra charge will be levied on vehicles that do not meet Euro 6/VI emission standards. These are vehicles registered before 2014/15
- Single deck buses will all be fully electric by 2020 and all double deck buses that operate in central London will be hybrid
- The Mayor has published a draft Transport Strategy which includes an aspiration to deliver a zero emission zone in central London from 2025
- The Mayor has also published a draft Environment Strategy with a range of actions designed to: reduce the exposure of Londoners to air pollution; achieve legal compliance with air quality limits as soon as possible and to establish tighter air quality targets for London

### **Increasing resources**

13. Given its profile, the City Corporation is increasing resources to work on air quality policy and projects. An Air Quality and Communications Assistant has recently joined the Air Quality Team to assist with the dissemination of information and support project delivery. Recruitment is also underway for an additional Air Quality Officer to deliver projects and programmes and assist with applications for external funding.

### **Corporate & Strategic Implications**

14. The work on air quality supports Key Policy Priority KPP3 of the Corporate Plan: 'Engaging with London and national government on key issues of concern to our communities such as transport, housing and public health'.
15. The work also supports delivery of the City of London Air Quality Strategy 2015 - 2020

### **Conclusion**

16. The Air Quality Team plan for 2017/18 details the work being undertaken to deliver the City Corporation's obligations for air quality management. It also details the innovative and collaborative work being undertaken by the team. A report on progress with actions in the plan will be produced in early summer 2018.
17. The City Corporation continues to take a wide range of coordinated action to deal with air quality and reduce its impact on health. Additional resources are being

made available to deal with air quality given its increasing priority within the organisation.

18. Actions being implemented by both the City Corporation and Mayor of London will result in air quality improvements in the Ward of Dowgate over the next few years. The Air Quality Team will continue to monitor air quality to assess the effectiveness of various schemes.

**Appendices:**

**Appendix 1:** Air Quality Team Plan 2017/18

**Appendix 2:** Map of current monitoring locations in the City

**Background Papers:**

City of London Air Quality Strategy 2015 – 2020

Air quality annual status report, PHES Committee , Tuesday 4 July 2017

**Ruth Calderwood**

Air Quality Manager

T: 020 7332 1162

E: [ruth.calderwood@cityoflondon.gov.uk](mailto:ruth.calderwood@cityoflondon.gov.uk)



# **Air Quality Team Plan for 2017/18**

## Team aim

To reduce the impact of air quality on public health by fulfilling the City Corporation statutory obligations for air quality management and providing leadership for air quality policy and projects across London.

## Context

The Air Quality team was established in September 2016. It was formed to reflect the high priority placed on improving air quality in the City; the increasing profile of air quality and the additional workload following the successful application for funding from the Mayor of London to implement a Low Emission Neighbourhood. Improving air quality is an important priority for the City Corporation and is currently listed as a 'red' corporate risk.

The team is responsible for ensuring that the City complies with statutory air quality responsibilities. It is also responsible for reducing the impact of poor air quality on public health.

The City Corporation has been awarded Clean Air Borough Status for its efforts to improve air quality. Pollution generated across the whole of London has an impact on air quality in the City; consequently the Air Quality team works collaboratively with a large number of organisations including being the chair of the London Air Quality Steering Group. It is regarded as a leader in its field delivering a wide range of pioneering and innovative projects.

## Strategic objectives

**Improving air quality** by implementing measures in the City Air Quality Strategy

**Protecting public health** by providing robust and timely information to increase awareness of air quality and enable the public to manage exposure to pollution

**Providing leadership in air quality policy and action** by disseminating information and best practice, and driving policy and legislative changes

**Piloting innovative solutions** by arranging trials, particularly in the City Low Emission Neighbourhood

**Working collaboratively** by working closely with a range of organisations such as the Greater London Authority, London Councils, London Boroughs, the Environment Agency, London's Universities, charities, the construction industry, City businesses, residents and schools.



## How we will improve air quality in 2017/18

Action	Outcome	Measure	Responsibility
Ensure compliance with the statutory requirements for London Local Air Quality Management	Full and continuing compliance with the statutory obligations, which require new systems of working and the implementation of new reporting mechanisms	Annual progress report submitted to the GLA and Defra by 24 April 2017  Report approved and Clean Air Borough Status maintained	Air Quality Manager  Air Quality Officer
Reduce the status of the corporate air quality risk by implementing a range of agreed measures	Mitigate the impact of poor air quality on the health of residents and workers in the City  Reduce the financial and reputational risk to the organisation	1. Implement the policies contained in the City of London Air Quality Strategy 2. Review and assess air quality in line with statutory obligations 3. Ensure the City Corporation becomes an Exemplar Borough for air quality 4. Develop and implement a communications strategy 5. Develop a plan for reducing the impact of diesel vehicles	Air Quality Manager
Improve the process of minimising emissions from new developments	Clarity on requirements for mitigating air pollution associated with new developments	Publish new air quality Supplementary Planning Document  Identify best practice and develop guidance to support the Supplementary Planning Document	Air Quality Officer
Comment on planning applications	Impact of new developments on local air quality reduced	Comments submitted on time to planning applications and accompanying reports  New procedures developed for dealing with planning applications	Air Quality Officer
Regulate the height of new chimneys	Increased dispersion of pollutants from new boilers, generators and combined heat and power plant	Review and authorise applications under the Clean Air Act 1993	Air Quality Officer

Action	Outcome	Measure	Responsibility
Regulate prescribed processes under the Environmental Permitting (England and Wales) Regulations 2016	Prescribed process operations that comply with the requirements of the regulations	Inspection visits, data analysis and updated public register	Air Quality Manager
Work with Transport Coordination Group to oversee the purchase of new vehicles	Cleaner Corporate fleet	Non diesel vehicles purchased where possible	Air Quality Manager
Install greening and air conditioning filtration system at Sir John Cass Foundation Primary School	Further protection of children from poor air quality at the school	Green screen installed on the school perimeter adjacent to Aldgate  Air filtration system up and running in the nursery by March 2018	Air Quality Officer
Oversee the inspection of construction sites for compliance with Non Road Mobile Machinery (NRMM) requirements	Reduced emissions of air pollutants from construction sites	Equipment registered on NRMM web site that meets stage IIIB emission standards	Air Quality Officer
Appoint temporary Air Quality and Communications Officer and permanent Air Quality Officer	Extra resources to assist with the delivery of the Air Quality Strategy and associated work	2 x people in post by Dec 2017	Air Quality Manager
Installation of secure cycle parking in Barbican Estate residential car parks and the Golden Lane Estate	More residents and visitors cycling in the City and Low Emission Neighbourhood area.	Increased cycling activity amongst residents in the area and reduction in number of cycle thefts	LEN Project Manager
Support the Mayor of London with the implementation of the Emission Surcharge (ES)	Businesses and residents are aware of the ES being introduced in the Congestion Charge Zone in October 2017	Publicise ES through networks	Air Quality Manager  New Air Quality Comms post
Reduce emissions from Corporate properties	Minimising the impact of City Corporation actions on air quality in London	Training for facilities managers and awareness raising with CoL Surveyors dept	Air Quality Manager
Ensure urban realm design includes reference to improving air quality	Areas in the City that meet health based air quality targets	Input into designs and monitor changes in air quality	Air Quality Manager  Technical Assistant

Action	Outcome	Measure	Responsibility
Ensure new code of practice for construction incorporates air quality requirements	Minimise emissions from construction and demolition activity through best practice	An improved and approved new Code of Practice	Air Quality Officer

## How we will protect public health in 2017/18

Action	Outcome	Measure	Responsibility
Maintain an extensive monitoring network	Robust data set to assess compliance with limit values and the effectiveness of policies to improve air quality	Maintain 3 x continuous NOx analysers, 2 x PM10 analysers, 2 x PM2.5 analysers, 1 Osiris, 2 x AQ Mesh analysers and an extensive diffusion tube monitoring network  Make data available on the LAQN site and to the public	Technical Assistant
Support City residents and workers in measuring exposure to air pollution	Greater understanding by the public on how to reduce exposure to pollution in the Square Mile	Train in the use of exposure monitors and download and analyse data	Technical Assistant
Assess the impact of the Bank on Safety scheme on air quality	An understanding of the impact of changes to traffic flow in the area	Robust data set from 22 locations in and around Bank	Technical Assistant
Run events for National Clean Air Day	Raise awareness of the work of the team	<ul style="list-style-type: none"> <li>• Open pop up garden and clean air route at the Barbican</li> <li>• Idling engine action day</li> <li>• Open day event at Guildhall</li> <li>• Residents air quality &amp; cycle week pop up event</li> </ul>	Air Quality Officer  Technical Assistant  LEN Project Manager
Update City air quality web pages	Improved and timely information on City air quality web pages	Information updated at least fortnightly to reflect work of the team	Air Quality Officer  New AQ and Comms. post
Develop and manage systems to promote the work of the team and provide alerts when air pollution is high	Raised awareness amongst stakeholders of the wider work of the team and of high pollution days	Increased social media presence and people informed about high pollution days	New AQ and Comms. post
Develop the cityairapp.com web site	Improved web site for disseminating information	Web site up and running by March 2018	New AQ and Comms. post
Highlight and display air quality related information spatially using GIS	Increase public understanding of, and access to, air quality data and projects	A series of maps detailing air quality information	Air Quality Officer  Technical Assistant
Support City events, e.g. residents meetings, business events	Increased awareness of air quality amongst stakeholders	Presence at various events across the Square Mile	Whole team as required

Action	Outcome	Measure	Responsibility
Publish short films of stakeholders on the LEN and air quality	Increased awareness of the activities being undertaken in the LEN	A series of short films uploaded to City YouTube channel  Increased awareness of air pollution amongst residents and workers in the LEN area.	LEN Project Manager
Develop a map of focus areas based on pedestrian flow and air quality	An understanding of areas of high pollution and high footfall	A map detailing areas of focus	Technical Assistant
Low emission route way finding projects	Encouraging residents, workers and visitors in the City LEN area to avoid busy traffic routes and instead take quieter and lower pollution routes thereby reducing their exposure	Installation of Cleaner Air Footprint aluminium/vinyl stickers along the quieter routes – Barbican High Walk. Increased pedestrians on quieter routes	LEN Project Manager

## How we will provide leadership in 2017/18

Action	Outcome	Measure	Responsibility
Investigate options for reducing emissions from combustion plant within the Square Mile	Mitigate the impact of combustion plant on local air quality	Report on options for low and zero emission plant	Air Quality Manager  Air Quality Officer
Maintain the City's status as 'Clean Air Borough'	Demonstrate taking robust action  Mitigate risk associated with fines for non-compliance	Demonstrate significant progress in: <ul style="list-style-type: none"> <li>• Political leadership</li> <li>• Taking action</li> <li>• Leading by example</li> <li>• Development control</li> <li>• Public health</li> <li>• Information and communication</li> </ul>	Air Quality Manager
Provide the chair for the London Air Quality Steering Group and be the key contact for London Councils on London air quality policy	Coordinated action across London	Quarterly meetings and ad hoc information provided as required	Air Quality Manager
Develop text for new Clean Air private members Bill	Improved regulatory powers for dealing with air quality	Draft Bill approved by March 2018	Air Quality Manager
Provide consultation comments, and input into the development of, the National Air Quality Plan, Mayor's Environment Strategy, proposals for changes to the ULEZ and the draft London Plan	Input into strategic plans affecting air quality in the City	Consultation comments submitted on time and approved by Committee	Air Quality Manager

## How we will pilot innovative solutions in 2017/18

Action	Outcome	Measure	Responsibility
Apply for funding to support the innovative work of the air quality team	To support the delivery of the City Corporation air quality aims and objectives	Successful applications for funding	Air Quality Manager  Air Quality Officer  LEN project Manager
Develop the business air quality champions grant scheme	Raised awareness and support for air quality improvement by businesses with the implementation of real world case studies	Successful applications and projects implemented by businesses with monitored outcomes	LEN Project Manager
Trial electric charge points in Barbican Estate car parks	Increased uptake of electric and plug-in vehicles amongst residents who own petrol/diesel vehicles	Trial installation of over 30 electric vehicle charging points installed in 5 different car parks, which will be monitored and assessed to determine best options for future rollout of EVCPs in car parks.	LEN Project Manager
Develop feasibility study and proposals for restricting traffic in Beech Street and other streets in the Low Emission Neighbourhood area to ULEVs or zero emission vehicles	Nitrogen dioxide levels in Beech Street and surrounding streets will be reduced to the EU safe limit threshold	Reduced traffic flows in the area. Increased uptake of zero emission capable vehicles particularly amongst taxis and servicing vehicles	LEN Project Manager
Museum of London Urban Air Quality Gardens	Raise awareness and understanding of air quality impacts on soil and vegetation	Number of visitors to the museum engaged in the project	LEN Project Manager
Develop proposals for electric / Zero Emission Capable (ZEC) only taxi ranks and rest bays including trial of on street charger at a rest bay	Increased uptake of zero emission capable taxis and shift to electric vehicles resulting in reduced emissions of NOX	Number on ZEC rest bays and ranks in LEN area. Uptake of ZEC taxis	LEN Project Manager
LEN cargo bike hire scheme for residents and businesses	Increased use of cargo bikes amongst businesses and residents in LEN area. Reduced van movements	Use and number of trips made by cargo bike	LEN Project Manager

## How we will work collaboratively in 2017/18

Action	Outcome	Measure	Responsibility
Support Kings College London PhD to develop new health based messages for air quality	Improved messaging system around days of high air pollution	Support public survey through the City Air App and promote the research through local contacts	Air Quality Manager
Lead on idling engine project for London	Roll out successful idling engine behaviour change programme	Successful delivery of pan London project	Air Quality Officer
Run quarterly idling engine action days with a range of stakeholders	Reduced emissions from unnecessary vehicle engine idling	4 x events with the support of community volunteers	Air Quality Officer
Work with City businesses on targeted intervention to reduce emissions in the Square Mile	Reduced emissions from boilers, buildings and business activities and travel	Number of businesses engaged	LEN project Manager Air Quality Manager
Work with Global Action Plan to raise awareness of air quality amongst residents in City estates across London	Increased awareness of air quality amongst City tenants	Material developed with 4 x workshops, follow up meetings and published articles	Air Quality Manager
Work with the London Responsible Procurement Network to disseminate good practice across London	London Boroughs incorporating air quality into procurement decisions	Workshops and development of best practice	Air Quality Manager
Installation of ivy screen planters on Aldersgate footbridge	Increased usage of footbridge and Barbican High Walk instead of Beech Street leading to reduced exposure to pollution	Greening installed and maintained on footbridge	LEN Project Manager



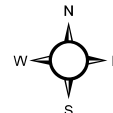
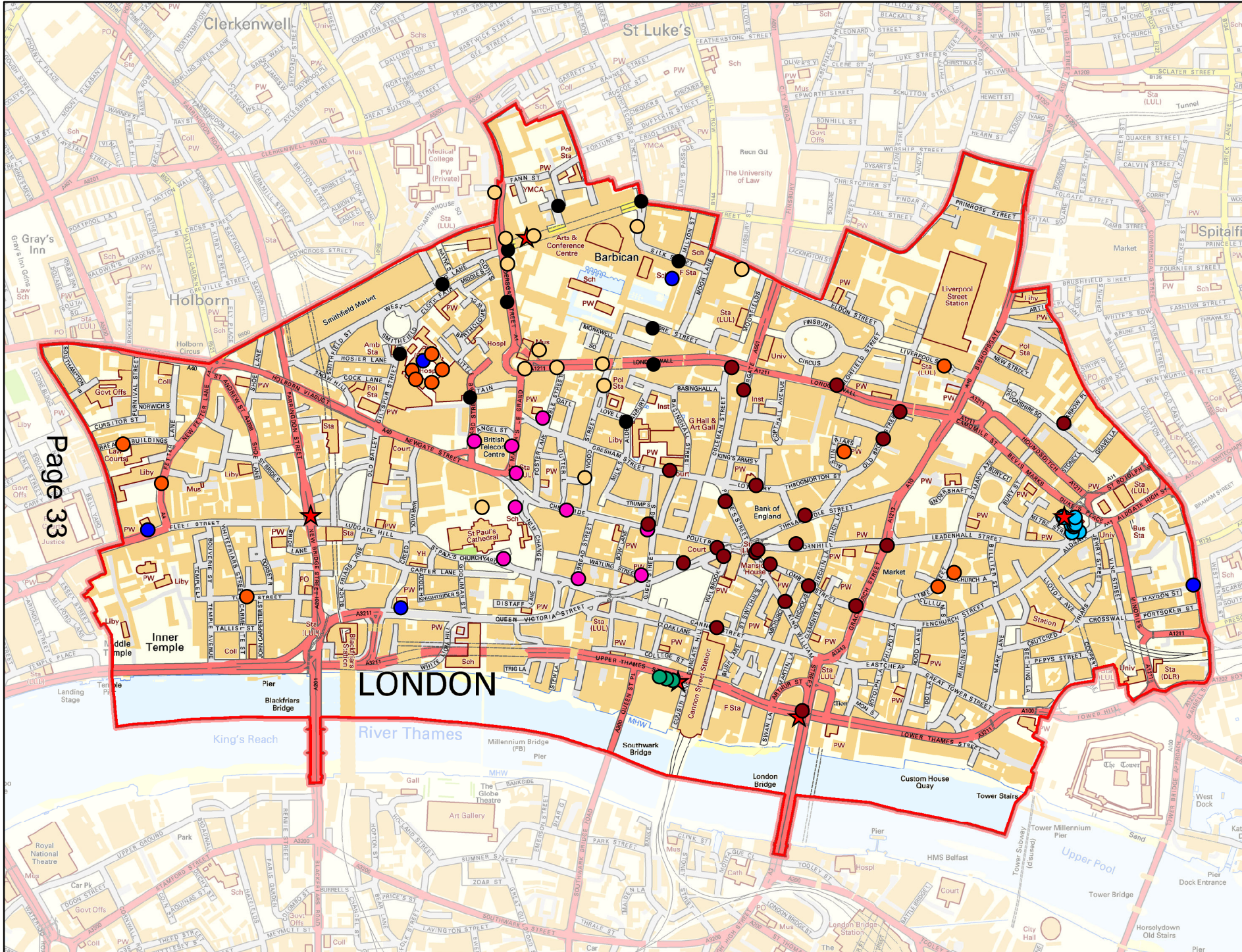
Action	Outcome	Measure	Responsibility
Delivery and servicing case studies	Working with businesses, other organisations and DBE to support them with implementation of the actions and recommendations of the DSP case studies to reduce freight traffic movements	Engagement and actions being undertaken by involved organisations	LEN Project Manager
Feasibility proposals for micro-consolidation centre in London Wall car park	Feasibility study produced outlining options and scenarios for using London Wall car park for a micro-consolidation centre to reduce freight trips on City roads	Final feasibility study with recommendations that are received well by the City Surveyors and DBE	LEN Project Manager

## The Air Quality Team

The Air Quality team is comprised of:

- Air Quality Manager
- Air Quality Officer (x 2 from Autumn 2017)
- Low Emission Neighbourhood Project Manager (0.8 FTE)
- Technical Assistant (0.5 FTE)
- Air Quality and Communications Assistant (2 year post from 14/8/17)





## Air Quality Monitoring

- NO2 Co-location
- NO2 Business engagement
- NO2 Specific projects
- NO2 Bank
- NO2 Cheapside BA
- NO2 Long term
- NO2 LEN
- Continuous AQM
- NO2 SJC school

Created by:  
A. Noori

Date Created:  
03 Aug 2017



© Crown copyright and  
database rights 2015  
OS 100023243

This page is intentionally left blank

<b>Committees:</b>		<b>Dates:</b>
Port Health and Environmental Services Committee Projects Sub		19 September 2017 07 September 2017
<b>Subject:</b> Extending Burial Space at the City of London Cemetery (The Shoot)	<b>Gateway 7 Outcome Report</b> Regular	<b>Public</b>
<b>Report of:</b> Director of Open Spaces <b>Report Author:</b> Patrick Hegarty		<b>For Decision</b>

## Summary

### Dashboard

- Project Status: Green
- Timeline indicating the stage at which the project is: Works completed December 2015 followed by a year's defects monitoring period during which no outstanding issues were detected.
- Total Spend: £479k
- Overall project risk: Green

### RAG status for project against GW2 budget, specification and time

- Project Status: Amber –

Within budget and specification but an additional year was needed prior to the works for investigation, monitoring, etc. to comply with planning requirements. However this delay was still within the time frame to meet the operational needs of the Cemetery for the provision of additional burial space.

### RAG status for project against last approved budget, specification and time

- Project Status: Green – Within budget, specification and time.

### Total expenditure over total period of time

Year	£
2014/15	48,830
2015/16	406,307
2016/17	24,291
<b>Total</b>	<b>479,428</b>

### Summary of project completed

The former storage and waste area at the City of London Cemetery was re-formed as a landscaped burial area to provide space for approximately 3,000 additional



lawn graves to assist in having a continuity of supply of this form of burial ahead of being able to re-use older lawn areas in years to come.

### **Recommendations**

- 1 It is recommended that the lessons learnt be noted and the project be closed.

## **Main Report**

<b>1. Brief description of project</b>	<p>The four acre site known as The Shoot was previously used for the storage and disposal of spoil and cemetery waste within the City of London Cemetery. The most popular burial choice by the public is lawn graves and the site was identified to provide approximately 3,000 additional graves, sufficient for more than 10 years beyond the current availability and thereby help to ensure the continuation of an important income stream. Extensive earthworks were required to prepare and landscape the area, a new access chamber was provided to a culvert running under the site and minor alterations were made to adjacent internal roadways as well as access paths from the surrounding roads.</p>
<b>2. Assessment of project against SMART Objectives</b>	<p>Specific – Completed approvals, development and procurement of proposals for ground works with ancillary works to a Victorian drainage culvert and adjustments to adjacent internal roads at a four acre self-contained site at the City of London Cemetery.</p> <p>Measurable – Space provided for approximately 3,000 lawn burial spaces. Appropriate ground conditions assessed and monitored to avoid ground water contamination to meet Environment Agency and Planning requirements.</p> <p>Assignable – Delivered by the Cemetery &amp; Crematorium division of the Open Spaces Department overseen by a Project Board and with support from consultants, officers in the Chamberlain's Department and the City Solicitors Department. Having close supervision by the on-site management of the Cemetery ensured minimal operational or public relations impact of the major works on the working cemetery.</p> <p>Realistic – Careful development of the proposals involved extensive soil investigation and sampling, consideration of soil volumes and strategy for dealing with unwanted materials in the existing waste heaps on site. Early consideration of hydrology constraints, archaeology potential and heritage aspects of the landscape were key considerations to the successful outcome of the project.</p> <p>Time-related – Completed to a programme which was</p>

	adjusted as appropriate. Completion of the ground works by the end of 2015 to allow five years settlement before interments and within the overall deadline of a previously envisaged shortfall of lawn burial space at the Cemetery around 2022.
<b>3. Assessment of project against success criteria</b>	<p>1 Permissions. Planning permission was obtained subject to conditions which were complied with and the works were signed off by the London Borough of Newham in consultation with the Environment Agency and Historic England. An area of the works at the Shoot was on consecrated ground and the Chancellor of the Diocese of Chelmsford directed that, in the circumstances, Faculty approval was not required.</p> <p>2 Successful completion of:</p> <ul style="list-style-type: none"> <li>• site clearance, processing of the waste material on site and disposal of unwanted material;</li> <li>• engineering of new embankments, spreading of backfill and formation of finished levels;</li> <li>• cleaning works to the Victorian drainage culvert underlying the site and construction of an access chamber to the culvert to facilitate any future maintenance;</li> <li>• works to adjust roadways and kerbs immediately adjacent to the site.</li> </ul> <p>3 The landscape works were completed on 23<sup>rd</sup> December 2015 followed by a defects monitoring period of a year, with no defects requiring correction noted. The land is being left for a further four year period to settle before receiving burials. This is well in time for an estimated deadline of 2022 by which time the Cemetery might otherwise cease to provide lawn burials, a significant risk to the operational life of the Cemetery.</p> <p>4 The project was delivered within budget.</p> <p>5 Historic England was consulted during the planning of the scheme. The works were carried out in accordance with the Cemetery's Conservation and Management Plan and enhance the site whilst complimenting its Grade I listed landscape status.</p>
<b>4. Key Benefits</b>	Reclamation and landscaping of four acres of land, formerly used as a dump for spoil and green waste at the City of London Cemetery to provide sufficient space for approximately 3,000 new lawn graves, sufficient to meet an expected demand of this popular form of burial for between 10 and 15 years.
<b>5. Was the project specification fully</b>	Yes

<p><b>delivered (as agreed at Gateway 5 or any subsequent Issue report)</b></p>	
<p><b>6. Programme</b></p>	<p>The project was not completed within the agreed programme</p> <p>At Gateway 2 an outline programme was drawn up. However an additional year was added to that programme due to the need to comply with planning conditions including soil sampling, archaeological investigations, monitoring of soil water levels over a year and the requirement to process waste material under an Environment Agency protocol to manage the movement on site of material classed as waste. This did not impact on the overall deadline for completion of the ground works in sufficient time to allow a five year period of settlement of the ground ahead of being in a state to receive burials by 2022.</p> <p>The updated programme was refined and reported to Members in subsequent reports.</p> <p>At Gateway 5 it was reported that the main contractor was expected to begin on site in September 2015. This was delayed by about a month because of negotiations with the main contractor over a miscalculation they discovered with the hard landscape element of their tender submission. This was resolved when the main contractor was given the option to reduce the scope of their work by removing the hard landscape element from the contract on the basis they forgo any entitlement for any fees or claims for loss of profit in relation to omitted elements and submission of an acceptable revised programme of works. This was accepted and allowed the weather critical ground works to proceed in a timely manner. The hard landscape element of the works was subsequently carried out by the City's term contractor, JB Riney, and by the cemetery on site team at less cost than the tender submission.</p>



## 7. Budget

The project was completed within the agreed budget

	Gateway 2	Issue Report	Gateway 5	Budget Outturn
Fees		88,926	90,484	93,487
Works		497,300	476,381	385,941
Total	£250,000 - £500,000 range	586,226	566,865	479,428

At Gateway 2 we estimated the cost range to be between £250,000 to £500,000 subject to costing and appraisal of options. Subsequently, at Gateway 3/4, three options were assessed ranging from £504,500 to £861,300 and the lowest option approved. As the detailed design of the project developed and planning permission was obtained, significant additional fees were identified for services to meet statutory planning conditions and this was reported to Members in an Issue Report.

Following tendering the works estimate in the Issue Report was reduced and reported at Gateway 5.

Significant further reductions were made in the works budget by negotiations with the main contractor over a miscalculation in their tender submission. They agreed to reduced the scope of their work, in particular dropping the hard landscape elements, agreeing to forgo any entitlement for any fees or claims for loss of profit in relation to omitted elements. The hard landscape elements were subsequently carried out by the City's term contractor, JB Riney, and by the cemetery on site team at less cost than the tender submission.

## Final Account Verification

Please confirm whether or not the Final Account for this project has been verified. \*

Not Verified

*State any outstanding issues, actions to be taken and timescales for resolution.*

There are no outstanding issues or actions to be taken other than verification of the account which is being addressed by the Finance Team.

## **Review of Team Performance**

<b>8. Key strengths</b>	<p>1 Robust monitoring and communication with the contractor through the on-site presence of the Superintendent's team and the programmed visits of the landscape consultants. This ensured any potential impacts of the works on the users of the Cemetery and Crematorium were identified and mitigated.</p> <p>2 Support from Procurement and the City Solicitor in dealing with tendering and contract issues in a clear and timely manner.</p>
<b>9. Areas for improvement</b>	None
<b>10. Special recognition</b>	<p>Julie Gerred, Senior Legal Assistant in the Comptroller and City Solicitor's Department for her support in dealing with the post tender negotiations with the main contractor.</p> <p>Samantha Rogers, Category Manager, Construction &amp; Property Category Team, City Procurement, for her support in the procurement process.</p>

## **Lessons Learnt**

<b>11. Key lessons</b>	<p>1 The Invitation to Tender for the works included a technical question requesting the tenderers to detail how they intended to facilitate the City's policy objectives of providing socially responsible solutions during the lifetime of the contract, e.g. apprenticeships from local schools, supporting Investors in People (IiP), local labour initiatives, protecting the environment, etc. The responses received to this question were part of the evaluation of the tenders and indicated various ways the companies could provide benefits in line with the policy objectives, albeit outside the terms of the contract subsequently drawn up with the appointed contractor. On request the appointed contractor provided a report towards the end of the contract outlining what they had done to meet the objectives. Their response included IiP related training and the use of some local suppliers. However it is not clear what they did <u>differently</u> to facilitate the policy objectives and because it is not a contract requirement for the contractor to provide evidence it is difficult to evaluate the effectiveness of including corporate social responsibility (CSR) proposals at the invitation to tender. Building in more</p>
------------------------	--

	robust mechanisms for the measurement of CSR throughout the contract would help in holding the contractor to deliver the proposals which they used as part of the tender exercise.
<b>12. Implementation plan for lessons learnt</b>	1 Bring the issue to the attention of the Project Team in the Town Clerk's Department to see if there is a more robust way of monitoring the CSR objectives through the contract.

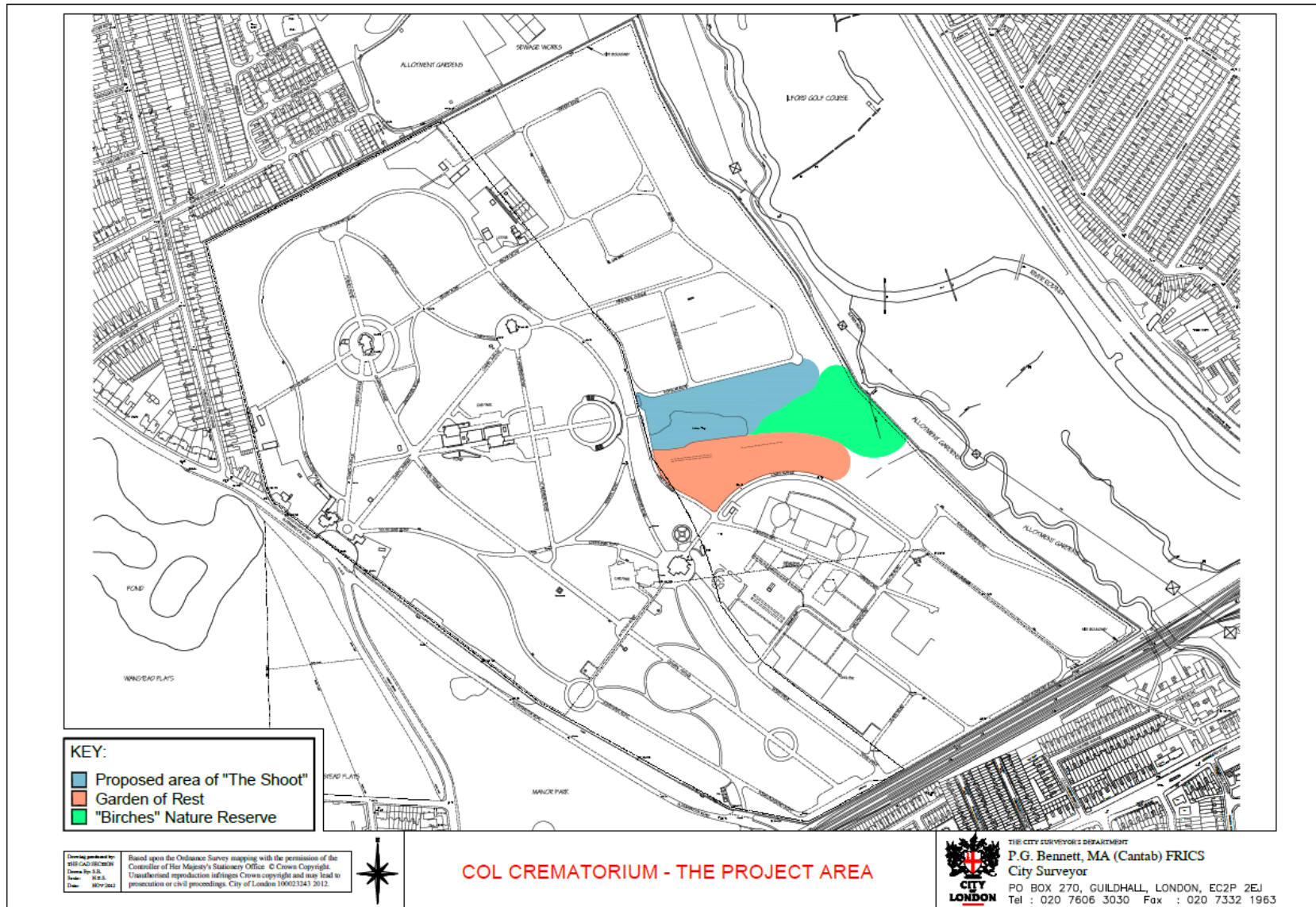
### **Appendices**

<b>Appendix 1</b>	Plan
<b>Appendix 2</b>	Photographs

### **Contact**

<b>Report Author</b>	Patrick Hegarty
<b>Email Address</b>	patrick.hegarty@cityoflondon.gov.uk
<b>Telephone Number</b>	020 7332 3516

## Appendix 1 Site Plan





Appendix 2 Photographs

Before:



A - Shoot looking east



B - Shoot looking west

client:	project:	scale:	date:	drawn:	checked:
City of London	City of London Cemetery- The Shoot		20.01.14	PH	PH
drawing title:	Photograph Locations Sheet 1	drawing number:	DCB-D1-12	rev:	status: P

© Crown copyright. All rights reserved. 20.. | License number ###  
e. info@harrisondd.co.uk | t. 01352 741110 | www. harrisondd.co.uk

**Harrison**  
design - development

After:



South west corner with altered road layout



Looking east showing embankment and plateau

<b>Committee(s)</b>	<b>Dated:</b>
Port Health and Environmental Services – for information Planning and Transportation – for decision	19 September 2017 3 October 2017
<b>Subject:</b> Electric vehicle charging	<b>Public</b>
<b>Report of:</b> Steve Presland – Transportation and Public Realm Director	<b>For Information</b>
<b>Report author:</b> Samantha Tharme – Strategic Transportation Officer	

## Summary

This report considers the need for electric vehicle (EV) charging in the City of London. Fast charge points are already in place in a number of City of London Corporation car parks. There is now a need to consider providing dedicated rapid charge points to encourage the operation of zero emission capable taxis in the City and support the taxi trade in meeting TfL's licensing requirements for all new taxis to be zero emission from 1 January 2018.

An overarching policy on charging for EVs is proposed. This policy has to balance the benefit of providing charging facilities within the Square Mile at appropriate locations, whilst guarding against the generation of additional vehicle trips and minimising the impact on the public realm. The proposed policy includes details of acceptable locations of charge points for different types of vehicles.

In line with this proposed policy approach, the report also seeks approval for the installation of eight rapid charge points for taxis in Baynard House car park. The installation of these charge points, and any enabling works, will be fully funded by Transport for London (TfL).

## Recommendation(s)

Members are asked to:

- Approve the policy to support the installation of electric vehicle charge points at appropriate locations. This will take into account the need to guard against additional vehicle trips and have minimal impact on the public realm.
- Approve the implementation of eight rapid charge points for taxis at Baynard House car park.
- Approve the implementation on a trial basis of a rapid charge point at Noble Street taxi rest bay. To be reviewed and reported back to Planning Transportation Committee after 12 months to determine whether it should be made permanent.



## **Main Report**

### **Background and context**

1. The draft Mayor's Transport Strategy includes targets for improved emission standards for all vehicles in order to meet the required limits for air pollutants across London. The key dates and targets are set out in Appendix 1. The first restriction is a requirement for newly licensed taxis to be zero emission capable from January 2018. This measure will in due course benefit the City as taxis currently make up 19% of motorised traffic in the Square Mile, contributing 24% of all NO<sub>x</sub> emissions and 50% of PM<sub>10</sub> from transport.
2. Zero emission capable means a vehicle able to operate with zero tailpipe emissions. An ultra-low emission vehicle (ULEV) is the collective term for such vehicles, including battery electric vehicles (BEVs), plugin hybrid electric vehicles (PHEVs), range-extended electric vehicles (RE-EVs) and hydrogen fuel cell electric vehicles (FCEVs). This report covers the provision of charging infrastructure for BEVs, PHEVs and RE-EVs, referred to as EVs for ease of reference.
3. The City of London Corporation recognises the need to improve air quality for those living and working in the City. National health based limits for exposure to the pollutants nitrogen dioxide (NO<sub>2</sub>) and small particles (PM<sub>10</sub>) are not being met in the City. The whole of the Square Mile has been declared an Air Quality Management Area and air quality improvement is one of the key policies in the Corporate Plan. Air quality is also on the Corporate Risk Register as a 'red' risk. The City Corporation supported the Mayor's proposal to introduce the ULEZ at an earlier date of April 2019 provided that a certified retrofit system is in place to allow heavy vehicles to be fitted and tested for Euro VI compliance. The Transport Co-ordinating Group is working to ensure the City's fleet is ready to meet the requirements for ULEZ.
4. A number of types of EVs have been on the market for some time, both fully electric vehicles and hybrids. Several freight and servicing companies already run fully electric vehicles, and many private hire vehicles are hybrid. New to the market is a zero emission capable vehicle which meets the requirements for London taxis. It is anticipated that this will be available by October 2017, in time to meet TfL's requirement for newly licensed taxis to be zero emission capable by January 2018. These vehicles are range-extended - they have a back-up petrol engine but are designed to be run in electric mode the majority of the time.



5. There are a number of different types of charging unit currently available, operating at different power outputs that determine the charging time. Charging units are not universal, with different vehicles requiring different types of charger. The type of unit available is likely to develop with emerging technology, including the possibility of induction charging, which is currently being trialled for buses. Charging units currently available are listed below. An illustration of the type of rapid (50kW) units in the TfL framework are in appendix 4 :

CHARGE TYPE	POWER OUTPUT	CHARGING TIME
<b>Standard</b>	3 kW	6-8 hrs
<b>Fast</b>	7-22 kW	1-4 hrs
<b>Rapid</b>	50 kW	30 mins

6. The charging requirements for different types of vehicles and recommended locations are set out in Table 1.

**Table 1: Vehicle requirements and recommended locations for City of London.**

Vehicle type	Charge type	Comments	Recommended locations
<b>Taxi</b>	- Rapid	Charging for taxis can be accommodated in car parks, taxi rest bays and possibly taxi ranks. Due to the nature of use, taxis need rapid charge units in central London. Lack of top up facilities would restrict range and ability to operate effectively	- off-street public car parks
<b>Private Hire vehicle</b>	- Fast - Standard	The private hire vehicle trade already has a reasonably high number of hybrid vehicles in the fleet and this is expected to increase. Standard or fast charging at locations close to drivers' homes is likely to remain most appropriate, making provision in the City less necessary. Some PHV companies are considering dedicated private facilities particularly rapid charging.	- off-street public and private car parks
<b>Private car</b>	- Fast - Standard	Off-street car parks are most appropriate for residents and other private vehicles. On-street residential and P&D parking locations are not recommended given the nature of footways and the limited amount of on-street parking within the City.	- off-street public and private car parks
<b>Commercial/ freight – LGV</b>	- Rapid - Fast	Commercial/freight vehicles need rapid charging facilities to maintain range and operational ability. Provision is considered appropriate in off-street car parks, private loading bays within buildings, consolidation centres and private distribution centres. A number of commercial operators already operate electric vehicles and meet their own needs at depots.	- off-street public car parks; - freight consolidation centres; - private building loading areas
<b>Commercial/ freight – HGV</b>	n/a	Heavy goods freight vehicles are less suited to battery operation than light vehicles; some trials are in operation with buses and freight, for both hybrid and hydrogen fuel cells. There is no anticipated need for vehicles to be serviced in the City.	not currently applicable

**Notes** Conclusions based on information from 'Electric Vehicle Charging Infrastructure: Location Guidance for London' and research undertaken on Ultra Low Emission Vehicles (ULEVs) TfL website at [tfl.gov.uk/ulev-research](http://tfl.gov.uk/ulev-research)

7. The City Corporation has provided electric vehicle charging for 15 years. New and improved charging facilities have recently been installed in the Corporation's five public car parks, providing 50 charge points overall:
  - Baynard House
  - London Wall
  - Minories
  - Smithfield
  - Tower Hill

These fast (7kW) charge points take up to four hours to deliver a full charge. Users pay to park at the standard rate and pay an additional fee to belong to the charge point operating company.

8. Additional off-street charging for Barbican residents will be delivered as part of the Low Emission Neighbourhood (LEN), along with a fast charge point in the Golden Lane Estate car park for use by City Corporation fleet vehicles (Housing and Cleansing) and residents.
9. Two fast and two standard charge points are available at Walbrook Wharf for use by services for Cleansing/Waste and Transport (DBE) and Markets and Consumer Protection and Environmental Health. These facilities are also available to City of London Police.
10. A fast charge point is provided in the Members car park and a procurement process for the installation of further four fast charge points is underway.
11. Local Plan Policy 16.5 requires new developments to provide infrastructure to support the use of electric vehicles in off-street loading or parking areas. The draft Freight Servicing SPD gives further guidance on providing infrastructure suitable for commercial vehicle needs. The Local Plan review Issues and Options paper asked whether measures should be introduced to improve air quality, including the implementation of EV charge points. This received a number of supportive comments in the consultation responses.
12. The Energy Savings Trust (for TfL) has carried out a significant amount of research to identify the likely demand for EV charge points required to support the introduction of the ULEZ and meet anticipated market demand. The most immediate need is for rapid charging to support the switch to zero emission capable taxis. This is forecast to require the installation of 75 rapid charge points across central London by December 2017, increasing to 90 dedicated taxi charge points by December 2018. The Energy Savings Trust have estimated that by December 2018 there will be 1,400 zero emission capable taxis operating in London, assuming current vehicle replacement rates are maintained (EST, November 2016, 'Feasibility Study into rapid chargepoint network for plug-in taxis', Executive Summary, see Appendix 3).
13. Some City of London car parks are operating under capacity and have the potential to accommodate rapid charge units in addition to the fast charge points already provided. London Wall Car Park is currently being considered for closure

as a public car park, but there may be a future opportunity to introduce a rapid charging hub at this site, depending on alternative uses. It is understood that the new owners of Minories car park want to redevelop the site so the future of this is uncertain.

14. Any rapid charging would initially be for taxis only, with the potential for future provision to also serve commercial vehicles. As the City Corporation has a policy of reducing vehicle trips, the aim is to accommodate the needs of vehicles that have business in the area without attracting any additional traffic. Following advice from the Energy Saving Trust the number of charge points provided will initially be quite low, with any expansion in provision based on monitoring of use.

15. It will be important to align any provision in the City of London with neighbouring boroughs to prevent drivers travelling to the City purely for charging purposes, generating additional traffic. The following central London boroughs are expected to install rapid charging for taxis by early 2018:

- Westminster
- Islington
- Royal Borough Kensington & Chelsea
- Southwark
- Lambeth
- Tower Hamlets

Hackney have already installed on-street rapid charge units that are available to taxis. We are awaiting clarification on Camden's approach to rapid charging. Further details on charging facilities in neighbouring boroughs are provided in Appendix 2.

16. Given current and planned provision the risk of attracting additional journeys into the City to charge vehicles by installing a small number of rapid charge points for taxis is low.

### **Recommended policy on Electric Vehicle charge points for the City of London.**

17. Air quality improvement is one of the key policies in the City's Corporate Plan. A policy setting out appropriate locations for EV charge points is needed to manage requests and support the introduction and use of EVs in the City.

18. It is recommended that the City Corporation adopts the following policy on EV charge points:

**The City of London Corporation recognises the need to reduce traffic, and reduce emissions from remaining vehicles, in order to improve air quality. Public and private charge points for electric vehicles support the use of ultra low emission vehicles (ULEVs) within the City of London.**

**The number and location of charge points will aim to meet the needs of vehicles accessing and serving the Square Mile without generating any additional vehicle trips. Charge points will only be installed in locations that**

have minimal impact on the public realm and do not add to street clutter or restrict pedestrian movement.

To meet the needs of the different vehicle types, the following locations will be acceptable for installing charge points.

Vehicle type	Charge type	Location
<b>Taxi</b>	Rapid	Off-street public car parks
	Fast	On-street by exception
<b>Private Hire</b>	Fast/Standard	Off-street public/private car parks
<b>Private Car</b>	Fast/Standard	Off-street public/private car parks
<b>Freight and servicing</b>	Rapid/Fast	Off-street public/private car parks
		Freight consolidation centres
		Private off-street loading areas

The installation of charge points will be supported by other measures to encourage the transition to ULEVs for taxis, freight and servicing vehicles. These could include ULEV only taxi rest bays and ranks and on-street loading bays.

This policy will be kept under review as the ULEV market and charging technology develops. The use of all charging infrastructure will be closely monitored to enable trends in demand to be tracked.

### **Rapid charging for taxis at Baynard House Car Park**

19. As noted above, TfL has identified the need to install 75 rapid charge points for taxis across central London by December 2017. The installation of these charge points will be funded by TfL, who have made £18m available for the implementation of 300 charge points by 2020.
20. A framework for procurement has been set up by TfL with five suppliers who meet appropriate standards. The framework covers procurement of service to supply electricity. All equipment maintenance, replacement costs and management is covered within the installation fee and the charging equipment will remain the property of the service provider. The framework is designed to provide electricity at a competitive cost rate for drivers measured against diesel or petrol costs. Contracts to supply electricity at any given location would usually be let for an eight year period.
21. Some charge points will be required in the City to support the use of zero emission capable taxis in the Square Mile and to support the taxi trade in meeting the requirements of the Mayor's taxi licensing policy. Potential on-street charging locations at taxi rest bays in the City have been looked at, two of which are deliverable on practical grounds at Ropemaker Street and Noble Street. Installation at Ropemaker Street is not recommended due to the impact on the public realm and obstruction of the footway.

22. A rapid charge point could potentially be installed on a trial basis on Noble Street without pedestrian obstruction. A charge point in this location would support the aims of the City Low Emission Neighbourhood project, it is therefore proposed that one is introduced here on an experimental basis to be reviewed and reported back to Planning and Transportation Committee after 12 months to determine whether it should be made permanent. Levels of usage of the charger and any impact on traffic volume will be monitored and reported on. The LEN project also holds a budget and could fund this charger including relocation if deemed appropriate after a trial.
23. Further site assessment is necessary to understand if this site is considered suitable by UK Power Networks for a rapid charge point, if so the enabling works would be covered by TfL. If it is not possible to install a rapid (50kW) charge point, at Noble Street, a report considering the merits of installing a fast (22kW) charge point will be brought back to P&T committee for consideration. The 22kW charge points are smaller but can only be used at limited capacity by one of the new taxi types manufactured (there are two vehicle manufacturers at present).
24. TfL is also in discussion with Network Rail to install rapid charge units for taxis within Liverpool Street station.
25. Baynard House Car Park has been identified as a suitable location for installing rapid charge units. There is sufficient space within the car park which is not used to capacity. Baynard House also allows for the creation of a dedicated taxi charging area in the basement, which can be segregated from the rest of the car park with separate entrance and exit off Castle Baynard Street. This area can accommodate 12 charge points.
26. Both TfL and the City Corporation wish to guard against installing equipment which is not well utilised. It is proposed that eight charge points are installed initially. Usage will be monitored to assess the need for further charge points. Some upgrade to the power supply to the building will be required plus enabling works. All costs will be met by TfL and the upgrade will be sufficient to cover power requirements for 12 rapid charge points. Subject to final agreement with TfL and the tendering process we expect the charge points to be installed by the end of 2017.

### **Financial Implications**

27. TfL has made £18m available to fund delivery of the 300 rapid charge points across London; therefore there are no capital costs to be incurred by the City Corporation. A percentage of revenue generated is payable to the authority, and the rate will be part of the terms proposed in the bidding process.

### **Health Implications**

28. The proposals support the improvement in air quality in the City of London and should contribute to positive health impacts.

## **Conclusion**

29. If approved, the recommendations will enable a reduction in vehicle emissions in the City, with associated improvements in air quality. Monitoring of use and of developments in the ULEV market will be undertaken to try to ensure optimum provision. The results of this monitoring will be shared with the Committee 12 months after installation. Any recommendations on expansion of the EV charging network will be brought to the Planning and Transportation Committee for decision.
30. Given the expected provision of charge points in neighbouring boroughs the proposals in this report would not be expected to add unnecessary journey times into the City and therefore should not impact upon congestion.

## **Appendices**

- Appendix 1 – Draft Mayor's Transport Strategy targets and deadlines.
- Appendix 2 – Forecast delivery of taxi charge points in neighbouring boroughs to City of London.
- Appendix 3 – Executive Summary and extracts from Energy Savings Trust 'A feasibility study into a rapid charge point network for plug-in taxis'.
- Appendix 4 - Illustrative charge point designs (TfL framework suppliers).

## **Samantha Tharme**

Strategic Transportation

T: 020 7332 3160

E: [Samantha.Tharme@cityoflondon.gov.uk](mailto:Samantha.Tharme@cityoflondon.gov.uk)

## Appendix 1: Draft Mayor's Transport Strategy targets and deadlines for vehicle emissions

Date	Targets and required installations rapid charge points across central London	comment
Dec 2017	75 – taxi only	Based on identified requirements coming from TfL research with Energy Savings Trust
Jan 2018	Newly licensed taxis must be zero emission compliant	
Dec 2018	150 – total (of which) 90 – taxi only	
April 2019	Introduction of Ultra Low Emission zone for central London. (all vehicles except taxis)	Subject to final decision by Mayor date as per draft MTS. (proposed as earlier date in consultation)
Jan 2020	Private hire vehicles under 18mths newly licensed to be ZEC	140 rapid charge points will be needed to serve the electric PHV fleet in 2020 – based on market analysis of PHV fleet
Dec 2020		9,000 zero emission taxis in order to meet AQ targets
Jan 2023	All private hire vehicles newly licensed to be ZEC	

## **Appendix 2: Forecast delivery of taxi charge points in neighbouring boroughs**

It will be important to align any provision in the City of London with neighbouring boroughs to prevent drivers travelling to the City purely for charging purposes, generating additional traffic.

TfL have been working with boroughs to identify sites and the current position for those relevant to the City is listed below. The priority for TfL is on providing charge points dedicated for taxi use.

Neighbouring boroughs and TfL are expected to be looking for further sites in their areas over the period to December 2018.

**Islington:** Multiple rapid sites for taxis identified. Three sites with five charge points are forecast for delivery late 2017 / early 2018

**Tower Hamlets:** Tens of potential sites identified and the locations for the first three or four sites are currently being finalised. It is estimated that six charge points to be delivered in early 2018.

**Westminster:** Tens of suitable taxi rest rank sites identified but awaiting on decision EV policy/strategy before proceeding. It is not clear yet how many charge points will ultimately be provided.

**Southwark:** A private site in a taxi park will be delivered shortly with a further six rapid charge points identified for delivery early-mid 2018.

**Hammersmith & Fulham:** Three sites are forecast to be delivered by early 2018 and two further by mid-2018; providing a total of eight to ten charge points

**Kensington & Chelsea:** 8 rapid charge points identified for delivery early-mid 2018.

**Camden:** Pending confirmation.

**Hackney:** already have three rapid charge units in place that will be available to taxis

**Transport for London Road Network (TLRN):** TfL are planning to install an estimated 60 charge points at 40 sites across central London boroughs over a 12 month period to September 2018. Further information on which sites are going ahead should be available by the end of September 2017.





This page is intentionally left blank

**Appendix 3: Executive Summary and extracts from Energy Savings Trust 'A feasibility study into a rapid charge point network for plug-in taxis.' November 2016**

# Executive Summary

---

## Background

Energy Saving Trust was commissioned by Transport for London (TfL) in 2013 to review the feasibility of a rapid chargepoint network for plug-in taxis in London, determine suitable locations for infrastructure and provide advice on operational viability. This report is part of a suite of studies being undertaken by TfL to understand where rapid charge infrastructure might be needed to serve a variety of potential users in London.

From January 2018, all newly licensed London taxis will be zero emissions capable ( $\leq 50\text{g/km CO}_2$  with a minimum zero emission range of 30 miles). This will complement the introduction of the world's first big city Ultra Low Emission Zone (ULEZ) in central London currently planned in 2020 but under review following a series of consultations through 2016 and 2017.

- **Phase 1 – July 2016:** Air quality consultation on high level proposals including the principle of introducing a new Emissions Surcharge to discourage the oldest vehicles from driving in Central London and changes to the plans for the Ultra Low Emission Zone (ULEZ), high pollution alerts and incentivising the use of cleaner vehicles.
- **Phase 2 – Autumn 2016:** Policy consultation on transport related proposals including a detailed statutory public consultation on the introduction of a new Emissions Surcharge
- **Phase 3 – 2017:** A detailed statutory public consultation on the transport related proposals including the widening of the ULEZ boundary to include more of inner London and proposal to tighten the emission standards for the London-wide Low Emission Zone

## Plug-in vehicles and rapid charging

Plug-in vehicles emit zero tailpipe emissions while driving using electric power and can therefore make a significant contribution towards air quality objectives. According to TfL's research, taxis are responsible for 19% of  $\text{PM}_{10}$  emissions and 18% of  $\text{NO}_x$  emissions arising from road transport sources in central London<sup>1</sup>.

Taxis' duty cycles make them ideal for utilising plug-in technology, as they are driven predominantly in an urban, stop-start environment, where battery electric vehicles operate most effectively.

'Rapid charging' involves charging a plug-in vehicle at a rate of 43kW or more, which would typically provide a vehicle with the capability of charging at this rate with an 80% charge in less than half an hour. Access to rapid charging offers three potential benefits for taxis:

---

<sup>1</sup> Source: TfL modelling based on the LAEI 2010

1. The limited range on a single charge is effectively no longer an issue given the speed at which vehicles can be recharged, eliminating excess driver downtime.
2. The low cost per mile when driving on electric power reduces total cost of ownership
3. Vehicles will produce zero tailpipe emissions and therefore reduce the negative impact on London's air quality.

## Rapid chargepoint network

This report proposes a rapid chargepoint network for taxis based on current vehicle movements. In designing this network, the intention is to minimise disruption to drivers' working patterns.

- Chargepoints should be sited at or close to where taxis are stationary in large numbers, such as key ranks and drivers' break locations. Strategically locating chargepoints is also necessary to maximise chargepoint utilisation rates.
- The rate of charging should allow drivers to recharge their vehicles without being off the road for longer than they are currently.

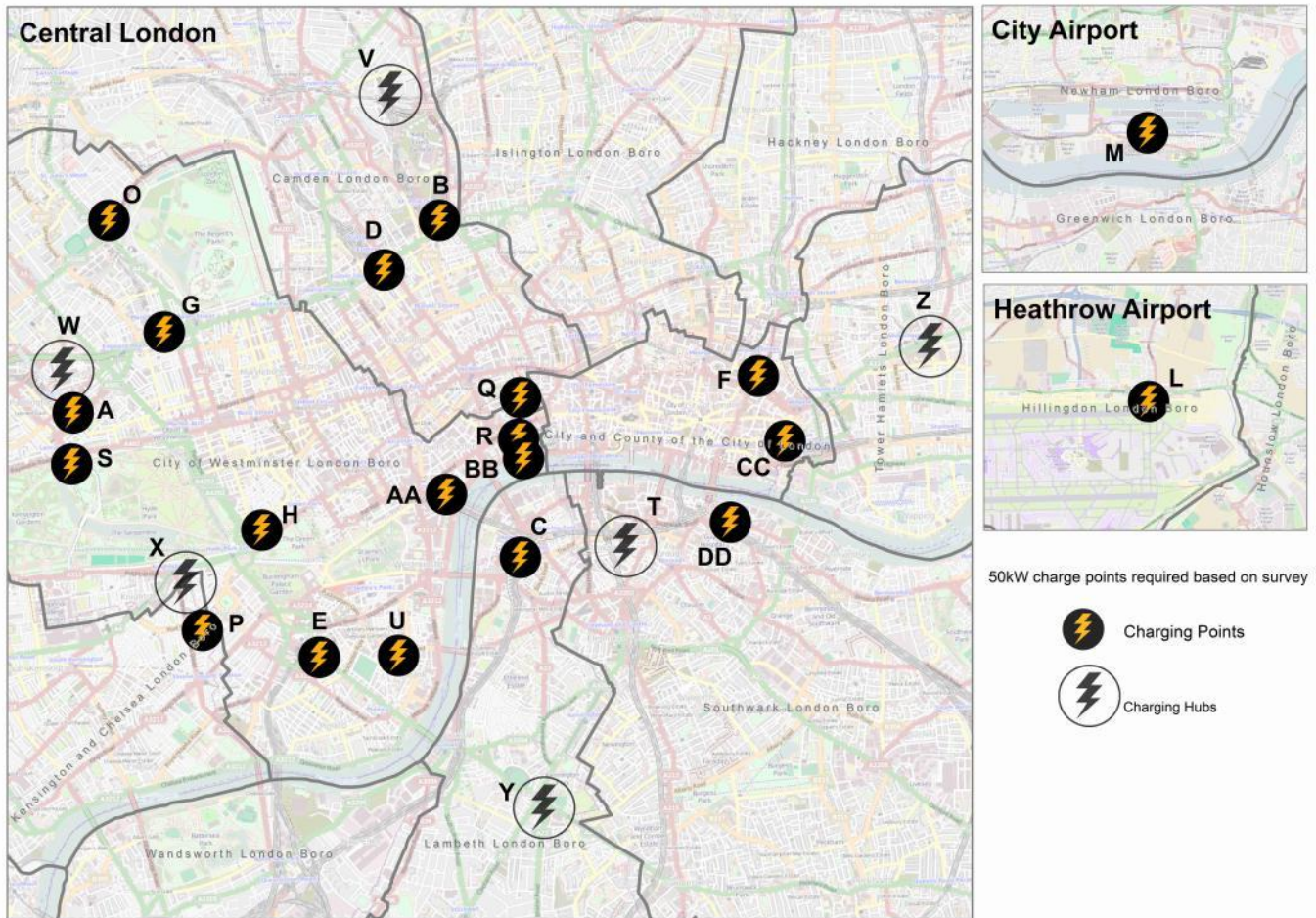
We estimate that by the end of 2018 approximately 90 rapid chargepoints will be required to support the introduction of 1,400 taxis, based on the current replacement cycle of the vehicles. Additional financial support being made available to drivers by TfL, in particular a voluntary decommissioning scheme, and the increase in replacements typically seen when a new vehicle is launched is anticipated to lead to the following scenarios:

Scenario	Number of chargepoints (2018)
1 Baseline, 50% E-REV <sup>2</sup>	88
2 Baseline, 100% E-REV	73
3 Accelerated uptake, 50% E-REV	150
4 Accelerated uptake, 100% E-REV	126

Based on taxi drivers' current working patterns, the following illustrative locations are suggested:

---

<sup>2</sup> Also applies 100% E-REV and 50% of drivers both commute and work in electric drive mode

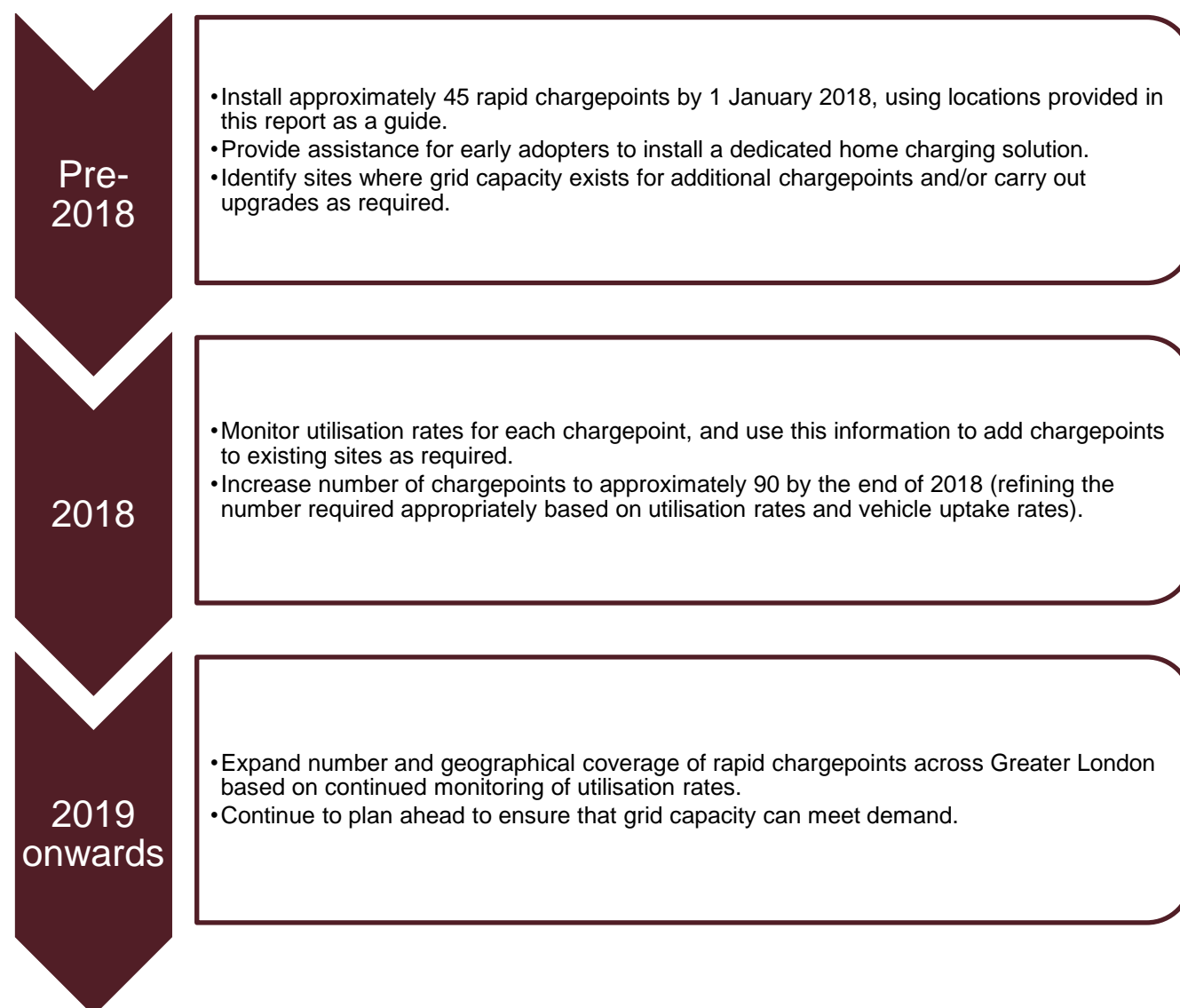


*Illustrative rapid chargepoint locations*

- **Stations:**
  - Paddington (A), King's Cross / St. Pancras (B), Waterloo (C), Euston (D), Victoria (E), Liverpool Street (F), Marylebone (G), Charing Cross (AA), Fenchurch Street (CC) and London Bridge (DD).
- **Hotels:**
  - In W1 postcode area.
- **Airports:**
  - Heathrow (L), London City (M).
- **Cabmen's shelters:**
  - Wellington Place NW8 (O), Pont Street SW1 (P), Temple Place WC2 (BB).
- **Rest ranks:**
  - Lincoln Inn Fields WC2 (Q), Strand WC2 (R), Lancaster Gate W2 (S).
- **Additional locations:**
  - Great Suffolk Street SE1 (T), Horseferry Road SW1 (U), Camley Street King's Cross (V), North Wharf Road near Paddington (W), Hyde Park Corner (X), Oval / Kennington (Y), Whitechapel (Z).

In order to provide the forecast number of chargepoints (c.90) in and around central London between one and three rapid chargepoints should be installed at each location. The exact number to be installed at a given site will depend on the results of Distribution Network Operator surveys to establish local grid capacity.

## Timescale for network introduction



## Comments on the feasibility of a rapid chargepoint network for taxis

The purpose of this study is primarily to determine the feasibility of a rapid chargepoint network for taxis. Therefore this report does not consider the viability of other options such as slow, fast or inductive charging in detail. It is presumed however that fast charging at 20/22 kW may be required in some central areas, such as Westminster, where space to install rapid chargepoints is at a premium. Our research suggests that it is feasible – and necessary – to implement a network of rapid chargepoints, supported in central areas by fast chargepoints to support the introduction of zero emission capable taxis and ensure that the potential financial and environmental benefits are maximised. However, in order to ensure the network is successful, it is critical that the following four areas are addressed.

**1. Zero emission capable vehicles licensed to operate as taxis should be available by 2018. All taxis should be rapid charge capable in order to make a rapid charge network feasible.**

- Several manufacturers are developing zero emission capable vehicles designed to meet the Conditions of Fitness for use as a London taxi. All vehicles described in this report can be driven without producing any tailpipe emissions, although the choice of technology includes both pure electric vehicles and extended range electric vehicles. Final decisions have not been reached or published by all manufacturers about incorporating rapid charge capability into the potential taxis. We recommend TfL determine the charging capability for all London taxis and incorporate a minimum charging specification into the conditions of fitness.
- When these vehicles are presented for licensing, TfL should work with the manufacturers to establish electrically driven range in 'real-world' conditions and petrol consumption (of plug-in hybrid or extended range electric vehicles) once the battery has been depleted.

**2. Sufficient rapid chargepoints should be installed at strategic locations across London, supported by appropriate KPIs and data management**

- Taxi drivers in London typically stop for 15 minutes or fewer when they take breaks. Therefore rapid (rather than slow or fast) chargepoints are desirable so that drivers can recharge vehicles without additional downtime. 50kW chargepoints (compatible with both major DC protocols) should be installed; they will supply approximately up to 40 miles of additional range in 15 minutes.
- Chargepoints should be reliable and supported by an appropriate back office system. We recommend that TfL sets KPIs for licensed network operator(s) to ensure they provide sufficient, reliable and well maintained chargepoints. TfL should also collate and monitor chargepoint utilisation data to plan the expansion of the network beyond 2018.

**3. Taxi drivers in extended range and plug-in hybrid vehicles should use rapid charging rather than rely on the petrol engine once the battery is depleted**

- Even if rapid charge compatible vehicles and rapid chargepoints are provided, there is a significant risk that drivers of extended range and plug-in hybrid vehicles will rely on the petrol engine once the battery is depleted. This will reduce the environmental and financial effectiveness of the new vehicles and will lead to significant under-utilisation of chargepoints. Drivers should, whenever practicable, use rapid chargepoints once the vehicle battery is depleted.
- Part of the solution will be to ensure that the cost of rapid charging is less than the cost of petrol, on a pence per mile basis. However, a price incentive to use rapid charging will not be sufficient by itself. TfL should consider the risks associated with drivers not



utilising their vehicles effectively and ensure the use of rapid charging becomes normal practice.

**4. Electricity supply constraints at the substation level are potentially the biggest barrier to rapid chargepoint provision. Plans for mitigating this should be drawn up.**

- Installing rapid chargepoints will add significant demand to the already constrained electricity supply system in London. Given the estimated number of rapid chargepoints required to support zero emission capable taxis, the cost of upgrading the electricity network is likely to be the greatest potential barrier to developing rapid charge infrastructure.
- Some installations may require a new substation which could cost up to £200,000, in addition to the cost of land to site chargepoints and a substation. Distribution Network Operators are not responsible for paying for upgrades, except in instances where they have demonstrated that it will benefit network users. If prospective chargepoint operators are expected to be responsible for the full upfront cost of any network reinforcement, it is unlikely that they will be able to produce a business case for installing chargepoints.
- TfL and the appropriate Distribution Network Operators should collaborate from the outset to manage rapid chargepoint installations and any necessary supply upgrades, including integrating chargepoints into new built environment developments where practicable.
- Subsequent to the initial (unpublished) draft of this report TfL has confirmed that it will identify and enable sites for the installation of charging infrastructure across the TfL, borough and private sector estates. Enabling works will include upgrades of power capacity and groundworks to make the site suitable for charge point installations.

This page is intentionally left blank

#### **Appendix 4: Illustrative charge point designs (TfL framework suppliers).**

Fast - 7kW and 22kW type charger.



CHARGE MASTER
Dimensions (D x W x H)
366mm x 366mm x 1400mm

Rapid - 50kW type charge point (overleaf).

# Charge Point Design

- Different charge point operators will use charge points from different manufacturers, e.g. APT, ABB, Chargemaster. There is therefore not one specific set of dimensions which will apply to the charge points.



ABB	APT	CHARGEMASTER
Dimensions (D x W x H) 760mm x 525mm x 1900mm	Dimensions (D x W x H) 780mm x 625mm x 2060mm	Dimensions (D x W x H) 600mm x 600mm x 1500mm



<b>Committees:</b>	<b>Dates:</b>	
Streets and Walkways Sub-Committee Projects Sub-Committee Port Health and Environmental Services (for information)	24 July 2017 18 July 2017 19 September 2017	
<b>Subject:</b> Middlesex Street Area Enhancement Phase 2: Petticoat Lane Market Improvements and Public Realm	<b>Gateway 3 Outline Options Appraisal</b>	<b>Public</b>
<b>Report of:</b> Director of the Built Environment and Director of Markets and Consumer Protection		<b>For Information</b>

## Summary

### Dashboard

**Project status:** Green

**Timeline:** Gateway 3

**Project estimated to cost:** c.£2m - £4m cost range, for public realm enhancements and market improvements.

**Latest Approved Budget:** £50,000

**Spend to date:** £8,000

**Estimated cost to reach next Gateway:** £110,000 (which includes the £42,000 balance proposed to be brought forward from the previous gateway)

**Overall project risk:** Low

### Strategic Overview

The project aims to enhance Petticoat Lane Market and the central section of Middlesex Street between Sandys Row and St Botolph Street, celebrating the character and history of the area whilst improving the visitor experience. It will involve public realm enhancements to the area, alongside much-needed improvements to the operation of the market, and a full strategy to bring new visitors into the area, introduce public art programmes, and make the ongoing life of the Market viable for the future.

The market is operated by both the City (at the northern end) and Tower Hamlets (along the middle and southern sections), therefore this project involves close working in partnership with the London Borough of Tower Hamlets, as well as consultation with market traders and other local stakeholders. At this stage, it is the intention of officers to undertake the project in conjunction with Tower Hamlets, and work towards proposals that can be applied across the two sections of the market and along the whole length of the street, whether owned/ run by the City or Tower Hamlets.

### **Last Gateway approved**

An Issue report for the Phase 2 element of the works was considered in November 2016 and Members approved the funding required to reach Gateway 3 of £50,000. Prior to that, a Gateway 1/ 2 report had been approved.

This Report relates exclusively to Phase 2 of the Middlesex Street Area works; Phases 1 and 3 have been reported to Committee separately. For information, Phase 1, comprises public realm and enhancement works at the northern end of Middlesex Street, and works are now complete. Phase 3 comprises the removal of Middlesex Street Estate ramps and new landscaped space at Artisan Street, and has been approved at Gateway 4. Works are expected to commence imminently.

### **Progress to date**

Following Gateway 1/2 approval the City commissioned two studies: one of potential public realm improvements and one on the market offer and operations. The recommendations of both studies were informed by extensive stakeholder and market trader consultation undertaken in 2013 and 2015. Part of this work was taken forward in a separate project, the Phase 1 improvements.

The elements of the work that related to the proposed Phase 2 were set out in an Issue Report in November 2016. This included a set of findings about the Market that were barriers to its improvement, such as the poor presentation of stalls, a lack of sense of arrival at the market, a lack of facilities such as toilets, and a lack of branding.

Members approved the recommendation in the Issue Report to grant funding to reach Gateway 3 collectively. A Working Party was convened to set the aims of the project and to drive it forward. The Working Party is chaired by City and Tower Hamlets Ward Members, and its membership includes City and Tower Hamlets officers, Market trader representatives, and local stakeholders.

Through workshop sessions, the 'Issues' relating to the area along with corresponding proposed 'Objectives' and 'Next Steps' have been drafted. These are given on the attached Appendix 1, and will guide the development of the project.

Over the course of the project to date, it became apparent that feelings about the types of improvements needed in the area were fairly unified across the City, Tower Hamlets and the stakeholders. These included both market improvements and public realm enhancements. There was also a general agreement on the need to make improvements quickly, for example through some short-term 'Quick Wins' to improve market stalls and wayfinding in the area, and to introduce temporary events/ art projects to welcome new visitors. This would take place whilst the longer-term design work is developed.

Given that the Working Party is in broad agreement about how to go forward, and that the results of the consultants' work on the market undertaken previously are still valid, officers have decided to move forward with the project without spending the proposed £40,000 on fees to reach Gateway 3, instead rolling this figure forward into post-



Gateway 3 work that would allow officers to assess the feasibility of the agreed objectives.

### **Proposed way forward and summary of recommended options**

The proposed way forward is based on the agreed objectives and next steps developed by the Working Party, as given in the attached Appendix 1.

Some of the key project aims are:

- To deliver appropriate size, layout, and mix of stalls to meet the current and future needs of the market traders and visitors.
- Local retail units are incorporated into the market's/ area's offer, providing complementary facilities such as events hubs or visitor facilities
- To produce a joint management plan (i.e. City and Tower Hamlets) for the management of the market including market hours and cleansing.
- Public realm enhancements including improved paving, wayfinding, greening, street furniture, where appropriate for the market operations. Improvements to accessibility in the area, including accessible toilets, seating, and signage to be explored as part of the designs.
- A marketing plan is in place, including events, public art, coordinated digital and social media.
- The name of Middlesex Street has been changed back to 'Petticoat Lane'; subject to approval
- A funding model is established that covers the on-going costs of new stalls, power, repairs, communications, management, events etc.

See Appendix 1 for the full list of objectives.

Key surveys and information gathering including examination of any legal implications of the proposals are now required to inform the design process, and as such the proposed next steps are as follows:

- Market Operations: market development work to produce a draft Market strategy, action plan, and 'Quick Wins'
- Commission consultants to prepare concept designs/ design options for the public realm
- Commission a marketing consultant to put forward a plan for communications, marketing and branding, to include: website, events, signage, brand, social media/ promotions
- Carry out a traffic assessment to recommend a way forward on potential road closures/ changes to vehicle movements
- Review the legal implications of proposals including examining any relevant byelaws or legislative requirements or restrictions, including any relevant highways or planning provisions.

Members will be presented with the options at Gateway 4 where they will have the

opportunity to decide on a preferred option/ set of options. Wider public consultation will be arranged to ensure that all stakeholders in the area are given an opportunity to consider and comment on the proposals.

### **Procurement approach**

A number of appointments will be required in order to progress to the next Gateway. These appointments will be tendered competitively through the City of London Procurement Service, to ensure best value is achieved.

### **Financial implications**

Table 1 below shows the resources expended to date. Table 2 sets out the resources required to reach the next gateway, and a brief explanation of the tasks to be completed with that funding.

Table 1 – Spend to date:

Description	Allocation	Spend	Balance Remaining
<b>Fees</b>	£40k	£0k	40
<b>P&amp;T staff cost</b>	£10k	£8k	2
<b>Total Approved up to Gateway 3</b>	<b>£50k</b>	<b>£8k</b>	<b>42</b>

Table 2 – Funding needed to get to Gateway 4:

Item	Cost	Reason
<b>Market Operations</b>	£25,000	Market development to drive forward market regeneration and to put in place 'quick wins' improvements/ initiatives.
<b>Traffic assessment</b>	£20,000	To assess options for removing traffic/ timed closures for Middlesex Street
<b>Architect/ landscape design</b>	£25,000	To develop design options for the public realm, based on the design objectives as set out in Appendix 1 of this report
<b>Communications, Marketing and Branding</b>	£10,000	To appoint a consultant to develop a brand and communications strategy for the Market.
<b>Staff costs (City Public Realm and City Transportation)</b>	£30,000	To manage the project, commission and manage assessments, liaise with stakeholders, write reports
<b>Total</b>	<b>£110,000</b>	

Of the £110,000 required to get to Gateway 4, £42,000 will be funded from project underspend from the approved funds for the previous stage. The remaining £68,000 will be funded via S106 contributions relating to the 5 Broadgate development (Section 106 agreement dated 29<sup>th</sup> July 2011).

The S.106 Local Community and Environmental Improvements funding pot for 5 Broadgate can be used for *'health and welfare, leisure and recreation, street scene and air quality improvements in the vicinity of the site'*. The enhancement of the

Middlesex Street area is a high priority of the Liverpool Area Enhancement Strategy (adopted in 2013). This project meets its key strategic objectives approved by Members.

The LB Tower Hamlets will contribute financially to this project; to date they have allocated staff costs via market operations officers and a market development officer. Once the funding to Gateway 4 has been approved, officers will work towards setting out a clear funding plan for the remainder of this project, including implementation costs; looking to appropriate s106 monies. This plan will be presented to Members at the next Gateway.

### **Recommendations**

It is recommended that Members:

- Approve the Scheme Objectives as detailed in Appendix 1;
- Authorise the progression of the project and approve funds of £110,000, as set out in Table 2.
- Authorise officers to review the legal implications of proposals including examining any relevant byelaws or legislative requirements, highways and planning provisions.

### **Appendices**

<b>Appendix 1</b>	Schedule of Objectives
<b>Appendix 2</b>	Plan of Area

**Background Papers:** Issue report considered on 11 October 2016.

### **Contact**

<b>Report Author</b>	Helen Kearney
<b>Email Address</b>	<a href="mailto:helen.kearney@cityoflondon.gov.uk">helen.kearney@cityoflondon.gov.uk</a>
<b>Telephone Number</b>	020 7332 3526

This page is intentionally left blank

## Appendix 1

### Schedule of Objectives and Next Steps

Middlesex Street – Petticoat Lane Market: Issues, Objectives & Next Steps			
Ref.	Issue	Objective/ Outcome	Next Steps
<b>Operations of the Market</b>			
01	Lack of vision of what the market should be; who it is for; what it's future is	Tower Hamlets and City to work together to create a joint vision for the market; a strong unique vision for the market that will draw people in.	Working party to draft vision; work to gain endorsement from both City and Tower Hamlets
02	Larger stall sizes are required; a more consistent stall size and layout.	There is an appropriate size and layout of stalls to meet the current and future needs of the market traders and visitors	Create an overall market plan (with assistance of consultant if necessary), including: - agree a policy for consistent stall sizes and layout, a) in the short term; and b) with a longer term plan - Short-term plan to include discussions with traders in other local markets – ask them to come along to Petticoat Lane on Sundays. - implement the short term plan as soon as possible - Need clear plan for where pitches are, and what should be sold - Package for traders – one system - Stalls need to be appropriate – e.g. wind is a problem.
03	Keep layout of existing market layout to allow access to the shops and keep middle aisle as existing for visitors for the market.		
04	A better mix of stalls is required; can men's clothing be included and 2nd hand stalls and children's stalls.	A new mix in the Market's offer will exist, beyond its traditional focus on women's clothing. The Market offer becomes	Create an overall market plan with assistance of consultant if necessary, including:

O5	Grouping items and products in some way may appeal to more visitors	linked to the stall layout, so that stalls are grouped in an attractive and sensible way.  Flexibility is built in about what type of stalls we want; and where. Expand stalls in the area as growth occurs. Clear policy for the pitches.  A food offer is incorporated into the market.	- agree a new mix for the Market's offer, widening out beyond its traditional focus on women's clothing. - agree a clear 'USP' for the market  Clarify with legal advice licensing issues (e.g. for food).
O6	The Market does not have a clear message of what its purpose is		
O7	Traders need to be aware of the aim of the market for it to appeal to them to work there; it needs something to make it an iconic market.		
O8	Retail units – can these be used to introduce art and craft. To those who like to create (e.g. jewellery, chocolate, clothes, art).	Local retail units are incorporated into the market's/ area's offer, providing complementary facilities such as events hubs or visitor facilities. Local retail units are helped by being better connected to the market and related activities.	Agree aims for the local retail units, including how they might be involved in the wider improvement of the area
			Engage with local retailers to understand their views, and to give them opportunities for involvement in the new market plan and related events
O9	Improved management of the market ensuring stall positions are in sync	Produce a joint management plan (i.e. between City and Tower Hamlets) for the management of the market. Clear management structure that is across both City and Tower Hamlets.  A full events plan for the market, to include street art, is produced. The area needs to be an experience/ destination.  Events and market trading are linked to the history of the area.	Agree a joint management plan (i.e. City and Tower Hamlets) for the management of the market, including: - new enforcement policy of market to reflect operational needs as market develops - a new system for licences, permits, payments etc. - clear guidelines for traders that make it easier for new traders to start working, and encourage new traders to the market
O10	Can enforcement be linked to Policies requiring permits and licenses to fit in the traders?		
O11	Revised method of payment system to coordinate traders' payments to coordinate payments to COL and Tower Hamlets for market payments (e.g. rent, licensing perhaps managed on a credit platform).		
O12	Improve rules around how market will		

	function to encourage new traders	One off events – e.g. a free market, or an evening market, are planned regularly, and are advertised.	Plan to include: stall location; pitch size; offer
O13	Trading hours could be increased to 5-6pm in summer (or start later?)	There are new, more appropriate, trading hours to better suit traders and visitors – including extending market hours. Introduce this via a temporary measure first; then look to change primary legislation in the long-term.  Link this to market cleansing. Clear cleansing plan is in place and enforced.	Create an overall market plan with assistance of consultant if necessary, including: - Agree new, more appropriate, trading hours
O14	The market is open limited hours and is not under cover and this could deter visitors.		
PR5/ O15	Concrete staircase. Can it be used? Tourist centre? An associated area of the market, perhaps a covered section of the market?	The concrete staircase is re-purposed to support the functions of the market and adding amenity to the area	Explore possible re-uses of the staircase - Commission design for a new use of the concrete staircase
PR6/ O16	Power and water and sources are needed as part of the design	The redesign of Middlesex Street includes the addition of power and water supply along the Street for use by the Market	Assess how power and water supplies might be introduced along the market
<b>Market Facilities</b>			
F1	Speed: need to act now to attract traders	Short-term or temporary measures to be put in place, making improvements to the area and market, whilst a more long-term strategy is developed	Implement 'Quick wins' – introduce changes quickly so everyone can see we are making improvements now. Start events and temporary uses, and chairs/tables and food as soon as possible.
F2	Storage for stalls is an ongoing problem	Long-term solution put in place for storing any new stalls that are introduced.	Provide a quick solution in the short term for storing new stalls (explore whether the estate car park could be used?)
F3	There is no street food in the area or	To develop an attractive and coordinated	Create an overall market operations plan

	tables and chairs. This is what people want. Power required for outdoor use.	<p>food offer, and the facilities required for this, including:</p> <ul style="list-style-type: none"> <li>- street food carts</li> <li>- tables and chairs</li> <li>- public toilets</li> <li>- cleansing regime</li> <li>- pop-up events and food</li> <li>- Better and more bins</li> <li>- Covered area that includes facilities</li> </ul>	<p>with assistance of consultant if necessary, including:</p> <ul style="list-style-type: none"> <li>- put in place a plan for introducing a food offer to the market</li> </ul>
F4	Toilets required in the area.		
F5	Rubbish collecting is an existing issue.		
F6	Cleansing is an issue particularly due to night time economy		
F7	Pop up food and festivals are needed.		
F8	<p>Sense of arrival is important. Should there be a food and drink section at Bishopsgate side of the market.</p> <p>Seating and stalls at the top end of Liverpool street would make the market more visible.</p>	<p>The market has a clear 'sense of arrival', that is noticeable from Bishopsgate.</p> <p>Improved wayfinding and signage is delivered as part of the re-design of Middlesex Street, with particular focus on the entrances from Liverpool Street/ Bishopsgate and Aldgate.</p> <p>Curate a 'Market Mile' to include Petticoat Lane, Spitalfields, Columbia Road, Brick Lane etc.</p>	<p>Commission a designer to produce concept designs for wayfinding/ signage and other features (e.g. historic interpretation, street art etc.) along Middlesex Street</p> <p>Agree where the market ends and begins for signage purposes. Define the site, add markers, define boundaries.</p> <p>Curate a self-guided walking tour/ map for people to visit all the markets in the area. Plan joint events with other local markets.</p>
F9/ PR3	Signage, sculptures, and plaques as entrance features were discussed.		
F10	Liverpool Street station does not have signage to the market.		
F11	<p>A 'magic mile' type event could be arranged.</p> <p>A plan could be created showing the route?</p>		
F12	Vehicle access should be marked clearly.	The nature of vehicle access/ movement is reviewed to ensure successful market operations, with vehicle access information clearly displayed on the street.	Commission a traffic study to understand vehicle movement, and recommend timed closures and vehicle movement on market days



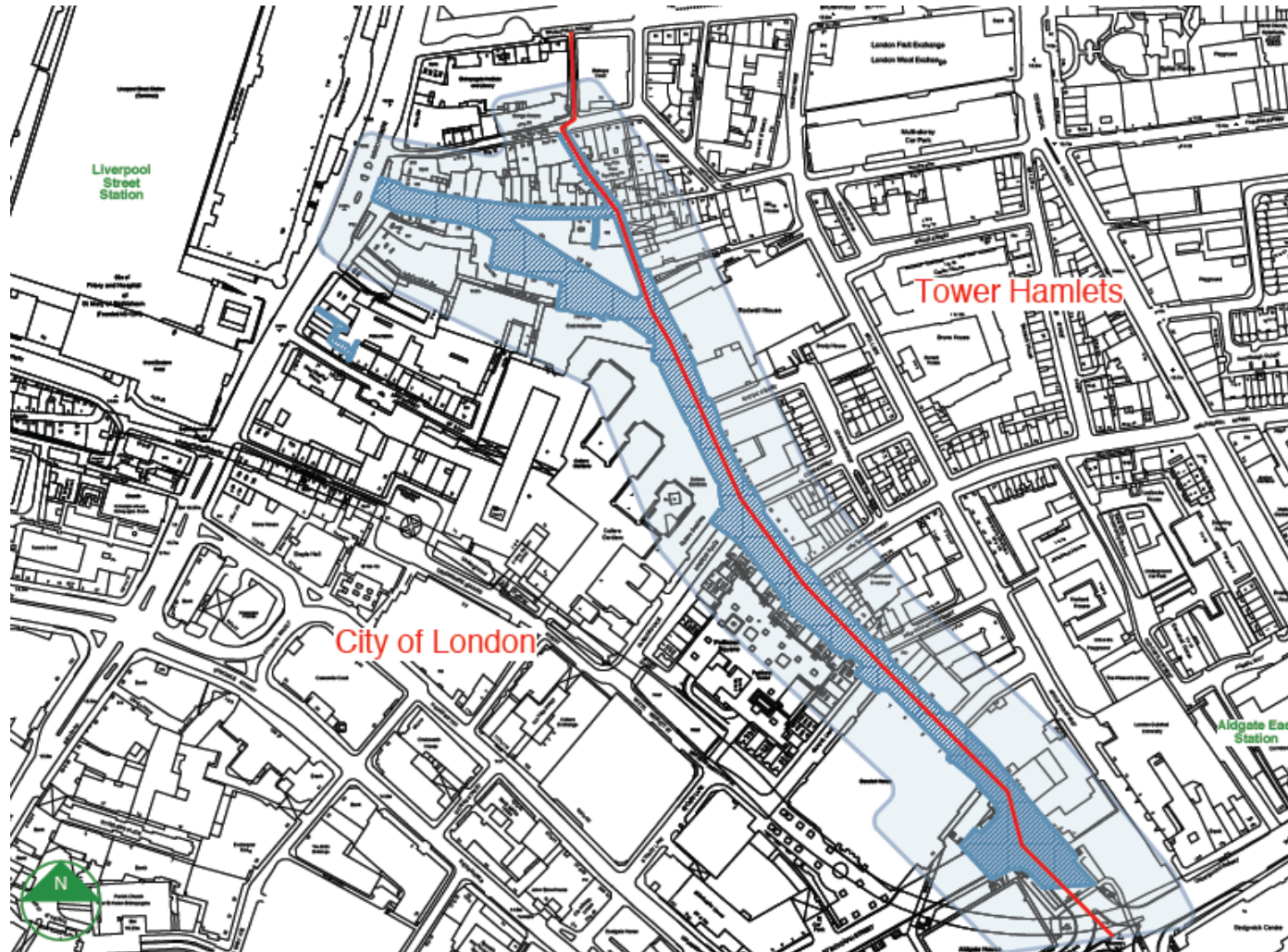
Public Realm along Middlesex Street			
PR1	Street art: can it be implemented? Can it add value to the market? Events and sculptures are needed.	The re-design of Middlesex Street includes street art, events and historic interpretation of Petticoat Lane Market.	Develop a street art/ placemaking and events strategy for the area that incorporates the historic market; do this with local groups and organisations.
PR2	Importance of history and heritage. Celebrate the area.	Events take place to complement the market, as set out in a marketing plan.	Commission a designer to produce concept designs for wayfinding/ signage and other features (e.g. historic interpretation, street art etc.) along Middlesex Street
PR3/ F8	Signage, sculptures, and plaques as entrance features were discussed.		
PR4	Greening and lighting was welcomed as long as it does not affect function of market.	Greening along Middlesex Street is to be improved, where appropriate to the needs of the market.  Seating to be added as part of the public realm.	Commission architects/ designers to draw up concept designs for the public realm in Middlesex Street including: - greening - new facilities - street improvements - seating
PR5/ O14	Concrete staircase. Can it be used? Tourist centre? An associated area of the market, perhaps a covered section of the market?	The concrete staircase to be re-purposed to support the functions of the market and adding amenity to the area	Explore possible re-uses of the staircase - Commission design for a new use of the concrete staircase
PR6	There are no public covered spaces for people in the rain	Indoor covered areas are opened up to the public and incorporated into market plans	Find a covered area for events, even if just temporary/ short-term – stage events and then make sure the stalls are there along the way.
PR7/ O15	Power and water and sources are needed close to market stalls	The redesign of Middlesex Street includes the addition of power and water supply along Middlesex Street for use by the Market. Food at the market fits in with and complements local cafes/ restaurants	Insert power supply and water as part of the public realm improvements. (prioritise certain areas – e.g. top and bottom ends where we could have food stalls)

		Cleansing is managed.	<p>Commission architects/ designers to draw up concept designs for the public realm in Middlesex Street including:</p> <ul style="list-style-type: none"> <li>- greening</li> <li>- new facilities</li> <li>- street improvements (e.g. power and water supply)</li> </ul> <p>Plan for local units, retail and café to complement market stalls.</p>
<b>Communications and Marketing</b>			
C1	Improve signage from Liverpool street, and digital approaches such as Facebook, website	<p>A marketing plan is put in place, including a coordinated digital and Social media plan for the market.</p> <p>A dedicated resource is established to manage the coms and marketing of the area (including the Market).</p> <p>A plan for events that link up to the local area – e.g. the fashion industry, and to crafts and other activities. Link this to a social media presence.</p>	<p>Draft a Communications and marketing plan that aims to attract new visitors, highlight the area's history, assist wayfinding, and publicise events.</p> <p>Work to understand who are the visitors</p> <p>Create a coordinated digital Social media plan for the market and provide a resource to fund and manage this; create a Petticoat Lane Market website and app.</p> <p>Provide resource and plan to attract new visitors, residents, tourists. Social media campaigns to attract new residents/ visitors. Make sure there are events/ experiences to attract them.</p> <p>Tap into the fashion industry – events, stalls, etc – student projects? Specialist traders.</p>

C2	The lack of visitors at the market could be targeted by internet or twitter other means to attract people.		Plan specific promotions, and then advertise them.
C3	website and/or an app was suggested for marketing		Attract tourists coming in from Liverpool Street
C4	Dedicated contact needed for marketing and events. This issue has started moving forward. E.g. busking	Events will take place in and around the market.	Christmas market – include food and decorate for Christmas; attract people from northern end (bishopsgate) to bring footfall down.
C5	Music was suggested along with history tours		Create events plan as part of the wider street art/ placemaking and events strategy.
C6	Petticoat Lane needs to be part of current promotion.	The Market will have a clear marketing plan and a 'rebranding' to explain the offer and attract new visitors.	Draft a Communications and marketing plan that aims to attract new visitors, highlight the area's history, assist wayfinding, and publicise events. Make sure the 'USP' of the market is clear.
C7	The Market does not have a clear message of what its purpose is		
C8	Traders need to be aware of the aim of the market for it to appeal to them to work there; it needs something to make it an iconic market.	A clear message of what the Market is, why you would come to trade here, is put into place.	Introduce incentives for new traders/ temporary trading/ specialist traders
C9	Making the market it unique and more interesting.		
C10	London tours – is the petticoat lane on the tour bus route?		
C11	Name change – Petticoat Lane at the top end of Liverpool Street	The name of Middlesex Street is to be changed back to 'Petticoat Lane': restoring Petticoat Lane.	Start process of investigating the possibility of a name change; set out legal requirements and formal processes that would be needed.
C12	Signage to reflect the history – e.g. 'Formerly known as Middlesex Street'		
C13	Understanding who customers are and the purpose of the market. Network with Sunday markets in the area.	A new marketing and branding approach will exist to better connect the market with its costumers (new and existing)	Commission a study to understand who the Market customers are, and what they want; and put together a strategy for attracting

			new people to the market
Other Issues			
I1	Increased wind in the area, does this need to be assessed?	The re-design of Middlesex Street will assess pedestrian comfort levels including climactic conditions	Commission architects/ designers to draw up concept designs for the public realm in Middlesex Street, taking into consideration the area's climactic conditions
I2	Funding is needed	A funding model is established that covers the on-going costs of new stalls, power, repairs, communications, management, events etc.	Funding sources to be investigated by City and Tower Hamlets.

**Appendix 2:**  
**Middlesex Street, showing boundary between City and Tower Hamlets**



This page is intentionally left blank

<b>Committee(s):</b>	<b>Dated:</b>
Health and Wellbeing Board – For decision (Approved, June 2017) Port Health and Environmental Services Committee – For information Policy and Resources Committee – For information	19 September 2017
<b>Subject:</b> Business Healthy Strategy 2017-20	<b>Public</b>
<b>Report of:</b> Andrew Carter, Director of Community and Children’s Services	<b>For Information</b>
<b>Report author:</b> Xenia Koumi, Project Officer – Business Healthy, DCCS	

## Summary

This report introduces the Business Healthy Strategy, 2017-20.

Business Healthy is an award-winning public health funded initiative that provides City employers with free support to promote better health and wellbeing among their staff, including events and signposting. Businesses are also encouraged to share best practice with each other. It also supports and promotes ongoing initiatives around health and wellbeing in the Square Mile, such as the Lord Mayor’s Appeal’s “This Is Me – In the City”, the London Healthy Workplace Charter and work being undertaken by other teams in the City Corporation.

## Recommendations

Members are asked to:

- Note the report.
- Endorse the Business Healthy Strategy 2017-20.

## Main Report

### Background

1. The City of London Corporation, as the local authority for the Square Mile, has a responsibility to ensure the health and wellbeing of not only its residents, but also more than 450,000 people working in the area each day.
2. Health and wellbeing is crucial to ensuring organisations’ success and increasingly, to being able to attract the best talent. This contributes to the City being able to attract the best talent and to be seen as an excellent place to do business.

3. The City has the highest density of jobs and firms in London and over 98% of businesses located in the Square Mile are SMEs (small and medium-sized enterprises, with 250 staff or fewer).
4. The Joint Strategic Needs Assessment and research published in May 2012<sup>1</sup> identifies City workers as a group that is generally younger and more male than London's population, who work long hours and experience high rates of stress, anxiety and depression. There are also high levels of smoking and other substance misuse. They often find it difficult to access healthcare without taking time off work, which makes the workplace an important setting for promoting and supporting healthy behaviours.
5. Business Healthy is an award-winning public health funded initiative that provides City employers with free support to promote better health and wellbeing among their staff, including events and signposting. Businesses are also encouraged to share best practice with each other. It also supports and promotes ongoing initiatives around health and wellbeing in the Square Mile, such as the Lord Mayor's Appeal's "This Is Me – In the City", the London Healthy Workplace Charter and work being undertaken by other teams in the City Corporation.
6. This helps to fulfil both local and national strategic objectives around creating and maintaining health workplaces and a healthy workforce.
7. The Business Healthy Strategy 2017-20 was approved by the Health and Wellbeing Board in June 2017.

### **Current Position**

8. The health and wellbeing of workers, including mental and physical, continues to be a growing priority for local and national stakeholders. Within this, Business Healthy's role to support and signpost City employers is increasingly important.
9. Business Healthy's network is growing, with currently more than 308 City organisations registered as members. This means that the variety of different businesses' needs is increasing, as are the topics within the umbrella term of workplace health and wellbeing. This must be reflected in Business Healthy's work going forward. To be able to remain relevant to City businesses, while recognising limits around resource and capacity, a strategic approach is required, outlining key priorities for the coming years.

### **Proposals**

10. A Business Healthy Action Plan has been developed, which will detail outcomes against the different priority areas. The Action Plan will be reviewed on an annual basis by the Health and Wellbeing Board to measure progress and to ensure that it reflects the broader public health aims of the City of London Corporation.
11. Overall objectives of this action plan are to are to:



- Promote the health and wellbeing of City workers.
- Make sure that Business Healthy remains a relevant and useful resource for City businesses.

12. The following areas have been identified as priority areas for Business Healthy

- Expand the Business Healthy network
- Make Business Healthy the “go-to” health and wellbeing resource for City businesses
- Secure high-level buy-in
- Make Business Healthy financially self-sustaining

13. The latest research into the health and wellbeing of City workers was carried out in 2012 and a refresh is required. This will be included in the Business Healthy Action Plan.

### **Corporate & Strategic Implications**

14. The proposals outlined above contribute to the Corporate Plan, particularly to the aims to support and promote the City as the world leader in international finance and business services and to provide modern, efficient and high-quality local services...within the Square Mile for workers, residents and visitors.

### **Conclusion**

15. The Business Healthy strategy 2017-20 sets out how Business Healthy will contribute to the promotion of City worker health and wellbeing.

### **Appendices**

Appendix 1 – Business Healthy Strategy, 2017-20

**Xenia Koumi**

Project Officer – Business Healthy

T: 020 7332 3378

E: [xenia.koumi@cityoflondon.gov.uk](mailto:xenia.koumi@cityoflondon.gov.uk)

<https://www.cityoflondon.gov.uk/business/economic-research-and-information/research-publications/Documents/research-2012/The%20Public%20Health%20and%20Primary%20Healthcare%20Needs%20of%20City%20Workers.pdf>

This page is intentionally left blank

# City of London Corporation: Business Healthy Strategic Plan: 2017 - 2020

---

## Contents

Introduction .....	2
Background .....	2
The City of London .....	2
Workers in the City and their health needs .....	2
What is Business Healthy? .....	3
Strategic Context .....	4
National .....	4
Local .....	4
Priorities .....	5
Priority One: Expand the network .....	5
Why is this important? .....	5
What we will do .....	5
How will we measure progress? .....	5
Priority Two: Make Business Healthy the “go-to” health and wellbeing resource for City businesses .....	6
Why is this important? .....	6
What we will do .....	6
How will we measure progress? .....	8
Priority Three: Secure high-level buy-in .....	8
Why is this important? .....	8
What we will do .....	8
How will we measure progress? .....	9
Priority Four: Make Business Healthy financially self-sustaining .....	9
Why is this important? .....	9
What we will do .....	9
How will we measure progress? .....	9
Looking forward .....	10
Longer term strategic goals .....	10
Appendix 1: Engagement Targets .....	10
Social Media Engagement Targets .....	10
Appendix 2: City Communication Channels .....	11
Appendix 3: Events Planning Calendar (2017) .....	11
Appendix 4: List of Commissioned Services available to Business Healthy member organisations .....	11
Appendix 5: Public Health Communications Plan .....	11

## Introduction

The purpose of this Strategic Plan is to focus Business Healthy's efforts over the coming three years and to ensure that the initiative goes from strength to strength, with a corresponding improvement in the health and wellbeing of City workers. This will be achieved by focusing on four key priorities, which are outlined in this document, in addition to promoting the City of London Corporation and supporting the Public Health team's efforts. The strategy also contains key metrics and targets, to ensure that progress can be measured effectively. Business Healthy is entering its third year of operation and with a new Project Officer in place, this is an important time to evaluate what has gone before and how the project can be improved and become more successful going forward.

## Background

### The City of London

The City of London Corporation is the municipal governing body of the City of London, the "Square Mile", which is the historic centre of London and the location of much of the UK's financial sector. It provides Local Government and policing services for the area.

### Workers in the City and their health needs

The City's worker population greatly outweighs its residents, with over 450,000 people working in the City each day<sup>1</sup>. Over 1 in 100 of the UK's workforce are employed in the City, which makes it the local authority area with the highest daytime population density. The vast majority of City workers commute into the Square Mile from other London boroughs and elsewhere in the South East (39% travel from elsewhere in inner London, 29% from outer London and 32% from outside London<sup>2</sup>). The City has the highest density of jobs and firms in London, with approximately 16,600 businesses. Unsurprisingly, financial services dominate, with almost half of the capital's finance and insurance output coming from the City and over one-third of people employed in the financial services sector. There are 3,030 finance and insurance businesses, which makes it the most prominent sector, followed by professional services, business support services, information and communication and law. The City has a diverse business landscape, with the technology, media and communications sectors growing fast. 98.7% of businesses in the Square Mile are Small and Medium Enterprises (SMEs), with 250 or fewer members of staff.

While small businesses are in the majority, the large businesses account for around half of the total number of jobs, making them hugely influential when looking at the workplace as a setting for staff health and wellbeing. City workers are young – 55% are aged between 25 and 39. They tend to be educated to degree level (66%) and median pay is around double the national level. The Square Mile also has a highly international workforce.

The Joint Strategic Needs Assessment (JSNA) and the latest health survey<sup>3</sup> (carried out in 2012) identify City workers as being a group that is generally younger and more male than London's population, who work long hours and experience high rates of stress, anxiety and depression. There are also high levels of smoking, alcohol and other substance misuse among this population group. Given the long working hours in the City and the fact that most workers commute in from other areas, it is difficult for workers to access healthcare without taking time off work. This also makes the workplace a core setting for promoting preventative measures with a view to establishing long-term health-promoting behaviours. In addition, with the increased pressure on public services, employers increasingly recognise

their responsibilities to promote and look after the health and wellbeing of their staff, as well as the social and financial benefits of such activities.

The City of London Corporation has numerous commissioned services that can be accessed free of charge by City businesses (see Priority 2).

## What is Business Healthy?

Under the Health and Social Care Act, the City Corporation's Health and Wellbeing Board has a responsibility to promote the health and wellbeing of people who live and work in the City. With this in mind, Business Healthy was created in 2014 to "bring together businesses in the City to ignite a positive change in the health and wellbeing of their workforce"<sup>4</sup>. Senior managers and directors in the HR function (of larger businesses) and responsible persons in smaller businesses sign up to Business Healthy, where they are the point of contact for their respective organisations.

Business Healthy provides City businesses with support to promote better health and wellbeing among their workforce. While the needs of each individual and of individual business in the City are unique, there are broad areas of interest that Business Healthy can support. These include, but are not limited to:

- Anxiety and depression, including aspects such as financial wellbeing
- MSDs (musculoskeletal disorders)
- Nutrition and healthy eating
- Physical activity
- Substance misuse (alcohol, drugs and smoking)
- An ageing workforce
- Disability and long-term conditions
- Workplace culture that is conducive to healthy and good work
- Engaging the workforce and communication
- Securing senior buy-in
- Delivering an effective wellbeing programme

Through Business Healthy, City employers are encouraged to share experience and best practice with each other. Through its involvement in steering groups, Business Healthy helps to signpost Square Mile employers to health and wellbeing initiatives that they can access, such as the Lord Mayor's Appeal's "This is Me – In the City" and the City Mental Health Alliance. Business Healthy also provides a platform to showcase best practice among City employers to others within the network.

Whereas some features of City working may relate to certain aspects of employee wellbeing and health, such as the impact of stressful jobs and long working hours, these issues are not unique to the City itself, which is why it is important to welcome businesses, experts and other stakeholders operating in other parts of London, the UK and internationally, to become engaged in the discussion around health and wellbeing.

The objective of Business Healthy is: "to provide a community and online resource for business leaders committed to improving the health and wellbeing of their workforce". This means engaging with high-level decision-makers within City of London businesses, to provide five key services:

- *Exclusive content: Access all areas of the Business Healthy website, including hidden reports, research and links, plus exclusive blog articles.*
- *Member-only Events: Exclusive workplace health events, presentations, seminars and networking opportunities, hosted by Business Healthy.*
- *Private online forum: Access our private online forum to discuss issues with peers, post questions and topics and have your say.*
- *Expert-led workshops: Expert-led workshops on workplace health and wellbeing issues.*

- Business Healthy Updates: *Be the first to know about new resources, events, articles and hot topics posted on the Business Healthy site.*

## Strategic Context

### National

In recent years, workplace health and wellbeing has become increasingly prominent at a strategic level, both within the business and policy-making communities. Examples of the national strategic context that Business Healthy operates within include:

- NICE guidance on workplace health
- The Workplace Wellbeing Charter
- HSE's "Helping Great Britain Work Well" strategy
- Government dialogue and the work of the independent Mental Health Taskforce
- The "Time to Change" movement

### Local

On a more local level, examples of the strategic context are Public Health England and the London Healthy Workplace Charter/ Healthy London Partnership.

The objectives of Business Healthy fit within the wider City of London Corporation's vision to "support, promote and enhance the City of London as the world leader in international finance and business services, and...maintain high quality, accessible and responsive services benefiting its communities, neighbours, London and the nation".

They also align within the City of London Corporation's Department for Community and Children's Services' Business Plan and more widely, the City Corporation's three strategic aims (within its Corporate Plan):

- To support and promote The City as the world leader in international finance and business services;
- To provide modern, efficient and high quality local services within the Square Mile for workers, residents and visitors; and
- To provide valued services, such as education, employment, culture and leisure, to London and the nation.

Business Healthy is led by the City and Hackney Public Health team and overlaps with several other strategies, for example the Joint Health and Wellbeing Strategy (JHWS), the Mental Health Strategy, the Air Quality Strategy, the Noise Strategy, VAWG (Violence against Women and Girls) Strategy, the Suicide Prevention Action Plan and Corporate Alcohol Strategy, which are currently being developed. The health and wellbeing of City workers is a key priority of the JHWS. As such, Business Healthy's objectives should align with those of the broader Public Health team and its other activities.

This strategy was developed by taking into account the ongoing and forward-planning work of the City of London Corporation's Public Health team and the wider Department for Community and Children's Services. External factors, such as the focus of future public-facing campaigns with a health element within the City of London, also contributed in shaping the priorities of this strategy.

## Priorities

### Priority One: Expand the network

#### Why is this important?

As an online network, Business Healthy can only be as influential as the breadth of its reach. The more individuals, stakeholders and businesses engaged with Business Healthy, the bigger the impact of its work. Expanding the network is not only important in terms of increasing numbers, but also ensuring that this sustainable growth is of a high quality. Bringing large organisations on board will increase the number of employees reached through the initiative, but incorporation of smaller companies with less staff is equally important.

As of the start of December 2016, there were 846 individuals registered as members on the Business Healthy website and on the newsletter distribution list, representing approximately 424 different organisations. Approximately 265 (63 per cent) of these organisations are located in the Square Mile, with others operating on the City fringes, elsewhere in London and across the UK.

Another metric of Business Healthy's influence is its presence on social media. Business Healthy's following on social media sites Twitter and LinkedIn is constantly growing, with the websites representing key channels through which Business Healthy can engage with existing and new organisations alike, promote its work and that of its partners and can spread key messages. Through Tweeting when attending events involving its stakeholders, Business Healthy can establish its presence and boost its engagement.

#### What we will do

We will continue to expand Business Healthy's network through social media and other online engagement, in addition to events. Social media engagement and online engagement in a wider sense is cumulative, meaning that the more businesses and individuals engaging with Business Healthy, the more will become aware of it. Social media engagement translates to more registered members, but face-to-face networking is also important in increasing awareness of Business Healthy.

Online engagement and events will be structured and will reflect, wherever possible, relevant external international, national and local "milestones", such as Walk to Work Day, to maximise potential for online engagement, through the use of Twitter hashtags and public awareness. Updates on the Business Healthy Twitter and LinkedIn accounts will be daily, with a weekly blog post and additions to the "Resources" page, which will be highlighted in the newsletter. Existing Business Healthy members are being polled on their preferred frequency for receiving newsletters, with weekly and monthly delivery seen as the most popular. Events will continue to be open to Business Healthy members and non-members alike, with a view to signing up new organisations.

Collaboration and cross-promotion with internal City of London Corporation initiatives is also important where objectives align, such as CityWell, This Is Me, Active City Business Network, the Clean Streets Partnership and the Safer Streets Partnership. Efforts will continue to ensure joined-up working between Business Healthy and these different programmes.

In addition, there are a range of other communication channels through which Business Healthy can deliver its messages to City residents and workers, as listed in Appendix 2.

#### How will we measure progress?

A key metric is the number of individuals and businesses signed up as members on the Business Healthy website. Detailed figures are listed in Appendix 1.

Another key metric to measure the scope of Business Healthy's brand recognition is social media engagement and it is important to continue to boost the number of followers on both LinkedIn and Twitter. As of December 2016, Business Healthy's social media presence was not being used to its full potential, notably through its LinkedIn and Twitter accounts. Increased, targeted and cohesive activity through these channels can be used to increase engagement with businesses and residents within the Square Mile and boost brand recognition for Business Healthy. This may be particularly useful in increasing engagement with SMEs in the more creative industries, of which there are many in the City. The proposed social media targets can be found in Appendix 1.

## **Priority Two: Make Business Healthy the “go-to” health and wellbeing resource for City businesses**

### **Why is this important?**

Making Business Healthy the “go-to” health and wellbeing resource for City businesses and residents looking to boost their employees' or individual wellbeing is important to the viability of the initiative for several reasons. For its members and potential members, this will make Business Healthy stand out among other similar initiatives, thus encouraging others to join. Businesses providing health and wellbeing services to employers in the City currently have the opportunity to list themselves free-of-charge on the “Providers” page of the Business Healthy website. For those providers, Business Healthy being the most prominent resource will present a strong business case when discussing sponsorship opportunities. Members may access Business Healthy's online resources or attend its events for expert guidance, networking purposes, to gain support for their initiatives and potentially other reasons.

It is also important for Business Healthy to be identified as a “go-to” resource for media outlets, to provide commentary on any related issues and also to provide insight to central Government and key decision-makers. This will help to increase the profile of Business Healthy and allow us to access specialists to write content for the Business Healthy website and to present at Business Healthy events.

Identifying ways in which Business Healthy can become the “go-to” resource for City businesses and residents overlaps with the other priorities outlined in this strategy. Business Healthy's unique selling point is that it is focused on the Square Mile and encompasses all aspects of workplace health and wellbeing.

### **What we will do**

It is important to identify the tools and resources at Business Healthy's disposal that can be used to engage with City businesses and residents and promote information and guidance:

- Member-only events.
- Business Healthy website, [www.businesshealthy.org](http://www.businesshealthy.org), which encompasses the blog, the private online forum, latest research, expert guidance and directory of providers.
- Social media (the Business Healthy Twitter and LinkedIn accounts).
- Business Healthy newsletter, which is sent out to all members.
- Commissioned services.
- London Healthy Workplace Charter

There will be several standalone Business Healthy events and activities during 2017, focusing on one or more of the aforementioned key health and wellbeing issues. Numerous Business Healthy-led print and digital campaigns running throughout the year will support Business Healthy's messaging. In addition, where there is resource, Business Healthy can support and/or attend relevant partner events. These events will be of a high quality and be aimed at senior employees, generally in the HR function of an organisation, but alluding to the need



for high-level buy-in, as outlined below, some events should also appeal to the “C-suite”, i.e. Chief Executive Officers, Chief Operating Officers and Chief Information Officers. Business Healthy events and campaigns are outlined in the “Events Planning Calendar” in Appendix 3.

Following each event, attendee feedback will be collected, which will influence future planning and events, ensuring that Business Healthy events constantly improve. During 2017 and on an ongoing basis, it will be important to gauge which key health and wellbeing topics will be of interest to the business community in 2018 and beyond.

The Business Healthy website is a resource provided to members. Between August 2016 and November 2016, the website received 1989 “sessions” (interactions by a single user, which can contain multiple screen or page views), 1525 new visitors and 464 returning visitors. 54.6 per cent of visitors to the website were from “Organic” searches, arriving at the website through non-paid search engine results. These statistics are being recorded on a quarterly basis to monitor how the website is being used and are also helpful when looking at what functions the website needs to service members. By linking content posted on the social media accounts to the website wherever possible, the number of website users will increase.

High-quality resources that members can access on the Business Healthy website are important, particularly where they cannot be accessed elsewhere. For example, Business Healthy can collaborate with Public Health England (PHE) to develop practical guides for the Business Healthy resource page.

The website's member forum is currently under-utilised and steps will be taken to develop this, to encourage discussion, the sharing of best practice and resource sharing by businesses, which will in turn, draw members and potential members to the Business Healthy website.

Members can be encouraged to showcase their work in employee and resident health and wellbeing, through writing blog posts and case studies for the website. There is also scope for the “Providers” page to be developed, through asking providers and local businesses to provide exclusive discounts and services to Business Healthy members. This will be explored when moving towards making Business Healthy financially self-sustaining (priority four).

Through the City of London Corporation, Business Healthy is able to offer its members specific services from external providers, often free of charge to City residents and/ or workers. In many instances, this is a unique offering and benefit of membership. Going forward, it is recommended that a comprehensive list of these services, including the terms and conditions, is promoted through the Business Healthy website and in face-to-face meetings. This list can be found in Appendix 4. There are opportunities to engage with local businesses and retailers to offer exclusive discounts and services to Business Healthy members, linked with employee and resident health and wellbeing. In turn, this will also boost engagement with the local community and with local branches of international and national businesses.

Business Healthy also works closely with colleagues at the City of London Corporation to promote and refer City businesses to the London Healthy Workplace Charter, which is another type of support on offer to them.

Other initiatives with a similar offering should be identified, whether they are operating within the Square Mile, London, or further afield and to see what their offering is to businesses. This will enable Business Healthy to align itself with the competition and also to identify opportunities to work in partnership with these schemes, to cross-promote and to enhance its own profile. This is also important as a way of ensuring efforts are not being duplicated and resources are not being wasted.

As outlined below, developing strong ties with local, national and international media outlets is important, to ensure that Business Healthy is the first point of call for commentary on news relating to workplace health and wellbeing. Wherever possible, Business Healthy presence in digital, broadcast and print news should not come at a cost to the initiative. Networking is a key aspect of building these relationships, as is having reliable sources and an original approach.

#### **How will we measure progress?**

Progress can be measured through growing use of the Business Healthy website, which is recorded on a quarterly basis as set out in Appendix One and good attendance at Business Healthy standalone and partner events, which is recorded following each event. Business Healthy events should be referred to in news publications as a way of branding the initiative as a reliable and trusted source of information. Referrals from Business Healthy contacts to the London Healthy Workplace Charter scheme is another way that Business Healthy's influence can be measured, with referred organisations achieving accreditation. We should also look to have Business Healthy cited in work, publications and events by other organisations operating in the field.

### **Priority Three: Secure high-level buy-in**

#### **Why is this important?**

This refers to recognition and acknowledgment of Business Healthy's role and importance from both high-profile figures within the City of London Corporation and also from high-profile business leaders within the Square Mile. It is crucial to the ability of Business Healthy to prosper and grow and to achieve its core aim of bringing together businesses in the City to ignite a positive change in the health and wellbeing of their workforce. The more highly-regarded Business Healthy is, the more willing organisations will be to sponsor its activities, events and resources, thus improving the likelihood of it becoming financially self-sustaining.

#### **What we will do**

It is important for City businesses to regard Business Healthy in a positive light and to be advocates for it. This will be achieved through ensuring valuable content and resources on the website and through hosting high-quality events throughout the year, which are attended by individuals of a similar standing and with decision-making responsibilities. Better relationships can be formed with experts in all areas listed above, to ensure a consistent level of relevant content for the website and speakers at Business Healthy events.

Endorsement of Business Healthy by City of London Corporation Members and other notable figures is crucial to ensuring the success of Business Healthy. That Business Healthy is an initiative established by the politically-neutral, well-recognised and long-established City of London Corporation is currently not being used to its full potential to attract City businesses large and small to become members. Over the coming year, efforts will be made to engage with more Members and other senior figures at the City of London Corporation and to familiarise all relevant Committees with its work.

A proposed high-profile Business Healthy conference in September 2017, held in the Square Mile and attended by senior decision-makers, politicians, external and internal supporters will demonstrate this high-level buy-in. London-focused groupings operating in a similar sphere, such as the Healthy London Partnership, Public Health England, the Mayor of London's office, the Greater London Authority, the City Mental Health Alliance, the CIPD and This Is Me – In the City, should be invited to participate as partners and co-hosts, which will boost the profile of Business Healthy and show it as a cooperative and supportive project, as many decision-makers already engage with, or are familiar with these groupings.

Efforts should also be made to develop stronger ties with local media outlets (print, broadcast and digital), including the Evening Standard, Metro, Financial Times, City Matters and City A.M., to promote the work of Business Healthy and to enhance its profile and brand awareness.

#### **How will we measure progress?**

Business Healthy should host at least one high-profile event in the Square Mile on a yearly basis, which garners news coverage locally and nationally. We should also look to have high-profile business leaders and experts speaking at Business Healthy standalone and partner events, providing expert insight and thought leadership.

### **Priority Four: Make Business Healthy financially self-sustaining**

#### **Why is this important?**

Currently Business Healthy is sustained by the Public Health budget. The aim is to move away from this dependency and to become financially self-sustaining, whether through introducing paid advertising on the Business Healthy website, through event sponsorship, through paid-for membership, or a combination of all three. In all scenarios, Business Healthy must prove that it provides value-for-money to its members and to sponsors. Having an independent budget will allow Business Healthy more freedoms around the types of events and resources it can offer to its members and also independence from changes to centrally-allocated public budgets, which can fluctuate annually.

#### **What we will do**

Business Healthy must establish its unique selling point (USP) and how it differs from other similar offerings in the Square Mile, such as the City Mental Health Alliance. Simultaneously, it must not be seen to be at odds with these other initiatives and must retain a collaborative and cooperative outlook. The USP may focus on Business Healthy as a unique initiative under the scope of a public body, engaging with and representing members of the most business-focused area in London and the UK.

City of London Corporation rules must be researched to set the boundaries of what is allowed by Business Healthy regarding commercial activity. If permitted, there are opportunities to introduce paid-for listings on the Business Healthy's "Provider" page and paid-for advertisements on the website. In early December 2016, there were 29 organisations registered on the page, which can be accessed by members looking to procure certain services.

Business Healthy could also introduce a fee for members to attend some of its events, however, their value-for-money must first be proved and secondly communicated. The feedback process completed following each event could be a useful tool in harnessing this information.

It is expected that moving to financial self-sustenance will take time and may not be completed within the duration of this strategy. Business Healthy should look to fully establish itself by 2018/19, with a view to setting a timeframe from this point onwards. Once procedures are in place, annual financial targets should also be set.

#### **How will we measure progress?**

Over the coming years Business Healthy will use increasingly less of the Public Health budget, through identifying corporate sponsors for events and campaigns. Regarding fundraising,

different options should be tested, for example charging for events, charging for advertising at events and/ or introducing a membership fee. Ultimately, progress will be measured by how much of the Public Health budget is used by Business Healthy, year on year.

The following targets are set for the duration of this strategy (2017-20) for Business Healthy. It will aim to reduce its reliance on the public health budget by:

- 2017-18: -5%
- 2018-19: -10%
- 2019-2020: -17%

## Looking forward

Once this strategy has been approved, an Action Plan will be developed that will outline step-by-step how each of the objectives will be achieved, including indicators as to timeframes. The Plan will be updated annually.

This strategic plan should be reviewed at least annually to ensure that the strategic objectives are being followed, the priorities are still relevant and that the goals are being attained.

### Longer term strategic goals

Alongside the aim to make Business Healthy financially self-sustaining, additional longer term strategic goals should be considered, reflecting current trends and prospective areas of interest over the coming years. These could include:

- Business Healthy influencing and leading the City of London Corporation's role as a business rates collector, based on ongoing discussions in the West Midlands around the "Wellbeing Premium". This could manifest in reducing business rates for smaller companies that demonstrate a commitment to – and investment in – worker health and wellbeing
- Incorporating the health impacts and considerations of a multigenerational workforce and the needs of younger and older workers in the City.
- Exploring opportunities for the City Corporation to add mental health support for City workers to its range of existing commissioned services. This would be subject to finding appropriate funding.

## Appendix 1: Engagement Targets

By December 2017, we aim to have 1,206 individual members registered on the Business Healthy website, representing 603 individual organisations. This represents an additional 360 members from the December 2016 figures. 375 of these organisations will be based within the City of London. The aim is to have a higher proportion of member organisations operating in the City than is the case currently. We aim to ensure that a significant proportion of these organisations will be Small and Medium Enterprises (SMEs), which constitute businesses with 250 employees or less. Small and Medium Enterprises (SMEs) are a huge untapped area of potential membership. Making the blogs, resources and other items on the website accessible only to registered members will promote growth. These targets will be revised in December 2017 for the coming year.

### Social Media Engagement Targets

The proposed social media targets are 1,100 Twitter followers (an increase of 41 per cent) by December 2017 and 153 LinkedIn followers (an increase of 41 per cent). These targets will be achieved by using the tools at Business Healthy's disposal, as outlined below and progress is measured and recorded monthly.

### Attendance at Business Healthy events:

- Jan-17: "A Listening Ear" (internal event for Nomura staff): 70 attendees
- Feb-17: Suicide prevention workshop, plus train-the-trainer: 30 attendees
- Mar-17: "The Importance of Sleep to Wellbeing" webinar: 64 participants
- Apr-17: "Health and Wellbeing: Why is it important for your SME? Building the business case": 6 attendees
- May-17: Business Healthy Challenge: 134 participants

### Appendix 2: City Communication Channels

- |  |                              |
|--|------------------------------|
| ▪ Barbican residents' meeting / Q&A                  | ▪ City Matters newspaper     |
| ▪ Barbican Residents' Open Day                       | ▪ Barbican email broadcasts  |
| ▪ Estate Open Meetings                               | ▪ Town Clerk's bulletin      |
| ▪ City Resident                                      | ▪ Healthwatch City of London |
| ▪ City View  | ▪ Teamtalk                   |
| ▪ Ward newsletters                                   | ▪ Barbican bulletin          |
| ▪ Barbicanews  | ▪ Aldgate Partnership        |
| ▪ News bulletin                                      | ▪ Barbican messages          |
| ▪ Colnet   | ▪ Members' Briefings         |
| ▪ City of London Corporation website                 | ▪ Residents' Associations    |
| ▪ City of London libraries service                   | ▪ One City website           |
| ▪ Heart of the City newsletters (monthly and weekly) | ▪ Barbican Life magazine     |

### Appendix 3: Events Planning Calendar (2017)

Separate document: \\Dccsdata\data\_dccs\Public Health\5. Workplace health\Business Healthy Members & Events\2017

### Appendix 4: List of Commissioned Services available to Business Healthy member organisations

- WDP Square Mile Health (alcohol, drugs and substance misuse)
- Advice on smoking cessation through Boots pharmacies
- Living Streets (promoting the benefits of walking)
- Cycle support and guidance, aimed at improving skills among the workforce and support with servicing bicycles
- City Advice (advice telephone line run by Toynbee Hall)
- Golden Lane Sport & Fitness (run by commissioned provider Fusion)
- City LivingWise (provided by Reed Momenta for low-paid City workers)
- The Sustainable City Awards' Health and Wellbeing Award (annual)

### Appendix 5: Public Health Communications Plan

This is in development.

### Bibliography

<sup>1</sup><https://www.cityoflondon.gov.uk/business/economic-research-and-information/Pages/economic-statistics.aspx>

<sup>2</sup><https://www.cityoflondon.gov.uk/business/economic-research-and-information/research-publications/Documents/Briefings/city-stats-june-16.pdf>

<sup>3</sup><https://www.cityoflondon.gov.uk/business/economic-research-and-information/research-publications/Documents/research-2012/The%20Public%20Health%20and%20Primary%20Healthcare%20Needs%20of%20City%20Workers.pdf>

<sup>4</sup> Business Healthy's mission statement

<b>Committee(s)</b>	<b>Dated:</b>
Port Health & Environmental Services	19 September 2017
<b>Subject:</b> Impact of the UK leaving the EU (Brexit) on Port Health & Public Protection	<b>Public</b>
<b>Report of:</b> Director of Markets & Consumer Protection	<b>For Decision</b>
<b>Report author:</b> Jon Averbs, Port Health & Public Protection Director	

## Summary

Following a referendum in June 2016, the UK is due to leave the European Union on 29 March 2019. Negotiations are underway between the UK and EU in relation to the terms of the UK's departure. As a wide and varied range of European legislation is enforced by the Port Health & Public Protection Division of the Department of Markets & Consumer Protection, particularly by Port Health and Animal Health, there are considerable implications concerning the way in which controls will be undertaken post-Brexit.

This report outlines the key issues and implications for the Division, and refers to an independent report that was commissioned to examine the impact of Brexit on the Division. Recommendations are made to protect City of London Corporation interests and those of the Consumer.

## Recommendations

Members are asked to approve the following:

- 1) The recommendations contained in the report commissioned by the City Corporation and listed in Appendix 3 should be pursued in more detail, and a progress report provided in March 2018.
- 2) The following key principles should form the basis of negotiations with government and relevant agencies with regard to the functions undertaken by Port Health and Public Protection:
  - a. The same, or an improved, level of consumer protection should be sought for public, animal and environmental health in terms of any proposed changes to regulatory controls after the UK leaves the EU.
  - b. Any changes to the current legislation should be commensurate with the risk posed by different activities and trades, as it is recognised that some enforcement requirements could be streamlined.

- c. The UK should continue to recognise EU controls in order to avoid resourcing implications at the UK border; and this would **best** be done as part of a reciprocal agreement with mutual recognition, as this would be more sustainable politically, promote regulatory alignment, and facilitate UK-EU trade.
- d. Full cost recovery for local authorities and port health authorities to enforce relevant legislation is essential, and this should be extended to include those areas not already covered, particularly if they have to undertake additional controls as a result of Brexit.
- e. The current checks at UK and EU borders on third country imports should be maintained to facilitate free movement of goods within the EU, and between the EU and the UK, and the UK should maintain access to existing IT and rapid alert arrangements.

## **Main Report**

### **Background**

1. A referendum was held in June 2016 in which the UK voted to leave the European Union. Subsequently, the UK triggered Article 50 of the Treaty of Lisbon, whereby the UK gave formal notice of withdrawal from the EU which is due to take place on 29 March 2019.
2. The Port Health & Public Protection Division enforces a range of legislation, much of it based on EU Directives and Regulations. The key areas are the border controls undertaken at by Port Health at the ports, and by Animal Health at Heathrow Animal Reception Centre (HARC).
3. The purpose of this report is to consider the main impact of Brexit on the Port Health & Public Protection Division, focusing on animal health and port health, and what measures.
4. The legislation enforced at the Ports and HARC is wide and varied, but is fundamentally aimed at protecting the consumer in terms of public, animal and environmental health. Controls are exercised by Port Health on food and feed imported from third countries, i.e. those outside the EU. Products arriving from other EU countries currently benefit from the Single Market so are not routinely subject to full inspections. This is based on uniform standards coupled with common inspection and certification procedures in the countries of origin.
5. At HARC, animal health and welfare checks are undertaken on all animals imported through the Airport and the Pet Travel Scheme is administered. More information can be found in Appendices 1 and 2 (profiles of Port Health & Animal Health).
6. Within the Square Mile, most of the food safety and air quality legislation is EU based. This also applies to a lesser extent to other environmental, trading standards and health & safety law.



7. The UK is still subject to its legal obligations to the EU and vice versa until an exit is formally concluded. Whilst many EU Directives have been absorbed into domestic legislation and will therefore automatically remain post-Brexit, many are still “European”, painting a mixed picture for workplace and consumer law.
8. The European Union (Withdrawal) Bill was published on 13 July 2017. This converts all relevant EU law onto the UK statute books which means that current regulations and controls will remain and be transposed into domestic legislation. However, government will eventually review laws to consider which should be removed and if any alternatively regulatory measures should be introduced. The timetable for this, and any transitional regime that goes with it though, will only start to emerge over time, but the new legislation could result in considerable changes following Brexit.
9. To try and inform post-Brexit arrangements and any changes to legislation, meetings have been held with senior Civil Servants, directors of relevant Agencies and Business/Trade organisations. Representation has been secured on various review panels and boards, and opportunities are being taken to engage with relevant politicians.
10. Brexit has been included on the Port Health & Public Protection Division risk register and this report forms part of the actions identified to address the risk.
11. To identify areas of concern regarding the current level of control and the operational implications of potential post-Brexit changes, a report was commissioned to examine key impacts and opportunities. This was undertaken by two consultants who have extensive experience in local authority regulation, animal health, and food safety.

## **Current Position**

12. Although negotiations have commenced between the UK and the EU, there has been little indication of how animal and port health border controls will be undertaken post-Brexit. However, more recently the government has started to issue position papers, including one on future customs arrangements and another entitled ‘Continuity in the availability of goods for the EU and the UK’. The later contains the following statement: ‘The UK’s ambition is to work towards a comprehensive future agreement with the EU, which includes securing the freest and most frictionless trade possible in goods and services to the benefit of all.’
13. The report commissioned by the City Corporation referred to above has also been received. This explores the array of scenarios for the post-Brexit regulatory landscape, focussing on Port Health and Animal Health control systems, impact, threats and opportunities for the Corporation. An electronic link has been circulated and hard copies are available in the Members’ reading room.
14. The report outlines the different post-Brexit scenarios with the two extremes being as follows:

- a. No deal: in this case trade would be governed by the World Trade Organisation and the UK would be treated as a 'third country' in relation to trade with the EU. Similarly, imports from the EU to the UK might no longer be given free movement, so tariffs and strict controls could be imposed at UK borders. Food and agricultural imports would be seriously affected as by their nature they require clearance through Port controls without delay. There could be similar difficulties for agricultural exports to the EU.
- b. Single Market: Such an agreement would ensure harmonised regulation and tariff free trade with the EU and if it included customs and agriculture it would be the equivalent, in trade terms at least, of continued membership of the EU.

15. The Labour Party has recently announced its support for continuing the Customs Union and Single Market, at least for a transitional term.

### **Implications for Port Health & Public Protection**

16. The implications for Port Health & Public Protection are more severe if a 'hard' Brexit is the outcome of negotiations, and a summary is provided for each area below:
17. **Port Health** – Treating imports from the EU in the same way as those from third countries would lead to a significant increase in the work of port health authorities around the country as checks would be required at the borders. Given the current trade pattern in the Port Health area of jurisdiction (the tidal Thames and lower Medway), this would result in a 25% increase in workload. This would have staffing and training implications, and also require additional offices and facilities at wharves and ports that do not currently have them. The seven Official Veterinarians (OVs) employed by the Corporation are all nationals of other EU Member States, as are many OVs who carry out other food safety and animal health functions.
18. Conversely, should checks at the border be relaxed through free trade agreements with other third countries, or if for any reason inspections were undertaken inland rather than at the borders, this could pose a risk to Public and Animal Health, and result in redundancies and decreased income.
19. Shellfish monitoring and controls are carried out in the Thames estuary to EU standards and a high proportion of the harvest is exported to the EU. Existing standards need to continue if consumer protection and the current EU trade are to be maintained.
20. **Animal Health** – the main source of income and controls undertaken at HARC relate to the Pet Travel Scheme. Any changes to the Scheme, or to the way in which animals from the EU third countries are handled and checked could have a major impact on HARC, both in terms of activity and income.

21. A large percentage of the pet travel trade is via professionals relocating to the UK for work on one or two year contracts. If this employment moves away from the UK because of Brexit there will be decrease in throughput at HARC.
22. Currently there are no live animal border inspection posts (points of entry approved by the European Commission) at any UK seaport. If it becomes a requirement to check all live animal consignments entering the UK from the EU, this would push trade to airports, especially in the short term due to the lack of facilities at seaports. This could have staffing and facility implications at HARC as it is currently the major live animal border inspection post serving the UK.
23. **Air Quality** - The European Union Ambient Air Quality Directives set a series of air quality limit values that must be met across Member States. The most challenging limit value to meet has been for nitrogen dioxide. Member States were required to produce plans to limit nitrogen dioxide to acceptable levels by 2010, or 2015 at the latest. The UK failed to do so and will have nitrogen dioxide levels that breach the limits beyond 2025.
24. After Brexit, the limit values would remain in UK law, having been enshrined through Air Quality Standards Regulations. However the European Commission would no longer have a role in enforcement and the UK would be free to repeal the laws. The UK is currently subject to EC infraction proceedings, so exiting the EU would also remove the threat of fines for non-compliance. The increasing awareness of the broad range of adverse health effects resulting from air pollution exposure could make any significant watering down of limits politically sensitive.
25. As well as imposing the limit values, EU laws also empowered campaigners to challenge the UK Government in the courts over its failure to ensure that air quality meets the limits. Following a legal challenge by ClientEarth, the Department for Environment, Food and Rural Affairs brought out a new strategy outlining further steps that will be taken to improve air quality across the UK.
26. **Food Safety** - whilst having high level domestic legislation such as the Food Safety Act 1990 and the Food Standards Act 1999, most UK food law is derived from directly effective EU Regulations and is not incorporated into UK law so these would have to be enacted into domestic legislation post-Brexit.
27. **Health & Safety** – for health and safety legislation the opposite is true with most of our laws flowing from EU Directives which have been already incorporated into UK legislation and so leaving the EU will have little impact on UK health & safety law.
28. **Trading Standards** – is a real mixture with domestic legislation providing the framework yet some areas of product liability, cosmetics, medical devices and medicines regulation have standards that are both UK and EU defined.
29. **Pollution Control** - legislation is primarily based on the law of nuisance and various Public Health Acts that pre-date entry into the European Union. As such, amendments to legislation concerning issues such as noise and other nuisance,

some environmental controls, and privately rented housing is unlikely in the short to medium term following Brexit.

## Proposals

30. The City Corporation consultants' report has made ten recommendations on how the City should approach Brexit with regard to Port Health and Animal Health and the preparations that it should make. These are included in Appendix 3 to this report. Given the short time that has elapsed since the report was received, subject to any comments received by your Committee, I propose to pursue these in more detail and provide a further report in March 2018.

31. Due to the uncertainties of how Brexit will impact on Port and Animal Health, I propose that in negotiations with government departments, agencies etc., the City Corporation should adopt the following five key principles:

- a. The same, or an improved, level of consumer protection should be sought for public, animal and environmental health in terms of any proposed changes to regulatory controls after the UK leaves the EU.

**Rationale:** there should not be any consumer detriment as a result of Brexit, and there may be opportunities to improve public health standards in areas such as air quality, as well as controls undertaken at the borders.

- b. Any changes to the current legislation should be commensurate with the risk posed by different activities and trades, as it is recognised that some enforcement requirements could be streamlined.

**Rationale:** in line with (a) above, although the overall level of consumer protection should be maintained or improved, some legal requirements could be relaxed where there is clearly a lower level of risk.

- c. The UK should continue to recognise EU controls in order to avoid resourcing implications at the UK border; and this would **best** be done as part of a reciprocal agreement with mutual recognition, as this would be more sustainable politically, promote regulatory alignment, and facilitate UK-EU trade.

**Rationale:** mutual recognition or equivalence agreements, whereby the EU and UK recognise controls at the point of production (or first point of entry into the UK or EU – see (e) below) and therefore do not carry out checks at borders for products being exported from the EU to the UK, or vice versa, would keep unnecessary controls to a minimum. Given that the FSA estimates around a third of the food consumed in the UK is imported from the EU, and were checks to be undertaken at the border, there would be massive resource implications, so reciprocity would avoid this potential problem.

- d. Full cost recovery for local authorities and port health authorities to enforce relevant legislation is essential, and this should be extended to include those areas not already covered, particularly if they have to undertake additional controls as a result of Brexit.

**Rationale:** the cost of enforcing legislation should not fall to the public purse, and although full cost recovery is permitted in many cases, this could be extended to include other areas, such as food hygiene and health & safety inspections, imported consumer product safety, and shellfish monitoring.

- e. The current checks at UK and EU borders on third country imports should be maintained to facilitate free movement of goods within the EU, and between the EU and the UK, and the UK should maintain access to existing IT and rapid alert arrangements.

**Rationale:** currently, once third country goods have undergone border controls at the point of entry into the EU, there is no further need for additional checks. In line with (c) above, if these checks were maintained goods could still move freely between the UK and the EU. The current IT and rapid alert arrangements regarding hazardous food/feed are essential for effective controls, so if possible should be retained.

### **Corporate & Strategic Implications**

- 32. The proposals outlined above address the actions outlined in the Departmental Risk Register and also conform to objectives in the Business Plan.
- 33. As far as financial implications are concerned, there is insufficient information available to make an assessment of how any proposals will affect Port Health & Public Protection budgets. However, as part of the ongoing monitoring of Brexit these will be kept under review.
- 34. The legal implications of the EU Withdrawal Bill are being overseen by the Remembrancer. His most recent briefing for MPs prior to the second reading of the Bill referred border inspections, and his comments have been incorporated into the recommendations made in this report.

### **Conclusion**

- 35. There are a range of potential impacts on the Port Health & Public Protection Division resulting from the UK leaving the EU, particularly for Animal Health & Port Health. The implications need to be kept under review, and the City Corporation needs to address them taking into account agreed principles that protect the City Corporation and in line with the recommendations of the consultants' report.

### **Appendices**

- Appendix 1: London Port Health Authority Profile
- Appendix 2: Animal Health & Welfare; Primary Customers
- Appendix 3: Summary of recommendations from report commissioned by the Port Health and Public protection Division

## **Background Papers**

Report commissioned by the Port Health and Public Protection Division: **Brexit**: A future regulatory landscape, key impacts and opportunities. Authors: Derek Allen and Will Creswell.

### **Jon Averts**

Port Health & Public Protection Director

T: 020 7332 1603

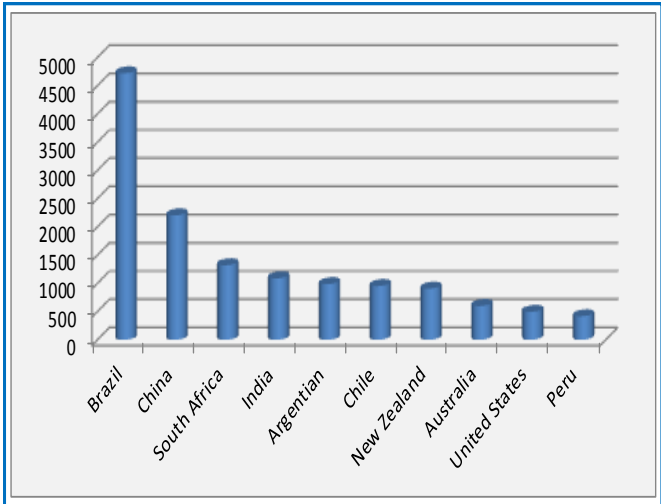
E: [jon.averns@cityoflondon.gov.uk](mailto:jon.averns@cityoflondon.gov.uk)



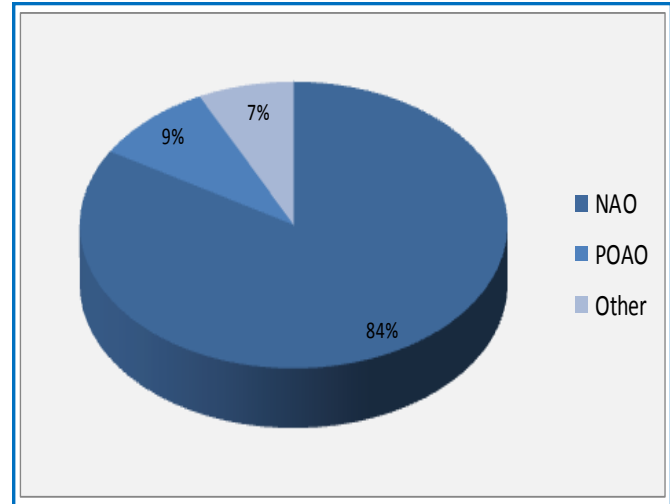
# London Port Health Authority—Profile



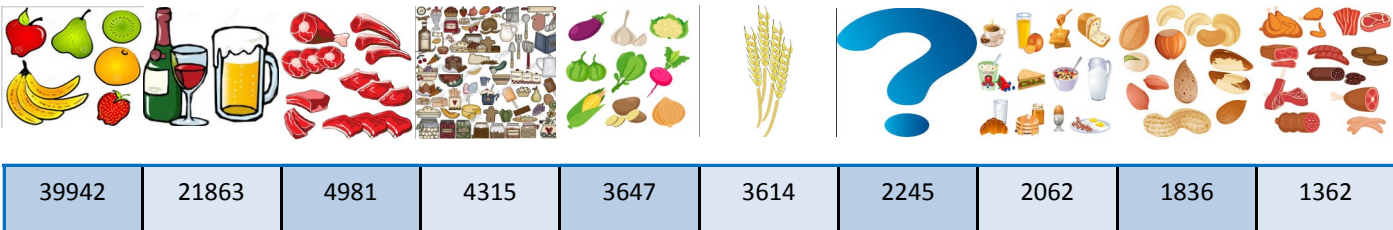
Imports are received from over 129 different countries but the top 10 country's for imports subject to Port Health checks in the last 12 months are:



Imports are classified into 3 main types, Non Animal Origin (NAO), Product of Animal Origin (POAO) and Other. The distribution over the last 12 months has been:



A variety of different food and feed products are received at the City of London ports with the top 10 consignments being:

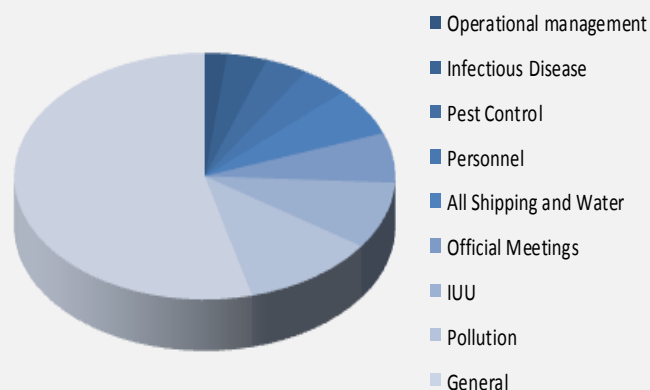
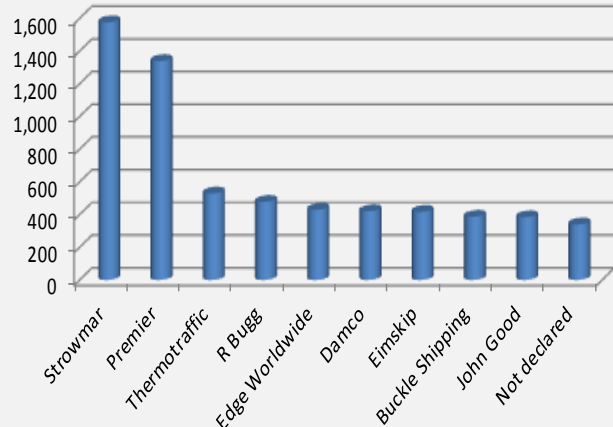


Food imports are categorised into 23 groups and staff working in the Port Health Authority recorded and classified 90445 food and feed imports in the last 12 months.

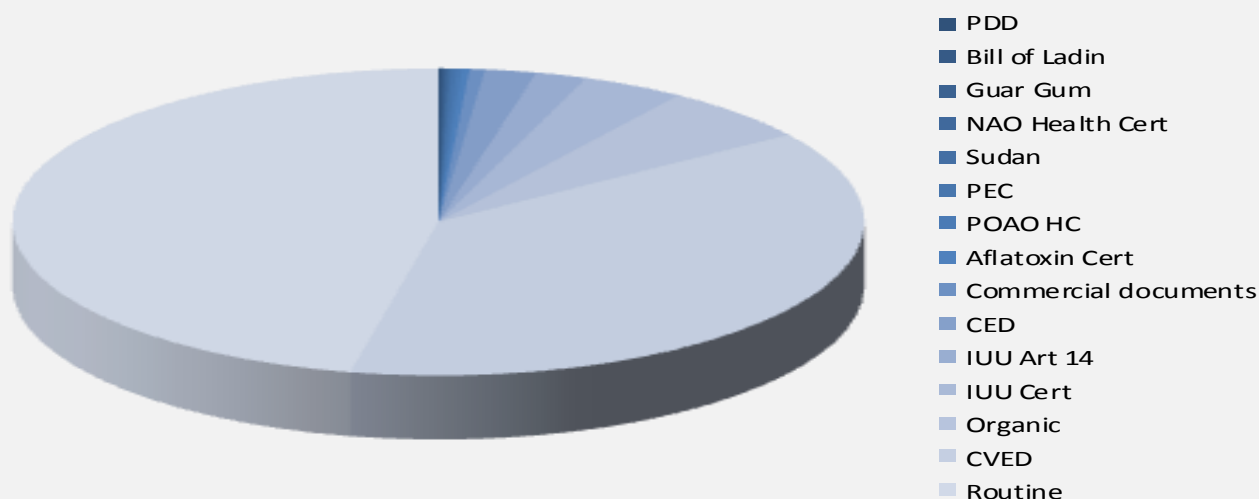
Page 109

Port Health staff have dealt with over 641 different clearance agents during the last 12 months with the top 10 customers, in terms of jobs created being:

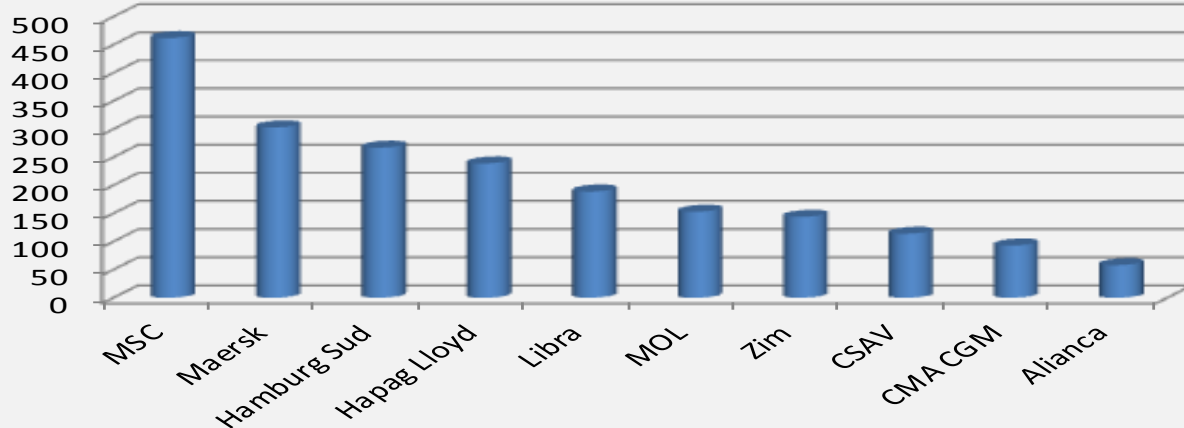
Aside from Imported Food, Port Health also includes other operational and official controls which have no relation to imported food. These areas are :



Port Health staff have created over 19000 import records for consignments arriving through the ports. These “jobs” can be classified by their official import controls:



Ports under the control of the City of London service 33 different shipping lines. 26 of these lines carry cargo from third countries. The following shows the arrival frequency of the top 10 during the last 12 months:





## Animal Health & Welfare Service; Primary Customers

### Heathrow Animal Reception Centre;



	Stakeholder Type	Primary Customers		
International	Shipping Agents	USA; Animals Away, Worldcare, Pets in Transit AUSTRALIA; Jetpets, Dogtainers SOUTH AFRICA; Global Paws NEW ZEALAND; Venture pet, Jetpets		
	Airlines; 58% of throughput	(BA) United Airlines	Qantas Emirates	Aegean Virgin Atlantic
	Government	US Dept. Agriculture Australian Dept. Agriculture Republic of South Africa, Dept. Agriculture New Zealand Ministry for Primary Industries		
UK	Clearing Agents/Shipping agents	JCS PBS	Jalsa Virgin	Pet Air Air Pets
	Trade Organisations	TMC IRT	Eurorep	(HAL)
	Government	Defra Family; APHA, CEFAS, FERA, PHSI HMRC; Border Force CAA DfT		

### Annual Throughput by Species Group



11,000



6,000



300

Page 111  
70,000

28m

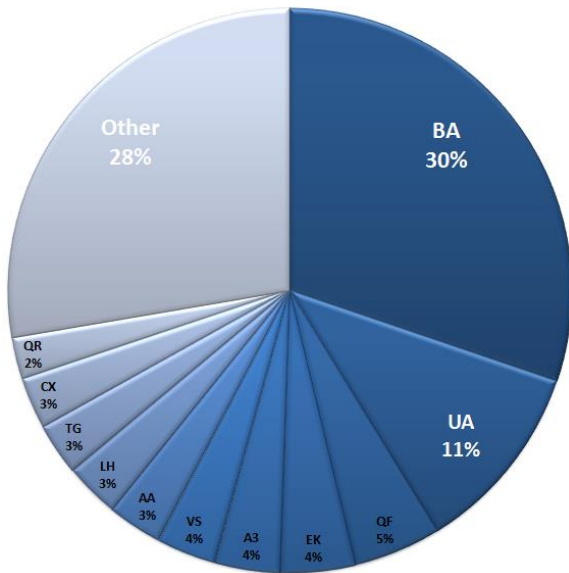


26m

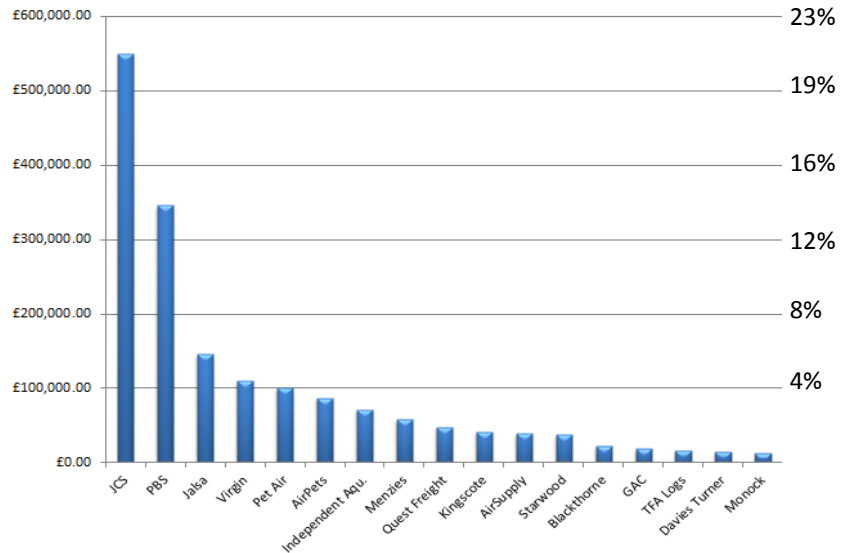


1,500

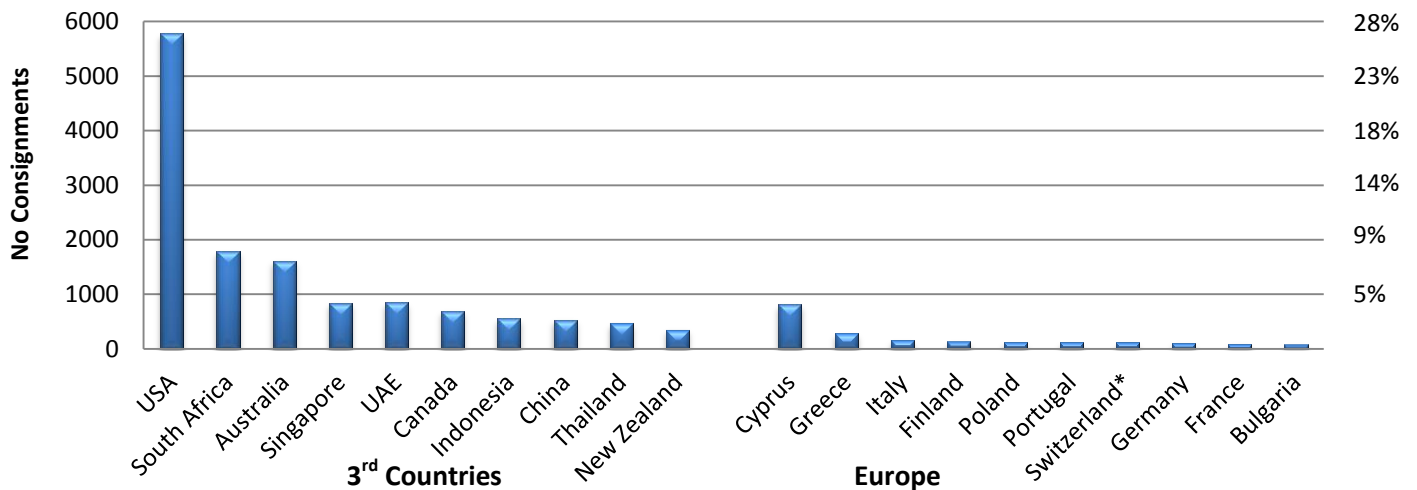
Airline Business by Throughput



Clearing Agents by Invoices Charged



Top 10 Countries of Origin



## Animal Health & Welfare Service; Contract income per annum

Primary Authority Partnerships;

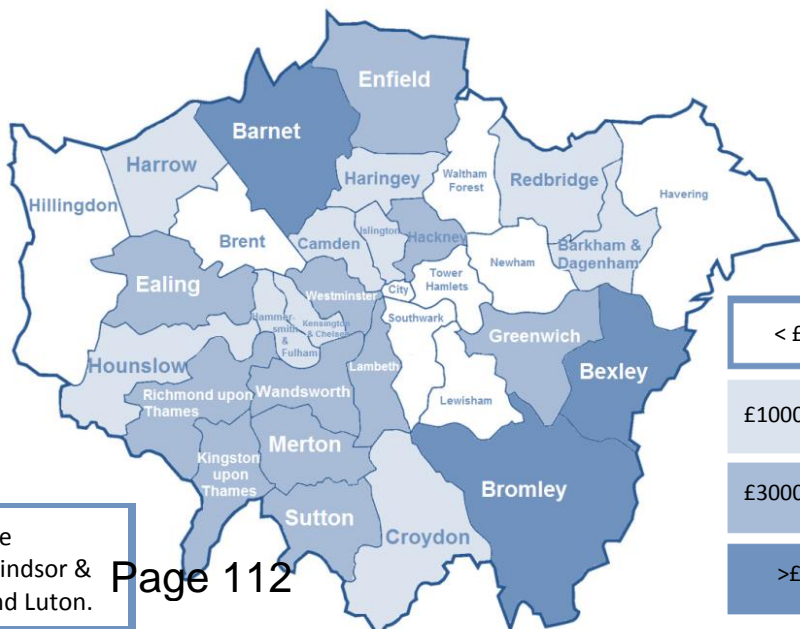


- Pet Vending



- Pet Vending
- Animal Boarding

<£1000 contracts also include Reading, Bracknell Forest, Windsor & Maidenhead, South Bucks and Luton.



< £1000 pa

£1000 - £3000 pa

£3000 - £5000 pa

>£5000 pa

## **Summary of recommendations from report commissioned by the Port Health and Public protection Division**

- Through its political processes, look to agree its position in respect of current relevant regulations, standards, controls leading up to and then when the UK has fully withdrawn from the EU. This will be in relation to the 'Repeal Bill', for example prioritising which relevant EU derived regulations should continue in UK domestic law to maintain equivalence standards of public health, animal health and consumer protection, and which regulatory controls could be relaxed or removed.
- Establish a dedicated resource to monitor Brexit issues and manage engagement with key regulators and stakeholders; providing regular updates and briefing to senior managers and elected Members.
- Continue to build strong alliances with key stakeholders to ensure the City Corporation's position is effectively communicated to decision-makers and that the PHPP's leadership and unique competence is clearly recognised
- Engage with and seek to influence central government regulators, particularly to ensure that appropriate data and IT solutions are developed to support post-Brexit strategies and operational priorities
- Engage the Department for Exiting the EU, possibly in cooperation with the Local Government Association, to better understand and influence thinking on the post-Brexit landscape
- Consider developing an intelligence and data-sharing capability with partner authorities and stakeholders. The City Corporation should also look to capture relevant data identifying the current and forecast volumes, flow and specific types of products imported into the UK via City Corporation jurisdiction ports.
- Develop a post Brexit resilience plan that identifies, weights and then prioritises any risks and threats to the PHPP service/s from a range of regulatory scenarios based on its understanding of likely outcomes. For example a major reduction in regulatory controls at the UK border impacting on future City Corporation Port Health Authority resource requirements that could subsequently compromise public health and consumer protection for UK citizens.
- Adopt a proactive approach to a potential future regulatory role, including exploring the potential for joining up with other similar teams in other major Ports to share training, data/intelligence, and where it is cost-effective the sharing of back-office functions. This should be scoped ahead of the Brexit deadline to ensure opportunities are maximised.
- Consider the potential for development as a lead authority/centre of excellence for a group of Port Health Authorities (on a regional or national basis), or as a Primary Authority for a number of major sea port and airport businesses operating either across the UK as a whole, within a region, or the within the City Corporation jurisdiction area only
- Ensure it has effective and regular dialogue with the major trade bodies/air transport/airline companies, and use these alliances to lobby government to reduce any risk from moving away from the current and future EC rules and standards on Pet Travel through the Pet Travel Scheme, that could particularly impact on transit movements from third countries to EC countries via Heathrow Airport (HARC).

This page is intentionally left blank

<b>Committee(s)</b>	<b>Dated:</b>
Port Health and Environmental Services Planning and Transportation	19 <sup>th</sup> September 3rd October
<b>Subject:</b> Draft Code of Practice for Deconstruction and Construction Sites Eighth Edition 2017	<b>Public</b>
<b>Report of:</b> Director of Markets and Consumer Protection	<b>For Decision (PHES)</b> <b>For Decision (PT)</b>
<b>Report author:</b> Rachel Sambells, Pollution Team Manager	

## Summary

The City of London Corporation published its last Code of Practice for Deconstruction and Construction (the Code) in 2013. The Code, in its Seventh Edition was approved by the Port Health and Environmental Services Committee on 30<sup>th</sup> April 2013. It requires refreshing and updating to reflect current best practice, guidance and the inclusion of a schedule of monitoring fees for developers.

A draft Code of Practice for Deconstruction and Construction Sites Eighth Edition 2017 has been produced and is appended to this report. It seeks to set out simply and clearly what constitutes acceptable site practice within the City, and to assist developers, architects, engineers and construction professionals to prepare Schemes of Protective Works required for the planning process, to plan, cost and manage the environmental issues which arise in the industry. The draft Code reflects the City's increased emphasis on improving air quality alongside updated chapters on noise and contaminated land.

The draft Code will help ensure that the City Corporation continues to encourage the use of the best environmental options in planning and managing construction and deconstruction. It also reflects the priority placed on the effects of reducing the impact of poor air quality and unwanted sound on the health of residents, workers and visitors as detailed in the City and Hackney Joint Strategic Needs Assessment.

The draft Code was subject to extensive consultation for a 3 month period ending on the 17<sup>th</sup> July.

The draft Code meets the key aims of the City's Air Quality, Noise and Contaminated Land Strategies.

## Recommendation

It is recommended that:

subject to comments received at your meeting;

- a. the attached Code (Appendix 1) be approved and published on 3 October 2017 subject to any comments received at your meeting; and

- b. The introduction of the proposed monitoring contribution fees set out in Appendix L of the Code be approved with effect from 3 October 2017; and
- c. Planning and Transportation Committee endorse the amendments to the Standard Planning Conditions shown at Appendix 4

## **Main Report**

### **Background**

1. The City is constantly being redeveloped through deconstruction, construction and refurbishment of its buildings. In order to facilitate this process the Code of the City Corporation seeks to set out simply and clearly what constitutes acceptable site practice within the City, and to assist developers, architects, engineers and construction professionals to plan, cost and manage the environmental issues which arise in the industry. There is inevitably some conflict with neighbours due to deconstruction and construction activities affecting them through the development process.
2. The City Corporation has a responsibility to manage and minimise exposure to excessive and sometimes unnecessary environmental impacts of construction, whilst ensuring that the City can continue to function as a modern world-class business centre.
3. In 2013, the City of London produced a Seventh Edition of the Code outlining what constitutes acceptable site practice to manage and mitigate the effects of construction. In tandem a planning condition began to be imposed for major developments requiring a 'Scheme of Protective Works' from construction and demolition sites. This Scheme of Protective Works is required to be developed in accordance with the requirements and recommendations of the Code.
4. The Code covers eight key areas: Community liaison and consultation; Noise; air quality; contaminated land; waste, water; sustainability and light. The revised Code also incorporates proposals for enhanced monitoring including arrangements for contributions to monitoring costs to be made by developers.
5. The Code balances the needs of the Business City (particularly construction sites) to undertake construction works, with the expectations of residents and neighbouring businesses who wish for impacts to be minimised.

### **Key Policies and Proposals**

6. The Eighth Edition City of London Code brings together, refreshes and updates these key chapters with a greater emphasis on air quality to manage and mitigate the environmental impacts of construction. In particular, the Code will help deliver one of the key themes of the Local Plan to "protect, promote and enhance our environment" whilst contributing to the wider policy context of maintaining a world class city.

7. The Code introduces for the first time a schedule of monitoring costs contributed to by the developer in order to ensure better long term environmental management and help mitigate adverse construction impacts more effectively. This will enable a more proactive approach to monitoring by City Officers. In accordance with the resolution of the 21 March 2017 Planning and Transportation Committee the Code refers to the use of planning conditions to make provision for the contributions. The Chief Planning Officer has prepared amendments to the Standard Planning Conditions to encompass such payments (see Appendix 4).
8. This revised draft Code ensures that the City of London's approach continues to be suitable and appropriate for a world class City.

## Proposals

9. I propose that, subject to comments received at your meeting, the attached Code be approved and published. Amendments to the Standard Planning Conditions to make provision for monitoring payments are also proposed.

## Financial Implications

10. Appendix L details a schedule of monitoring fees to be paid by developers on commencement of works and annually thereafter until completion, which is summarised below.

Site Category	Fee	
	Year 1 £	Subsequent Years £
1 (Large Major Development)	53,820	46,460
2 (Medium Major Development)	30,935	25,760
3 (Minor Development)	5,060	5,060

11. The fees have been calculated on a full cost recovery basis, and will be updated annually by officers.
12. Whilst not indicative of future requirements, in order to illustrate the approximate scale of the scheme the table below shows the number of active developments in each category at 31 March 2017. The table also shows the maximum income that would have been received during 2016/17 had the proposed monitoring fees been in force for that period, assuming work had commenced at all sites on 1 April 2016 (i.e. a full first year fee was payable). In practice it is very unlikely that the maximum would be achieved, and it is expected that there will be a downward trend in the number of active sites over the medium term, further reducing the overall income achievable.

<b>Site Category</b>	<b>Number of sites</b>	<b>Total (max) contribution £</b>
1 (Large Major Development)	30	1,614,600
2 (Medium Major Development)	32	989,920
3 (Minor Development)	27	136,620
<b>Total (All Sites)</b>	<b>89</b>	<b>2,741,140</b>

13. Additional staff will be required to resource the new work resulting from the proposed monitoring scheme. Due to uncertainty in the number and timing of commencement of development works, it is difficult to forecast the likely income and resource requirement, and staffing will need to be managed to ensure we have the flexibility to meet demand without incurring additional costs to the City, however it is anticipated that the introduction of the monitoring scheme will be cost neutral overall.
14. Existing work carried out by the Pollution Control team in relation to the Code will be continue to be met within the Director of Markets and Consumer Protection's existing resources. The Department of the Built Environment are also involved in applying conditions at the planning stage requiring a 'Scheme of Protective Works', applying the new condition requiring payment of fees, the administration of the Considerate Contractors Scheme, as well as issues with impacts on the public highway, and this work will be met from their existing resources.

### **Corporate and Strategic Implications**

15. The work on noise sits within Strategic Aims 1 and 2 (SA1) (SA2) and of the Corporate Plan: 'To support and promote The City as the world leader in international finance and business services' and 'To provide modern, efficient and high quality local services, including policing, within the Square Mile for workers, residents and visitors'.

### **Consultees**

16. The Draft Code has undergone full internal and external consultation e.g. residents, businesses, City stakeholder groups and neighbouring boroughs, internally with officers of the Department of the Built Environment and the results of this have been considered in this draft. A total of 37 written submissions were received totalling 170 individual comments. The majority of comments were very supportive of the draft Code and where critical feedback was received on particular issues it was requesting a stricter approach and additional resources to be dedicated to enforcing the Code. An analysis of this



feedback is attached in Appendix 2. The suggestion received from the Barbican Association and other residents for not permitting noisy work from construction sites in or adjoining residential areas on Saturdays is the subject of a briefing note attached at Appendix 3, as no changes are recommended to existing arrangements.

## **Conclusion**

17. The City Corporation has produced a refreshed and updated Code to encourage the use of the best environmental options in planning and managing construction and deconstruction, whilst ensuring the City can continue to function as a modern world class business centre. Subject to comments received at your meeting, the Code will be published and standard planning conditions amended to enable developers to be charged for monitoring sites.

## **Background Papers:**

Code of Practice for Deconstruction and Construction Sites Seventh Edition May 2013.

Mitigation of Environmental Impacts from Developments Committee Report April 2013

Construction Site Noise Monitoring Report March/May 2017

## **Appendix 1**

Draft Code of Practice for Deconstruction and Construction Sites Eighth Edition 2017.

## **Appendix 2**

Stakeholder Consultation Analysis.

## **Appendix 3**

Briefing paper: Hours for noisy works in the City of London

## **Appendix 4**

Proposed Amendments to Standard Planning Conditions

## **Contact:**

Rachel Sambells

[Rachel.sambells@cityoflondon.gov.uk](mailto:Rachel.sambells@cityoflondon.gov.uk)

020 7332 3313

This page is intentionally left blank

City of London

*Draft*

Code of Practice  
for Deconstruction and  
Construction Sites

**Eighth Edition**



Department of Markets and Consumer Protection  
City of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

### Foreword

This is the eighth version of the Code of Practice developed by the City of London's Pollution Control Team to encourage the use of the best environmental options in planning and managing construction and deconstruction (demolition) in the City of London. The area is densely populated by residents, many types of business, and other sensitive premises, all of which can be affected by construction work and associated activities.

This Code meets one of the aims of the City Noise Strategy which is to mitigate and minimise noise and noise impacts that could adversely affect health and well-being of City residents, workers and visitors and to avoid noise and noise impacts that could have a significant adverse effect.

This Code seeks to set out simply and clearly what constitutes acceptable site practice within the City. It is intended to help developers, architects, engineers and construction professionals to plan, cost and manage the environmental issues which frequently arise in the industry.

In the City we encourage a flexible approach to addressing environmental problems. I must emphasise that this needs early and, in some cases, frequent liaison with the officers in the Pollution Control Team who should be consulted at all stages of project planning, programming and operation, so that the best options for your site can be developed.

This eighth edition of the code generally revises and updates the original version. It contains further guidance on the prevention of air pollution from activities on site, and a schedule of monitoring contributions introduced.

Additionally, we encourage you all to apply, via our Considerate Contractors Scheme (CCS), for the Environmental Award. This will recognise those sites/companies who innovate to protect the Environment in the City each year.

The Code takes into account current best practice and new technology already adopted by many sites in the City.

I hope you will find this guidance useful in planning and managing your site activities.

**Jeremy Simons**  
**Chairman of Port Health and Environmental Services Committee**  
**September 2017**

## Contents

### Forward by Jeremy Simons

*Chairman of Port Health and Environmental Services Committee*

Section	Page
1 Introduction.....	1
2 Community Liaison and Consultation.....	3
3 Noise.....	11
4 Air Quality.....	19
5 Contaminated Land.....	27
6 Waste and Materials Handling and Storage.....	32
7 Water.....	34
8 Sustainability and Preservation.....	36
9 Light Pollution.....	39
10 Problems on Site.....	40
11 Legislation and Documentation.....	42

### Appendices

Page		Page
Appendix A	Guidance and Legislation.....	i
Appendix B	Contact details for City departments and External Agencies.....	iv
Appendix C	Considerate Contractors Scheme.....	vi
Appendix D	Information Scaffolding and Hoarding Licence Requirements.....	vii
Appendix E	Sewers Information.....	viii
Appendix F	Traffic Management requirements.....	xi
Appendix G	Site Information Sheet.....	xiii
Appendix H	Site Variation Sheets.....	xiv
Appendix I	Mobile Plant Authorisation Notice & Structures Notification.....	xvi
Appendix J	Residential Map.....	xviii
Appendix K	Ward Boundaries.....	xix
Appendix L	Development Monitoring Contribution.....	xx

*Note: Copies of this Code of Practice can also be accessed via the City's website at:*

[www.cityoflondon.gov.uk/business/environmental-health/environmental-protection/noise/construction-information-and-advice/Pages/default.aspx](http://www.cityoflondon.gov.uk/business/environmental-health/environmental-protection/noise/construction-information-and-advice/Pages/default.aspx)

# 1 Introduction and Use

## Introduction

- 1.1 At any one time there are many active deconstruction, construction and refurbishment sites within the City of London. The work is essential in order to enable the City to maintain its status as a world class centre of business and finance. Some of the activities involved and listed in this document can often disturb and disrupt neighbours and users of the surrounding area. To help Developers and their Contractors minimise disturbance, the City of London has prepared this Code of Practice detailing the standards to which they expect sites to be maintained and operated.
- 1.2 The environmental impacts of construction work must be considered as early as possible in the project. Where potential adverse impacts are identified, measures to offset or reduce them should be incorporated into the project proposals at the earliest stage and taken into account in the final cost. These matters must form part of the 'Scheme of Protective Works' to be submitted to the Pollution Control Team in the Department of Markets and Consumer Protection. We wish to encourage best practice and new innovation in Environmental Matters and welcome all companies/sites to take part in the CCS Environment Award.
- 1.3 *Note: The term Contractor used within this Code of Practice includes Principal Contractors, Construction Managers, Trade Contractors and other similar roles. Ultimate responsibility rests with the Principal Contractor although the Developer (or promoter of the project) will clearly have an interest in ensuring that works are undertaken with minimum disruption.*

## Use and Application of the Code of Practice

- 1.4 This Code is intended as a guide to 'Best Practicable Means' but must not replace consultation between developers, Contractors and regulators. Throughout all stages of a project, discussion with the City of London is actively encouraged at the earliest opportunity. The Code should be used by developers during the planning application process as an informative document, allowing the developer to discuss terms tailored to their specific development with the City of London. Developers must ensure that Contractors are fully aware of this Code and its implications, in particular the requirement for proactive and effective community Liaison and Consultation (section 2).
- 1.5 Adherence to this Code will demonstrate a positive attitude and commitment towards minimising environmental impacts and will be used as one of the main methods of assessment within the City's Considerate Contractor Scheme. Many consents granted by the City of London under Planning Acts will include conditions which refer to the standards in this Code. Site specific Deconstruction and Construction Schemes submitted under planning conditions will generally be expected to reflect the relevant provisions of this Code.
- 1.6 The Code follows a methodical approach to construction works and sets standards to be followed. Not all parts of this Code will apply to every construction project. However, the City will expect all Contractors to comply with the spirit of the Code,

with appropriate provisions being applied to the site at all times. This should allow local residents and businesses to continue operating with minimal disturbance.

- 1.7 Where two sites (or more) are operating in close proximity to each other the impact of all operations on neighbours will be taken into account when applying controls to mitigate any environmental effects. It will be expected that arrangements for liaison between sites, as well as the City, are made by the Contractor at the beginning of projects to ensure that the joint impact from the work of all sites in the locality is kept to a minimum.
- 1.8 Although this Code gives an outline of legal requirements, it is not an authoritative statement of the law. Where necessary in accordance with its policy statement on enforcement, the City of London will not hesitate to enforce the statutory powers they have. A list of relevant guidance and legislation are included as Appendix A.
- 1.9 There is generally a good level of compliance across the City with this Code, but the density of development, high level of activity, and conflicting needs of different communities occupying an extremely limited area mean that the impacts of non-compliance can be particularly severe. This Code makes provision for a more proactive approach to monitoring by City Officers in order to ensure better long term environmental management and help mitigate adverse construction impacts more effectively.
- 2.0 Appendix L sets out contributions which will be sought by the City on certain developments to assist improved monitoring and liaison, and which may be provided for in site specific Deconstruction and Construction Schemes submitted under planning conditions.

## 2 Community Liaison and Consultation

### Summary:


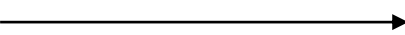
The Contractor needs to:

- demonstrate 'best practicable means' by contacting the City of London *well in advance of* works commencing to discuss the proposed works and the scope of liaison and 'Scheme of Protective Works' to be submitted for protecting nearby residents and commercial occupiers (hereafter referred to as *neighbours*);
- identify neighbours and interested parties (including where appropriate Ward Members) and consult with them **before** finalising the Scheme of Protective Works;
- maintain dialogue and information exchange with the City of London's Pollution Control Team, neighbours and interested parties throughout the proposed works;
- respond quickly to complaints and resolve where practicable; and
- ensure neighbours and interested parties are kept informed of works as they progress and are consulted where necessary.

### Scheme of Protective Works

- 2.1 Prior to work commencing on each stage of the development, the Contractor **must** contact the City of London's Highways Division and the Pollution Control Team, in order to:
- agree the scope of the '**Scheme of Protective Works**' to be submitted; and
  - identify the scope of community liaison and consultation.
- 2.2 The Contractor must demonstrate 'Best Practicable Means' (BPM) and create a 'Scheme of Protective Works' for protecting neighbours. As part of this Scheme, the Contractor is expected to have and apply appropriate liaison and consultation approaches to minimise the environmental impact on neighbours.
- 2.3 The scope of the Scheme and extent of liaison will be site dependent, having regard to the scale of works and the potential for disruption to neighbours. Figures 2.1, 2.2 and 2.3 will be used to guide the scope required. Figure 2.4 is a guide to the information which may be required in the 'Scheme of Protective Works'.

**Figure 2.1 – Category of Site**

<b>Site Sensitivity</b> 	High	Category 2 Site	Category 1 Site	Category 1 Site
	Medium	Category 3 Site	Category 2 Site	Category 1 Site
	Low	Category 3 Site	Category 3 Site	Category 2 Site
		Minor Development	Medium Scale Major Development	Large Scale Major Development
		<b>Size and nature of development</b> 		



**Figure 2.2 - Deciding on the Size, Nature and Sensitivity of the works**

<b>Size of the development</b>	
<p><i>Large scale Major Developments</i></p> <ul style="list-style-type: none"> <li>• Residential - 200 or more units</li> <li>• Industrial, commercial or retail floor space -10,000 square metres.</li> </ul> <p><i>Medium Scale Major Developments</i></p> <ul style="list-style-type: none"> <li>• Residential between 10 and 199 (inclusive) units.</li> <li>• For all other uses - floorspace between 1,000 square metres and 9,999 square metres or where the site area is between 0.5 hectare and less than 2 hectares.</li> </ul> <p><i>Minor Developments</i></p> <ul style="list-style-type: none"> <li>• Residential - Between 1 and 9 (inclusive) units.</li> <li>• For all other uses - floorspace of less than 1,000 square metres or where the site area is less than 1 hectare.</li> </ul>	
<p><b>Nature of the works</b></p> <ul style="list-style-type: none"> <li>• Type of works and its impact</li> <li>• Duration of works</li> <li>• Working hours</li> </ul>	<p><b>Sensitivity</b></p> <ul style="list-style-type: none"> <li>• Proximity of site to neighbours</li> <li>• Number of people affected</li> <li>• Type of neighbour</li> <li>• Duration of works</li> </ul>

**Figure 2.3 - Scope of Information to be Provided**

<p><b>Category 1 Site</b> (site example: construction and or deconstruction sites)</p>	<ul style="list-style-type: none"> <li>• Prior consultation with the Pollution Control Team;</li> <li>• Approval by Pollution Control Team of Full Scheme of Protective Works;</li> <li>• Full level of community engagement in Liaison and Consultation section below, including Ward Member(s), about the works.</li> </ul>
<p><b>Category 2 Site</b> (site example: retainment of façade with internal works)</p>	<ul style="list-style-type: none"> <li>• Prior consultation with the Pollution Control Team;</li> <li>• Approval by Pollution Control Team of Scheme of Protective Works;</li> <li>• Communication as per figure 2.5 below</li> </ul>
<p><b>Category 3 Site</b> (site example: involving a refurbishment only)</p>	<ul style="list-style-type: none"> <li>• Communication as detailed in figure 2.5 below.</li> </ul>

**Figure 2.4 - Scheme of Protective Works**

<b>Basic Information to facilitate discussion – (Site suggested Information Sheet in Appendix G)</b>	
<ul style="list-style-type: none"> <li>• Site Contact Details</li> <li>• Contractor Contact Details</li> <li>• Description of works to be carried out – including working hours and duration</li> <li>• Summary of Noisy works and mitigation</li> <li>• Summary of works affecting Air Quality (e.g. dust) and mitigation</li> <li>• Site Sensitivity and methods of notifying neighbours</li> <li>• Training of the construction team e.g. toolbox talks to include mitigation measures and locations of sensitive receptors</li> </ul>	
<b>Detailed Information (subject to discussion with Pollution Control Team)</b>	
<b>1) Programme of Proposed Works</b>	including start and finish dates of principle stages
<b>2) Liaison &amp; Consultation Strategy</b>	see section 2.5 – 2.10 below
<b>3) Complaints and incidents Procedure</b>	A system and procedure for dealing with enquiries and complaints from the public (see section 2.11 to 2.16 below)
<b>4) Staff and training</b>	Details of toolbox talks, frequency and content relating to noise, vibration, air quality, contaminated land, waste, water and light pollution matters
<b>5) Site Plan(s) showing site boundary</b>	<ul style="list-style-type: none"> <li>• Show sensitive receptors</li> <li>• site layout and access</li> <li>• wheel / vehicle check and wash facilities</li> <li>• air quality and noise monitoring locations (where applicable)</li> <li>• site equipment location (e.g. cranes and generators)</li> <li>• location of water for damping down</li> <li>• fuel and waste store on site</li> <li>• refer to the CLP haulage routes and vehicle waiting areas</li> </ul>
<b>6) Monitoring</b>	Proposed monitoring regime for noise, dust and vibration (where applicable) together with procedures to respond to non-compliances in relation to any trigger levels set for noise, dust and vibration
<b>7) Proposed Vehicles and Machinery</b>	Detail proposed vehicles and machinery on site: <b>Noise and vibration:</b> see section 3.11 relating to predictions <b>Air quality:</b> see sections 4.12-4.15 e.g. NRMM compliance
<b>8) Working methods and pollution control measures</b>	Where applicable, reference to the results of background assessments, predictions and/or phase I/II assessments needs to be made in the submitted Scheme of Protective Works in order to refer to the necessary <b>working methods, protective works, control measures or remediation works</b> required to: <ul style="list-style-type: none"> <li>• mitigate against activities which have the potential to cause disturbance to neighbours (e.g. noise, dust and vibration)</li> <li>• prevent an impact on the environment (e.g. air quality)</li> <li>• remove pollution (e.g. contaminated land)</li> </ul> <b>Noise</b> see sections: 3.27-3.48 <b>Air Quality:</b> see sections: 4.19-4.29 <b>Contaminated Land:</b> see section 5

- 2.4 For Category 1, 2 and 3 sites, throughout the construction/deconstruction works, regular dialogue between the Contractor and the City of the London should take place and meetings with the City may be held. The names and contact details of appropriate site personnel must therefore be forwarded to the Pollution Control Team at the earliest opportunity to facilitate liaison. A list of useful City of London contact names and telephone numbers is included in Appendix B. The liaison requirements for all sites are set out in figures 2.1 to 2.5.

### **Liaison and Consultation Strategy**

- 2.5 The Liaison and Consultation Strategy should identify all neighbours and specify individuals and groups who may be affected by, and consulted with, regarding activities at the site. The strategy should include the contact details and programme for engagement. The Contractor should therefore identify the following:

- City of London Ward Member(s) for the site; who can be identified via the City of London Website at:  
<http://democracy.cityoflondon.gov.uk/mgFindMember.aspx> or by contacting the Pollution Control Team. A copy of the Ward boundaries can be found in Appendix K and an interactive map can be found at:

<https://www.cityoflondon.gov.uk/about-the-city/elections-and-wards/wards/Pages/ward-boundaries-map.aspx>

- All neighbours and premises which may be affected by the site's activities, including:
  - any residential properties;
  - hotels, hostels and hospitals;
  - offices;
  - lunchtime catering premises;
  - public houses;
  - those affected by party wall/shared party element works (see sections 3.40-3.42 for guidance);
  - Places of worship
  - Community Centres
- Local Community Groups such as the Barbican Association, Castle Baynard Residents and Smithfield Trust; and
- Other interested parties (e.g. other construction / deconstruction sites in close proximity, utility and street works in the area and any events such as the Lord Mayors Show or road races).

### **2.6 Identification of residential premises**

Reference should be made to the Residential Streets map (Appendix J), which identifies residential areas within the City. New residential developments are continually appearing, so the Pollution Control Team should be consulted in order to obtain the most up to date information. For this reason, the Contractor should also reevaluate the area in close proximity to the site from time to time. This will enable the Contractor to identify new groups or individuals who may be affected by the site's activities.

- 2.7 With reference to Figure 2.5 below, the Liaison and Consultation Strategy should include:

### **2.8 Initial Consultation**

Prior to each project stage, provide a briefing/presentation of the 'Scheme' (detailed above) to the Ward Member(s), residents, Local Community Groups, businesses and other individuals identified. Briefings should include:

- Details of the 'Scheme of protective Works' in a readily understandable form;
- formal presentation, question and answer session or drop in sessions;
- information regarding how the works will enhance and benefit the local environment for neighbours; and
- Opportunity to provide feedback on the proposed works should be invited and responded to in writing; where practicable, amendments to the Scheme should be made to address concerns raised. The *finalised* Scheme should be provided to the City's Pollution Control Team and where requested, the Ward Member(s), neighbours and interested parties.

### 2.9 **On-going Communication**

- Plans for at least fortnightly communication (or as otherwise agreed) with neighbours and interested parties (identified above), for example by newsletter, in order to keep neighbours informed about current progress and planned works. The newsletter should be timely to allow neighbours time to plan around the works. It should contain the information suggested below, together with details of the Pollution Control Team contact:
  - The location of the planned works;
  - The type of planned works which are anticipated to give rise to effects on adjacent residents;
  - The duration of the planned works and the periods within which works will be undertaken (i.e. whether during normal working hours, during the evening or overnight);
  - The anticipated effects of the planned works;
  - The measures to be implemented in line with the Scheme of Protective Works to mitigate the impact of the planned works;
  - Contact details for enquiries; and
  - Complaints Procedure.
- A display board should be erected outside the site, which as a minimum shall identify key personnel, contact addresses, web site and telephone numbers, including complaint contact numbers. Additional information should include details of the scheme and its progress.

### 2.10 **Other Communication**

- The Contractor should appoint a responsible person to liaise with the City, neighbours and interested parties in order to keep them informed of matters likely to affect them. Good relations can be developed by keeping neighbours informed of progress and by responding to complaints quickly and fairly.
- Site Hours Variation Request Procedure (as per paragraph 3.10) to be followed for ANY works outside the 'standard hours' or within the 'quiet hours';
- Arrangements should be put in place for notifying or alerting neighbours in advance of additional unplanned noisy works, where applicable;
- Feedback should be requested from neighbours throughout the project and at the end, in order to allow modification of activities to reduce impact;

<b>Fig 2.5 – Communication Requirements per Site Category</b>	Category 1 Site	Category 2 Site	Category 3 Site
<b>Identification of neighbours who may be affected</b>	✓	✓	✓
Notification of works to Ward Member(s), neighbours and community groups	✓	possible	
<b>Initial Consultation</b>			
Scheme of Protective Works in an understandable form	✓	✓	
Presentation/drop in session/question and answer session	✓		
Explain how works will enhance area	✓		
Request feedback to proposed Scheme of Protective Works	✓		
<b>On-going Communication</b>			
Regular communication e.g. newsletters	✓	✓	
Display board / information outside site	✓	✓	✓
<b>Other Communication</b>			
Responsible person to liaise with the City	✓	✓	✓
Site Hours Variation Procedure as per paragraph 3.10	✓	✓	✓
Feedback obtained throughout the works	✓		

## Complaints Procedures

- 2.11 The Contractor will establish a system and procedure for dealing with enquiries and complaints from the public.
- 2.12 Contact numbers, email and postal addresses for the enquiries and complaints system will be displayed on signs around the construction site and will be published on the website and newsletters.
- 2.13 Where complaints are made, the Contractor is expected to respond by investigating the complaint quickly and sympathetically, taking action to resolve the problem where the complaint is justified. If no resolution can be found the complaint should be referred to the City of London. A Contractor's response to complaints is an important criterion when evaluating the performance of the site for the Considerate Contractor Scheme.
- 2.14 The Contractor must maintain a designated complaints/incidents logbook or register covering:
- the nature of the complaint;
  - the cause; and, where appropriate,
  - the remedial action taken.
- 2.15 The City may request to see the complaints/incidents logbook at any time.
- 2.16 Complaints received by the City of London will be investigated. This will involve discussions with the Contractor and, if appropriate, monitoring or surveillance. Enforcement action may be taken if the complaint/s are justified and sufficient steps have not been taken by the Contractor to resolve matters.

## Other Consultation

- 2.17 The City of London must be told in advance of any unusual activities including planned out-of-hours working. The Site Hours Variation Request Sheet (Appendix H) must be completed and e-mailed to the Pollution Control Team at least 5 days before the activity is to take place. Approval or the reasons for refusal will be countersigned and e-mailed back. Unless approval is given and the sheet is available for inspection, an Officer attending the site, in response to a complaint, will require the noisy work to stop.
- 2.18 The Pollution Control Team must be supplied with a current 24-hour call out number that will be answered in the case of a complaint or an emergency. It is also recommended that Contractors contact the City of London Police service to ensure a security assessment is carried out.
- 2.19 Where construction activities are being undertaken on two or more sites in close proximity, regular meetings should be arranged and attended by representatives from each site and the City of London in order to minimise cumulative impacts. Items for discussion may include:
- activities to be undertaken;
  - requirements for road closures;
  - out of hours work;
  - neighbour liaison;
  - monitoring results;
  - requirements for mitigation.
- 2.20 The appropriate body must be contacted with regard to wastewater generated from site activities which is classified as trade effluent. See section 7.
- 2.21 Contact must be made with the City of London Drainage Services Group (020 7332 1105) or Thames Water Utilities (0800 3169800) before any work is undertaken on connections to sewers or drains running under the public highway. See Section 7.
- 2.22 The Contractor must ensure that the Department of Built Environment (Development Management) has been contacted via 020 7332 1710 to establish whether the site contains a listed building, scheduled ancient monument or archaeological remains, and what specific requirements are included in the planning permission, listed building consent or conservation area consent. Details regarding scheduled monument consent should be obtained from Historic England; their contact number is 020 7973 3000. See Section 8.
- 2.23 The Contractor must ascertain whether any trees on the site or in immediate area are either protected by Tree Preservation Orders or fall within a Planning Conservation Area prior to works starting. This may be done by contacting the Department of the Built Environment (Tree Officer) on 020 7332 1708. See Section 8.
- 2.24 Prior to commencement of works on-site, an ecological survey should be undertaken by a qualified professional to confirm the absence of birds, bats and any other protected species which may be nesting/roosting within buildings or vegetation. If present, appropriate mitigation measures should be undertaken following consultation with the City's Department of Open Spaces who can be contacted on 020 7332 3505. See Section 8.

### **Considerate Contractor Scheme**

- 2.25 The Considerate Contractor Scheme (CCS), pioneered by the City of London in 1987, aims to encourage building and civil engineering Contractors working adjacent to the City's streets to carry out their operations in a safe and considerate manner, with due regard to passing pedestrians and road users. Details are set out in Appendix C of this Code. As part of the scheme, all Contractors will be evaluated by the Pollution Control Team for their level of co-operation and compliance with this Code of Practice.

### 3 Noise

#### Summary:

The Contractor must:

- contact the Pollution Control Team to agree the working hours and methods to be used which may generate noise and vibration prior to the commencement of any work on site (see Section 2 – Scheme of Protective Works);
- Adhere to 'standard' hours for noisy site work and ensure that best practicable means are used to mitigate noise and vibration impacts on neighbours;
- Observe 'quiet hours' where City business activities may be affected by noise or vibration;
- ensure that if work is planned to take place outside the 'standard' hours, prior approval is obtained from the Pollution Control Team using the 'Site Hours Variation Request' procedure

#### Introduction

- 3.1 The high level of intensive development in the City, including major office redevelopments in the east and infrastructure projects, can have significant environmental impacts on occupiers of nearby noise sensitive premises. Protecting City businesses, residents and other noise sensitive premises (e.g. schools) from noise and vibration impacts of construction sites is essential to the City's continuing reputation as an excellent place to live, work and to do business.
- 3.2 This Code of Practice is a notice of the City of London's general requirements under Section 60 of the Control of Pollution Act 1974. The Contractor may also be informed of additional requirements during consultations with the City of London.
- 3.3 Complaints about excessive noise disturbance found to be justified may result in a Section 60 notice, under the Control of Pollution Act 1974, being served by the City of London. This will generally require the Contractor to adhere to these quiet working hours.

#### Hours of Work

- 3.4 Prior to commencing work, Contractors **must** contact the Pollution Control Team in order to agree hours of work. If no-one is disturbed by works then 24-hour working may be considered; however, such circumstances are rare in the City. Where residents and commercial activities are significantly affected or are likely to be affected, the standard times of operation will be imposed.
- 3.5 **Standard Hours**  
'Standard' hours permitted for **noisy** work will normally be the following:
  - 08:00 - 18:00 hours (Monday to Friday);
  - 08:00 - 13:00 hours (Saturday) ;
  - No noisy working is permitted on Sundays, Bank or Public Holidays.



## 3.6 **Quiet Hours**

The City also requires time restrictions on noisy works to reduce noise disturbance to businesses. These times are known as '**quiet hours**' which are:

- 10:00 - 12:00 (Monday to Friday);
- 14:00 - 16:00 (Monday to Friday).

'Quiet hours' are put in place to give nearby commercial occupiers at least 4 hours without noisy working from street and construction sites during the working day. These periods may be subject to variation in particular circumstances, for example during lunchtimes, adjacent to eating places or businesses where the majority of trade is carried out at lunchtimes.

## 3.7 **Work outside standard hours and during quiet hours**

Outside '*standard hours*' and during '*quiet hours*' the following noise generating activities will not usually be permitted where the activities are likely to cause disturbance:

- Cutting using power tools;
- Breaking out using power tools;
- Other noise generating activities, depending on the specific location of site and neighbours.
- The use of impact fasteners;
- The loading of heavy materials;
- Other noisy activities, depending on the specific location of site and neighbours, deemed unacceptable by Environmental Health Officers.

Where there is no disturbance from these activities it is likely that variations will be permitted, see 3.10 below.

3.8 Noisy work outside '*standard hours*' or during '*quiet hours*' will be considered in order to support the City's businesses and also the needs of local neighbours e.g. proximity to restaurants, places of worship or residential properties.

3.9 ANY works outside the '*standard hours*' or within the '*quiet hours*' can only be undertaken with the approval of the City using the Site Hours Variation Request Sheet (Appendix H). Approval will be conditional on the Contractor submitting the following:

- Details of site and out of hours contacts
- Details of site operations and location
- Dates and proposed hours
- Reasons and justification for the request
- Proposed plant to be used
- Predicted noise levels at sensitive locations
- Mitigation measures
- Neighbours affected and copies of written notifications.

Variations will be approved for works where impacts can be demonstrated to be low, in locations where there are no affected neighbours or for safety, logistics or engineering reasons. Variations may be refused if the impacts on neighbours are considered high and cannot be mitigated or previous variations have not been fully complied with.

3.10 Where, in the opinion of Environmental Health Officers, structurally transmitted noise adversely affects neighbours, **it will be barred between 09:00 - 17:00 hours**. For complex sites with a neighbour mix including residential, retail, and commercial properties, advance negotiation with all parties and the Pollution Control Team is

expected of the Developer/Contractor, as restrictions may have significant implications for cost and timing of the project.

### Noise and Vibration Monitoring Regimes and Limits

- 3.11 The City requires Contractors to undertake and submit predictions of noise and vibration levels at identified locations and any identified sensitive receptors. Regular intelligence-led monitoring of noise and vibration levels is also expected to be undertaken by looking at the work programme and identifying aspects likely to cause significant noise/vibration. Receptor points are to be agreed with the City of London prior to initiation of predictions and monitoring. Results should be compared against suitable baseline data as a useful means of:
- Controlling noise and vibration, and identifying problems at an early stage (it is particularly valuable to carry out monitoring during the early stages of a project);
  - providing an objective basis for evaluating complaints; and
  - safeguarding Contractors against claims of damage.
- 3.12 Prior to commencing work, it is essential to undertake monitoring of ambient noise levels around the site at sensitive neighbours (this should be agreed with the City Pollution Control Team). This will provide baseline data for comparison with levels present during the works. This baseline assessment should be submitted to the Pollution Control Team. A baseline vibration exercise will be unnecessary unless neighbours are clearly affected by any existing source of substantial vibration e.g. a tube line.
- 3.13 Where there are party walls or neighbours are otherwise directly attached to elements of the site, the noise, vibration and structural implications of the proposals will require individual and detailed evaluation.
- 3.14 In some circumstances, the Pollution Control Team may require continuous monitoring combined with a real-time alarm system, with details to be agreed on an individual basis. Informal site boundary walk about to monitor noise as experienced by neighbours is highly recommended to understand the impact site may be having.
- 3.15 Noise measurements should ideally be taken with a Class I Integrating Logging Sound Level Meter calibrated (before and after) with a Class I Acoustic Calibrator.  $L_{Aeq}$  and  $L_{AFmax}$ , noise levels should be recorded (as a minimum) together with a record of all events potentially affecting the noise level at the time of monitoring.
- 3.16 *Note: The period over which the  $L_{Aeq}$  parameter should be averaged must be agreed with Environmental Health Officers.*

### Noise Limits

- 3.17 The suitability of specific noise limits is highly dependent upon the individual situation. The factors to be considered include:
- The characteristics of the noise and its potential effect on the neighbours;
  - Baseline ambient noise levels; and
  - The nature and duration of the works.
- 3.18 In addition, following complaints, specific noise levels may be set to prevent speech interference in offices and loss of trade.

- 3.19 The City of London expects noise from the site to be controlled to an acceptable level. In the City environment this can be a difficult balance and 'best practicable means' must be applied to reduce noise and vibration as far as possible.
- 3.20 Noise levels within businesses during noisy periods must enable workers to carry out conversations, both face-to-face and on the telephone, and allow normal business to be conducted. It is considered that an internal noise level of 65 dBA or above is likely to cause annoyance and interference (dependent on the noise characteristics).
- 3.21 Such noise should be restricted to hours outside the normal working day of 09.00 – 17.00. Timings of works with noise levels exceeding 65dBA should be discussed and agreed with Environmental Health Officers prior to commencing.

### **Vibration Limits**

- 3.22 When carrying out works which may produce vibration, all potential receptors must be considered, with particular attention to be paid to the following:
- Occupiers and users of buildings
  - Hospitals or laboratories
  - IT related issues;
  - Cosmetic or structural damage to buildings or heritage sites.
- 3.23 People's response to perceptible vibration is accentuated by their fear of building damage. Suitable guidance upon the levels of vibration, which may cause building damage, can be found in BS 7385-2:1993.
- 3.24 Guidance relating to the potential effect upon the operation of computers and other relatively sensitive equipment can be found in BS 5228-2:2009+A1:2014.
- 3.25 Complaints of vibration are usually concerned with fear of the unknown and the potential effects of relatively low levels of vibration in buildings. This problem is best addressed by:
- Liaison with all parties potentially affected, with explanations given of precisely when they are likely to be affected by specific activities;
  - Monitoring affected parties to reassure occupants as to the relative levels of vibration compared with building effect (BS 7385-2:1993).
- 3.26 Vibration meters should preferably record 3 orthogonal Peak Particle Velocity values (15 minutes of 10 second or shorter samples). Where complaints are received, the Contractor/client should consider the need for monitoring at neighbouring premises.

## **Working Methodologies, Noise and Vibration Control Measures**

### **General methodologies**

- 3.27 In addition to working hours and community liaison, all works must be carried out in accordance with BS 5228-1:2009+A1:2014 and BS 5228-2:2009+A1:2014. All works must employ Best Practicable Means as defined by Section 72 of the Control of Pollution Act 1972 to minimise the effects of noise and vibration. The City must be satisfied that all means of managing and reducing noise and vibration, which can be practicably applied at reasonable cost, have been implemented.

- 3.28 A written evaluation of methodologies used must be made available to the City of London and include justifications with regards to the minimisation of noise and vibration (see section 2 and figure 2.4).
- 3.29 The City considers the off-site prefabrication or preparation of as many building elements and materials as possible an essential requirement for Best Practicable Means, in particular for the cutting of decking and steelwork.
- 3.30 Where appropriate, the following measures to minimise noise and vibration levels should be adopted:
- Employing only modern, quiet and well-maintained equipment (all equipment must comply with the EC Directives and UK Regulations set out in BS 5228-1:2009+A1:2014);
  - Using low impact techniques, such as demolition munchers and bored or hydraulically-jacked piling rigs;
  - careful planning of the sequence of work in order to minimise the transfer of noise/vibration to neighbours;
  - using fully silenced modern piling rigs selecting pressed in methods or auger over higher impact methodologies
  - Careful operation of the piling rig so there is **no reversing** of the Kelly/auger bars;
  - using electrically powered equipment run from the mains supply;
  - use of screws and drills rather than nails for fixing hoardings etc;
  - use of an alternative to percussive drills / hammer where possible
  - use of plasma cutters where cutting on site is the only alternative
  - careful handling of materials & waste such as lowering rather than dropping items;
  - taking steps to isolate the deconstruction works from sensitive neighbours, in order to minimise the transfer of vibration and structure borne noise;
  - erection of acoustic screens or enclosures wherever possible;
  - avoidance of unnecessary noise (such as engines idling between operations, shouting, loud radios or excessive revving of engines) by effective site management.
  - Concrete pours and finishing must be planned to avoid overruns past the standard hours, the pour size and concrete workability must be considered. The Contractor must enter into a written protocol with the concrete supplier regarding timing of deliveries to ensure works can be completed within the permitted hours.
  - The position, location and acoustic shielding of any concrete pumps must be agreed with the Pollution Control Team.
  - Audible alarms must be broadband sound, including reversing alarms and other equipment such as mobile elevated work platforms.
  - Pile breaking-out, pile reduction work, and concrete break-out and removal must be carried out, where reasonable and practicable, within a portable acoustic enclosure. The enclosure shall be three-sided with a roof or such other acoustic enclosure.
  - As an alternative to breaking in situ, remove larger sections by lifting them out and breaking them down off site.
- 3.31 Where control at source is not practicable or adequate, the distance between noise/vibration sources and sensitive neighbours should be maximised and the transmission path interrupted, with options considered in the order of source-pathway-receptor. Where practical this can be achieved by:

- Siting of stationary plant and loading/unloading areas;
- erecting impervious hoardings, of at least 5 kg/m<sup>2</sup> surface density, where possible higher than the line of sight to neighbours;
- leaving building façades and boundary walls intact as long as possible during demolition and boarding/bricking up windows;
- the use of existing non-sensitive structures as shields;
- the use of temporary structures; and
- cutting of transmission pathways for vibration.

3.32 In addition to mitigation strategies above, a Liaison and Consultation Strategy (as detailed in section 2) should be implemented as an essential element of the Best Practicable Means to minimise the effects of noise and vibration.

### **Vehicle Movements, Deliveries, Loading and Unloading**

3.33 Vehicle movements, deliveries, loading and unloading can cause considerable noise and disruption to neighbours as a result of the following:

- reversing beacons;
- running engines; and
- noisy material being loaded and unloaded

3.34 All loading, unloading and deliveries of materials and plant to the site and removal of waste should, where possible, be carried out within normal site working hours. Any early morning or evening deliveries must have approval from the Pollution Control Team. This must be requested using the copy of the Site Hours Variation Request Sheet (Appendix H).

3.35 All vehicle movement alarms and reversing beacons must be broadband sound where practicable, engines must be switched off when not in use and unloading conducted with care. The site layout should be designed to minimise potential effects on neighbours. A competent banksman should be employed to provide assistance to vehicles accessing and leaving the site, thereby ensuring minimal traffic disturbance and pedestrian safety.

3.36 Vehicle movements should be planned to ensure that lorries do not arrive or depart outside standard hours. No daytime or night-time parking of lorries will be permitted outside agreed areas.

3.37 Where appropriate, deliveries should be arranged on a just-in-time basis in order to prevent vehicles queuing outside site.

3.38 Appendix F of this code summarises the City of London's traffic management requirements for vehicle movements, site deliveries, street closures, crane operations and abnormal loads. This can be copied for use by Sub-Contractors and others.

### **Party Wall work**

3.39 Work to party walls and major works in partially occupied buildings will be strictly controlled, and are **usually barred between 09:00 and 17:00 hours** when noise and/or vibration could be transmitted to neighbouring properties and businesses.

Working hours for Party Wall work must therefore be agreed with the City's Pollution Control Team prior to works commencing.

- 3.40 Vibration monitoring should be considered to reassure neighbours and assist in demonstrating that levels do not exceed those which may cause structural damage to adjoining buildings. Complaints relating to vibration can cause considerable delays, particularly during demolition piling and ground work phases of construction activities. Noise should also be considered to assist in determination of acceptable levels.
- 3.41 Where works are carried out close to, or on, a party wall, The Party Wall Act 1996 may apply. The Contractor must consider all aspects of this Act and allow sufficient time to comply with it.

### ***Scaffolding and Gantries***

- 3.42 Scaffold erection or dismantling can cause disturbance to site neighbours. All works must be undertaken in accordance with the Department of Built Environment's Highways Division Guidance Notes for Activities on the Public Highway and be subject to a licence under the 1980 Highways Act. Subsequent erection and dismantling activities must be agreed with the Pollution Control Team, and comply with prescribed times.
- 3.43 Appendix D sets out detailed information on the requirements of the City for scaffolding and gantries.

### ***Cranes, Lifting of Heavy Equipment, and consequent Road Closures***

- 3.44 The erection of fixed cranes, rigging, and use of mobile cranes on the highway and lifting of heavy equipment often has to be undertaken outside normal working hours. All these street-based activities require prior consent from *both* the Highways Division *and* the Pollution Control Team. Although it is normally the crane company's responsibility to obtain prior approval for the works, the Contractor should ensure this has been done.
- 3.45 The Pollution Control Team's approval for the work is required to ensure that all plans are appropriate for the location, and that steps have been taken to mitigate any disturbance to commercial or residential neighbours. The application for this must be accompanied by a lifting plan.
- 3.46 The correct procedure involves the following:
- See: [highway licences](#) page to ensure all relevant authorisations have been obtained
  - Telephone the Pollution Control Team to agree the outline proposals (020 7606 3030).
  - The 'mobile crane environmental health authorisation notice & structures notification form' (Appendix I), together with a lifting plan, should be fully completed and returned to the Pollution Control Team for scrutiny/approval.
  - Once received, the completed application form will be checked, any necessary amendments agreed with the sender, and returned to the applicant with the appropriate signature. This can then be presented to the City's Street Management Office at a previously agreed appointment (020 7332 3553).

- 3.47 *Note - The part of Appendix I relating to 'structures authorisation' must also be signed by the crane company's representative. It is the crane operators responsibility to check whether there are any underground 'structures' either under or in the vicinity of the highway where the crane operation is sited - see Appendix F for full details.*
- 3.48 Crane oversailing must be agreed with the City of London and/or site neighbours. Under section 177 of the Highways Act 1980, site cranes require a licence if the jib at any point extends over the public highway. Application for this licence should be made to the Department Built Environment's Highways Division. A charge may be levied for oversailing the public highway.

## 4 Air Quality

### Summary

The Contractor must:

- Submit a Scheme of Protective Works which includes an Air Quality Dust Management Plan (AQDMP) which details techniques to be adopted that ensure the air quality in the City of London is not adversely affected by activities at and associated with the development site.
- The AQDMP should be produced in line with the requirements of this section which includes a consideration of:
  - ✓ Summary of works that may impact air quality
  - ✓ Complaints and incidents procedure
  - ✓ Staff training relating to air quality matters
  - ✓ Site Plan
  - ✓ Air quality monitoring considerations and trigger levels
  - ✓ Machinery and equipment used on site (*NRMM compliance / minimised generator use / concrete crushers/ no-idling policy*)
  - ✓ Working methodologies and emission controls to be employed

### Introduction

- 4.1 Under Part IV of The Environmental Act 1995 and the Governments UK Air Quality Strategy, Local Authorities are required to work towards achieving national air quality objectives. The City of London has some of the worst air quality in the Country and has been declared an Air Quality Management Area for PM<sub>10</sub> (fine particles) and nitrogen dioxide.
- 4.2 The UK is facing the prospect of large fines from the European Commission for failure to meet air quality Limit Values. Recent studies have demonstrated that poor air quality and dust have a significant impact on public health in London, with the equivalent of over 10,000 premature deaths in London in 2010 attributable to poor air quality; this issue is now therefore of the highest priority.
- 4.3 Construction and de-construction sites in the City are therefore expected to meet the highest possible standards for control of air pollution and dust.
- 4.4 In July 2014, The Greater London Authority (GLA) published the Supplementary Planning Guidance document: 'The Control of Dust and Emission During Construction and Demolition' (SPG). In order to mitigate negative impacts on air quality in the City, the construction and deconstruction industry is expected to employ, as a minimum, methods detailed in the GLA SPG (and subsequent revisions) and detailed in this section. As additional best practice and case studies become available, they will be available at:  
[www.cityoflondon.gov.uk/airqualityconstruction](http://www.cityoflondon.gov.uk/airqualityconstruction)

### Air Quality Risk Categorisation in the City Environment

- 4.5 Where an Air Quality Impact Assessment is created and submitted at the planning stage for approval, it may include an Air Quality Risk Assessment (AQDRA) prepared



by a competent person. The GLA's SPG (2014) provides guidance with regard to which sites the GLA consider high risk.

- 4.6 The risk assessment detailed in the SPG requires a detailed understanding of the project and its effect on receptors. The built up nature of the City and its poor air quality means even small scale deconstruction/construction projects can have an adverse impact on air quality. For this reason, all projects will be expected to implement all possible mitigation measures and an explanation provided where they are felt not to be required.

### **Air Quality Monitoring**

- 4.7 The GLA's SPG suggests that continuous monitoring for particulate matter is required at high risk sites. However, reliance on the results of continuous monitoring as an indicator that the site is doing all it can to reduce emissions is not sufficient due to the density and wind direction factors in the City mentioned above. As such, a greater emphasis should be placed on control measures such as damping down and site management (e.g. no-idling policy and NRMM compliance, see sections below).
- 4.8 Continuous monitoring positioned between construction sites and sensitive land users, such as buildings with openable windows, outside amenity and residential developments, is beneficial with regard to providing assurance to neighbours; however its reliance as an indicator of good site management is limited due to the above. Appendix 8 of the GLA's SPG provides details regarding different types of monitoring.
- 4.9 Continuous air quality monitoring will normally be required on large sites adjacent to sensitive premises such as residential properties, schools and St Bartholomew's hospital. This may include dust slides for assessing nuisance dust and real time monitoring to assess PM<sub>2.5</sub> and PM<sub>10</sub>. A site will not normally be required to monitor nitrogen dioxide.
- 4.10 Real time monitoring may involve setting an alarm to alert the site manager if levels of PM<sub>10</sub> go above a set threshold. The threshold value, and type and location of any monitoring equipment should be agreed with the City of London in advance. The threshold value is normally initially set at 150µg/m<sup>3</sup> for PM<sub>10</sub> over a 15 minute period, with the level being reviewed periodically.
- 4.11 Regular patrols outside the site perimeter during potentially dusty works are required. This is to look for visual evidence of dust releases off site and to take appropriate where it is identified. The Contractor shall take any necessary measures to prevent nuisance/adverse effects to people's health.

**Machinery and Equipment on Site (GLA SPG Chapter 7)**

- 4.12 **Non-Road Mobile Machinery (NRMM):** NRMM are often fuelled by diesel and therefore give rise to nitrogen dioxide and particulate emissions. Consequently, the need, size and choice of NRMM should be carefully considered. Before sourcing diesel plant, consideration needs to be given to low and zero emission plant, such as electric or hybrid MEWPs. Where diesel plant is employed it should adhere to the NRMM policy below as a minimum. Notwithstanding the policy size requirements, ALL diesel plant should be the lowest emission solution available.

The NRMM policy is set out in the GLA's Dust and Emissions SPG. Since 1 September 2015 NRMM of net power between 37kW and 560kW used in Central Activity Zone are required to meet the standards set out below. This applies to both variable and constant speed engines for both NOx and PM. These standards are based upon engine emissions standards set in EU Directive 97/68/EC, and its subsequent amendments.

- NRMM (within the above kW range) used on any site within the City will be required to meet Stage IIIB of the Directive as a minimum. From September 2018, this requirement changes to Stage IV. Any amendments of the policy and guidance must be adhered to.
- Prior to the commencement of any works, all developments within the City must register relevant NRMM online at [www.nrmm.london/register](http://www.nrmm.london/register). There are a small number of permitted exemptions to the above, and more details of this or updates to the overall NRMM policy requirements, which should be adhered to, can be found at the website: [www.nrmm.london](http://www.nrmm.london).

The NRMM should be maintained and operated in accordance with the manufacturers guidelines so as to achieve the required emission standard; this includes the grade of fuel used.

In order to demonstrate NRMM compliance, best practice includes using stickers on machinery to show engine stage and the use of a spreadsheet to detail all equipment on site, with photos and a compliance reference; such best practice is encouraged on City sites.

- 4.12 **Generators:** Diesel generators give rise to nitrogen dioxide and particulate matter emissions. The use of generators to provide electricity on site should therefore be avoided wherever possible. This can be avoided by ensuring an electrical supply for the site is secured well in advance of works.

Where generator use cannot be avoided, it should be a lower emission solution, such as hybrid, gas or hydrogen technology. Where diesel is used, the newest Euro standard engine should be used (in accordance with the NRMM policy), with a lower emission solution that incorporates battery storage technology. This reduces generator size and running hours, cuts fuel consumption, emissions and noise. The use of hydrogen technology for lighting towers and site cabins rather than generators should also be considered.

- 4.14 **Concrete Crushers:** The use of concrete crushers will not generally be sanctioned in the City because of the potential to cause dust and nuisance to neighbours. However, the City of London will allow the use of city crushers to prepare material for piling mats and ramps, as this reduces the number of vehicle movements associated with the site. Any crushing plant would have to be authorised under the Environmental Protection Act 1990. Appropriate measures, such as enclosing the plant and built in water sprays would have to be used at all times.
- 4.15 **Emission management and idling engines:** Machinery must be appropriately sized and sourced for use and well maintained and used in accordance with manufactures guidelines. Machinery and vehicles must not be left idling either on site or waiting for access to the site as this gives rise to unnecessary air pollution. It is a requirement of *Regulation 98 of the Road Vehicles (Construction and Use) Regulations 1986* (as amended) for drivers to switch off their engines in parked vehicles. Failure to turn off an idling engine if requested may lead to a Fixed Penalty Notice being issued under the *Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002*.

### Scheme of Protective Works and Air Quality Dust Management Plan (AQDMP)

- 4.16 Scheme of Protective Works will need to be submitted to the City Corporation and approved prior to works commencing on-site, which should include an Air Quality and Dust Management Plan (AQMDP).
- 4.17 The AQDMP should detail measures to reduce on site emissions and a consideration of utilising dust and emission reduction measures detailed below. It should also be kept under review so that changes to the timetable and potential emissions can be mitigated.
- 4.18 The AQDMP should be produced prior to any demolition or construction works, agreed with the City Corporation, and should contain details of the following:
- **Summary** of the work to be carried out and an inventory and timetable of all dust and NOx air pollutant generating activities
  - **Liaison and consultation strategy** relating to works which may impact on air quality
  - **Complaints and incidents:** methodology for recording action taken in response to incidents.
  - **Staff and training:** The identification of trained and responsible person on site for air quality and the training schedule for all staff e.g. toolbox talks relating to idling engines
  - A site **plan(s)** showing:
    - sensitive receptors
    - site layout and access (with wheel check and wash facilities shown)
    - air quality monitoring locations
    - site equipment including generator location
    - location of water for damping down
    - fuel stored on site
    - reference to the CLP which contains proposed haulage routes and vehicle waiting areas
  - **Monitoring:** Summary of monitoring methods (if applicable), trigger levels and procedure for mitigation when exceeded.
  - **Machinery:**

- confirmation that **NRMM** compliant equipment will be sourced and registered on the GLA website;
- a commitment to sourcing power for the site which does not involve diesel **generators**;
- details regarding **concrete crusher** use
- emission management plans which includes no-engine **idling**, both on and off site
- **working methodologies and controls measures** should be included in the AQDMP for all relevant activities which may affect air quality. The controls implemented should include those detailed in sections 4.19-4.29 below. The scheme should consider the entire lifetime of the project and sequence of works.

## Working Methodologies and Control Measures (SPG chapter 5)

- 4.19 Activities undertaken on site must be done so with methodologies which reduce the likelihood of dust generation and the worsening of air quality. With reference to the Mayors SPG, the phases are works which could create emissions that affect human health and the environment are:
- Demolition
  - Earthworks
  - Construction
  - Trackout
- 4.20 The following control measures should be incorporated for the relevant phases. The AQDMP can state it will adhere to this code, rather than detail all methods that will be adopted; however, where measures are not adopted, the AQDMP should detail why they have not been adopted in discussion with the City Corporation.

## General measures and details for Demolition, Earthworks, Construction and Track-out

- 4.21 **Preparing the site:**
- a. Plan site layout: Plans should be made to eliminate dusty works, where this is not possible, dusty activity should be planned away from sensitive receptors, with wind direction taken into consideration.
  - b. All sites should be sufficiently screened / wrapped in order to prevent offsite dust deposition. Plans should be made for screening dust generating activity and for water to be available for damping down.
  - c. Install green walls, screens or other green infrastructure to minimise the impact of dust and pollution.
  - d. Provide showers and ensure a change of shoes and clothes are required before going off-site to reduce transport of dust.
  - e. Where air quality monitoring is proposed, select appropriate locations and commence baseline monitoring at least three months before phase begins. Ensure the equipment is maintained and calibrated in accordance with the manufacturer's guidelines.
  - f. Plan for wheel washing facilities, where space allows.

#### 4.22 **Inspections, liaison and complaints:**

- a. Hold regular liaison meetings with other high risk construction sites within 500m of the site boundary to ensure plans are coordinated and dust and particulate matter emissions are minimised.
- b. *Site inspections and record keeping:* Carry out regular site inspections to monitor compliance with air quality and dust control procedures including:
  - checking for spillages of cement and other powders which should be removed to prevent off-site deposition)
  - checks of buildings within 100m of site boundary (cleaning to be provided if necessary).
- c. Record inspection results, and make an inspection log available to The City Corporation when asked. The frequency of site inspections should be increased by those accountable for dust and air quality pollutant emissions issues when activities with a high potential to produce dust and emissions and dust are being carried out, and during prolonged dry or windy conditions.
- d. *Incidents and Complaints:* Record any exceptional incidents that cause dust and air quality pollutant emissions, either on or off the site, and ensure the action taken to resolve the situation is recorded in the log book. Record and respond to all dust and air quality pollutant emissions complaints and make a complaints log available to the local authority when asked.

#### 4.23 **General site Management and Operations:**

The operator should ensure fumes and/or dust do not escape from the site to affect members of the public and the surrounding environment:

- a. By using processes which do not generate fumes and/or dust and dusty material.
- b. Ensure an adequate water supply and water pressure (using groundwater / recycled water where possible) or local exhaust ventilation is available on the site for effective dust/particulate matter mitigation for:
  - o damping down dust generating activities and unsealed areas in dry weather
  - o using mobile sprinkler systems and mobile bowzers
  - o using equipment fitted with fine mist sprays during dust generating works
  - o collecting dusty material during dusty works
- c. Use enclosed (rubber) chutes, conveyors, covered skips, sheeting, bagging and minimize drop heights to reduce the amount of dust produced on site.
- d. Dusty works should be eliminated; where this is not possible, solid screens or barriers of appropriate height should be erected around dusty activities and/or the site boundary and action taken to prevent offsite deposition. The site fencing, barriers and scaffolding should be kept clean using wet methods.
- e. Ensure equipment is readily available on site to clean any dry spillages, and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.
- f. The burning of materials on site is not permitted under any circumstances.
- g. Careful consideration should be given to the location and temperature control of tar and asphalt burners and the lid should remain closed when heating.
- h. Avoid site runoff of water or mud.
- i. Remove materials from site as soon as possible.
- j. Off-site fabrication, cutting, grinding and sawing should ideally be undertaken off site. If the work must take place on site, the following techniques should be

used. It will be the Contractor's responsibility to demonstrate that stated methodologies are not available, and that every effort has been made to acquire them:

- Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction.
- Areas used to undertake cutting and grinding should be screened; and
- Shears and guillotines or burners should be used in preference to disc cutters on activities such as re-bar cutting and decking.

### 4.24 **Vehicles, Machinery and sustainable travel**

Vehicle choices and management can have a significant impact on air quality within the City of London. For this reason, the following should be adhered to:

- a. Ensure all on-road vehicles comply with the requirements of the London Low Emission Zone and any subsequent traffic management policies to improve air quality.
- b. Ensure a consideration of items in sections 4.12-4.15 (NRMM compliance, minimised generator use, appropriate concrete crusher use and no idling engines)
- c. Wherever possible, vehicle movements should be minimised through full load only delivery, considered logistics planning, liaison with other sites within close proximity and the use of consolidation centres. To that end, a Construction Logistics Plan should be produced to manage the sustainable delivery of goods and materials. See TfL Guidance:  
<https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/guidance-by-transport-type/freight>
- d. Implement a Travel Plan that supports and encourages sustainable travel to and from site. See City Advice notes:  
<https://www.cityoflondon.gov.uk/services/transport-and-streets/transport-planning/Pages/default.aspx>
- e. Prevent the occurrence of smoke emissions or fumes from site plant or stored fuel oils by ensuring plant is well maintained and measures are taken to ensure they are not left idling when not in use.
- f. Low sulphur diesel fuel should be used.
- g. Wheel washers to be used on vehicles leaving the site (where site on space allows);
- h. Where there is a potential for dust releases lorries and skips leaving the site to be covered; and
- i. The generation of dust whilst loading or unloading materials must be controlled.
- j. Where possible, vehicles visiting site should sign up and adhere to FORS standards (or equivalent). Best practice has noted the use of an on-line booking system which only allows compliant vehicles to attend site and this is encouraged.

### 4.25 **Waste management (see section 6 of this code).**

- a. Reuse and recycle waste to reduce dust from waste materials
- b. NO bonfires or burning of waste materials.

### 4.26 **Measures and details specific to Demolition**

- a. The use of 'long arm' demolition equipment and methods using explosives will not generally be sanctioned in the City, except where the work is within an enclosure or underground.
- b. Soft strip inside buildings before demolition (retaining walls and windows in the

- rest of the building where possible, to provide a screen against dust).
- c. Ensure water suppression is used during demolition operations.
- d. Explosive blasting is not permitted, use appropriate manual or mechanical alternatives.

### 4.27 **Measures and details specific to Earthworks**

Due to site space restrictions, it is anticipated that material will not be stored on site for extended periods within the City. Where it is, reference needs to be made to contaminated land requirements in section 5. When material is stored or moved, operations should be employed which minimise dust releases by stabilising stockpiles and damping down when dry or moved.

### 4.28 **Measures Specific to Construction**

- a. Scabbling should be done off site and will not generally be allowed in the City due to the amount of dust generated;
- b. Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, (unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place)
- c. Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery.
- d. For smaller supplies of fine powder materials ensure bags are sealed after use and used and stored appropriately to prevent dust.
- e. Spraying of intumescent fire paint and cementations fibrous fire spray should not be carried out in the city, due to air quality issues and difficulties in encapsulating areas and will only be permitted when working areas can be full encapsulated and air monitoring carried out

### 4.29 **Measures Specific to Trackout**

- a. Ensure vehicles entering and leaving sites are securely covered to prevent escape of materials during transport.
- b. Install hard surfaced routes and areas to work, which are regularly damped down with fixed or mobile sprinkler systems, pressure washers or water-assisted dust sweepers. Areas should be regularly cleaned (avoiding dry sweeping of large areas). Hard surfaced areas should be inspected for damage and repaired where required.
- c. Record all inspections of surfaces and routes to and from site and any subsequent action in a site log book.
- d. Ensure there is an adequate area of hard surfaced area between the wheel wash facility and the site exit, where possible. Access gates should be ideally located at least 10m from receptors.
- e. Where reasonably practicable, implement a wheel washing system (with rumble grids) to dislodge accumulated dust and mud prior to vehicles leaving the site.
- f. Apply dust suppressants to locations where a large volume of vehicles enter and exit the site (See GLA SPG for guidance with regard to dust suppressants).

## 5 Contaminated Land

### Summary

Where the site is suspected of being affected by contamination, then appropriate investigations and a subsequent remediation strategy and verification programme will be the subject of planning conditions for any works that require planning approval.

Irrespective of whether or not the development is subject to such planning conditions, it is the responsibility of the Contractor to ensure that appropriate investigations and risk assessments have been carried out to characterise the ground conditions. It is similarly the Contractor's responsibility to ensure that appropriate action is taken and/or mitigation measures put in place to ensure that:

- The works themselves do not pose any unacceptable risks to human health (including construction workers, neighbours and the general public), controlled waters or other eco systems.
- The development once completed does not pose any unacceptable risks to human health (including subsequent construction/maintenance workers, future occupants, neighbours and the general public), controlled waters and other eco systems.

It is also the Contractor's responsibility to ensure that:

- The City of London's Pollution Control Team is notified of any ground contamination that is found either during prior investigation or subsequently during development
- Any remediation which takes place is approved by the City of London's Pollution Control Team and is thoroughly documented in the form of a verification report.

### Introduction

- 5.1 It is the duty of the Contractor to ensure that adequate work has been done to investigate, evaluate and manage risks from contaminated land (whether it originates on the site or not) to human health, controlled waters and other eco systems.
- 5.2 General guidance is provided by the Environment Agency on its *Land Contamination: Technical Guidance* website page which may be found at <https://www.gov.uk/government/collections/land-contamination-technical-guidance>. The Agency's guiding principles of managing and reducing contaminated land are explained in "GPLC2 - FAQ's, technical information, detailed advice and references" which may be accessed at the above website. The technical framework for the management of contaminated land is provided in the Agency's publication "*Model Procedures for the Management of Land*", report CLR11" which also may be accessed via the above website.
- 5.3 The technical framework is underpinned by a large number of Environment Agency reports and tools, British Standards and other industry technical reports which give specific guidance on the various aspects of investigation, evaluation and mitigation of risks posed by contamination. Again the Environment Agency website



above provides a link to its own reports and tools. Cl:aire, CIRIA and the BRE are other sources of industry reports, many of which are included in the references section below.

- 5.4 The assessment of contaminated land in the UK is a risk based one. This means that although contamination may exist in, on or under land, this may not in itself present an unacceptable risk. A risk arises when there is a pollutant linkage i.e. a receptor (such as humans) may be impacted by a source (such as hydrocarbon contamination within the ground) via a pathway (such as inhalation of vapours). That risk only becomes unacceptable once the magnitude of the risk exceeds a set limit.

### Phased Approach

- 5.5 The investigation and assessment of contaminated land requires the assessor to identify potential sources of contamination, receptors and the potential pathways that may connect them to establish potential pollutant linkages.
- 5.6 The investigations should be undertaken, in a phased manner, with the results of each phase being used to decide whether or not there is a requirement to proceed to the next phase. In some cases iterative investigation may be required. At each step the Contractor should liaise with the Pollution Control Team before proceeding to the next phase and where a phase indicates that no unacceptable risks exist then must seek the Pollution Control Team's approval before omitting subsequent phases.
- 5.7 The methodology for site investigation appraisal and assessment is outlined in the documents detailed above. The process of phased and iterative assessment is summarised in CLR11, Figure 1.
- 5.8 The City of London is a densely populated area which has had a long history of previous development including a range of potentially contaminating industrial uses. As such the possibility of contamination must be assumed on all development sites. The City Corporation will require, as a minimum, a Phase 1 Desk Study and Conceptual Site Model (CSM).
- 5.9 Where contamination is found (albeit on or off site) that poses unacceptable risk, then a Remedial Options Appraisal shall be carried out to ensure that the selected option meets the City's targets for sustainable development as well as providing the required mitigation measures.
- 5.10 Where remediation is required then a detailed Remediation Method Statement shall be provided to the City Corporation for approval prior to commencement of any remediation works. The Remediation Method Statement should include an Environmental Monitoring Plan where it is identified that the remediation works themselves may pose a potential risk to human health, controlled waters or other eco systems.
- 5.11 On completion of the remediation, a verification report shall be provided. The verification report should contain documentary evidence of the remediation works carried out together with photographs and laboratory test results to support decisions made on site.

### Local Context

### 5.12 **Geology and Groundwater**

Due to the historical redevelopment of the City made ground is expected to present (to varying thickness) across the area. Made ground or fill is by nature highly variable in composition and may contain contaminated and/or putrescible material. It can therefore be potential source of contamination and landfill gas.

5.13 The City of London is mapped by the British Geological Survey as being entirely underlain by London Clay which is classified as Unproductive Strata.

5.14 Superficial deposits overlying the clay include Alluvium associated with the River Thames along the southern boundary, and in linear deposits in the central and western areas of the City. Hackney Gravel, Taplow Gravel and Lynch Hill Gravel are mapped across the City and are classed as a Secondary Aquifer. Areas of Langley Silt Member are mapped in the southern and eastern parts of the City.

### 5.15 **Surface Water**

The primary surface water feature within the City of London is the River Thames located along the southern boundary of the City. The River Fleet and Walbrook are both culverted, flowing south beneath the City and discharge into the Thames.

### 5.16 **Historical Uses**

The City of London has a long history of industrial use dating back to the Roman era. Historical maps of the City available from the 1870s detail a number of industrial land uses which include (but are not limited to) warehouses and wharves (predominantly along the River Thames boundary), railway land, factories and works including printers, hatters, furriers and foundries; some historic uses can be seen on the City's [interactive map](#).

### 5.17 **Unexploded Ordnance**

Approximately half of the City is mapped as having suffered WWII bomb damage. Published copies of bomb damage maps are available on the Council web site as well as the website 'Bomb Sight' which records the positions of bombs which landed across London.

5.18 A desk based UXO risk assessment should be undertaken, as a minimum, by an appropriately qualified person for all works where ground is to be 'broken'. Mitigation measures may be required for intrusive works and or construction, with appropriate contingency measures in place to deal with any suspect items.

## **Key Personnel**

5.19 Due to the highly complex nature of site investigation, risk assessment and remediation design; it strongly recommended that the Contractor appoint a specialist consultant at the earliest opportunity. In any case any contaminated land report, risk assessment, options appraisal, remediation strategy or verification report must be prepared and countersigned by a Competent Person.

5.20 A competent person is someone who has the appropriate qualifications and experience to undertake the task in question. The Contractor may wish to use the services of a SiLC (Specialist in Land Condition). A register of SiLCs may be found at <http://www.silc.org.uk/silc-register/>. Subject to discussion with the Pollution Control

Team, the City Corporation requires that all contaminated land reports are signed off by a SQP (Suitably Qualified Person as defined under the National Quality Mark Scheme).

- 5.21 The Pollution Control Team are responsible for approving contaminated land reports and the Contractor is advised to contact the Team in the early stages of planning.

### **Unexpected Contamination**

- 5.22 If any undetected or unexpected contamination or ground gas is identified or suspected during the course of the development works, the Contractor must stop work, seek the advice of a competent person and undertake whatever further specific investigations are required to characterise the contamination and develop an appropriate remediation strategy. Where ground contamination is identified, the Pollution Control Team must be notified. Where ground-water contamination is suspected, then the Environment Agency and Pollution Control Team must be contacted. All remedial work must be approved by the Pollution Control Team.

### **Waste Disposal**

- 5.23 The City advises that all projects with an estimated construction cost exceeding £300,000 excluding VAT have a Site Waste Management Plan and in any case all waste must be disposed of in accordance with current legislation.
- 5.24 Appropriate soil tests must be carried out on all soils removed from waste to ensure an accurate and appropriate waste classification.
- 5.25 It is a requirement of the waste legislation that hazardous and non-hazardous waste be treated prior to disposal to change the characteristics of the waste and in so doing either reduce the volume and/or hazardous nature of the waste and/or facilitate handling and/or recovery. Additional hazardous and non-hazardous waste must be separated.
- 5.26 Soils may be classified as non-hazardous or hazardous waste on the basis of its chemical content.
- 5.27 Particular attention is drawn to the subject of asbestos in soils. Where the asbestos content exceeds 0.1% by volume OR a competent person is able to detect asbestos containing materials with the naked eye. The latter is likely to apply at asbestos concentrations significantly lower than 0.1%

### **Re-use of Soils**

- 5.28 The City of London promotes sustainable development and in this respect is supportive of soil re-use where appropriate.
- 5.29 Where soils are to be re-used on the subject site (Site of Origin) or another site (Receiver Site), then it is recommended that this is done in accordance with the CL:aire Code of Practice, otherwise the soils may be classified as waste, requiring an EA permit or EA exemption before it may be reused.
- 5.30 It is noted that only natural soils (e.g. London Clay) may be moved and reused on another site, whereas made ground or natural soils may be re-used on the site of origin provided it meets key test criteria set out in the code.

- 5.31 Where soils are to be reused on site either in accordance with the Code or under an EA exemption or permit then details must be forwarded to the Pollution Control Team prior to re-use and all such re-use detailed in the final verification report for the site.

### **General Site Activities and Controls**

- 5.32 Notwithstanding the requirements to remediate or provide mitigation measures to counter ground contamination, the Contractor must also ensure that all its activities are undertaken in such manner as is required to prevent contamination of the ground, ground-water and surface waters. This may include but is not restricted to:
- materials being stored in appropriate conditions to prevent damage/contamination of storage areas;
  - containers of hazardous or potentially contaminating materials being sited away from drains and un-surfaced areas;
  - containers of hazardous or potentially contaminating materials being fit for purpose, regularly inspected and maintained;
  - containers of hazardous or potentially contaminating materials should have secondary containment (such as a bund) to contain any leaks or spills for example, areas used for the storage of diesel fuel or chemicals
  - All waste should be clearly labelled and segregated prior to offsite disposal to prevent cross contamination and inappropriate disposal; and
  - It is the Contractor's responsibility to ensure that its principal Contractor and sub-Contractors are made aware of the ground conditions and potential hazards associated with those conditions.

## 6 Waste and Materials Handling and Storage

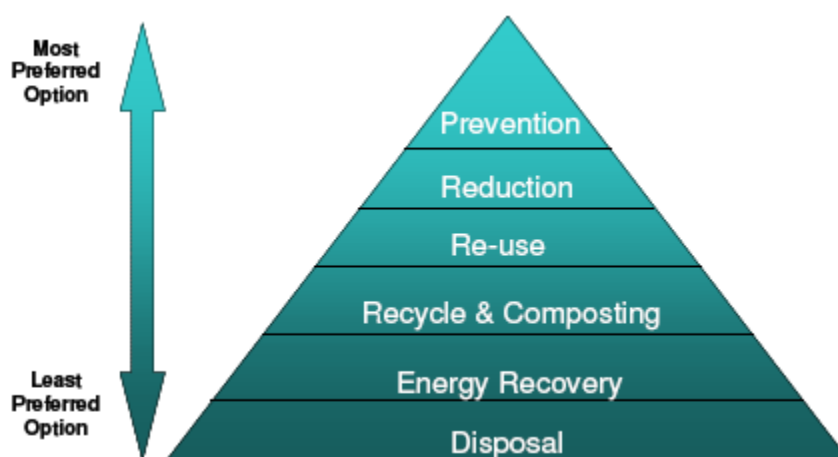
### Summary

The Contractor must:

- ensure a Site Waste Management Plan is developed (if required);
- ensure waste is contained and disposed of in an appropriate manner and in accordance with legislation and the Waste Management Hierarchy; and
- ensure methodologies are adopted that prevent environmental impacts by the mishandling and storage of on-site materials and waste.

### Waste Management

- 6.1 The City recommends any project costing over £300k is required to produce a Site Waste Management Plan (SWMP) for new build, maintenance, and alteration or installation/removal of services (such as sewerage or water).
- 6.2 The purpose of a SWMP is to ensure that building materials are managed efficiently, waste is disposed of legally, and that material recycling, reuse and recovery is maximised. As such, a SWMP sets out how all building materials, and resulting wastes, are to be managed over the course of a project. For more information, please consult the following websites: [www.defra.gov.uk](http://www.defra.gov.uk) and [www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)
- 6.3 Those sites with a budget of less than £300k must manage their waste according to current legislation (see [www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)). Evidence of how waste is disposed of, and efforts to reduce and recycle waste, must be maintained and kept on site.
- 6.4 All site waste management must be planned and carried out in accordance with the Waste Management Hierarchy, as demonstrated below:



- 6.5 All wastes must be removed from sites using a registered waste carrier and sent only to disposal facilities authorised to receive it. Disposal must be in accordance with relevant legislation.

- 6.6 All waste documentation - transfer notes, consignment notes, exemptions, waste carrier and facility licences - must be held on site as required by legislation. Such documentation must be maintained to be readily available for inspection at all times.

### **Materials Handling and Storage**

- 6.7 Materials should be stored in appropriate conditions to prevent damage/contamination, of storage areas. Containers should be sited away from drains and un-surfaced areas. Storage containers should be fit for purpose, regularly inspected and maintained, and should all have secondary containment (such as a bund) to contain any leaks or spills.
- 6.8 Fuels should be stored in compliance with current guidance and recommendations.
- 6.9 Procedures and training should be in place for the safe delivery and handling of materials, with regular site inspections carried out to ensure that once on site they are stored safely and correctly.

### **Asbestos and other Hazardous Materials**

- 6.10 All work on asbestos and other hazardous materials must comply with current Legislation and HSE Approved Codes of Practice & Guidance.
- 6.11 Before any work is done or commissioned that is likely to disturb asbestos or other hazardous material, the following must be worked out:
- The amount of hazardous material;
  - Where it is and what condition it is in;
  - Whether work is likely to disturb material; and,
  - Whether and how the material needs to be safely protected or removed.
- 6.12 This can be achieved either by checking existing records (such as client's survey, asbestos plan or register) or commissioning a suitable survey before work starts. It is good practice to include the need for such a survey in the initial project cost and programme. For more information, please see the following and associated links:  
<http://www.hse.gov.uk/construction/healthrisks/asbestos.htm>  
<http://www.hse.gov.uk/comah/index.htm>

## 7 Water

### Summary

The Contractor must:

- ensure trade effluent is not discharged directly to surface or foul drains without contacting the appropriate body;
- trade effluent consents are held on site;
- contact the City of London's Drainage Services Group or Thames Water Utilities if work is to be undertaken on sewer connections or drains running under the public highway; and
- ensure the under-ground drainage systems are adequately designed and installed.

### Discharge of Waste Water from Sites

- 7.1 Wastewater generated from site activities including water from dewatering excavations, site run off slurry and bentonite are classified as trade effluent. These should not be discharged direct to surface or foul drains without the consent of the Environment Agency for controlled waters, and Thames Water for others.
- 7.2 The Contractor is responsible for obtaining necessary consents and ensuring compliance with any conditions imposed on them. Copies of consents must be held in a designated file kept on site. In cases of heavy water run-off, sumps must be provided in order to deal with the issue.

### Site Drainage, Temporary and Permanent Connections to Sewers

- 7.3 Contact must be made with the City of London Drainage Services Group (020 7332 1105) or Thames Water Utilities (0845 9200 800) before any work is undertaken on connections to sewers or drains running under the public highway. The following general requirements will have to be met:
- All redundant sewer communication pipe work must be sealed off at the sewer. The remaining pipe work should be removed or filled with a suitable weak concrete, cement grout or other suitable material. This is to prevent any infestation by rodents and avoid the risk of future possible subsidence.
  - All retained sewer communication pipes should be tested and a CCTV survey carried out to ensure they are suitable for the new development and in good condition.
  - In order to prevent rodents or sewer gases reaching the site, temporary sewer communication pipes must be provided with a 'cascade' cast iron interceptor trap to British Standard specification.
- 7.4 It is strongly recommended that all under-ground drainage systems are installed using pipes made of a robust material such as cast iron, and that inspection chambers etc. are properly sealed with bolted down covers. This will prevent later problems from damage by vibration or rodent access.
- 7.5 Wherever it is at all possible, the drainage system serving the proposed development or refurbishment should gravitate to the sewer. This will eliminate the need for pumping of foul drainage to the sewer and the associated problems which regularly occur with this type of installation.

- 7.6 The sewage system within the City of London is vented to atmosphere via vents at road surface level and any increase of discharge velocity resulting from pumped or stored sewage being discharged to the sewer frequently results in complaints of foul smells. These may well be treated as a statutory nuisance by the City of London. The importance of designing a system which discharges to the sewer by gravity wherever practicable cannot be overstated.
- 7.7 *Note: Details of the City's standard drainage connection requirements and the related legislation are shown in Appendix E.*



## 8 Sustainability and Preservation

### Summary

The Contractor should:

- employ best practice and look for new innovative techniques in the priority areas specified to ensure a more sustainable approach;
- ensure the Department of Planning and Transportation has been contacted to establish the status of the site and what specific requirements are included in the planning permission, listed building consent or conservation area consent;
- ascertain whether any trees on the site or immediate area are either protected or fall within a Conservation Area prior to works starting; and
- ensure an ecological survey has been undertaken by a qualified professional and appropriate mitigation measures agreed with the City of London.

### Climate Change and Sustainability

- 8.1 The City of London is working towards limiting the impact of the region and making it more sustainable, demonstrated by (among other projects) the current development of a Climate Change Strategy, and strongly encourages other parties to do the same. Innovation and best practice in this area will therefore be highly regarded in applications for the Environment Award through the CCS.
- 8.2 The Sustainable Development Commission has identified the following key priority areas for action in the UK:
- sustainable consumption and production – greater efficiency in utilisation of resources and minimisation of waste;
  - natural resource protection; and,
  - climate change and energy – both reducing energy consumption and sourcing that energy from more sustainable sources.
- 8.3 Contractors should employ best practice and look for new innovative techniques in each of these priority areas, thus ensuring the process of construction or deconstruction is made more sustainable.
- 8.4 The impact of such techniques, or indeed highlighting of areas for improvement, can be demonstrated by including life cycle analyses for materials/processes or basic carbon footprinting in documentation submitted as part of the planning process.
- 8.5 Examples of actions taken to increase the sustainability of the site could include:
- Use of the Mayor of London's Green Procurement Code, in particular via the procurement of FSC-approved/sustainable timber or equivalent, for example, PEFC certification;
  - Use of non-virgin aggregate;
  - general good practice including ensuring that plant not in use is switched off and that lighting is used only when necessary (such as through the use of timers);
  - Use of energy efficient bulbs or solar powered lighting;
  - the use of existing feeds for power where possible to prevent the need for generators, or the purchasing of energy/electricity from sustainable sources;

- Employment of energy efficient and, where possible, gas powered plant as opposed to petrol/diesel;
- Efficient use of water as a resource, for example in cleaning systems or the implementation of rainwater harvesting.

8.6 For more information regarding climate change and sustainability issues relevant to a particular project or site, Contractors are encouraged to contact the City of London Sustainability Team on 020 7332 3598, or read the Climate Change Adaptation Strategy available at:

<https://www.cityoflondon.gov.uk/services/environment-and-planning/sustainability/Documents/climate-change-adaptation-strategy-2010-update.pdf>

### Archaeology and Built Heritage

- 8.7 Much of the City of London is designated as being of archaeological potential. Archaeology is a material consideration of the planning process. Where archaeological remains survive, the archaeological potential is considered as part of the planning application. Where a development affects archaeology, investigation and recording is required as a condition of the planning permission. This may be to ensure the preservation *in-situ* of important archaeological remains and to ensure that a record of the remains is made.
- 8.8 Some monuments and archaeological remains are scheduled ancient monuments under Part I of the Ancient Monuments and Archaeological Areas Act 1979 and scheduled monument consent is required to undertake any work that may affect a scheduled monument. Scheduled Monument Consent is obtained from the Department of Culture, Media and Sport and advice on this is available from Historic England.
- 8.9 Some buildings and structures are included on the statutory list of buildings of special architectural or historic interest. Listed building consent is needed to carry out any work which may affect a building's special architectural or historic interest.
- 8.10 The Contractor must ensure that the Department of the Built Environment has been contacted to establish whether the site contains a listed building, scheduled ancient monument or archaeological remains, and what specific requirements are included in the planning permission, listed building consent or conservation area consent. Conditions of a planning permission may include the requirement of a programme of archaeological work and recording to be carried out as an integrated part of the development, submitted to and approved by the Department of the Built Environment before work commences (contactable via 020 7332 1710).
- 8.11 Advice and details of the need for Scheduled Monument Consent should be obtained from Historic England (contactable via 020 7973 3000).

### Trees and Wildlife

- 8.12 The local planning authority has specific powers under the Planning Acts to protect trees and require the planting of a replacement tree in certain circumstances. The Director of Open Spaces is also responsible for the maintenance and management

of street trees and trees within some of the city churchyards. The Contractor must therefore ascertain whether any trees on the site or in the immediate vicinity of the site are protected or maintained by the Corporation prior to starting work.

8.13 A tree may be protected in one of the following ways:

- By a Tree Preservation Order
- If it is located within a conservation area
- By means of conditions on planning permissions or other consents.

8.14 The City of London Tree Strategy Supplementary Planning Document (Part 1) and the accompanying evidence and practice guidance (Part 2) sets out a co-ordinated approach to the management of trees in the City of London. It provides advice for anyone wishing to undertake work to existing trees or to plant new trees. It can be found via the following link:

<https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/heritage-and-design/Documents/Tree-Strat-Part-1-Complete.pdf>

8.15 Development schemes can have a major impact on existing trees including street trees. It is essential therefore that the potential impact of the proposed works on these trees is assessed at an early stage prior to the submission of any application. This should include the demolition and construction process and future maintenance of the building. Prior to undertaking any tree works or any works in the vicinity of trees Contractors should consult the City Corporation Tree Strategy.

8.16 Prior to commencement of works on site, checks should be undertaken to confirm whether there are any birds or bats that may be nesting/roosting within buildings or vegetation. If present appropriate mitigation measures should be undertaken following consultation with the City's Department of Open Spaces 020 7332 3505.

## 9 Light Pollution

### Summary

The Contractor must ensure:

- nearby residents and commercial occupiers are not adversely affected by light pollution from the site;
- an energy efficient lighting approach is adopted; and
- lighting does not pose a hazard;

### Light Pollution

- 9.1 Light pollution is a statutory nuisance and is defined as any form of artificial light which shines outside the area it is required to illuminate. Unnecessary use of lights is considered a waste of energy (see section 8.5). Any use of lighting should have regard to these facts and should be designed to prevent any nuisance to residents or road traffic and be used primarily for reasons of health and safety or security.
- 9.2 Site lighting should be located and aligned so as not to intrude into residential properties, on sensitive areas, or constitute a road or rail hazard.
- 9.3 Site lighting outside of working hours should be designed to the minimum required to ensure safety and security taking to prevent potential impacts on neighbours.
- 9.4 During the fit out stages of construction, it is a requirement that contractors will utilise black out window coverings.

## 10 Problems on Site

### Summary:

- If emergency work is required then the Contractor must contact City of London as detailed;
- The Contractor must ensure that systems are in place to enable problems on site to be identified and ensure that appropriate action is taken to mitigate the problem and the appropriate parties are informed.

### Emergency Work

- 10.1 The City of London appreciates that occasionally incidents arise whereby it is impossible or impractical to comply with all the requirements within this Code. In such an event, the Pollution Control Team should be contacted within the hours of 08:00 and 17:00. Outside of these hours The Out of Hours Team should be called on 020 7606 3030, leaving a name, mobile number, the nature of the emergency, and the site address. Following this the Environmental Health Out of Hours Officer will respond by calling the Contractor in order to ensure the presence of an emergency and approve the method of work.
- 10.2 In the event of an environmental incident (e.g. a spillage), steps should be taken to prevent pollution, for example through:
- Protection of drains by the use of drain covers or booms;
  - Use of absorbent granules following an oil/chemical spill; and,
  - Turning off equipment or other sources of noise or dust.
- 10.3 Once the situation has been rectified, full details about the incident and remedial actions undertaken should be provided to the City of London and other relevant authorities, and recorded in the site complaints/incidents logbook.

### Pollution Emergencies

- 10.4 All sites should have a plan, equipment and training in place for dealing with pollution emergencies. A summary of the plan should be visibly displayed around site, and understood by all workers.
- 10.5 For more guidance on such planning, please see the Environment Agency guidance 'Pollution Prevention Pays – getting your site right', downloadable at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/485173/LIT\\_7481.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/485173/LIT_7481.pdf)

### Pest Control

- 10.6 The City of London has a statutory duty to take such steps as may be necessary to keep the City free from rats and mice this includes enforcement of the *Prevention of Damage by Pests Act 1949*.
- 10.7 When an occupier of any land, including a construction site becomes aware of an infestation by rats or mice in large number he must notify Port Health and Public Protection (020 7606 3030).

- 10.8 Appropriate measures must be taken to limit any insect, bird or rodent infestation. Such measures are considered essential to limit future problems in completed buildings - especially in the case of mice.
- 10.9 Pest control does not just include treatment by a pest control company; in fact this is a last resort. Measures should be taken to:
- Prevent access to the site principally from exposed drainage;
  - Reduce harbourage in order to ensure that rubbish or spoil is not left for long enough allow rodents to establish themselves above ground;
  - Limit potential food and water sources. It is particularly important to ensure that waste food or empty cartons are not left in areas where they can encourage rats and mice.
- 10.10 Many of the methods necessary to achieve adequate control should be part of established construction/deconstruction methods. To report any problems with infestations, or if you require any additional advice, contact the City of London on the following number: 020 7606 3030.

## 11 Legislation and Documentation

### Documentation

- 11.1 The Contractor should keep all appropriate documentation and records relevant to the requirements of this Code in designated files held on or accessible from site (i.e. electronic or on-line). They must be available at all times for inspection and review by the City of London or other authorities and should include as a minimum:
- Scheme of Protective Works (as per section 2);
  - liaison minutes, letters, photos and newsletters.
  - noise, vibration and dust monitoring results (where applicable);
  - waste management documentation (where applicable);
  - inventory of non-road-mobile machinery and corresponding emission standards, with the relevant plant registered on the NRMM website;
  - Site hours variation sheets; and
  - a complaints/incidents log with actions taken.

### Section 60 and 61 Notices

- 11.2 The Control of Pollution Act 1974 Part III restricts and limits noise and vibration from a construction site. If complaints are received, where it is considered necessary, the Department of Markets and Consumer Protection will serve a Section 60 notice on the Contractor for the control of noise and vibration at the site. This notice can:
- Specify the plant or machinery that is or is not to be used;
  - specify the hours during which work can be carried out; and/or,
  - specify the levels of noise and vibration that can be emitted from the site.
- 11.3 The Contractor can apply in advance for a consent in the form of a Section 61 notice regarding the methods and conditions by which they are intending to undertake the works and control nuisance.
- 11.4 The City does not advise the use of Section 61 consents but it does support a system of prior agreement on similar lines, as this allows a much more flexible approach of greater benefit to the Contractor. Section 60 notices will be served where they are considered necessary. Contraventions of either Section 60 or 61 may well result in legal proceedings, leading to further costs and delays for the Contractor.

## **APPENDIX A**

### **Guidance and Legislation**

#### **General**

Environment Agency Pollution Prevention Guidance Notes  
National Planning Policy Framework  
Planning Policy Guidance Notes  
Town and Country Planning Act 1990  
Planning and Compensation Act 1991  
BS 6187: 2011 Code of Practice for Demolition  
ISO 14001

#### **Vehicle Movements**

Highways Act 1980  
Road Traffic Regulations Act 1984  
Traffic Management Act 2004  
Standard for Construction Logistics – Managing Work Related Road Risk (TfL) and Fleet Operator Recognition Scheme (TfL)

#### **Noise and Vibration**

Environmental Protection Act 1990 (especially Sections 79 – 82)  
Control of Pollution Act 1974 (especially Section 60 and 61)  
BS 5228-1:2009+A1:2014 and BS 5228-2:2009+A1:2014, – Noise & Vibration Control on Construction and Open Sites  
BS 7385-2:1993 Evaluation and Measurement for Vibration in Buildings. Part 2 Guide to Damage Levels from Ground borne Vibration  
BS 6472:2008 Guide to Evaluation of Exposure to Vibration in Buildings (1Hz - 80Hz)  
Noise and Statutory Nuisance Act 1993  
Control of Noise at Work Regulations 2005  
The City of London Noise Strategy 2016 to 2026

#### **Air Quality**

Air Quality (England) Regulations 2000  
Environment Act 1995  
Clean Air Act 1993  
Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002  
Road Vehicles (Construction and Use) Regulations 1986 (as amended) – Regulation 98  
GLA Guidance: The Control of Dust and Emission during Construction and Deconstruction (SPG)  
DEFRA (2001) UK Air Quality Strategy, HMSO, London  
The City of London Air Quality Strategy: see [www.cityoflondon.gov.uk/air](http://www.cityoflondon.gov.uk/air) for the most recent copy  
Building Research Establishment Code of Practice on Controlling Particles from Construction and Demolition (2003)

#### **Smoke and Fume Nuisance**

Noise and Statutory Nuisance Act 1993

#### **Asbestos and Hazardous Substances**

The Control of Asbestos Regulations 2012  
Special Waste (Amendment) (England and Wales) Regulations 2001



MDHS 100 "Surveying sampling and assessment of asbestos-containing materials" HSE Guidance Note 2002  
Control of Substances Hazardous to Health Regulations 2002 (as amended)  
Environmental Protection (Controls on Substances that Deplete the Ozone Layer) Regulations 2011  
Plus all other current/future Legislation together with HSE Approved Codes of Practice and Guidance

## **Waste Management**

Environmental Protection Act 1990  
Environment Act 1995  
Environmental Protection (Duty of Care) Regulations 1991  
Environmental Protection (Special Waste) Regulations 1996 (as amended)  
The Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1991  
Waste Management Licensing Regulations 1994 (as amended)  
Waste Management Duty of Care Code of Practice (1996), HMSO

## **Contaminated Land**

British Standards Institute, Investigation of potentially contaminated sites – Code of practice BS 10175:2011+A1:2013  
British Standards Institute, Guidance on investigations for ground gas – Permanent gases and Volatile Organic Compounds (VOCs) BS 8576:2013  
British Standards Institute, Specification for subsoil and requirements for use BS 8601:2013  
British Standards Institute, Code of practice for the design of protective measures for methane and carbon dioxide ground gases for new buildings BS 8485:2015  
British Standards Institute, Specification for Topsoil BS 3882:2015  
British Standards Institute, Code of practice for ground investigations BS 5930:2015  
Building Research Establishment, Cover Systems for Land Regeneration: 2004  
Building Research Establishment, Concrete in Aggressive Ground, Special Digest 1 : 2005  
Chartered Institute of Environmental Health and Land Quality Management, Generic Assessment Criteria for human health risk assessment: 2006  
Chartered Institute of Environmental Health and Department for Environment Food and rural Affairs, Local authority guide to the application of Part 2A of the Environment Protection Act 1990 – extended to cover radioactive contamination 2007  
Chartered Institute of Environmental Health and Cl:aire, Guidance on comparing soil contamination data with critical concentration: 2008  
CIRIA, A guide for safe working on contaminated sites, R132: 1996  
CIRIA, Assessing risks posed by hazardous ground gases to buildings CIRIA C665: 2007  
CIRIA, The VOCs handbook. Investigating assessing and managing risks from inhalation of VOCs at land affected by contamination. CIRIA 682: 2009  
Cl:aire, SuRF UK, A Framework for Assessing the Sustainability of Soil and Groundwater Remediation: 2010  
Cl:aire, The Definition of Waste: Development Industry Code of Practice, V2: 2011  
Cl:aire, A Pragmatic Approach to Ground Gas Risk Assessment. Cl:aire Research Bulletin RB17 : 2012  
Cl:aire and Joint Industry Working Group, CAR-SOIL™, Control of Asbestos Regulations 2012, Interpretation for Managing and Working with Asbestos in Soil and Construction and Demolition Materials: 2016  
Department for Environment Food and Rural Affairs, Environmental Protection Act 1990: Part 2A Contaminated Land Statutory Guidance.  
Department for Environment Food and Rural Affairs, Model Procedures for the Management of Land", report CLR11: 2004  
Environment Agency, Guidance on requirements for Land Contamination Reports: 2005

Environment Agency, Remedial targets Methodology – Hydrogeological Risk Assessment for Land Contamination: 2006  
Environment Agency, Contaminated Land Exposure Assessment Tool v1.05: 2009  
Environment Agency, Guiding Policies for Land Contamination 2010, last updated 2016  
HMSO, Environment Act 1995  
HMSO, The Contaminated Land (England) Regulations: 2000 (with amendments 2006,2012)  
HMSO, The Landfill Tax Regulations 1996 (with amendments 2015,2016)

### **Discharges and Site Drainage**

Environmental Protection Act 1990  
Environment Act 1995  
Water Resources Act 1991  
Water Industry Act 1991  
Trade Effluent (Prescribed Processes and Substances) Regulations 1989 (as amended)  
Anti-Pollution Works Regulations 1999

### **Pests**

Wildlife and Countryside Act 1981 (as amended)

### **Trees**

Town and Country Planning Act 1990  
Wildlife and Countryside Act 1981 (as amended)  
Conservation of Habitats and Species Regulations 2010  
BS 5837:2012 Trees in relation to design, demolition and construction - Recommendations  
BS 3998:2010 Tree work: Recommendations

### **Archaeology and Built Heritage**

Ancient Monuments and Archaeological Areas Act 1979  
Planning (Listed Buildings and Conservation Areas) Act 1990

### **City of London Documents**

Code of Practice for Deconstruction and Construction Sites  
Considerate Contractor Scheme (see Appendix C)  
Scaffolding and Hoarding Licences (see Appendix D)  
City's Standard Requirements for Sewer Connections (see Appendix E)  
Traffic Management Requirements (see Appendix F)

## **APPENDIX B**

### **Contact details for City Departments and External Agencies**

**Postal address for all Internal Departments:** PO Box 270, Guildhall  
London, EC2P 2EJ  
**General Switchboard (24 hour service)** Tel: 020 7606 3030

#### **MARKETS AND CONSUMER PROTECTION – Pollution Control Team**

All enquiries: Tel: 020 7606 3030.  
Email:  
[publicprotection@cityoflondon.gov.uk](mailto:publicprotection@cityoflondon.gov.uk)

#### **DEPARTMENT OF THE BUILT ENVIRONMENT HIGHWAY MANAGEMENT GROUP**

Out of Hours in Emergency: Tel: 020 7606 3030 and ask for duty officer to be called. He or she will call you back.

Considerate Contractor Scheme: Tel: 020 7332 1104  
Email: [ccs@cityoflondon.gov.uk](mailto:ccs@cityoflondon.gov.uk)

Highways Section & Scaffolding Licences: Tel: 020 7332 1104/3578  
Fax: 020 7332 1578

Parking dispensations & Highway Closures: Tel: 020 7332 3553  
[traffic.management@cityoflondon.gov.uk](mailto:traffic.management@cityoflondon.gov.uk)

City of London Drainage Group: Tel: 020 7332 1105

District Surveyors: Tel: 020 7332 1000

City Structures Officer Tel: 020 7332 1544

#### **DEPARTMENT OF THE BUILT ENVIRONMENT DEVELOPMENT MANAGEMENT**

Protected Trees Tel: 020 7332 1708

Listed Buildings – Consent to Work Tel: 020 7332 1710

#### **OPEN SPACES DEPARTMENT**

Advice on birds, bats or plants found on site Tel: 020 7374 4127

#### **THE CITY OF LONDON POLICE**

Postal Address: Wood Street Police Station  
37 Wood Street, London EC21 2NQ

General Enquiries: Tel: 020 7601 2455

Control Room (24 Hour operations): Tel: 020 7601 2222

Abnormal loads & traffic planning: Tel: 020 7332 3122

#### **MUSEUM OF LONDON ARCHEOLOGY – ‘MOLA’**

Postal Address: 46 Eagle Wharf, London, N1 7ED

General Enquiries: Tel: 020 7410 2200  
Fax: 020 7410 2201

## **EXTERNAL AGENCIES**

### **THE ENVIRONMENT AGENCY**

Postal Address: Apollo Court  
2, Bishops Square Business Park  
St. Albans Road  
Hatfield,  
Herts, AL10 9EX  
Tel: 08708 506 506

General Enquiries:

### **HEALTH & SAFETY EXECUTIVE**

Postal Address: Rose Court  
2, Southwark Bridge Road  
London, SE1 4LW

24 Hour Emergency Contact:  
(construction, demolition  
& asbestos related matters)

Tel: General enquiries: 0845 3450055  
Tel: 020 7556 2102  
Fax: 020 7556 2109

### **THE METROPOLITAN POLICE**

Postal Address: New Scotland Yard  
Broadway  
London, SW1H 0BG

General Enquiries:  
Abnormal Loads Section

Tel: 0300 123 1212  
Tel 020 8246 0931

### **LONDON FIRE & EMERGENCY PLANNING AUTHORITY**

Postal Address: 20 Albert Embankment  
London, SE1 7SD

General Enquiries: Tel: 020 7587 2000

**NB.** The work previously carried out by the **Petroleum Inspectorate** is now shared between The Health & Safety Executive - in respect of most instances where fuel is dispensed or stored in large quantities and Building Control Officers in Local Authorities - in the case of ventilation & signage in underground car parks etc.

### **ENGLISH HERITAGE**

Postal Address: 1 Waterhouse Square, 138-142 Holborn, London, EC1N 2ST

General enquiries: Tel: 020 7973 3000

### **TRANSPORT FOR LONDON**

Abnormal loads section Tel: 020 7474 4770

### **LONDON UNDERGROUND LTD**

Contact re underground structures etc. Tel: 020 7222 1234

### **PORT OF LONDON AUTHORITY**

General enquiries: Tel: 0147 456 2200

## **APPENDIX C**

### **Considerate Contractor Scheme Information**

1. The Considerate Contractor Scheme (CCS) comprises:
  - a Code of Good Practice, covering care, cleanliness, consideration and cooperation;
  - regular inspections by the City's Considerate Contractor Surveillance Officers;
  - an annual judging and awards ceremony; and
  - a telephone hotline enabling the general public to comment on the Scheme, sites and on participating Contractors. (020 7332 1104 / email [ccs@cityoflondon.gov.uk](mailto:ccs@cityoflondon.gov.uk))

*Note: general compliance with this Code of Practice is also a requirement of the scheme and sites will be judged and scored in this context.*

2. The CCS is a co-operative initiative open to all Contractors undertaking building and civil engineering work in the City of London. There is no membership fee, but on joining the Scheme, members agree to abide by the Code of Good Practice. It is by following this voluntary Code that the general standards of works are raised and the condition and safety of City streets and pavements improved for the benefit of everyone living, working or just travelling through the Square Mile.

Membership of the CCS is actively encouraged for all construction and deconstruction works in the City.

Additional information and a copy of the code of practice can be obtained from The Department of the Built Environment Highways Division representative on 020 7332 1104 or by email to [ccs@cityoflondon.gov.uk](mailto:ccs@cityoflondon.gov.uk)

3. An Environment Award is available as a separate achievement in the Considerate Contractor Scheme to recognise and encourage best practice and innovation in the sustainability of City construction and deconstruction. For details email [publicprotection@cityoflondon.gov.uk](mailto:publicprotection@cityoflondon.gov.uk)

## **APPENDIX D**

### **Scaffolding & Hoarding Licence Requirements**

1. Under sections 168 and 169 of the Highways Act 1980, scaffolds and gantries on or over the Public Highway require a licence and must comply in all respects with the Department of the Built Environment's Highways Division's Guidance Notes for Activities on the Public Highway.
2. Under section 184 of the Highways Act 1980, temporary vehicle crossovers require a licence and should comply with section 13 of the Highways Division's Guidance Notes for Activities on the Public Highway.
3. Application for these licences should be made to the City by contacting Highways Division, Department of Markets and Consumer Protection. A site visit will usually be required. (020 7332 1104)
4. Scaffolding over the River Thames, on the foreshore or within 16 metres of flood defences requires consent under the byelaws of the Environment Agency, Thames Region and the Port of London Authority.
5. Requests for further information, copies of the guidance notes and licence applications should be made to the Highways Division (020 7332 3578).



## **APPENDIX E**

### **The City of London Sewers Act 1848** **City of London Standard Requirements**

1. All communicating drains to the sewer outfall **must** be provided with a cast iron intercepting/disconnecting trap which has a cascade, with access to the crown of the trap and have rodding access through to the sewer as BSS figure 26 or equivalent (for rodent control measures).
2. The communication pipework should be laid in straight lines in the vertical and the horizontal alignments and with no other pipe connections. (e.g. at a self-cleansing velocity and in a straight line from interceptor to the sewer).
3. The interceptor should be located inside the property boundary and adjacent to the buildings curtilage.
4. There should be provision to provide ventilation to the low invert level of a drainage system this should normally be at the intercepting trap. It may be difficult to evaluate air movement precisely and therefore as guidance you should allow for the vent pipe to be half diameter at the size of the intercepting trap. This vent should be discharged to a safe outlet at roof level atmosphere.

#### **NOTES**

- a) The sewage system within the City historically vents to atmosphere via low level vents and any increases of discharge velocity (e.g. pumped drainage) of building effluent to the sewers results in the incidences of smells being reported. As justified smell complaints are treated as a statutory nuisance by this Department. It is **STRONGLY RECOMMENDED** where practicable and safe to do so all drainage should discharge via gravity.
- b) In the view of this authority there are rodents present within the sewers and special rodent control is therefore required, historically the measures this authority accepts is both by means of an interceptor trap and a sealed drainage system. You should discuss this matter with your Building Control body/Advisor.
- c) There is a requirement under Section 62 of the Building Act 1984 for any person who carries out works which result in any part of a drain becoming permanently disused that they shall seal the drain at such points as the local authority may direct. You should therefore make arrangements to seal off any redundant communication drains connecting to the Thames Water Utilities (TWU) sewer at the point of communication with the local sewer and at the buildings curtilage.
- d) The City now requires in some instances the introduction of sewer vent pipes. Via the Planning process. The information required for this approval is shown below:
  - A long sectional detail is required for each connection. Copy of standard City detail is shown.
  - Minimum size of sewer vent to be 150mm.
  - Confirmation of materials proposed, pipework must be rodent proof, i.e. light weight iron or similar.
  - Basement, ground floor and roof level layout plans are required, showing sewer vent pipework.
  - Locations of the sewer vent pipework, in building, to be shown, i.e. in a duct or riser.
  - Schematic drawing of all soil and waste pipework, clearly showing sewer vent with route of the sewer vent highlighted so it is easy to identify.

Any failure in respect of these requirements may result in: -

1. *Charging of costs and expenses involved in attending site and auditing works.*
2. *Copies of documents concerning any default being placed on our Land Charges Register and disclosed to all subsequent enquiries*
3. *Charging for remedial works done in default and costs recovered from responsible person(s) which may be substantial in terms of cost and delays to the project.*

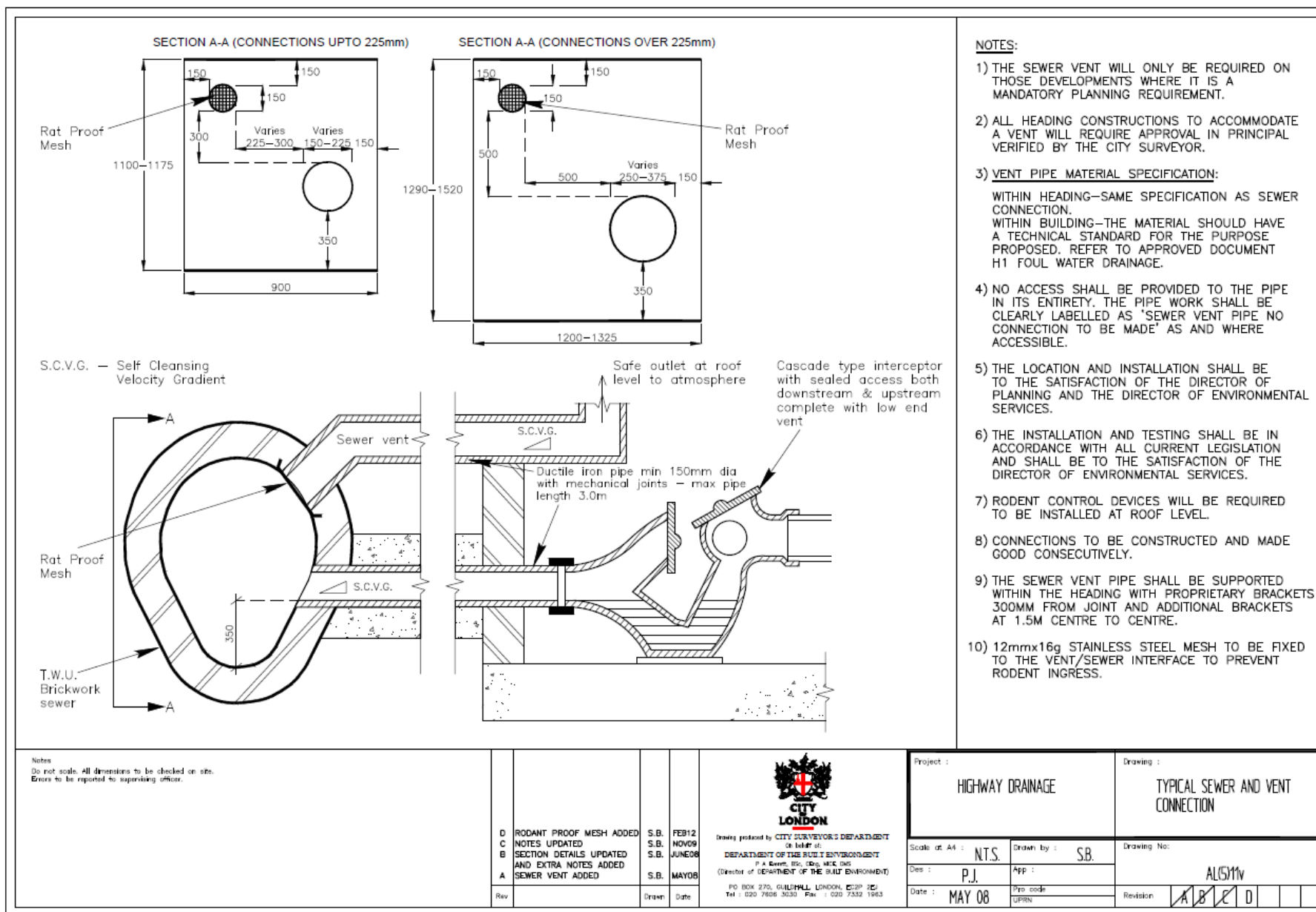
**You are advised to submit proposals in writing concerning these matters to the above address**

If you require any further advice or information on this matter, then please do not hesitate to contact a

Member of the Pollution Team on 020 7606 3030 or email:

[publicprotection@cityoflondon.gov.uk](mailto:publicprotection@cityoflondon.gov.uk)





28/06/2008 16:17:26 Baynes, Scot. H:\Projects\New Structures\CAD\HIGHWAYS\Drainage & Sewer Subways - Cadd\Standard Drainage Details - AL511 - Inc Vent - Read Only.dwg

## **APPENDIX F**

### **Traffic Management Requirements**

#### **General**

The Contractor will be required to use designated traffic routes. These must be agreed during the site operations planning stage with the Department of Markets and Consumer Protection Highways Management Group (020 7332 3993).

If necessary, proposed routes will also be discussed with The City Police (020 7601 2222), Transport for London (020 7474 4770), Port Health and Public Protection (020 7606 3030) & The Metropolitan Police. (020 7230 1212).

Whenever possible vehicles must enter and exit the site in a forward direction, any exceptions to this rule must have prior consent from the Department of Markets and Consumer Protection Highways Division (020 7332 3578).

A competent banksman should be provided to assist your drivers accessing & leaving sites where there are busy streets etc., thereby ensuring pedestrian safety & minimal disturbance to other traffic.

Deliveries to the site should be properly co-ordinated. Parking in local streets whilst waiting for access to the site is not permitted. A 'parking dispensation' will be required for vehicles unloading or loading in the street. (Contact the Traffic Management Office on 020 7332 3553 to arrange this)

The Contractor will be held responsible for any damage caused to the highway by site activities and will be required to carry out the temporary or permanent reinstatement of roads, kerbs, footpaths & street furniture to the satisfaction of the City.

The City encourages use of systems where vehicles serving sites regularly are identified by prominently displayed notices.

Contractors must not allow mud or other spoil from sites onto the highway adjacent to the site. Wheel washing plant or other means of cleaning wheels must be used before vehicles leave unpaved sites.

#### **Arranging road closures in connection with crane & other heavy lifting equipment deliveries.**

The correct procedure involves firstly telephoning the Pollution Control Team to agree the hours of operation and noise implications of your outline proposals on 020 7606 3030.

**The 'mobile crane environmental health authorisation & structures form'** – 'Appendix I' should then be completed and e-mailed to the Pollution Control Team via the following e-mail address for approval: [publicprotection@cityoflondon.gov.uk](mailto:publicprotection@cityoflondon.gov.uk)

Once received, the completed form will be checked, any necessary amendments agreed with the applicant and returned to the applicant signed by the authorising officer.

Formal application for any crane operation and / or road closure must then be made in person to the Department of Built Environment's Traffic Management Office. Applications will only be considered by appointment, and applicants must have details of the proposed date, time and nature of the operation at this time. Also, a completed 'Appendix I' signed by the authorising officer must be presented, together with the appropriate payment. For details of current charges or to make an appointment, telephone 020 7332 3553.

### **Important Note- Underground 'Structures'**

The part of Appendix I relating to 'structures authorisation' must also be signed by the crane company's representative before it is presented to The Traffic Management office. It is the crane operators responsibility to check whether there are any underground 'structures' such as subways, car parks, vaults or railway tunnels under, or adjacent to the part of the highway where the crane is to be sited.

Operators must contact the City's Structures officer on 020 7332 1544 to discuss the operation and, if required, the owners of any private underground structures such as London Underground Ltd. (020 7222 1234)

### **Abnormal Loads**

Prior permission for any **abnormal loads** (as specified in legislation enforced by the City of London & Metropolitan Police forces) is required from The City of London Police's traffic planning section (020 7601 2143) & The Metropolitan Police's abnormal loads section (020 8246 0931). Generally, such deliveries have to take place on weekdays after 19.00 hours or at weekends and may also require prior agreement from 'Transport for London'. Contact 020 7474 4770.

### **Standard for Construction Logistics – Managing Work Related Road Risk**

In addition to the particular requirements above, the City expect all Contractors to observe the Standard for Construction Logistics – Managing Work Related Road Risk, especially as all journeys have to pass along routes administered by Transport for London. It is recommended that all Developers/Project Managers include adherence to the Standard as a contractual obligation for all of their Contractors.

### **Fleet Operator Recognition Scheme**

The City of London has a fleet of around 150 vehicles, and has a Gold accreditation FORS assessment. It is expected that all fleet operators within the City will be a member of the scheme, with at least a Bronze accreditation. Whilst it is recognised that most construction sites will be serviced by a variety of construction suppliers, the City of London will actively encourage all developers and project managers to insist that ALL vehicles visiting their sites are registered with FORS. MACE and Berkeley Group have now made this a contractual obligation

## **APPENDIX G**

### **SITE INFORMATION SHEET**

Working and Out of Hours Contact No: 020 7606 3030

Please email the details below to:  
[publicprotection@cityoflondon.gov.uk](mailto:publicprotection@cityoflondon.gov.uk)

<b>Contact Details</b>			
<b>Date form completed:</b>		<b>Date works starting:</b>	
<b>Site name and address (Site Plan to be attached)</b>			
<b>Name of Site Contact:</b>			
<b>Site contact direct dial number and e-mail address:</b>			
<b>Site 24 Hour Contact Number:</b>			
<b>Contractor Company Name:</b>			
<b>Name of Contractor Contact:</b>			
<b>Contractor address</b>			
<b>Contractor contact number and e-mail:</b>			
<b>Details of Works</b>			
<b>Proposed Working Hours:</b>			
<b>Approximate dates of Works:</b>			
<b>Brief Details of Works to be Carried Out:</b>			



## **APPENDIX H**

Pollution Control Team  
City of London, PO Box 270, Guildhall, London EC2P 2EJ  
Normal and Out of Hours Contact No: 020 7606 3030  
[publicprotection@cityoflondon.gov.uk](mailto:publicprotection@cityoflondon.gov.uk)

### **SITE HOURS VARIATION REQUEST SHEET**

*This form must be completed and returned to the Pollution Control Team at least 5 days before the activities are to take place. The site hours requested can only be worked if approval is given and this form is countersigned by relevant Environmental Health Officer(s).*

<b>Date:</b>				
<b>Company:</b>				
<b>Company Contact:</b>				
<b>Company Contact for Operation:</b>				
<b>Site Name and Address:</b>				
<b>Direct Number:</b>				
<b>e-mail address:</b>				
<b>Operation(s) including location on site:</b>				
<b>Date of operation(s)</b>				
<b>Proposed Working hours:</b>				
<b>Company contact(s) for operation(s):</b>				
<b>Details of operation(s):</b>				
<b>Reasons for the operation(s):</b>				
<b>Plant and/or tools used:</b>				
<b>Predicted noise levels at sensitive location<sup>1</sup></b>	<b>Location</b>	<b>High</b>	<b>Medium</b>	<b>Low</b>
<b>Mitigation measures to minimise high and medium levels of noise:</b>				

<b><sup>1</sup> Criteria for predicted noise levels</b>	
<b>High</b>	Operations that involve frequent mechanical impact, large numbers of plant and/or are continuous for 30 to 60 min. in every 1 hour.
<b>Medium</b>	Operations that involve manual impact noise, movement of plant (e.g. excavation, movement of materials etc.) and/or are continuous for 10 to 25 min. in every 1 hour.
<b>Low</b>	Little or no perceptible noise above background levels at receptor, manual activities, limited plant and/or are continuous for up to 10 min. in every 1 hour.

<b>Residents and businesses likely to be affected. e.g. addresses, site maps etc.</b>	
<b>Notification method (copies of written communications to be included)</b>	

**For Environmental Health use:**

**Variation Number:** \_\_\_\_\_

**Variation Granted: YES/NO** (delete as appropriate)

If **YES**, any additional comment/specific conditions:

--

If **NO**, please provide brief details/reasons:

--

<b>Name:</b>	
<b>Signature:</b>	
	<b>Environmental Health Officer</b>
<b>Date:</b>	



## APPENDIX I

### Environmental Health MOBILE PLANT & STRUCTURES NOTIFICATION

[publicprotection@cityoflondon.gov.uk](mailto:publicprotection@cityoflondon.gov.uk)

*In order to demonstrate the environmental impact of the operation has been minimised, this form must be signed by Environmental Health and presented to the Street Management Office at your authorisation appointment. This form alone does not constitute authorisation.*

<b>Company Name:</b>	
<b>Contact Name:</b>	
<b>e-mail address:</b>	
<b>Telephone No/Site Contact Mobile No:-</b>	
<b>Company Address</b>	
<b>Street Name &amp; Location (Where operation is to take place):</b>	
<b>Type Of Operation:</b>	
<b>Are any noisy operations involved?</b>	
<b>Weight of Crane:</b>	
<b>Type Of Traffic Prohibition:</b>	
<b>Date Of Street Management Services Appointment:</b>	

(Times Requested): (please state **TIMES** below in the relevant section)

<b>(Monday-Friday)</b>	
<b>(Saturday Only)</b>	
<b>(Sunday Only)</b>	
<b>(*Friday/Saturday-Sunday)</b> (please also state non operational times) (*delete where necessary)	

#### **Authorisation Declaration (to be signed by environmental officer)**

<b>State Name:</b> (of environmental officer) [see Map]	<b>Authorised Signature:</b>	<b>Date:</b> (of confirmation)

**B**

#### **STRUCTURES AUTHORISATION NOTICE**

Are there any underground City of London or Privately owned structures? (See List for Corp of London structures).		If YES, please provide documentation that permission has been provided.	Signature of Crane Representative:
Yes	No		Date:

If you fail to produce this form (signed by environmental health and crane company) at your appointment, you may have to book another appointment which will delay your operation.

**To be completed by Street Management Services Officer at appointment:**

<b>INDEMNITY NUMBER:</b>		<b>DATES AGREED:</b>	
<b>SMS OFFICER:</b>			
<b>DATE:</b>			



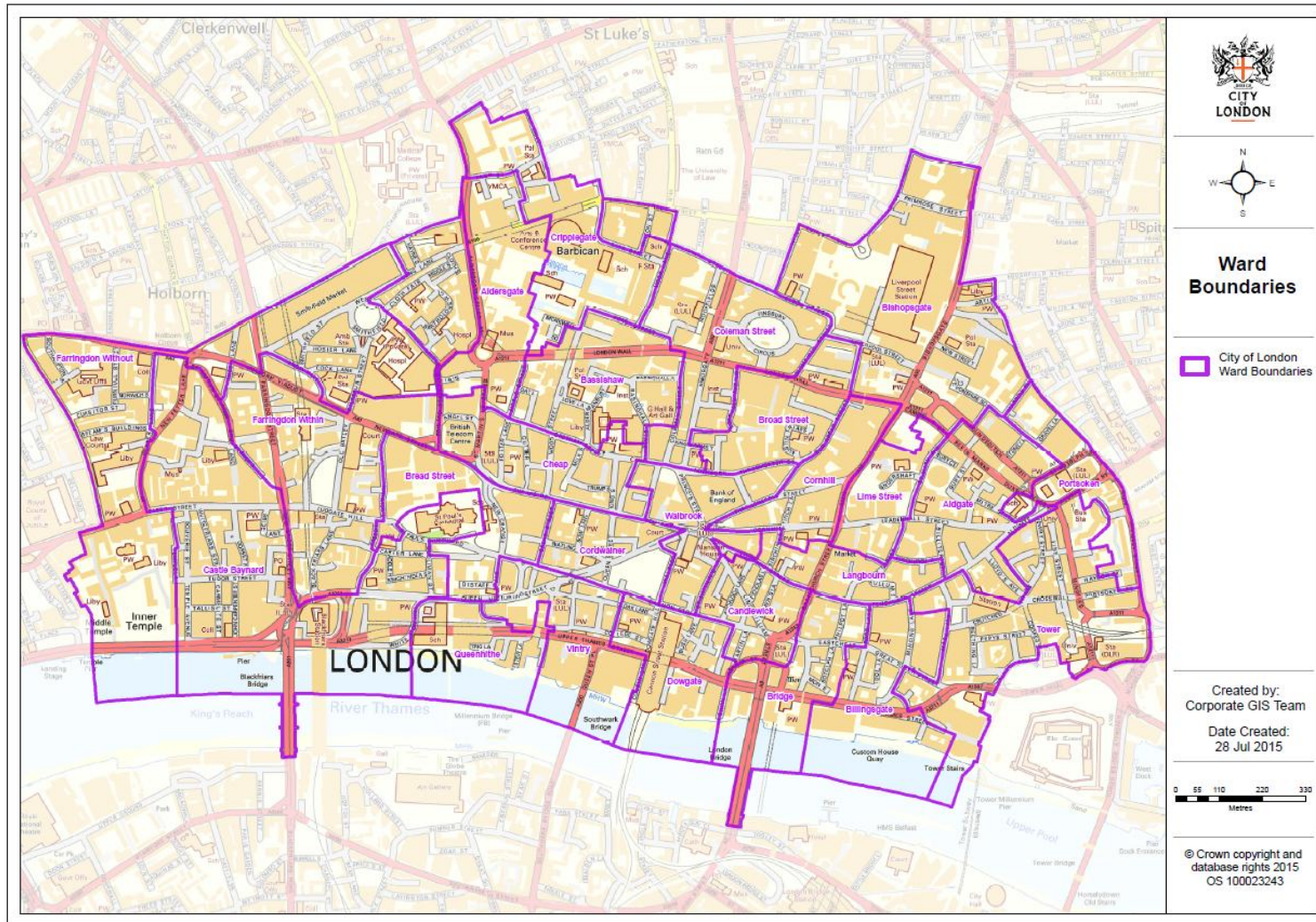
## **Appendix J**

### **NEW MAP**

## Appendix K

Search online to find a ward member:

[www.democracy.cityoflondon.gov.uk/mgFindMember.aspx](http://www.democracy.cityoflondon.gov.uk/mgFindMember.aspx)



## APPENDIX L

### SITE SIZE AND MONITORING CONTRIBUTION

#### Size of the development

##### Category 1: Large scale Major Developments

- Residential - 200 or more units
- Industrial, commercial or retail floor space -10,000 square metres.

##### Category 2: Medium Scale Major Developments

- Residential between 10 and 199 (inclusive) units.
- For all other uses – floor space between 1,000 square metres and 9,999 square metres or where the site area is between 0.5 hectare and less than 2 hectares.

##### Category 3: Minor Developments

- Residential - Between 1 and 9 (inclusive) units.
- For all other uses - floor space of less than 1,000 square metres or where the site area is less than 1 hectare.

<b>Category 1 Site</b> (site example: construction and or deconstruction sites)	Services required
	Advice to applicants relating to environmental requirements e.g. full scheme of protective works including noise and dust mitigation measures. Meetings and follow up correspondence as required for first year site set up only or as phases of development progress e.g. demolition and ground works to construction.
	Review of draft scheme of protective works for first year site set up only or as phases of development progress e.g. demolition and ground works to construction.
	Site visits twice a week over the duration of the developments to assess compliance with agreed requirements.
	Complaints investigation and follow up.
	Attendance at Community Liaison events to include initial consultation and on-going events.
	Review and approval of Site Hours Variation Requests.
	Review of noise, dust and complaint monitoring data.
	<b>Cost for Category 1 site:</b> <b>£53,820 for first year of project.</b> <b>£46,460 for each year thereafter.</b>

<b>Category 2 Site</b> (site example: retainment of façade with internal works)	<b>Services required</b>
	Advice to applicants relating to environmental requirements e.g. full scheme of protective works including noise and dust mitigation measures. Meetings and follow up correspondence as required for first year site set up only or as phases of development progress e.g. demolition and ground works to construction.
	Review of draft scheme of protective works for first year site set up only or as phases of development progress e.g. demolition and ground works to construction.
	Site visits once a week over the duration of the developments to assess compliance with agreed requirements.
	Complaints investigation and follow up.
	Attendance at Community Liaison events to include initial consultation and on-going events.
	Review and approval of Site Hours Variation Requests.
	Review of noise, dust and complaint monitoring data.
	<b>Cost for Category 2 site:</b> £30,935 for first year of project. £25,760 for each year thereafter.
<b>Category 3 Site</b> (site example: involving a refurbishment only)	<b>Services required</b>
	Complaints investigation and follow up.
	Review and approval of Site Hours Variation Requests.
	<b>Cost for Category 3 site:</b> £5,060 per annum.

## **Appendix 2**

### **City of London Noise Code of Practice for Deconstruction and Construction Sites 2017: analysis of feedback to stakeholder consultation**

#### **Introduction**

The refreshed and updated draft Code of Construction Practice sets out the approach to ensure the use of the best environmental options in planning and managing construction and deconstruction (demolition) in the City of London.

The draft Code was presented to this committee on 24<sup>th</sup> January 2017 and was made available online for stakeholder comment during a 3 month period that ended on 14<sup>th</sup> July 2017. The consultation draft version can still be downloaded from [here](#). The Code was promoted widely on the City of London social media platforms, articles were placed in City publications such as the City Property Association Newsletter, City Resident Magazine. The consultation was emailed directly to all City of London Members, City Officers, London Noise Action Forum members, London Boroughs including neighbouring Boroughs, City property Association Members, City Developers, all Considerate Contractor Scheme construction, demolition, streetworks contractors, the Noise Abatement Society, the Institute of Acoustics. In addition the draft Code was presented to the DBE User group and the City Wide Residents meeting.

#### **Number of consultation responses received**

A total of 37 written submissions, totalling 170 individual comments plus a number of informal comments, were received in response to the consultation. These submissions can be broken down into four main categories as follows:

- Residents and residents groups: 24 (65%)
- City of London departments & partner organisations: 8 (22%)
- Construction: 4 (11%)
- Noise consultant: 1 (3%)

The responses from residents included four co-ordinated responses by local residents associations (Eastern cluster, Barbican Association, Thomas Moore House Group, Speed House Group) on behalf of their members. The Code contains proposals that are aimed at residents, construction and demolition companies, consultants, developers, businesses and workers and it is the latter categories that are poorly represented in the responses received.

#### **Overall response received**

It is pleasing to report that the overall response to the consultation draft of the Code was very positive with the vast majority of comments supportive of both the overall direction of travel and much of the detail.

## Further analysis of feedback received

This discussion should be read in the wider context that the majority of comments were generally supportive, or very supportive, of the draft Code. Where critical feedback has been received it is usually that the draft Code does not appear to go far enough on a particular issue, with the main underlying message from residents being a call for a stricter approach, additional enforcement and penalties; and for additional resources to be dedicated to enforcing the Code.

The following broad themes have emerged from an analysis of the feedback received, these being issues that have been raised in multiple responses out of the 170 individual comments received:

<i>Theme</i>	<i>Number of individual comments to support</i>
Technical / procedural / editorial queries and suggestions from stakeholders	45
No noisy Saturday construction in residential areas	13
More enforcement / stricter penalties	13
Support for charging proposals	13
Strengthen prohibition on reversing alarms and audible warnings	10
Support for Code	10
Support for existing working hours / days	9
Improved consultation / liaison	6
Improvements to Considerate Contractor Scheme	5
Quiet hours for residents	4
Improved access to residential maps	3
Improved notification of variations granted	3
Individual comments about specific issues	36
Total	170

The various specific technical, procedural and editorial proposals have each been dealt with methodically and have been incorporated where possible.

The relatively large number of responses received from residents and resident groups reflects the high levels of construction experienced in the City of London and the impact this has on the residential population.

A number (13) of individual comments were received requesting more enforcement or stricter penalties for breaches. Enforcement action is required to be conducted in accordance with the City enforcement policy and national legislation. The new schedule of monitoring fees paid for by developers for environmental inspectors will go some way to providing more proactive enforcement of the Codes requirements.

10 residential respondents requested the approach to audible alarms be strengthened to a general requirement for broadband alarms. This approach has been supported and is now included in the Code.

Suggested improvements received in relation to the Considerate Contractors Scheme have been passed to the officers in DBE who administer the scheme for their consideration.

The feedback received from colleagues in other Departments is very supportive and mostly consists of specific suggestions to retain the existing arrangements for noisy working hours and support for the proposed charging scheme with a potential to expand this to other Air Quality and Highways initiatives.

### **Proposed response to feedback received**

The Code has been edited and updated in response to the issues raised. The key proposed changes are listed in Appendix A.

Officers have provided a separate briefing note in Appendix 3 to the Committee report in response to the matter of Saturday working raised by residents, City Officers and construction companies.

It is acknowledged that there have been no responses to the consultation exercise from developers who the charging regime will affect despite very specific approaches being made directly to this sector.

Table of amendments to the Code post consultation		
Paragraph	Details	Reason for Change
Cover N/A	Replace M&CP with COL.	Unnecessary use of M&CP. COL document.
Foreword 1,4,5	Added - ‘This Code meets one of the aims of the City Noise Strategy which is to mitigate and minimise noise and noise impacts that could adversely affect health and well-being of City residents, workers and visitors and to avoid noise and noise impacts that could have a significant adverse effect.’  ‘schedule of monitoring contributions introduced.’  Deleted -  ‘and this year will look in particular at improvements in the field of air quality’.	Text edited so phrasing more aligned with the City Noise Strategy and with national policy in the NPPF and NPSE.  Attention drawn to monitoring costs.  CCS open to all environmental examples.
Para 1.4	Added ‘at the earliest opportunity. ‘	In response to respondent 4 comments.
Para 1.7	‘by the Contractor’	
Fig 2.5	Added ‘neighbours and community groups’	In response to respondent 8 comments.
Para 2.8	Added ‘Residents’	In response to respondent 5 comments.
Para 2.17	Amended – Replaced ‘may’ with ‘will’	In response to respondent 29 comments.
Para 3.10	Amended and bold ‘it will be barred between 0900 and 1700 hours’.	In response to respondent 8



		comments.
Para 3.30	Deleted 'wherever practicable'.	In response to respondent 8 comments.
Para 4.4	Insert: 'As additional best practice and case studies become available they will be available at <a href="http://www.cityoflondon.gov.uk/airqualityconstruction">www.cityoflondon.gov.uk/airqualityconstruction</a> '	In response to respondent 7
Para 4.12	<p>Insert / delete text</p> <p><u>...Before sourcing diesel plant, consideration needs to be given to low and zero emission plant, such as electric or hybrid MEWPs. Where diesel plant is employed they it should also be well maintained adhere to the NRMM policy below as a minimum. Notwithstanding the policy size requirements, ALL diesel plant should be the lowest emission available.</u></p> <p><u>...or updates to the overall NRMM policy requirements, which should be adhered to,</u></p> <p><u>In order to demonstrate NRMM compliance, best practice includes using stickers on machinery to show engine stage and the use of a spreadsheet to detail all equipment on site, with photos and a compliance reference; such best practice is encouraged on City sites.</u></p>	In response to respondent 4 and for clarity
Para 4.13	<p>Delete text: <del>Alternative technologies are also available and should be investigated.</del></p> <p>Insert text:  <u>Where generator use cannot be avoided, it should be a lower emission solution, such as hybrid, gas or hydrogen technology. Where diesel is used, the newest Euro standard engine should be used (in accordance with the NRMM policy), with a lower emission solution that incorporates battery storage technology. This reduces generator size and running hours, cuts fuel consumption, emissions and noise. The use of hydrogen technology for lighting towers and site cabins rather than generators</u></p>	In response to respondent 6 and 7

	<u>should also be considered.</u>	
Para 4.21	<p>Insert and delete text:</p> <p>a. ....<u>Plans should be made to eliminate dusty works, where this is not possible</u>.....</p> <p>b. All sites should be <u>sufficiently</u> screened / wrapped <u>in order</u> to prevent offsite dust deposition. <u>Plans should be made for screening dust generating activity and for water to be</u> <del>and plans made for dust generating activities to be screened and water</del> available for damping down.</p>	In response to respondent 4 and for clarity
4.23	<p>Insert and delete text:</p> <p>d. <u>Dusty works should be eliminated; where this is not possible</u>, solid screens or barriers of appropriate height should be erected around dusty activities and/or the site boundary and <u>action taken to prevent offsite deposition</u>. <del>Where there is a high dust potential these areas should be fully enclosed, where possible.</del></p>	In response to respondent 4 and for clarity
4.24	<p>Insert and text:</p> <p>c. .... <u>full load only delivery</u>, considered logistics planning, <del>and</del> liaison with other sites within close proximity <u>and the use of consolidation centres</u>. To that end, <del>produce</del> a Construction Logistics Plan <u>should be produced</u> to manage the sustainable delivery of goods and materials. <u>See TfL Guidance:....</u>  <a href="https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/guidance-by-transport-type/freight">https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/guidance-by-transport-type/freight</a></p> <p>d. ....<del>and</del> Implement a Travel Plan ....  <a href="https://www.cityoflondon.gov.uk/services/transport-and-streets/transport-planning/Pages/default.aspx">https://www.cityoflondon.gov.uk/services/transport-and-streets/transport-planning/Pages/default.aspx</a></p> <p>j. <u>Where possible, vehicles visiting site should sign up and adhere to FORS standards (or equivalent). Best practice has noted the use of an on-line</u></p>	In response to respondent 4, 6 and 12 and for clarity

	<u>booking system which only allows compliant vehicles to attend site and this is encouraged.</u>	
Para 4.26	Delete text e. <del>Bag and remove any biological debris or damp down such material before demolition</del>	In response to respondent 4
Para 5.2.3	Amended – <u>The City advises that all projects with an estimated construction cost exceeding £300,000 excluding VAT <del>have</del> require...</u>	Legislation repealed.
Para 6.1	Amended – ‘The City recommends...’	In response to respondent 4 comments.
Para 6.8	Amended ‘ ‘in compliance with current guidance and legislation’	Legislation repealed.
Para 8.5	Insert.....or equivalent, for example, PEFC certification;	In response to respondent 4 comments.
Para 9.3 and 9.4	Added - 9.3 Site lighting outside of working hours should be designed to the minimum required to ensure safety and security taking to prevent potential impacts on neighbours. 9.4 During the fit out stages of construction, it is a requirement that contractors will utilise black out window coverings.	In response to respondent 8 comments.
11.1	Insert text The Contractor should keep all appropriate documentation <u>and records</u> relevant to the requirements of this Code in designated files held on or <u>accessible from</u> site (i.e. electronic or on-line). They must be available at all times for inspection and review by the City of London or other authorities and should	In response to respondent 4

	<p>include as a minimum:</p> <ul style="list-style-type: none"> <li>• Scheme of Protective Works (as per section 2);</li> <li>• liaison minutes, letters, photos and newsletters.</li> <li>• noise, vibration and dust monitoring results (where applicable);</li> <li>• waste management documentation (where applicable);</li> <li>• inventory of non-road-mobile machinery <u>and corresponding emission standards, with the relevant plant registered on the NRMM website;</u> <del>and emission standards</del></li> <li>• Site hours variation sheets; and</li> <li>• a complaints/incidents log with actions taken.</li> </ul>	
Appendix L	Remove 'average' / 'approximately' / estimate	For clarity



This page is intentionally left blank

**City of London Code of Practice for Deconstruction and Construction 2017**  
**Briefing Paper: Permitted hours for noisy works in the City**

**Introduction**

In response to the City's formal Consultation on the Code of Practice for Deconstruction and Construction (COP), Members of The Port Health and Environmental Services Committee (PHES) received an email (1235/18 June) from the Barbican Association containing a resolution which states that "This Association resolves that the City of London should not permit noisy work from construction sites in or adjoining residential areas on Saturdays."

**Aim**

The aim of this paper is to provide background information to aid decision making and assist the Committee in considering the Barbican Association's resolution.

**COP consultation**

- PHES considered a report on January 24 2017 to consult upon the next iteration of the COP.
- The consultation was open for 3 months, closed on July 14 and ensuring all stakeholders had a chance to respond to the City.
- The City received 37 responses from residents, internal City Departments and construction related companies, totalling 170 individual comments.
- 13 individual comments were received from residents of the Barbican requesting the consideration of a ban on construction on Saturdays and 9 individual comments were received from the construction industry and City Officers supporting the existing arrangements.

**Background and Current Working Arrangements**

The current permitted hours for noisy work are from British Standards and national restrictions on site working hours. These are stipulated in the seventh edition of the COP approved by the PH&ES Committee in 2013 and are:-

- 0800-1800 hours (Monday to Friday)
- 0800-1300 hours (Saturday), by agreement 0900-1400 around Barbican/Golden Lane Estates
- Quiet hours (non-pneumatic) Monday to Friday 1000-1200 and 1400 to 1600; these are applicable to most city sites.
- No noisy working on Sunday, Bank or Public Holidays (except where agreed by the City Corporation)

A planning condition is usually imposed for major developments requiring a 'Scheme of Protective Works' from construction and demolition sites. This Scheme is required to be developed in accordance with the requirements and recommendations of the Code including the control on hours set out above.

The Royal Borough of Kensington and Chelsea (RBKC) and City of Westminster are the only two authorities in London and nationally that have recently introduced their own, similar, Codes of Practice for construction activity which restricts noisy Saturday working in residential areas. This has been done in response to specific residents' concerns with residential neighbours' basement extensions, hence the application of the restriction only to residential areas **Legal advice**

An opinion was sought from the Comptroller and City Solicitor on the Barbican Association proposal from the perspective of both the Planning and Environmental Health regimes:

#### **“Control of Pollution Act 1974**

It would not be possible to justify imposing a complete prohibition on Saturday working as sought by the Barbican Association. The major difficulties are:-

1. The area of the Barbican is not considered to be exclusively residential and is treated as being mixed residential/business;
2. The decrease in ambient background noise at weekends is no longer significant due to the increase in vehicular and pedestrian activity in the City during these times. Therefore, the “oasis of calm” no longer exists in the City at weekends;
3. The presence of the Arts Centre and associated entertainment provided at the Barbican Centre counts against the argument that the Barbican Estate is a quiet place at weekends. It also contradicts the assertion that the Barbican is a residential area;
4. The majority of local authorities in England permit Saturday working between the hours of 0800 – 1300. Whilst Westminster C.C. has now sought to restrict Saturday working in residential areas its reasoning for doing so is based on completely different area characteristics e.g. areas which are almost solely residential than that which the City would have to consider being a mixed residential / business area.

Consequently, the Comptroller is of the view that to attempt to impose a prohibition on Saturday working by way of the use of S.60 Control of Pollution Act 1974 notices would not be possible to justify and would most likely result in successful appeals which attract costs consequences.”

#### **“The Planning Regime**

Planning conditions must meet six tests to be valid. In the context of the application of the COP this applies as follows (the ‘tests’ are underlined for ease of reference).



Each development must be considered on its own merits and the imposition of a planning condition requiring compliance with the Code of Construction Practice via a “Scheme of Protective Works” depends on whether it is justified in the particular circumstances of the proposed development.

If there’s a definite need for it (e.g. to mitigate adverse noise impact of the particular development) and the condition is no wider in scope than is necessary to achieve the planning objective, then it is likely to satisfy the test of necessity.

A condition which relates to planning objectives and is within the scope of the permission would need to meet the test of relevance to planning.

A condition which is justified by the nature or impact of the development will be meeting the test of relevance to the development permitted.

A condition must also be enforceable (i.e. it must be possible to detect and remedy a breach); it must be precise (i.e. make clear what must be done to comply with it), and reasonable in all other respects (i.e. must not place unjustifiable and disproportionate burdens on the developer.)

A condition requiring compliance with the COP via a “Scheme of Works” justified in the specific circumstances of the case to protect residents from harm is therefore likely to meet the six tests. However, such a condition tied to the City’s current COP won’t prevent noisy works on Saturday mornings in residential areas unless the COP is amended to that effect, which would require justification by way of an evidence base for making the change following public consultation, plus Member approval.

Were the City Corporation to consider there are grounds, backed by a full evidence base, for the proposal for changing the current regime along the lines suggested by the Barbican Residents, such a substantial change would necessitate a further consultation to allow developers and anyone else affected to have their views taken into account.”

### **Discussion**

The City of London already requires construction companies to consider residents and other occupiers when scheduling Saturday morning works and take into account their wish for less noisy works to take place. These considerations are also balanced with other issues that must be taken into account such as safety of pedestrians and cyclists, congestion, access, air quality, workforce and overall programme.

The current arrangements deliver a compromise whereby activities such as scaffolding, crane erection and dismantling and road resurfacing, can be managed on a weekend (by agreement with the Environmental Health Officer) because the consequences of undertaking them on a weekday are disproportionate.

In the vicinity of the Barbican, although standard hours in the City’s COP are applied, site by site assessments of works are also made. For example, the lack of traffic in places such as Moor Lane and Silk St does allow an opportunity to undertake some streetworks on weekdays. However, it is not possible on streets such as London Wall

and Aldersgate Street, so work on Saturday mornings in these roads is still a necessity.

The mixed commercial and residential demographic in the City of London, is protected by the terms of the City's COP, and is normally exposed to a total of thirty five noisy working hours per week, excluding weekday 'quiet hours' and including Saturdays working.. This compares with Westminster or RBKC who do not apply quiet hours and, excluding Saturdays, a total number of fifty noisy working hours per week are experienced by residents. City residents are currently experience fifteen less noisy hours per week than neighbours under the Westminster or RBKC COP regimes.

### **Conclusion**

The COP seeks to set out simply and clearly what constitutes acceptable site practice within the City. It balances the needs of the Business City (particularly construction sites) to undertake construction works, with the expectations of residents and neighbouring businesses who wish for impacts to be minimised.

The advice from the Comptroller is that to impose a prohibition on Saturday working would not be possible to justify and would likely result in successful appeals and subsequent costs.

**If it were intended to alter the Saturday working hours significantly, as proposed by the Barbican Association, another formal public Consultation would be necessary.**

**PROPOSED AMENDMENTS TO STANDARD PLANNING CONDITIONS**  
**(DELETIONS ARE SHOWN)**  
**(AMENDMENTS ARE UNDERLINED)**

M10E There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects ~~during demolition shall be~~ has been submitted to and approved in writing by the Local Planning Authority ~~prior to any demolition taking place on the site.~~ The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution)

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

M11E There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction ~~shall be~~ has been submitted to and approved in writing by the Local Planning Authority ~~prior to any construction work taking place on the site.~~ The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution)

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.

M12E Works shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects

has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the development process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution)

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

<b>Committee</b>	<b>Dated:</b>
Port Health and Environmental Services	<b>19 September 2017</b>
<b>Subject:</b> Low Emission Neighbourhood Annual Update	<b>Public</b>
<b>Report of:</b> Director of Markets and Consumer Protection	<b>For Information</b>
<b>Report author:</b> Ben Kennedy Low Emission Neighbourhood Project Manager, Port Health and Public Protection Dept.	

## Summary

In July 2016 the Mayor of London awarded the City of London Corporation £990,000 over three years to implement a Low Emission Neighbourhood (LEN) in the north west of the Square Mile encompassing an area that includes the Barbican and Golden Lane Estates, Barts hospital and the Guildhall. The project formally commenced in September 2016 and this report provides an update on the activities of the first year of the project.

## Recommendation

Members are asked to note the contents of the report and continue to support the activities of the LEN project.

## Main Report

### Background

1. The City of London LEN is one of five that will be set up across eight London boroughs. All LENs will come into full effect by Spring of 2019.
2. The overall aim of the LEN is to improve local air quality by reducing traffic levels and support the transition to ultra-low and zero emission vehicles in the locality. It is anticipated that the most successful measures will be trialled in the LEN area and then be rolled out across the City.
3. The key objectives of the City's LEN project are to:
  - Reduce emissions
  - Reduce exposure
  - Raise awareness of air pollution
  - Pilot and test new ideas and approaches
  - Monitor and understand
4. The map in the Appendix A outlines the LEN area.

## Update on past 12 months

5. A wide range of activities and schemes have been successfully undertaken in the past 12 months, a selection of which are summarised below:

- *Monitoring* – A network of diffusion tubes have been installed at ten sites across the LEN area providing ongoing monitoring of nitrogen dioxide levels since the start of the project. Monitoring of black carbon and particulates has also been undertaken through the use of personal monitors.
- *Community engagement activities and events:*
  - LEN Launch Event, City of London Girls School – January 2017
  - Air Quality & Cycling Pop Up Event, Fann Street – June 2017
  - Air Quality Champions Business Workshop – June 2017
  - City in Bloom Clean and Green in Seventeen campaign – various sites May to July 2017
  - City of London School for Girls LEN presentation: Dr Ian Mudway, King's College London – June 2017
  - Golden Lane estate walkabouts x 2 – November 2016, June 2017
  - Barbican resident presentations x 7 – November 2016 – July 2017
  - Moor Lane Pop Up Garden resident consultation event – May 2017
- *Business engagement* – over 50 organisations have been engaged with over 20 participating in air quality benchmarking activities. The Air Quality Champions network was launched with the first workshop hosted by Investec, Gresham Street, in June.
- *Air Quality Champions business grant* – this scheme offers a total of £100,000 to businesses to implement innovative air quality improvement measures. Businesses have until 29<sup>th</sup> September to bid for the funding and projects must be completed by December 2018.
- *Idling engines* – several Idling Engine Action Days have been held in and around the LEN area with volunteers going out and approaching drivers with idling engines. A special LEN event was held at Barts Hospital with ambulance and patient transport drivers to raise awareness and reduce instances of idling in and around the hospital.
- *Beech Street* – a comprehensive feasibility study assessing the impact of different traffic restriction scenarios has been undertaken to determine the best option for reducing air pollution in this covered street. Due to the evolving proposals for the Cultural Mile and the Centre for Music it has become apparent that there is a need for wider traffic modelling requirements to support justification for any proposed traffic scheme. The LEN Project Manager is working with Department for Built Environment (DBE) and the Cultural Mile team to determine how respective objectives can be aligned to achieve rapid improvement in air quality whilst also delivering the public realm improvements greatly needed in Beech Street.
- *Reducing emissions from freight* – the LEN Project Manager has been working closely with DBE to collect data and information on current freight

and servicing activity in the LEN area to inform an action plan for reducing freight traffic in the peak hours. Work funded by the LEN project so far has included a survey of all on-street loading and unloading activities in the EC2Y (Barbican) and EC2V (Guildhall) post codes and the development of delivery and servicing plan (DSP) case studies for eight key organisations in the LEN area.

- *Resident electric vehicle charging* – the LEN Project Manager has been participating in a Barbican Residents' Working Party to identify the best solution for the provision of electric vehicle charging infrastructure. In June 2017 the Barbican Residents' Committee approved a pilot project to install charging points in five different Barbican car parks. The power supply upgrades are underway and the City is due to appoint a contractor to supply and install the charging points in September 2017. It is anticipated the points will be installed and operational in October 2017.
- *Measures to support zero emission capable taxis* – discussions are ongoing with TfL and DBE on how best to provide electric vehicle charging infrastructure for zero emission capable taxis in the City. The LEN project manager was closely involved in identifying the proposed site for a rapid charging hub in the Castle Baynard car park. Trial holes in the footway have been undertaken at several taxi rest bays in the LEN area to determine their suitability for charging infrastructure. It is hoped that approval can be obtained for at least one charging point at a taxi rest bay in the LEN area to act as a trial to determine suitability for elsewhere in the City.
- *Greening in the area* – as part of the City in Bloom (Clean and Green for Seventeen challenge) the LEN Project Manager has been working with Friends of City Gardens to support the installation of a number of pop up air quality gardens in the public realm. The largest of these was the Moor Lane pop up garden at the corner of Moor Lane and Silk Street which was opened on National Clean Air Day on the 15<sup>th</sup> June 2017.
- *Cycle parking improvements* – phase 1 of cycle parking improvements funded by the LEN have included the installation of 90 secure cycle parking spaces in the Barbican Estate car parks and a further 6 on the Golden Lane estate.
- *Cargo bikes* – a trial cargo bike hire scheme has been established on the Golden Lane Estate with the intention of expanding the project to three other locations in the LEN area to provide an area wide scheme for use by residents and businesses. The City Gardens team based at the Barbican Estate have also been given a cargo bike to reduce the need for them to drive their van from the depot to the Barbican site.

6. Further details of all of activities and schemes undertaken as part of the LEN in the past 12 months can be found in Appendix A.

#### **Planned outcomes for next 12 months**

7. The next 12 months will see a great deal of activity in the LEN area with the following key outcomes expected:

- Launch of residential electric vehicle charging points on the Barbican Estate car park
- Launch of electric Zipcar vehicles on the Barbican Estate
- Greening of Aldersgate Street footbridge
- Urban air quality garden outside the Museum of London entrance
- Launch of an area wide cargo bike hire scheme
- Development of proposals for zero emission capable taxi ranks
- Further progression of proposals for an ultra-low emission vehicle (ULEV) only street in the LEN area

### **Financial implications**

8. The financial expenditure for the project is detailed below. 'Other' funding will be additional match funding provided for the project and will be from a variety of sources, for example department underspend, City businesses, Transport for London, staff time, Section 106 etc.

<b>Financial Year</b>	<b>LEN grant</b>	<b>LIP funding</b>	<b>Other</b>
2016/17	255,000	100,000	nil
2017/18	470,000	100,000	TBD
2018/19	265,000	100,000	TBD
<b>Total</b>	<b>990,000</b>	<b>300,000</b>	

### **Corporate & Strategic Implications**

9. The LEN project supports the aims and objectives of the City of London Air Quality Strategy 2015–2020, in addition to a number of other corporate policies and strategies. It also goes towards addressing air quality, which has been identified as a corporate risk.

### **Conclusion**

10. The LEN project is progressing well and is expected to continue to do so with the support of the new Air Quality & Communications Assistant who will be assisting the LEN project manager on a part time basis.

11. With the continued support of other City Corporation Departments such as DBE and Barbican Estate the LEN project is on schedule to be delivered on time and to budget.

### **Appendices:**

- Appendix A: Summary of LEN Schemes 2016-17



### **Further information**

Ben Kennedy  
Low Emission Neighbourhood Project Manager  
T: 020 7332 3483  
E: [ben.kennedy@cityoflondon.gov.uk](mailto:ben.kennedy@cityoflondon.gov.uk)

This page is intentionally left blank

## Appendix A:

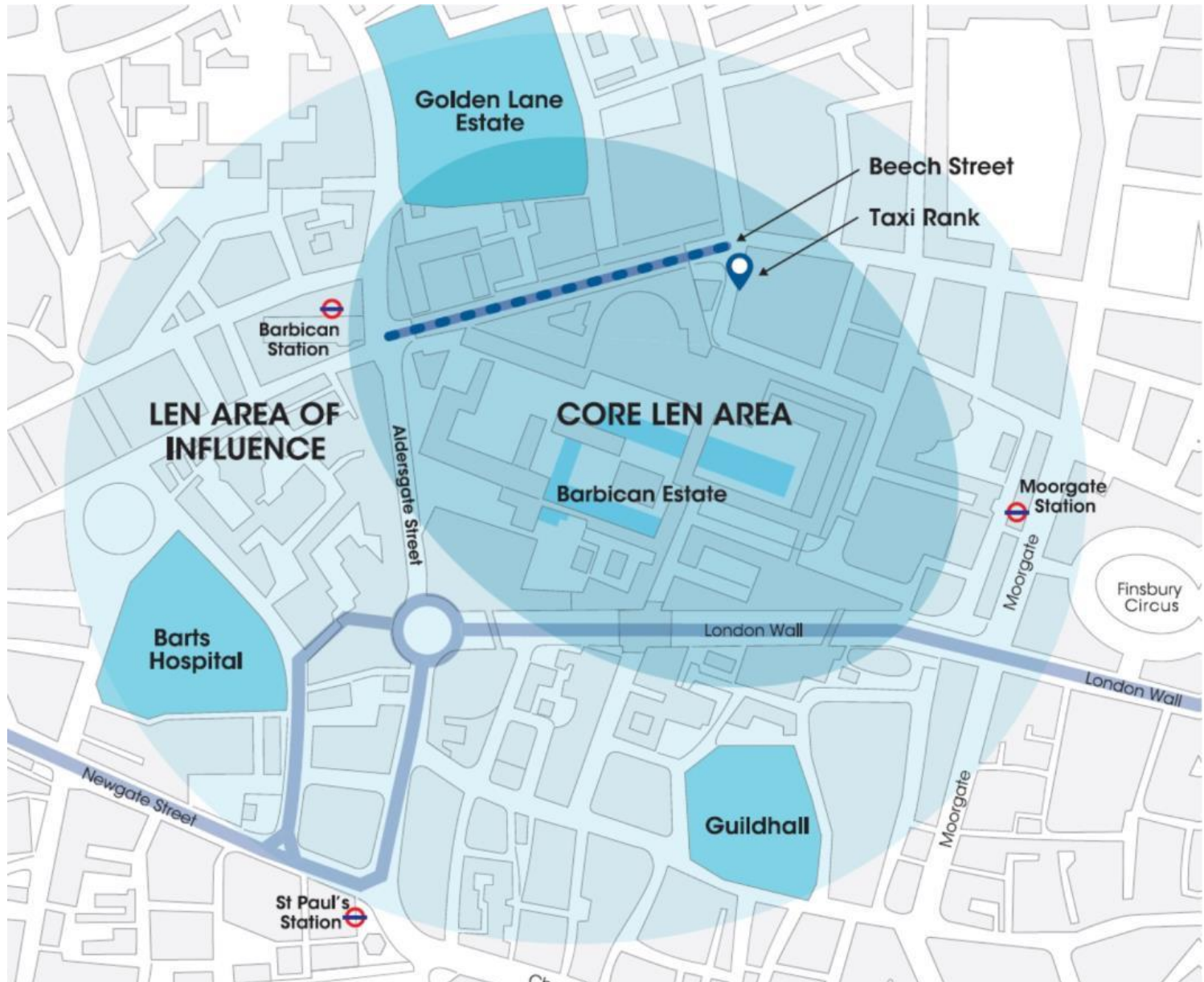
### Summary of City of London Low Emission Neighbourhood (LEN) schemes undertaken in 12 months to August 2017



SUPPORTED BY

**MAYOR OF LONDON**

## LEN Area Map



## Engagement – *Launch Event*

The LEN launch event was held at the City of London Girls School in January 2017. **Over 160 people** attended the event, including approximately 100 residents. Stakeholders and residents heard from speakers on subjects that included the LEN project proposals, the actions being proposed by the Mayor of London on a London-wide level, in addition to hearing from Client Earth on why they were taking the Government to Court.

There were also several information stands offering opportunities to learn more about air quality in the City, register for the “Greening the Grey” for City in Bloom challenge, and learn about electric vehicles, including the chance to test drive BMW and Nissan electric vehicles.



**Attendees in front of electric vehicle stand**



**Residents and stakeholders waiting for event to start**



# Engagement – *Clean Air Day and Bike Week Pop Up Events*

On Saturday, 17<sup>th</sup> June, a Pop Up event was held at Fann Street on the Golden Lane Estate, funded and initiated by the LEN project in partnership with the Road Danger Reduction Team, to raise awareness of air quality and promoting safer cycling.

Dr Bike mechanics were on site to offer cycle safety checks and minor repairs while the City of London Police provided free bike security markings which enables bikes to be returned to people easily if they are ever stolen. The London Cycling Campaign were also on hand to tell people how easy it is to cycle in the Capital and were handing out maps and information. The Road Danger Reduction team were on hand to offer advice and information on both air quality and keeping safe on the City's roads.



**Dr Bike and LCC marquee in Fann Street**



**LEN and Road Danger Reduction pop up stall**

## Engagement – *City of London Girls School Lecture*

As part of the awareness raising activities for the LEN project a lunchtime lecture was arranged for students of the City of London School for Girls (CLSG). The lecture was given by the leading air quality academic, Dr Ian Mudway from King's College London on the health impacts of air pollution.

Dr Mudway is a lecturer in respiratory toxicology within the School of Biomedical Sciences at King's College London and an affiliated member of the MRC-PHE Centre for Environment & Health. His recent and ongoing work examines the impact of both traffic and biomass derived particulate matter on the healthy and asthmatic airway, as well as the impacts of chronic exposures to these pollutants on children's respiratory health.

Dr Mudway has also developed lung lining fluid stimulants to provide rapid screening techniques to assess the toxicity of ambient particulate matter, which have been employed to assess the impact of traffic management schemes in London, including the Congestion Charging and Low Emission Zones.

The 45 minute lecture was very popular, with over 100 students in attendance to learn more about the impact of air pollution on human health.



**Dr Mudway talking to the students**



**Students listening to the lecture**

# Business Engagement – Air Quality Champions Network

LEN business engagement activities commenced in early 2017 and so far **50 organisations have engaged**, more than 20 participating in an air quality benchmarking survey.

The Air Quality Champions network was launched on 16<sup>th</sup> June at a lunchtime seminar workshop hosted by Investec, Gresham Street, with **over 40 business representatives** in attendance.

The workshop included presentations by Investec, an update on the LEN project by CrispAir, a resident's perspective on air quality from Barbican resident Sarah Hudson, in addition to Dr Gary Fuller, from King's College University of London, outlining the latest developments on government policy and academic research on air pollution in the UK.

Air Quality Champions are organisations that are committed to reducing their emissions and improving air quality in the Square Mile; their actions are held up as case studies and examples for other organisations to copy or follow.



**Dr Gary Fuller from King's College presenting at the Investec Air Quality Champions workshop**



**Lunchtime workshop attendees listening to Keith Cotton from CrispAir Consulting**



# Business Engagement - Commute to Work Air Pollution Monitoring

The LEN project has funded and provided personalised particulate monitoring for employees on their commutes to and from their place of business. Individuals at the following businesses have participated:

- Museum of London
- Linklaters
- Deutsche Bank
- Simmons & Simmons
- Skanska
- Investec
- Museum of London
- Schroders
- Eversheds
- British Lung Foundation

Individuals were given a personal sidepak monitor and a GPS tracker and asked to keep a log of their daily commute journey.

The results have been fascinating and enabled employees to changes their behaviour and routes to work to reduce their exposure to air pollution. Examples of how the data is presented and overlaid onto a commute journey map are shown to the right.

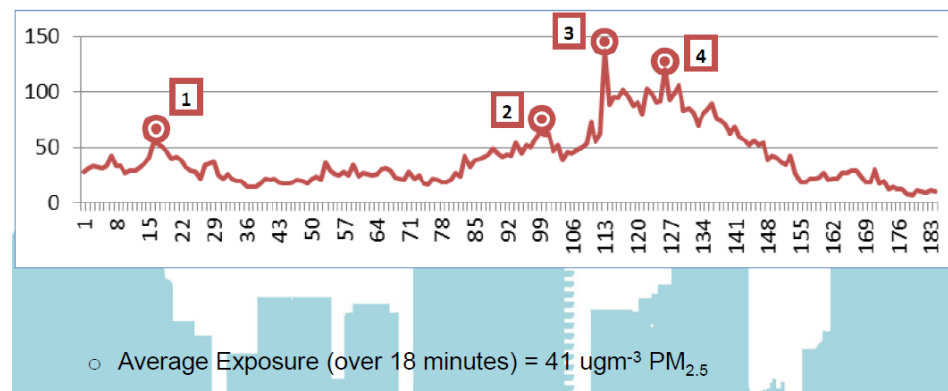
## Monitoring with SKANSKA

- Tube Commute – Paddington to 120 Aldersgate
- Journey Map



## Monitoring with SKANSKA

- Tube Commute – Paddington to 120 Aldersgate
- PM<sub>2.5</sub> Exposure



# Business Engagement – Air Quality Champions Grant Scheme

The LEN Air Quality Champions Grant Scheme was launched in June 2017. Participating businesses can apply for **funding of up to £10,000**.

Through the grant scheme, City firms are being invited to bid for funding to support innovative local solutions to fight air pollution. Examples could include new electric charge points for delivery and service vehicles, working with suppliers to reduce vehicle emissions and empowering staff to monitor air quality on their daily commutes and City journeys.

Successful schemes will be trialled and rolled out to other business in the Square Mile.

The closing date for applications is **29<sup>th</sup> September 2017**, with the final concept to be delivered by 31<sup>st</sup> October 2018.

All participating organisations will be entered into the Air Quality Champions Awards Ceremony to take place in November 2018.

Awards categories will include:

- Most innovative/inventive
- Largest reduction in NOx/PM emissions
- Best value for money



The poster features a blue sky background with a white silhouette of the London skyline. At the top left, it says 'Low Emission Neighbourhood'. At the top right, the 'CityAir' logo is displayed with the tagline 'Bringing clean air to the City'. The main title 'City of London Corporation Air Quality Champion Awards' is in large blue letters. Below this, a paragraph states: 'As part of the City of London Low Emission Neighbourhood (LEN) programme we are delighted to launch a new air quality champions grant scheme.' Another paragraph follows: 'The aim is to release the creativity of businesses in the Square Mile. We would like you to develop innovative solutions to support the City Corporation in its efforts to improve local air quality. We are looking for suitable schemes that can be trialled, assessed and subsequently adopted by other City businesses if successful.' A third paragraph says: 'Businesses that wish to become air quality champions can apply for funding of up to £10,000 to deliver and implement proposals. Overleaf are examples of the type of initiatives that will be considered but please do be creative and suggest other ideas!'. To the right of this text is an illustration of two green trees on a grey hill. At the bottom left is the 'CityAir' logo, at the bottom center is the text 'SUPPORTED BY MAYOR OF LONDON', and at the bottom right is the City of London coat of arms logo.

Low Emission Neighbourhood

CityAir  
Bringing clean air to the City

City of London Corporation  
**Air Quality Champion Awards**

As part of the City of London Low Emission Neighbourhood (LEN) programme we are delighted to launch a new air quality champions grant scheme.

The aim is to release the creativity of businesses in the Square Mile. We would like you to develop innovative solutions to support the City Corporation in its efforts to improve local air quality. We are looking for suitable schemes that can be trialled, assessed and subsequently adopted by other City businesses if successful.

Businesses that wish to become air quality champions can apply for funding of up to £10,000 to deliver and implement proposals. Overleaf are examples of the type of initiatives that will be considered but please do be creative and suggest other ideas!

CityAir

SUPPORTED BY  
MAYOR OF LONDON

CITY OF LONDON

# Awareness – Low Emission Walk

The Cleaner Air Foot Prints were installed for National Clean Air week (12<sup>th</sup>-16<sup>th</sup> June 2017) to improve way finding and encourage more people to take the quieter, less polluted route between Barbican Station and Moorgate, thereby reducing their exposure to air pollution.

This alternative route was promoted at the Barbican station and Moor Lane entrances, as well as along the route, and on social media. The launch of the route coincided with the launch of the Moor Lane Pop Up Garden, another LEN initiative.





## Awareness– *Neighbourhood Stories*

The LEN *Neighbourhood Stories* are a series of interviews with local businesses, residents and visitors, to capture attitudes, beliefs and behaviours, and to raise awareness of the LEN project. The films and photographs have been used as part of the awareness and marketing campaign for the LEN, primarily in social media and at events.

*Neighbourhood stories* forms part of the longer term strategy to engage residents and local businesses, and help support potential physical measures and the introduction of traffic restrictions to improve air quality.

The interviews captured the following:

- Concern about local air quality (what the existing problems are in the area/direct impact on the person's own physical self or wider concerns)
- Positive messages about the LEN project (and the changes LEN will deliver)
- Positive changes people can make (planting, walking and cycling, talking to friends/neighbours/colleagues, changes to business practices)

**Neighbourhood Stories and stakeholder films available on [City youtube channel](#)**



**Barbican resident Sarah Hudson**



**Anna Kowalewska from Sir Robert McAlpine**

# Construction Sites – *Non Road Mobile Machinery (NRMM)*

Non Road Mobile Machinery (NRMM) is the type of machinery that is used on construction sites, for example generators, diggers or cranes, which contain diesel engines. This equipment must now meet a certain standard set by the Greater London Authority (GLA), and site management should ensure that all site vehicles are well maintained to reduce emissions and are not left idling unnecessarily.

As part of the LEN project Sir Robert McAlpine consultants were tasked with auditing all construction sites within the north west area of the City to assess compliance with the GLA standards and the City of London's own Code of Practice.

Where compliance was not met the report recommended actions and City officers are working with developers and construction companies to ensure wider compliance.



## Idling Engines

There has been targeted action against idling engines in the LEN area, with several Idling Engine Action Days taking place since the start of the project, and multiple 'A' boards placed in taxi ranks and coach parking bays to raise awareness.

Air Quality officers have been working with the Traffic Management and Parking teams in DBE to install permanent on street 'no idling engines' signs. Over 30 of these signs have now been installed by DBE across the City.



**Volunteer with taxi drivers**



**Volunteers with No Idling banner outside the Guildhall**



# Idling Engines – *St Bartholomew's Hospital Training Event*

Following complaints about idling engines outside St Bartholomew's Hospital the LEN team arranged and funded a No Idling driver training course for ambulance and patient transport drivers.

The event was held with drivers based at St Bartholomew's Hospital to ensure they not only turn off their own engines but also speak to other drivers to reduce the idling of vehicle engines around the hospital site.



Pop up LEN stall at Barts Hospital



Ambulance drivers learning about the Smogmobile in Barts Hospital courtyard

## Beech Street– *Traffic Restrictions*

A comprehensive feasibility study assessing the impact of different traffic restriction scenarios has been undertaken to determine how best to reduce air pollution in this covered street.

Due to the evolving proposals for the Cultural Mile and the Centre for Music it has become apparent that there is a need for wider traffic modelling requirements to support justification for any proposed traffic scheme.

LEN officers are working with Department for Built Environment (DBE) and the Cultural Mile team to determine how our respective objectives can be aligned to achieve rapid improvement in air quality whilst also delivering the public realm improvements greatly needed in Beech Street.





# Residential Electric Vehicle Charging Points

An Electric Vehicle Working Party was established by the Barbican Residential Committee to develop options for the introduction of electric vehicle charging points for residents on the estate. The LEN Project Manager sits on the Working Party providing advice and input to the project which is being fully funded by the LEN.

Five car parks were chosen to act as pilot sites to identify the most suitable type of electric vehicle charging infrastructure for the estate, and ensure it is future-proofed to enable flexibility if and when technology progresses. The five car parks are Thomas More, Breton / Ben Jonson House, Willoughby Level 01, Bunyon House and Cromwell House.

In March 2017 the power switch rooms and cabling in five car parks were upgraded to accommodate the new charging infrastructure. The EV Working Party has recommended a selection of charging equipment for installation as part of the pilot project to **install 30 charging points (in the 5 car parks)**. The Barbican Residential Committee approved this pilot project on the 5<sup>th</sup> June 2017. It is anticipated that the successful contractor can be appointed by mid-September with installations expected to take place in October 2017.



Image of what the EV wall charger units will look like



Engineers inspecting the newly installed cabinets implemented as part of cabling upgrade works

## Taxis – *EV Charging & Taxi Ranks*

Discussions are on-going with TfL and DBE on how best to provide electric vehicle charging infrastructure for zero emission capable taxis in the City.

The LEN Project Manager was closely involved in identifying the proposed site for a rapid charging hub in the Castle Baynard car park.

Trial holes in the footway have been undertaken at several taxi rest bays in the LEN area to determine their suitability for charging infrastructure. It is hoped that approval can be obtained for at least one fast charging point at a taxi rest bay in the LEN area to act as a trial to determine suitability for elsewhere in the City.

Through the LEN project we are hope to convert taxi rank in Silk Street to a 'Zero Emissions Rank' meaning only the new electric zero emission capable taxis will be able to use it. Again to act as a trial to determine suitability for elsewhere in the City.

## Secure Residential Cycle Parking

As part of the LEN project an audit of the condition and capacity of all cycle parking facilities in the Barbican Estate, Barbican Centre, and Golden Lane Estate car parks was completed in the March 2017. Following on from this audit, a phased programme of installations of upgraded cycle parking facilities is taking place.

In the past 12 months the LEN project has funded and project managed the **installation of 90 secure cycle parking spaces** on the Barbican Estate and a further 6 on the Golden Lane estate.

The LEN project team are also working with the Bike Project charity to donate dozens of abandoned bikes on the Barbican Estate to be recycled and repaired for donation to asylum seekers and refugees living in London.



Newly installed cycle hangars



Existing poor quality facilities



Abandoned bikes waiting to be donated



New secure cycle cage

# Golden Lane Cargo Bike Hire Scheme

A cargo bike is on loan to Golden Lane Estate residents for 12 months. The intention is that, if the trial is successful, a permanent scheme will be introduced and it will be expanded to three other locations in the LEN area to provide an area wide scheme for use by residents and businesses.

The cargo bike is being well used, with a resident hiring it to take their children to the Prudential RideLondon Freecycle event in July, and by the Golden Lane baggers.



**Cargo bike with cover being shown on the Golden Lane Estate**



**Local resident Steve Smith with Joe and Sam at the RideLondon Freecycle event in July (Credit: Steve Smith)**



## Barbican City Gardens – Going Ultra Low

The LEN project has helped the City Gardeners team at the Barbican Estate to be almost zero emission with the provision of electric battery powered mowers and blowers and two cargo bikes. Instead of using the diesel van, the City Gardens team now carry their plants and new electric tools from their depot to the Barbican and Golden Lane estates by cargo bike.

The adoption of the new tools, replacing polluting and noisy petrol fuelled equipment, has already made a difference, with residents benefitting from cleaner air and quieter gardens. The battery equipment and the cargo bike were fully funded by the LEN project.



**The new Pellenc lithium battery powered mowing, cutting and blowing equipment funded by the LEN project**



**City Gardener Geoff Rogers on the new cargo bike funded as part of the LEN project**



# City in Bloom – *Clean and Green for Seventeen*

The LEN project has supported the Friends of City Gardens in their City in Bloom, Clean and Green for Seventeen challenge which is part of the Royal Horticultural Society's (RHS) *City in Bloom* and Greening Grey Britain campaign.

The Friends of City Gardens have installed a number of pop up air quality gardens in the public realm. To launch and promote the campaign and LEN project, residents and businesses were given indoor plants that improve air quality.

Two completely new gardens have been constructed in the public realm – one on the Cross Rail site on the corner of Charterhouse Street and Farringdon Road, and the other in the LEN project area on Moor Lane. A dozen other street level gardens have also been replanted by City businesses (Nomura, Eversheds Sutherland, UBS), residents and community groups to raise awareness of air quality.



**Crossrail site pop up garden** (Credit: Friends of City Gardens)



**Lauderdale Place planter** (Credit: Friends of City Gardens)



**Planters at Fann Street Wildlife Garden**



# Moor Lane – Air Quality Pop Up Garden

Moor Lane Pop Up Garden was built and project managed by the Friends of City Gardens, and commissioned and funded by the LEN project. It was conceived and designed by landscape designers Studio Xmpl who were a team of student designers working pro-bono on the project. Friends of City Gardens and local residents **volunteered more than 500 hours of their time** to install the garden, with the help of local businesses and workers from nearby building sites.

The garden is made up of plants with hairy leaves or stems designed to capture and mitigate particulate air pollution and improve biodiversity. The pop-up garden was launched on the 15<sup>th</sup> June as part of National Clean Air Day events in the City of London.



Plants and trees with banner telling people about the Pop Up Garden



What the site looked like before



What the site looked like after installation



Residents & stakeholders gathered at the launch event

## Freight & Servicing

The LEN Project Manager has been working closely with DBE to collect data and information on current freight and servicing activity in the LEN area to inform an action plan for reducing freight traffic in the peak hours.

The LEN project has funded a survey of all on-street loading and unloading activities in the EC2Y (Barbican) and EC2V (Guildhall) post codes to obtain a comprehensive understanding of what activity takes place, when it takes place, and why it takes place.

It is hoped that the analysis of the freight and servicing data collected through these pieces of work will support the implementation of the City's Freight strategy, and potentially inform the development of proposals for a micro-consolidation centre in the area.



**The trial of ULEV only loading bays is being considered as part of the LEN project**



**Electric lorry loading on Cheapside for Costa Coffee – funded by the FREVUE project**



# Delivery & Servicing Plan Case Studies

The LEN project has also funded the development of eight delivery and servicing plan (DSP) case studies of key organisations in the LEN area. Consultants have been working with several businesses and organisations in the LEN area to understand their existing delivery and servicing activities by surveying all incoming and outgoing freight activity.

Support is offered to businesses and organisations to help them implement any of the actions and recommendations made by the consultants in order to reduce their freight related trips.

The organisations participating in the case studies include:

- Barbican Centre
- Museum of London
- Guildhall and Walbrook Wharf
- Deutsche Bank, London Wall
- Linklaters, Silk Street
- Citypoint, Ropemaker Street
- LandSecurities 140 Aldersgate
- Cheapside Business Alliance




**Barbican Centre**

The Barbican Centre considers the role of its catering in air quality

Within the UK, the bar and restaurant sector has a market value of £16.4 billion. Bars, cafés and restaurants have a significant footprint within the City, with trade patterns reflecting increases in population and the extended operating hours due to late night opening growth of night time opening. Specialist requirements and multiple supply chains have led to delivery challenges within the City.

The Barbican Centre is a leading international arts centre, founded and principally funded by the City of London Corporation. The Barbican has a number of bars, cafes and restaurants that require a constant supply of beverages and food produce – ambient, chilled and frozen.

A data collection exercise found that the vast majority of deliveries are received morning and early afternoon, due to suppliers' scheduling and to guarantee the freshness and availability of goods.




**Linklaters**

Linklaters looks to contribute to reducing congestion and air pollution through working with their suppliers

Linklaters advises clients on undertaking business responsibly – a commitment which extends to the operations of this leading international law firm. This demands a focus on responsibility and integrity across the business, affecting their interactions with communities and how they manage their environmental and sustainability impact.

Linklaters aims to be the leading global law firm, building relationships with major companies and financial institutions who turn to them for support on their most important and challenging issues.

Linklaters One Silk Street office is located in the emerging

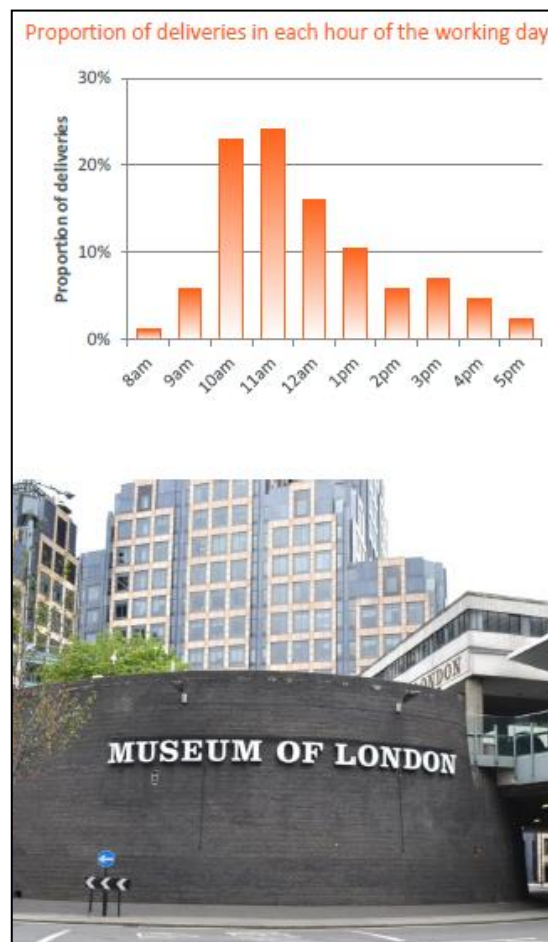
Building on previous improvements

Demonstrating support for the 'City of London Cleaner Air Action Day' in 2015, Linklaters promoted switching off engines for loading bay deliveries whilst adding criteria to some tenders for mileage to site, to reduce



**Cheapside Business Alliance**

Cheapside takes a collective approach to reducing freight movements and CO<sub>2</sub>



## Monitoring – Smogmobile

The LEN project funded an electric vehicle fitted with specialist air quality monitoring equipment to drive around the streets in the LEN and wider City of London area over a period of three days, to gain a detailed understanding of pollution levels in the City and how they change at different periods of the day and week. The Smogmobile was able to monitor nitrogen dioxide, particulates and black carbon, and had an antennae that could be raised to measure the pollution levels at differing heights.

The results provided by the Smogmobile have helped to improve the understanding of air pollution across the City.



The Smogmobile parked in Barts Hospital Courtyard

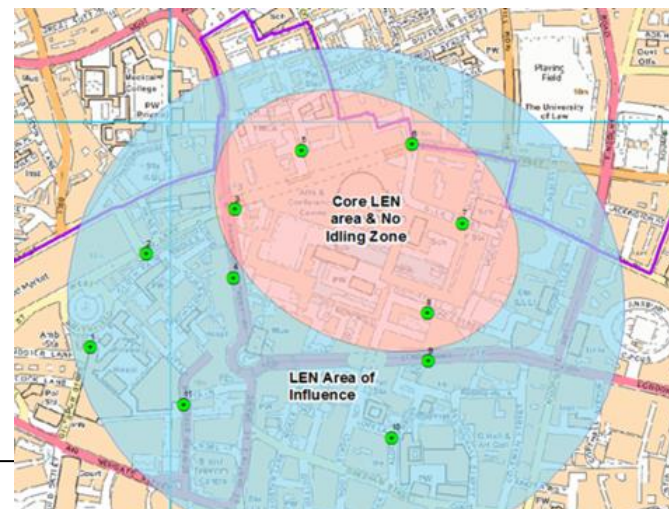


Map showing nitrogen oxide levels produced by Smogmobile

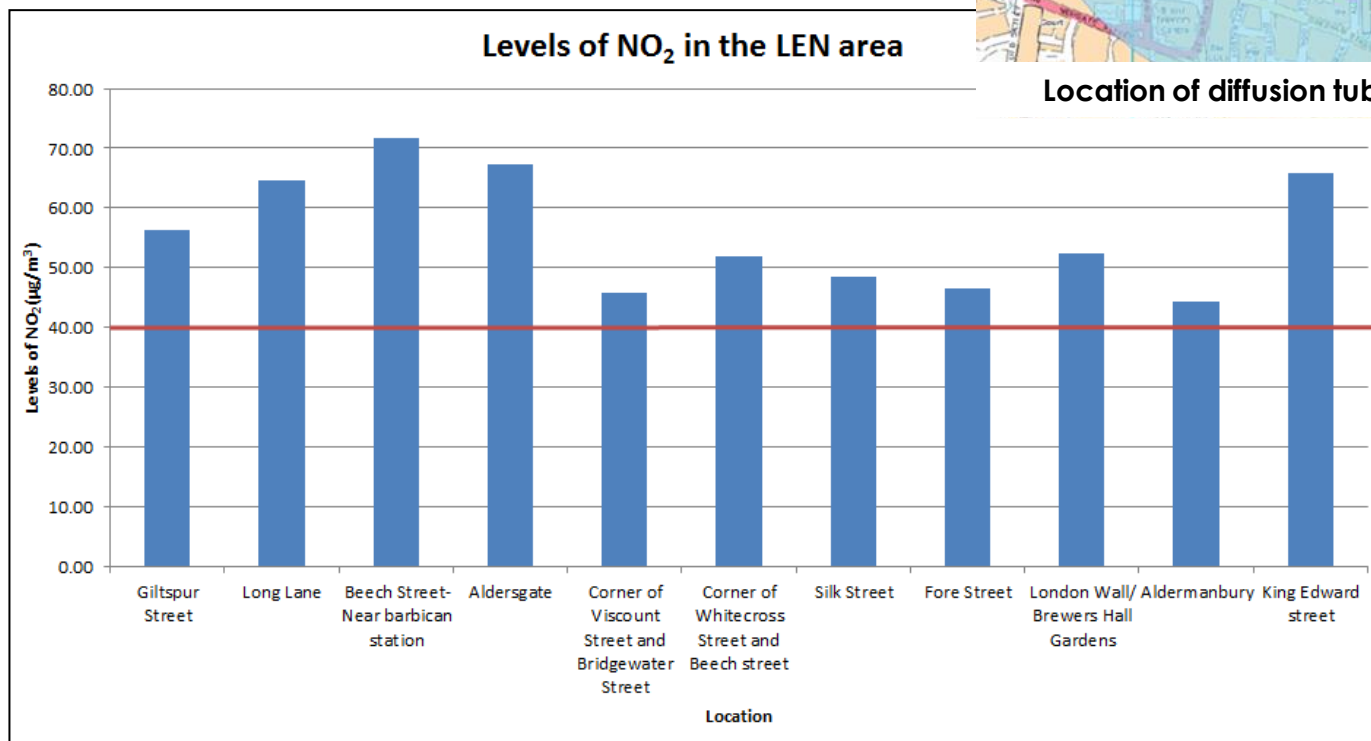
## Monitoring – Diffusion Tubes

A network of diffusion tubes has been installed at eleven sites across the LEN area providing on-going monitoring of nitrogen dioxide ( $\text{NO}_2$ ) levels since the start of the project. Businesses were also involved in measuring  $\text{NO}_2$  levels for a month in May at ten locations. Monitoring of black carbon and particulates has also been undertaken through the use of personal monitors.

Currently the EU/WHO safe threshold limit is not being met at any of the monitoring sites.



Location of diffusion tubes in LEN area



Annual average levels of nitrogen dioxide in the LEN area (40  $\text{mg}/\text{m}^3$  is the EU/WHO safe threshold)

This page is intentionally left blank

<b>Committee(s)</b>	<b>Dated:</b>
Port Health and Environmental Services – For information	19 September 2017
<b>Subject:</b> Markets and Consumer Protection Business Plan 2017-2020: Progress Report (Period 1)	<b>Public</b>
<b>Report of:</b> The Director of Markets and Consumer Protection	<b>For Information</b>
<b>Report author:</b> Joanne Hill, Department of Markets and Consumer Protection	

## Summary

This report provides an update on progress against the operational performance indicators (PIs) and improvement objectives outlined in the Business Plan of the Port Health and Public Protection Division (PH&PP) of the Department of Markets and Consumer Protection (M&CP), for Period 1 (April-July) of 2017-18.

The report consists of:

- Performance against operational performance indicators (PIs) – Appendix A
- Progress against key improvement objectives – Appendix B
- Enforcement activity – Appendix C
- Financial information – Appendix D

## Key points from the report are that:

- Action taken in relation to the implementation of a Low Emission Neighbourhood in the City included a feasibility study to assess the impact of scenarios for reducing air pollution in Beech Street; an Air Quality Champions Business Workshop; and, launching a pop-up garden in Moor Lane.
- The Air Quality Team has submitted the Annual Air Quality Status Report to the Mayor of London and Government.
- Trade at the Ports continues to increase year on year. The shipping lines formed new alliances early this year, with London Gateway having already increased its routes by 30%.
- Trading Standards continue to participate in Operation Broadway. Useful intelligence about one potential investment fraud business recently led to Trading Standards preventing one consumer from investing £50,000.
- Pollution Team Officers are working to ensure the environmental impacts of Crossrail, Thames Tideway Tunnel and Bank Station Capacity Upgrade are being continuously monitored and managed by the numerous contractors.
- One City food premises closed voluntarily pending improvements to cleaning and procedures.
- Specialist Environmental Health Officers supported, and presented at, high profile industry seminars on working at height.
- The HARC has received some interesting visitors including an Orang Utan, Red River Hogs, cheetahs, hyenas and alpacas.

- At the end of July 2017, M&CP was (£128k) (15%) underspent against the local risk budget to date of £849k, over all the PH&PP services managed by the Director and covered by the Port Health & Environmental Services Committee. Overall, the Director is currently forecasting a minimal year end underspend of (£39k) (2%) for the PH&PP City Fund services under his control.

### **Recommendation(s)**

Members are asked to:

- Note the content of this report and its appendices.

## **Main Report**

### **Background**

1. The 2017-20 PH&PP Business Plan sets out ten operational performance indicators (PIs) and fifteen improvement objectives against which the Division's performance will be measured throughout the year.
2. The PIs and objectives were selected to be representative of the main elements of work carried out.

### **Current Position**

3. To ensure that your Committee is kept informed of progress against the current business plan, progress against PIs (Appendix A) and key improvement objectives (Appendix B) is reported on a periodic (four-monthly) basis, along with a financial summary (Appendix D). This approach allows Members to ask questions and have a timely input to areas of particular importance to them. Members are also encouraged to ask the Director for information throughout the year.
4. Progress against the business plan is regularly discussed by Senior Management Groups to ensure any issues are resolved at an early stage.
5. In order to provide further information on the work carried out by PH&PP, each periodic report includes a summary of the enforcement activity carried out (Appendix C).

### **Air Quality**

6. The Risk Register for PH&PP includes Air Quality as a high (red) risk.
7. Air Quality is now also on the Corporate Risk Register and a list of actions to demonstrate mitigation against that risk was reported to the Audit and Risk Management Committee in June 2016. Small particulate pollution has chronic health impacts from long term exposure at very low concentrations and is in evidence within the City and central London. There is also a health impact associated with long term and short term exposure to nitrogen dioxide. Under certain atmospheric conditions there is a higher probability of poor air quality



within the City and it is more likely that residents, workers and visitors would suffer the acute consequences.

8. The consequences, both acute and chronic, may include:
  - An increase in hospital referrals placed upon both emergency services and the NHS for those already suffering from respiratory or cardiovascular conditions (it may also place a strain on City social services).
  - An increase in deaths, particularly of those already suffering from respiratory or cardiovascular conditions (both residents and workers).
  - Economic costs such as acting as a deterrent to businesses coming to London, or staying here, and financial penalties for non-compliance with air quality limits.
  - Persistent poor air quality may affect the longer term health of the City population.
  - Persistent poor air quality may attract adverse media coverage making the City seem a less attractive place to live and work.
9. With the aim of reducing the risk, the City continues to implement the policies detailed within the City of London Air Quality Strategy 2015-2020. The department is also working jointly with the Department of the Built Environment to investigate ways of reducing those factors which create air pollution. A number of other actions have been undertaken during Period One and a selection of these is shown in the Enforcement Activity Report at Appendix C.

### **Operational Property Holdings**

10. In accordance with Standing Order 55, PH&PP property holdings are reviewed annually with the City Surveyor. Actions taken this year to date, against a specific improvement objective (objective 12), are given in Appendix B.

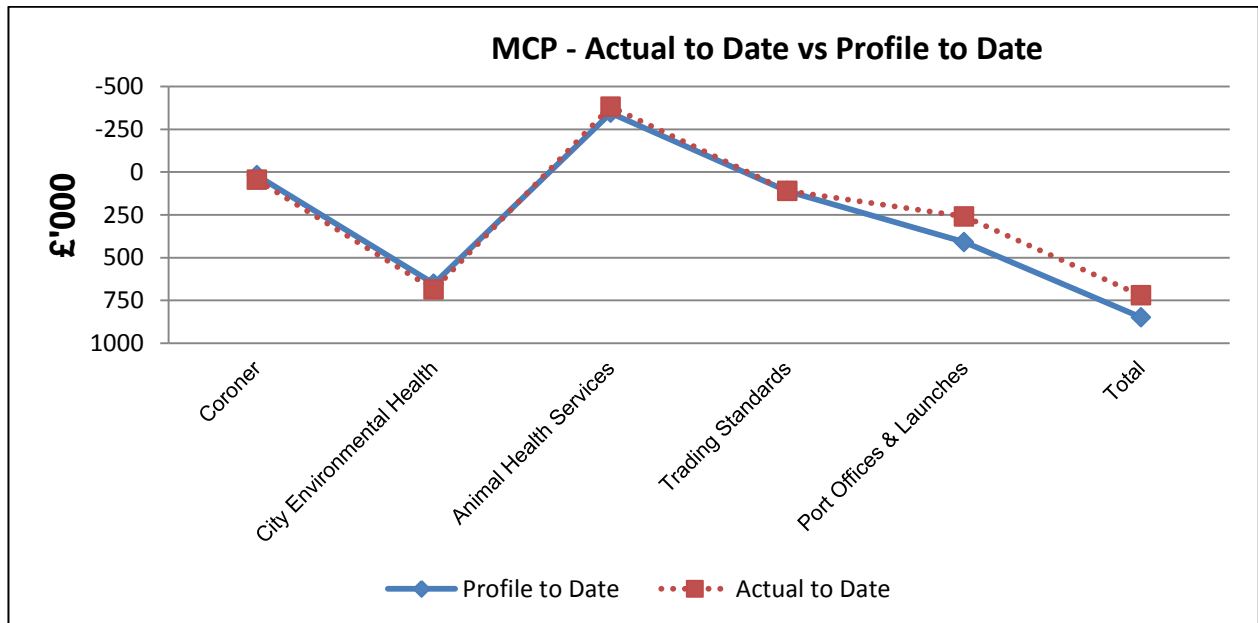
### **Corporate & Strategic Implications**

11. The monitoring of PIs and key improvement objectives across the Division links to all three of the Strategic Aims set out in the Corporate Plan 2015-19.

## Implications

### Financial and Risk Implications

12. The end of July 2017 monitoring position for M&CP services covered by the Port Health & Environmental Services Committee is provided at Appendix D. This reveals a net underspend to date for PH&PP of (£128k) (15%) against the overall local risk budget to date of £849k for 2017/18.

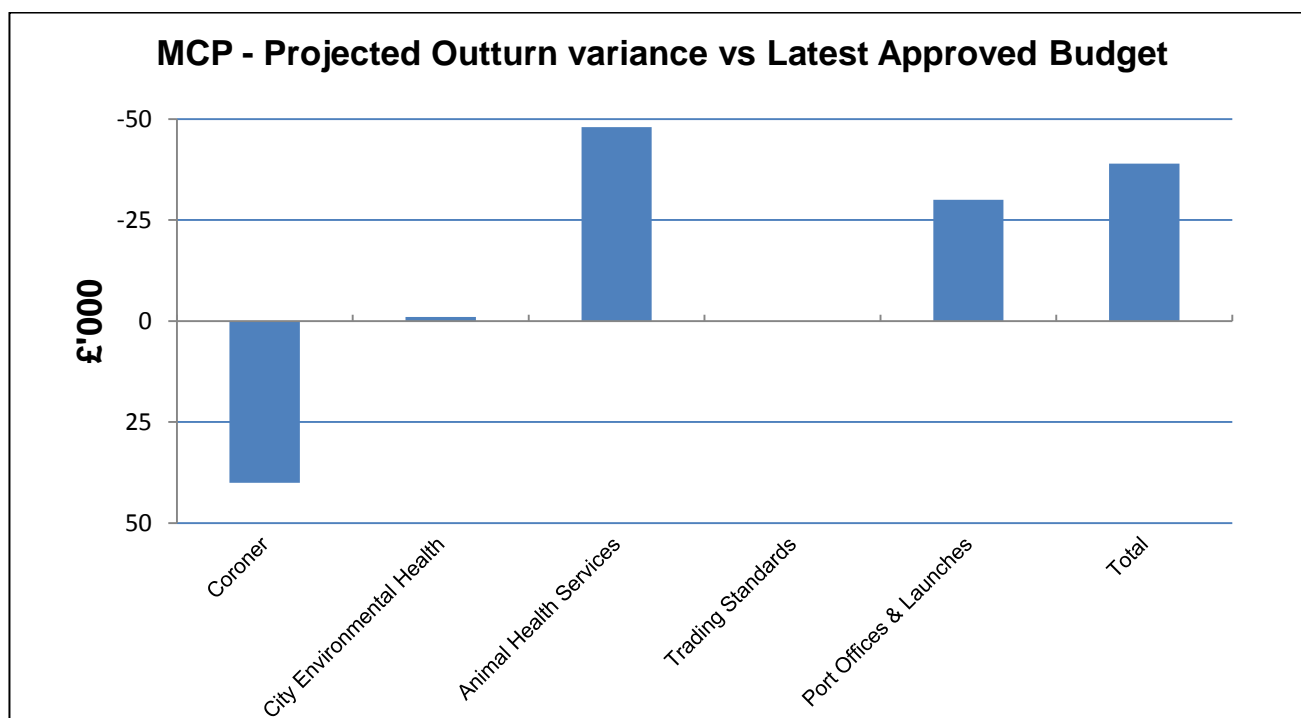


**Notes:**

1. Graph shows the actual local risk net position against the profiled budget to date for each PH&PP service.
2. MCP total actual to date spend of £721k is currently (£128k) under the profiled budget to date of £849k.



13. Overall, the Director of Markets and Consumer Protection is currently forecasting a year end underspend position of (£39k) (2%) for the PH&PP City Fund services under his control.



**Notes:**

1. Zero is the baseline latest approved budget for each PH&PP service.
  2. Graph shows projected outturn position against the latest approved budget.
  3. A variance above the baseline is favourable i.e. either additional income or reduced expenditure.
  4. A variance below the baseline is unfavourable i.e. additional expenditure or reduced income.
  5. Overall, the Director is forecasting an underspend of (£39k) at year end.
14. The reasons for the significant budget variations are detailed in Appendix D, which sets out a detailed financial analysis of each PH&PP service the Director supports.
15. The projected overspend for the City Coroner is due to additional employee and legal costs associated with a long complex inquest.
16. The better than budget position at the end of July 2017 is mainly due to a rate rebate for the vacated Thamesport office and successful appeal for London Gateway Border Control Post (BCP) liability, plus additional income generated from increased trade throughput at the Ports. There are further underspends at the Heathrow Animal Reception Centre in respect of increased passports for pets income, although this is partly offset by additional staffing upgrade costs following a restructure and additional computer costs for an Oracle interface.
17. The Director anticipates this current better than budget position will continue to year end, subject to income activity maintaining its current high performance.

## **Consultees**

18. The Town Clerk and the Chamberlain have been consulted in the preparation of this report.

## **Appendices**

- Appendix A – Performance Management Report Period 1 2017-18
- Appendix B – Progress against Key Objectives Period 1 2017-18
- Appendix C – Enforcement Activity Period 1 2017-18
- Appendix D - Financial Statements: Department of Markets and Consumer Protection, Port Health & Public Protection Division

## **Background Papers**

Port Health & Public Protection Business Plan 2017-2020  
(PH&ES Committee 4 July 2017)

## **Contacts**




Joanne Hill (*Performance Information*)  
Department of Markets and Consumer Protection  
T: 020 7332 1301  
E: [joanne.hill@cityoflondon.gov.uk](mailto:joanne.hill@cityoflondon.gov.uk)





Simon Owen (*Financial Information*)  
Chamberlain's Department  
T: 020 7332 1358  
E: [simon.owen@cityoflondon.gov.uk](mailto:simon.owen@cityoflondon.gov.uk)

Performance Management Report 2017-18  
Period One: 1 April – 31 July 2017

Department of Markets and Consumer Protection  
Port Health and Public Protection Division

Progress against Operational Performance Indicators

	This indicator is performing to or above the target. (100% of the target or higher)
	This indicator is a cause for concern, frequently performing just under target. (85% - 99% of the target)
	The indicator is performing below the target. (<85% of the target)

			Actual 2016-17			Target 2017-18	Actual 2017-18	Status
			Period 1	Period 2	Period 3			
PI 1	<b>Port Health</b> Proportion of imported food consignments (Products of Animal Origin – POAO) that satisfy the checking requirements cleared within five days:	a) Non-fish	97%	92%	96%	95%	71%	
		b) Fish	90%	88%	92%	85%	89%	
PI 2	<b>Port Health</b> 90% of imported food and feed consignments (Products of Non Animal Origin - PNAO) are subjected to mandatory documentary controls within five days.		N/A	N/A	N/A	90%	90%	
PI 3	<b>Port Health</b> 5% of imported food and feed consignments (Products of Non Animal Origin - PNAO) are subjected to non-mandatory physical checks.		N/A	N/A	N/A	5%	3.2%	

**PI 1:** Time elapsed between receipt of documents/presentation of container to release, on electronic cargo handling system. From 2016-17, this indicator has been split into separate measures for non-fish and fish products.

**PI 1a:** Period One 2017/18 – Tilbury: 85%; London Gateway: 70%.

The below target performance during Period One is due to new requirements to carry out enhanced checks on Brazilian meat products which came into effect in April 2017. This has resulted in physical checks increasing by 35% in comparison with the equivalent period of the previous year (i.e. from 1,416 during Period One of 2016/17 to 1,908 in 2017/18). However, the main factor is the number of samples of Brazilian products that the Service now has to undertake, and for which we have to detain the cargo (normally one week wait for the results). This increased from 7 samples in Period One of 2016/17 to 296 samples in Period One of 2017/18. This increased level of checks will continue until such time that the European Commission is satisfied that there is no risk posed by these goods.

**PI 1b:** Period One 2017/18 – Tilbury: 89%; London Gateway: 89%.

**PI 2:** New indicator for 2017-18.

**PI 3:** New indicator for 2017-18. Although not yet meeting the target of 5%, the checks have increased from the 2016 performance rate of 2.5% for the equivalent period. The additional checks on Brazilian products have had an impact on the ability to undertake non-mandatory checks, but weekly reports are now being run to monitor performance and ensure that the percentage of checks carried out continues to increase.

		Actual 2016-17			Target 2017-18	Actual 2017-18	Status
		Period 1	Period 2	Period 3		Period 1	
PI 6	<b>Pollution Team</b> 90% justifiable noise complaints investigated result in a satisfactory outcome.	96.4%	97.2%	96%	90%	95%	😊
PI 7	<b>Trading Standards</b> Respond to all victims of investment fraud identified to the Trading Standards Service within 5 working days to advise on the risk of repeat targeting, assess the need for safeguarding interventions and initiate the safeguarding process where appropriate.	100%	100%	100%	100%	100%	😊
PI 8	<b>Health &amp; Safety</b> Complete the annual risk-based cooling towers inspection programme in order to ensure that the risk of Legionnaires' disease is being effectively managed by all those responsible.	N/A	N/A	End of year result: 97%	100%	N/A	-

PI 6: The percentage of total justified noise complaints investigated resulting in noise control, reduction to an acceptable level and/or prevention measures; complaints may or may not be actionable through statutory action.

PI 8: Annual indicator.

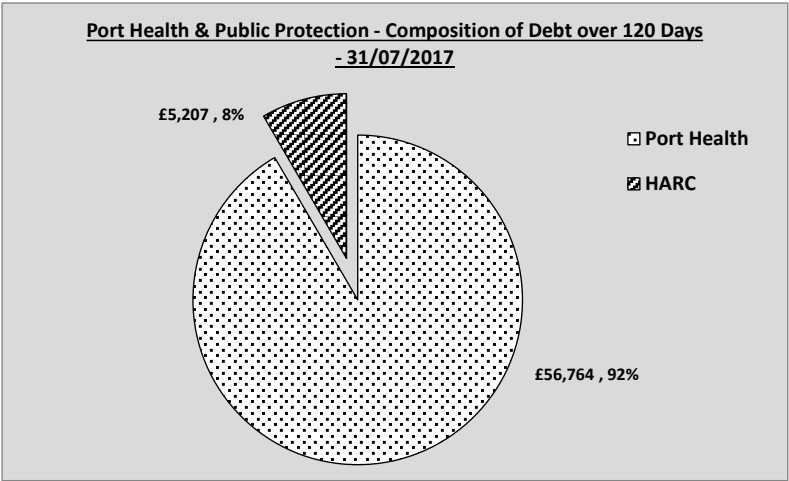
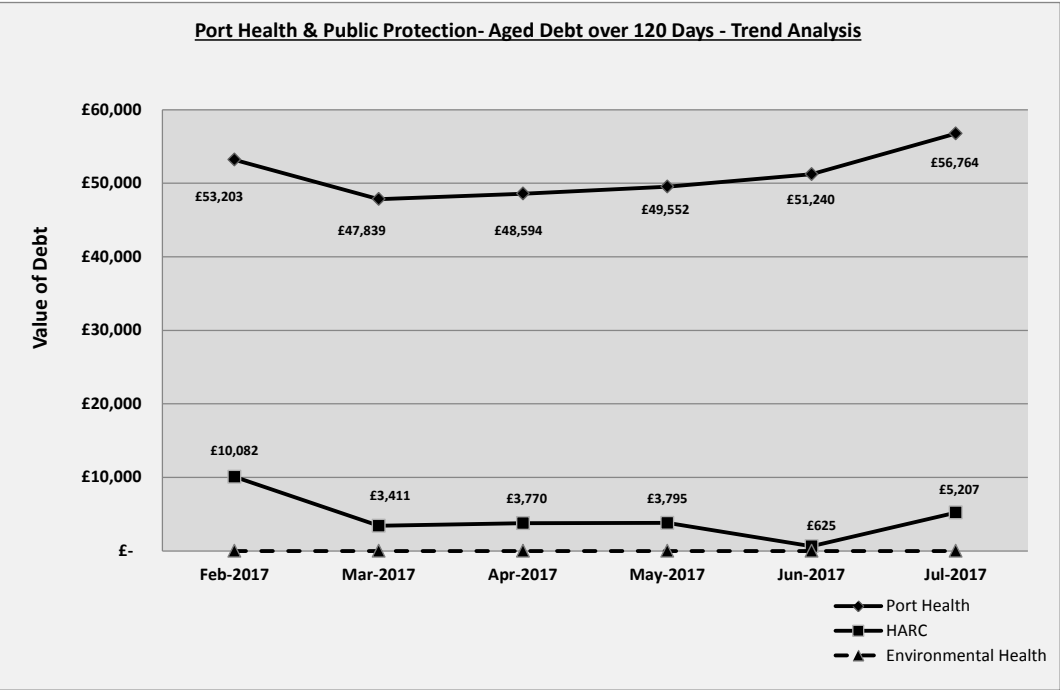
	All PH&PP Service areas	Actual 2016-17			Target 2017-18	Actual 2017-18	Status
		Period 1	Period 2	Period 3		Period 1	
PI 9	Achieve an overall sickness absence level of no more than 6 days per person by 31 March 2018, and a total of no more than 690 days (<230 days per period) across all PH&PP Service areas.	225 days	203 days	79 days (against pro-rated target of <116 days)	<230 days per period	256 days	☹
PI 10	a) 90% of debts to be settled within 60 days.	78%	87%	86%	90%	87%	☹
	b) 100% of debts settled within 120 days.	85%	92%	93%	100%	89%	☹
<p><b>PI 9:</b> Target based upon Full Time Equivalent (FTE) members of PH&amp;PP staff at 31 December 2016 (no. 115). The number of days lost to sickness absence at the end of Period One was slightly above target. However, it should be noted that since the target was set, the total number of FTEs in the Division has risen by 11% (from 115 in December 2016 to 128 in July 2017).</p> <p><b>PI 10a:</b> The majority of outstanding debts incorporated in this result were still less than 61 days old at the end of July 2017. It is, therefore, still possible that they will be settled within 60 days.</p> <p><b>PI 10b:</b> Debts older than 120 days relate to Port Health and the HARC. All debtors with debts more than 120 days old are currently being chased. Much of the Port Health debt relates to debtors currently being pursued by Comptrollers and City Solicitors.</p> <p><u>Further detail on aged debt over 120 days is provided on the following page.</u></p>							

Port Health & Public Protection - Aged Debt Over 120 Days - as at 31st July 2017

Department	Debts Exceeding 120 Days					
	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17
Port Health	£ 53,203	£ 47,839	£ 48,594	£ 49,552	£ 51,240	£ 56,764
HARC	£ 10,082	£ 3,411	£ 3,770	£ 3,795	£ 625	£ 5,207
Environmental Health	£ -	£ -	£ -	£ -	£ -	£ -
	£ 63,285	£ 51,250	£ 52,364	£ 53,347	£ 51,865	£ 61,971

Composition of Debt - 31/07/2017	
Port Health	£ 56,764
HARC	£ 5,207
Environmental Health	£ -
	£ 61,971

Page 245



This page is intentionally left blank



## Progress against Port Health & Public Protection key improvement objectives 2016-2017

Ref:	Objective	Progress to date
1.	Evaluate the potential impact of leaving the EU on the services provided by PH&PP. Inform central Government of these impacts and prepare appropriate mitigating actions.	<b>Period One</b> <ul style="list-style-type: none"> <li>• Visits have been hosted at HARC and port; meetings held with key agencies and Government departments.</li> <li>• Report commissioned from independent consultants.</li> <li>• Included on risk register.</li> <li>• A report for Committee is being prepared.</li> </ul>
2.	Trading Standards Team to maintain focus on protecting City residents from financial fraud.  Promote closer ties and better joint working between Trading Standards, Adult Services and City of London Police.	<b>Period One</b> <ul style="list-style-type: none"> <li>• The Trading Standards Manager is a member of the Safeguarding Board and the Financial Abuse Task &amp; Finish Group.</li> <li>• Partnership working with DC&amp;CS (Vulnerable Adults) and City Police (Op Broadway disrupting financial fraud) is ongoing.</li> <li>• Working with Bournemouth University and the Banking Industry on preventative measures for the vulnerable and the elderly to halt payments to rogue traders.</li> </ul>
3.	Continue with the current regulatory delivery model for Commercial regulation ensuring a clear focus on risk-based priorities.  Develop closer ties with other London local authorities and national regulators.  Explore the most effective methods of using legislative and non-legislative tools.	<b>Period One</b> <ul style="list-style-type: none"> <li>• Currently working with London Food Co-ordinating Group and SE Sector Food Groups of London Local Authorities, the central London LAs on LTTC Foods (rare burgers) and the All-London Boroughs' Health &amp; Safety Liaison Group</li> <li>• Ongoing development of mobile working processes to provide businesses with prompt feedback on non-compliances.</li> </ul>
4.	Animal Health Service to support government and non-government organisations in their work on combating the illegal puppy trade.	<b>Period One</b> <ul style="list-style-type: none"> <li>• A meeting with Defra officials was held in July regarding 'options' for the Pet Travel Scheme post-Brexit.</li> <li>• In regular dialogue with Defra on day to day issues.</li> <li>• Assisted Dog's Trust with advice on their most recent report on the issue.</li> </ul>
5.	Pollution Team to implement the Action Plan for the Noise Strategy 2016-2026.	<b>Period One</b> <ul style="list-style-type: none"> <li>• The City's Draft Code of Construction 2017 was subject to external consultation with 37 respondents who provided over 170 individual comments. The Code is being amended and will be presented to PHES Committee in September 2017.</li> <li>• Recruitment is underway for the TfL funded post 'Environmental and Liaison Officer' to reduce environmental impacts of works on the TfL road network.</li> <li>• Work is underway to refresh the evidence base related to noise and sound including the design of a social survey.</li> </ul>

Ref:	Objective	Progress to date
6.	Ensure compliance with the new statutory requirements for London Local Air Quality Management (LLAQM).  Mitigate the risk associated with potential fines for non-compliance with air quality limit values.	<b>Period One</b> <ul style="list-style-type: none"> <li>New systems established for recording the data required by the new LLAQM requirements.</li> <li>The Annual Report for 2016 was submitted to the GLA and Defra on time.</li> <li>The outcome of Clean Air Borough Status determination is awaited.</li> </ul>
7.	Implement a Low Emission Neighbourhood (LEN) in the City.	<b>Period One</b> <ul style="list-style-type: none"> <li>Progress made and action taken during Period One includes: <ul style="list-style-type: none"> <li>Air Quality and Cycling Pop-up Event, Fann Street.</li> <li>Air Quality Champions Business Workshop.</li> <li>City in Bloom Clean and Green in Seventeen campaigns – various sites.</li> <li>City of London School for Girls LEN presentation: Dr Ian Mudway, King's College London.</li> <li>Moor Lane Pop-up Garden.</li> <li>Feasibility study to assess impact of scenarios for reducing air pollution in Beech Street.</li> <li>Power supply upgrades for Barbican estate car parks for electric vehicle charge points.</li> <li>Secure cycle parking spaces in the Barbican Estate and Golden Lane Estate.</li> </ul> </li> </ul>
8.	Reduce the status of the corporate air quality risk by implementing a range of agreed measures as set out in the Air Quality Strategy 2015-2020.	<b>Period One</b> <ul style="list-style-type: none"> <li>Air quality remains a red risk.</li> <li>Air Quality Strategy actions are on track. A report on progress with the actions was submitted to the July PHES Committee.</li> </ul>
9.	Produce an updated Port Health Authority Order to ensure that the Port Health Service is authorised to take formal action within the boundary under the relevant legislation.	<b>Period One</b> <ul style="list-style-type: none"> <li>GIS plotting of boundaries is now complete and will undergo a final review. The legislation which the London Port Health Authority has at its disposal has also been reviewed. Once agreed, formal consultation will take place.</li> </ul>
10.	Evaluate the increased potential for Primary Authority work including the feasibility of establishing a new Primary Authority Unit. This will include a programme of engagement with City businesses.  Implement the findings of the evaluation.	<b>Period One</b> <ul style="list-style-type: none"> <li>A specification is being drafted to commission a research project into the potential for new Primary Authority Unit.</li> <li>Carry-forward monies have been confirmed for this purpose.</li> </ul>
11.	HARC: investigate and implement new income generation proposals.	<b>Period One</b> <ul style="list-style-type: none"> <li>Consultants have been engaged to review accommodation requirements and scope a case for change for service delivery.</li> <li>The consultant's draft accommodation report has been received and is being reviewed. The second consultant's report should be finalised during September.</li> </ul>

Ref:	Objective	Progress to date
12.	Complete the formal annual review of our property holdings with City Surveyors Department to ensure that we do not occupy buildings and land in excess of our identified operational need, in accordance with Standing Order 55.	<b>Period One</b> <ul style="list-style-type: none"> <li>PORT HEALTH: Currently working with the City Surveyor to dispose of the lease of the Tilbury Office. Currently pursuing extensions to the leases for offices at Charlton (expires Jan 2018) and Denton (expires Jun 2019).</li> </ul>
13.	<p>Continue to develop the use of technology and Mobile Working solutions.</p> <p>Complete the implementation of PHILIS software at the HARC.</p>	<b>Period One</b> <ul style="list-style-type: none"> <li>PORT HEALTH: Continued development of the mobile working solutions in place. Connectivity issues at some of our office and inspection facilities need to be addressed. The IT transformation project will hopefully resolve this.</li> <li>PUBLIC PROTECTION: Work has now been merged with the M3/Uniform System Rationalisation Project in order to seek a single application which is accessible from any browser-enabled device.</li> <li>Food EHOs continue to use 'iAuditor' to develop inspection processes which incorporate electronic data capture.</li> <li>HARC continues to work with Suffolk Coastal Port Health Authority on the implementation of PHILIS software. It is expected to go live by October.</li> </ul>
14.	<p>Implement a strategic Learning and Development Plan to ensure we have the necessary skills and capabilities and training to undertake our work and deliver the corporate strategy.</p> <p>Refresh the Workforce Plan to include upcoming proposed staff changes.</p> <p>Fully implement the Port Health HR Plan.</p> <p>Reorganise staff at the HARC as recommended in an independent external report.</p> <p>Actively support the development and use of Apprentices across the City Corporation.</p>	<b>Period One</b> <ul style="list-style-type: none"> <li>PORT HEALTH: Specific Development and Succession plan now in place. HR Plan is currently being delivered although the progress has been slow due to delays in the HR process.</li> <li>HARC: Reorganisation implemented and new posts have been filled. All bar one apprentice is now in place.</li> <li>Seven new apprentices were recruited across the division under the Apprenticeship Levy. They have joined four existing apprentices and two graduate interns. Several more apprentices will be taken on in the coming months as part of the second cohort of the Apprenticeship Levy.</li> </ul>
15.	Deliver the second iteration of the M&CP Leadership Development Programme.	<b>Period One</b> <ul style="list-style-type: none"> <li>This is underway with a new group of candidates from across the Department.</li> </ul>

This page is intentionally left blank

## Port Health & Public Protection Enforcement Activity Period 1 (April–July) 2017-18

Food Safety	2016-2017 Annual Total	2017-18 Target (where applicable)	Period 1 2017-18 Total
Programmed inspections	<u>Food Hygiene:</u> 898  <u>Food Standards:</u> 276	<b><u>Food Hygiene:</u></b> <b>1,138</b>  <b><u>Food Standards:</u></b> <b>662</b>	<u>Food Hygiene:</u> 238  <u>Food Standards:</u> 93
Hygiene Emergency Closures	1	N/A	0
Voluntary closures	2	N/A	1
Complaints & service requests received	327	N/A	157
Notices served	40	N/A	3
Prosecutions	0	N/A	0

### Period 1 - Food Safety Enforcement Highlights

- Entered into a **Primary Authority Partnership** with Gourmet Burger Kitchen Ltd which should result in the City making a significant contribution to improvements in compliance with FSA guidance on producing lightly cooked burgers and consistent enforcement by local authorities.
- There was one **Voluntary Closure** of a food premises pending improvements to cleaning and procedures.
- The teams have been developing **mobile working solutions** for food hygiene inspections using iAuditor, to reduce time spent on administration, improve data collection and to deliver on customer expectations for reporting. The software is assisting with consistency of enforcement and good record keeping, both of which were areas for improvement in the Food Standards Agency audit of our services in 2015/2016.
- Officers continue to tweet on [@SquareMileFood](#) to promote the successes of '5' FHRS rated premises; there were 173 such premises during this period.
- The **FSA Report 'Regulating our Future'** was published in July which gives a 'direction of travel' for their model of how regulatory controls over food in the UK will be delivered in the future. While the detail is yet to emerge, it could have a significant impact on how businesses are regulated in the City.

## Port Health & Public Protection Enforcement Activity Period 1 (April–July) 2017-18

### Food Hygiene Rating Scheme (FHRS) – profile of food businesses in the City of London

		Hygiene Rating						Total no. of food businesses in the City included in the FHRS
		5	4	3	2	1	0	
Number (%) of food businesses	March 2013	925 (58%)	345 (22%)	171 (11%)	69 (4%)	61 (4%)	12 (1%)	1583
	August 2013	908 (56%)	378 (23%)	168 (10%)	83 (5%)	67 (4%)	25 (2%)	1629
	29 November 2013	903 (55%)	387 (23%)	172 (10%)	98 (6%)	70 (4%)	24 (2%)	1654
	31 March 2014	880 (53%)	374 (23%)	182 (11%)	104 (6%)	74 (5%)	23 (1%)	1661 (incl. 24 awaiting inspection)
	31 July 2014	898 (54%)	374 (23%)	174 (10%)	102 (6%)	67 (4%)	19 (1%)	1661 (incl. 27 awaiting inspection)
	1 December 2014	919 (55%)	380 (23%)	175 (10%)	92 (6%)	58 (4%)	17 (1%)	1675 (incl. 34 awaiting inspection)
	31 March 2015	960 (57%)	361 (21%)	165 (10%)	88 (5%)	64 (4%)	18 (1%)	1692 (incl. 36 awaiting inspection)
	31 July 2015	1014 (59%)	361 (21%)	158 (9%)	77 (4.5%)	58 (3.5%)	8 (0.5%)	1721 (incl. 45 awaiting inspection)
	30 November 2015	1049 (60%)	360 (21%)	147 (8%)	68 (4%)	57 (3%)	10 (1%)	1748 (incl. 57 awaiting inspection)
	31 March 2016	1106 (63%)	320 (18%)	142 (8%)	74 (4%)	56 (3%)	18 (1%)	1756 (incl. 40 awaiting inspection)
	29 July 2016	1163 (66%)	306 (17%)	132 (8%)	60 (3%)	49 (3%)	13 (1%)	1765 (incl. 42 awaiting inspection)
	30 November 2016	1204 (69%)	306 (17%)	117 (7%)	64 (4%)	43 (2%)	6 (<1%)	1740 (incl. 46 awaiting inspection)
	31 March 2017	1244 (70%)	277 (16%)	101 (6%)	73 (4%)	36 (2%)	7 (<1%)	1774 (incl. 36 awaiting inspection)
	31 July 2017	1256 (71%)	270 (15%)	102 (6%)	68 (4%)	33 (2%)	6 (<1%)	1768 (incl. 33 awaiting inspection)

## Port Health & Public Protection Enforcement Activity Period 1 (April–July) 2017-18

### '0' rated food businesses in the City

These businesses were rated '0' at 31 July 2017; food businesses will have taken some action to improve and some have been since been re-inspected - further information is given in the 'Details' column.

Premises	Details
<b>Anokha</b> , 4 Burgon Street, London EC4V 5DR	Frequent re-visits have been undertaken resulting in improvements in pest control, remedy of structural defects and food safety management system; less frequent revisits are now necessary.
<b>Apulia</b> , 50 Long Lane, London EC1A 9EJ	Considerable improvements have been made since the initial inspection; now equivalent to '5' rating which should be verified at the next inspection due this month.
<b>Brokers Wine Bar</b> , First Floor 6-9 Leadenhall Market EC3	Follow up re-visits have supported the business to achieve immense improvements; further revisits are scheduled to ensure structural improvements are carried out and maintained.
<b>Eight Club</b> , 1 Change Alley, 24 Cornhill, EC3	The premises closed voluntarily for 1 day, re-opening after adequate improvements in cleaning, pest control and food handling practices were made. The premises is being closely monitored to ensure improvements are sustained.
<b>Gatti's</b> , Retail Unit 2b, 1 Ropemaker Street, London EC2Y 9AW	A further inspection was carried out following receipt of a re-rating request from the premises. A 5 rating has been awarded, vast improvements in all areas of concern.
<b>Wood Street Bar and Restaurant</b> , 53 Fore Street, London EC2Y 5EJ	At the last inspection, 2 Statutory Notices were served requiring improvements. A re-visit was made on 2 August to check compliance and both Notices have been complied with. Other issues raised have also been dealt with.

## Port Health & Public Protection Enforcement Activity Period 1 (April–July) 2017-18

Health & Safety	2016-17 Annual Total	2017-18 Target (where applicable)	Period 1 2017-18 Total
Programmed Cooling Tower inspections	62	<b>62</b>	25
Other H&S Inspections	18	<b>N/A</b>	6
H&S Project visits	7	<b>N/A</b>	0
Accident and dangerous occurrences notifications	246	<b>N/A</b>	48
Complaints & service requests received	178	<b>N/A</b>	38
Notices	0	<b>N/A</b>	3 (Pest Control Notices)
Prosecutions	0	<b>N/A</b>	0

### Period 1 – Health & Safety Enforcement Highlights

- Chairman, Jeremy Simons opened the '**London Work at Height Seminar**' at Guildhall in July.
- The team supported and presented at the second national **IRATA (Industrial Rope Access Trade Association) Work at Height Seminar**. Anecdotal feedback indicated this was a very successful event; attendance was higher than in 2016.
- A formal health and safety **accident investigation** is taking place following an accident to a pedestrian (who sustained serious head injuries) during a professional race at the 'Nocturne' cycling event that took place in the City on 10 June 2017.
- The City has entered into a new **Primary Authority Partnership** with Hugo Boss UK Ltd.
- A significant accumulation of waste and a rat infestation was resolved by service of **statutory notices** on DLR and a property investment company based in Jersey. Officers are liaising with Community and Children's Services regarding the land in question, which is beneath Tower Gateway DLR platforms, between Minories and Mansell Street, and is being used by a large number of rough sleepers. This is an ongoing problem and officers are supporting DLR and other stakeholders to manage rough sleeper environmental impacts and, in the longer term, to prevent unauthorised access to the land.
- A **statutory notice** was served on TfL in relation to a rat infestation at an open site in Aldgate High Street. Officers are liaising with City Surveyors, who own an adjacent site, to facilitate a joint resolution.
- Officers have provided technical input to the current corporate procurement process for **pest control services**.
- The team continues to develop **mobile working solutions** for cooling tower inspections to reduce time spent on administration, improve data collection and to deliver on customer expectations for reporting.



## Port Health & Public Protection Enforcement Activity Period 1 (April–July) 2017-18

Trading Standards	2016-17 Annual Total	2017-18 Target (where applicable)	Period 1 2017-18 Total
Inspections and visits	83	N/A	99
Complaints & service requests received	2,167	N/A	710
Home Authority referrals	138	N/A	33
Acting as a responsible authority for Licensing Applications	89	N/A	39
Prosecutions	0	N/A	1

### Period 1 – Trading Standards Highlights

- We continue to participate in **Operation Broadway** with our partners from the City of London Police, Met Police, Financial Conduct Authority, HMRC and the Insolvency Service. An officer attended the 'HiRiG' group meeting – a meeting of the senior facilities management personnel from the iconic buildings in the City – to raise awareness of **investment fraud** and to ask for intelligence about clients of the buildings. We later received some useful intelligence about one potential investment fraud business that led to Trading Standards managing to prevent one consumer from investing £50,000.
- An emerging area that is being looked into concerns businesses luring consumers to invest money into **binary options**. It is a worldwide problem and we identified around 120 premises in the City that may have connections and have visited them all. Many of the businesses are simply squatting and further work is planned in this area through Operation Broadway.
- An investigation into the activities of a **debt collector** was successfully concluded after he signed a formal undertaking under the Enterprise Act.
- We have been completing preparations to run a project to look at the **fair trading** issues of the **City's pubs**. In particular, we want to ensure that customers aren't being short measured and test purchasing will be taking place. It is possible that fraud associated with short measure in pubs in the City could run into millions of pounds each year. We are particularly keen to hear from anyone with information about pubs that are defrauding customers so that we can target our test purchasing activity later this year.
- **Knife crime** is a serious problem right across Greater London and Trading Standards colleagues in other Boroughs delivered business advice to retailers and carried out over 700 test purchases during 2016. In the City, this is an area that hasn't been looked at before but we are now working on a project to ensure that retailers in the Square Mile are treated in the same way as those across London.

## Port Health & Public Protection Enforcement Activity Period 1 (April–July) 2017-18

Pollution	2016-17 Annual Total	2017-18 Target (where applicable)	Period 1 2017-2018 results			
			Total	% Noise complaints resolved	Notices served	Prosecutions
Complaint investigations, noise	896	N/A	283	95%	2 COPA S.60*  2 CPW**	0
Complaint investigations, other	81	N/A	30	N/A	N/A	0
Licensing, Planning and Construction Works applications assessed	1,130	N/A	366	N/A	N/A	N/A
No. of variations (to construction working hours) notices issued	759	N/A	232	N/A	13 variation notices; 3 consents COPA S.61*	N/A

\* COPA: Control of Pollution Act 1974: S60 - Control of noise on construction sites

S61 - Prior consent for work on construction sites

\*\*CPW: Community Protection Warning Notices under the Anti-social Behaviour, Crime and Policing Act 2014

### Period 1 – Pollution Team Highlights

- All 6 of the City's **Houses in Multiple Occupation** (HMOs) received a full inspection under the Health and Safety Hazard Rating System with all identified defects rectified.
- The City's **Contaminated Land Strategy** progressed with the top two sites receiving a detailed desk study utilising a conceptual site model.
- The City's **infrastructure projects** are progressing well with the team working hard to ensure the environmental impacts of Crossrail, Thames Tideway Tunnel and Bank Station Capacity Upgrade are being continuously monitored and managed by the numerous contractors.

### Period 1 – Air Quality Team Highlights

During Period One, the Air Quality Team:

- Submitted the Annual **Air Quality Status Report** to the Mayor of London and Government
- Published the Air Quality **Supplementary Planning Document**
- Took part in several events for **National Clean Air Day**
- Launched a **pop up air quality garden** in Moor Lane
- Responded to a consultation on the Government's draft **National Plan for Air Quality** and the Mayor's **Ultra Low Emission Zone**
- Launched the **Business Air Quality Grant Scheme**
- Held an employee engagement workshop for **City businesses**
- Engaged with **residents of City estates** as part of the stronger communities fund
- Appointed a new **Air Quality and Communications Assistant**

## Port Health & Public Protection Enforcement Activity Period 1 (April–July) 2017-18

Animal Health & Welfare	2016-17 Annual total	2017-18 Target (where applicable)	Period 1 2017-2018 results			
			Total	Warning letters	Notices served	Prosecutions
Animal Reception Centre						
Throughput of animals (no. of consignments)	22,148	N/A	7,587	9	0	0
Animal Health						
Inspections carried out*	503	N/A	92	1	10	0
*Due to the legislation, most of the Animal Health licensing inspections are carried out at the end of the calendar year and figures will, therefore, fluctuate during the year.						

### Period 1 - HARC Highlights

- The HARC has had some interesting visitors during Period One.
  - A rescued **Orang Utan** from Moscow caused quite a stir when it arrived in the cabin in May.
  - It is unusual for many pigs to come through the Centre, but a shipment of **Red River Hogs**, a rare wild breed of pig, was received.
  - Other unusual animals included several **cheetahs**, two **hyenas**, and a shipment of 31 **alpacas**.
- The team's **shift rota** has been transferred from paper to a more efficient electronic system that staff can access from their smart phones.

## Port Health & Public Protection Enforcement Activity Period 1 (April–July) 2017-18

Port Health	2016-17 Annual total	Target 2017-18 (where applicable)	Period 1 2017-2018 results			
			Total	Cautions	Notices served	Prosecutions
Food Safety inspections and revisits	28	N/A	12	0	0	0
Ship Sanitation Inspections and Routine Boarding of Vessels	281	N/A	74 boardings	N/A	35 Ship Sanitation Certificates issued	N/A
Imported food Not of Animal Origin - document checks	14,761	N/A	4,889	0	162	0
Imported food Not of Animal Origin - physical checks	2,025	N/A	753	0	N/A	0
Number of samples taken	404	N/A	189	0	N/A	N/A
Products of Animal Origin Consignments – document checks	10,102	N/A	2,908	0	69	0
Products of Animal Origin Consignments – physical checks	4,265	N/A	1,908	0	8	0
Number of samples taken	226	N/A	387	N/A	296	N/A

### **Period 1 – Port Health Highlights**

- Trade **continues to increase** year on year. The shipping lines formed new alliances early this year, with London Gateway increasing its routes by 30%; this came into effect from May and we are yet to see the full impact on throughput. Recently London Gateway announced that it had won a new West African trade Route that will commence at the end of the summer.
- Back office functions have now been centralised at **Manorway House** to ensure consistency and resilience.
- Due to public and animal health concerns there has been an increase in the checking regime for **Brazilian products**. This came in from April 2017 and increased the checking regime from 30% overall physical examinations for poultry and red meat to 100% with a sample rate of 20%.
- Further checks are now required on **composite products** to establish the content and provenance of any product of animal origin; even in small quantities. Many processed foods will contain small amounts of animal product, such as milk powder used as a binding agent. Products can be rejected if they do not come from an approved country, even in small quantities.

Department of Markets & Consumer Protection Local Risk Revenue Budget - 1st April to 31st July 2017  
(Income and favourable variances are shown in brackets)

Appendix D

	Latest Approved Budget 2017/18 £'000	Budget to Date (Apr-Jul)			Actual to Date (Apr-Jul)			Variance Apr-Jul £'000	Forecast for the Year 2017/18			Notes
		Gross Expenditure £'000	Gross Income £'000	Net Expenditure £'000	Gross Expenditure £'000	Gross Income £'000	Net Expenditure £'000		LAB £'000	Forecast Outturn £'000	Over / (Under) £'000	
<b><u>Port Health &amp; Environmental Services (City Fund)</u></b>												
Coroner	63	20	0	20	46	0	46	26	63	103	40	1
City Environmental Health	1,949	709	(56)	653	742	(56)	686	33	1,949	1,948	(1 )	
Animal Health Services	(968)	764	(1,110)	(345)	774	(1,155)	(381)	(36)	(968)	(1,016)	(48 )	2
Trading Standards	340	125	(14)	111	124	(14)	110	(1)	340	340	0	
Port Offices & Launches	988	1,108	(698)	410	1,002	(742)	260	(150)	988	958	(30 )	3
<b>TOTAL PORT HEALTH &amp; ENV SRV COMMITTEE</b>	<b>2,372</b>	<b>2,726</b>	<b>(1,877)</b>	<b>849</b>	<b>2,687</b>	<b>(1,967)</b>	<b>721</b>	<b>(128)</b>	<b>2,372</b>	<b>2,333</b>	<b>(39 )</b>	

- Notes:**
- 1. Coroner - projected overspend due to additional employee and legal costs associated with a long complex inquest.**
  - 2. Animal Health Service** - favourable forecast relates mainly to increased passports for pets income and is expected to continue in line with previous years income performance. This is partly offset by additional staff upgrade costs following a restructure and additional costs for Oracle interface.
  - 3. Port Offices & Launches** - favourable variance to date mainly due to rates rebate in respect of vacated Thamesport office and successful appeal for London Gateway BCP liability, plus additional income generated from increased trade throughput.

This page is intentionally left blank

<b>Committee(s)</b> Port Health & Environmental Services Committee	<b>Dated:</b> 19 September 2017
<b>Subject:</b> Port Health & Public Protection Risks	<b>Public</b>
<b>Report of:</b> Director of Markets and Consumer Protection	<b>For Information</b>
<b>Report author:</b> John Smith Department of Markets and Consumer Protection	

## Summary

This report has been produced to provide the Port Health & Environmental Services Committee with assurance that risk management procedures in place within the Department of Markets and Consumer Protection are satisfactory and that they meet the requirements of the corporate Risk Management Framework.

Risk is reviewed regularly by the departmental Senior Management Team as part of the on-going management of operations within the Department of Markets and Consumer Protection. 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.

The Department of Markets and Consumer Protection have identified a number of departmental risks. Of these, the most significant risks for this Committee to consider are:

- CR21 – Air Quality (Current Risk: RED no change )
- MCP-PHPP 001 Brexit (Current Risk: AMBER no change)

## Recommendation(s)

Members are asked to:

- Note the report and the actions taken in the Department of Markets and Consumer Protection to monitor and manage effectively risks arising from our operations.

## Main Report

### Background

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

### Current Position

2. This report provides an update of the key risks that exist in relation to the operations of the Port Health & Public Protection Services within the Department of Markets and Consumer Protection. The report also outlines the processes adopted for the on-going review of risk and mitigating actions.

## **Risk Management Process**

3. The Department of Markets and Consumer Protection risk management is a standing agenda item at the two-monthly Departmental Senior Management Group (SMG) meeting, over and above the suggested quarterly review. SMG receives the risk register for review, together with a briefing note highlighting any changes since the previous review. Consideration is also given as to whether any emerging risks exist for inclusion in the risk register as part of Divisional updates on key issues from each of the Superintendents and Assistant Directors, ensuring that adequate consideration is given to operational risk.
4. Between each SMG meeting, risk and control owners are consulted regarding the risks for which they are responsible, with updates captured accordingly.
5. Regular risk management update reports are provided to this Committee in accordance with the City's Risk Management Framework.
6. The Director, accompanied by the Chairman, appeared before the Audit and Risk Management Committee in July for a 'Risk Challenge' session, so that the Committee could be assured that Risk within the Director's area of responsibility is adequately managed. The Director set out the department's key Risks as being about: Workplace Transport; Brexit; and Air Quality. Only the latter two are relevant to the PHES Committee. On both Brexit and Air Quality, which is also a Corporate Risk, the Director covered the ground that is explained in this report. There was also a discussion about illegal street trading, especially concerning nut-sellers by the bridges and ice-cream sellers, which led to a rather wider discussion about inspections of food establishments and the display of the Food Standards Agency's Food Hygiene Rating System (FHRS). In concluding the discussion, the Chairman of the ARM Committee thanked the Director for explaining how he was managing some very challenging risks and for his candour and insight.

## **Identification of New Risks**

7. New and emerging risks are identified through a number of channels, the main being:
  - Directly by SMG as part of the monthly review process.
  - In response to regular review of delivery of the departmental Business Plan; slippage against key deliverables, for example.
  - Annual, fundamental, risk register review, undertaken by the tier of management below SMG.

The risk register may be refreshed over and above the stated process for review and oversight, in response to emerging issues or changing circumstances.

## **Summary of Key Risks**

8. The Department of Markets and Consumer Protection's Risk Register for Port Health & Public Protection Services, attached as Appendix 1 to this report, includes one Red (Corporate) risk and one Amber risk:

### **CR21 – Air Quality (Current Risk: RED no change)**

Cause: Small particulate pollution has chronic health impacts from long term exposure at very low concentrations and is in evidence within the City and central



London. There is also a health impact associated with long term and short term exposure to nitrogen dioxide.

Event: Under certain atmospheric conditions there is a higher probability of poor air quality within the City and it is more likely that residents, workers and visitors would suffer the acute consequences.

Effect: The consequences both acute and chronic may include:

An increase in hospital referrals placed upon both emergency services and the NHS for those already suffering from respiratory or cardiovascular conditions (it may also place a strain on City social services).

An increase in deaths, particularly of those already suffering from respiratory or cardiovascular conditions (both residents and workers).

Economic costs such as acting as a deterrent of businesses coming to London or staying and financial penalties for non-compliance with air quality limits.

Persistent poor air quality may affect the longer term health of the City population.

Persistent poor air quality may attract adverse media coverage making the City seem a less attractive place to live and work.

### **MCP- PHPP 001 – Brexit (Current Risk: AMBER no change)**

Cause: UK decision to terminate membership of E.U (Brexit).

Event: Legislative changes

Effect: Increased risk to public, animal and environmental health. Increased risk to consumers. Reduction in income. Scarcity of qualified staff, e.g. Official Veterinarians (OVs). Potential for Increased workload depending on agreement reached

## **Conclusion**

9. Members are asked to note that risk management processes within the Department of Markets and Consumer Protection adhere to the requirements of the City Corporation's Risk Management Framework. Risks identified within the operational and strategic responsibilities of the Department of Markets and Consumer Protection are proactively managed.

## **Appendices**

- Appendix A – Port Health & Public Protection Risk Register Summary
- Appendix B – Risk Matrix

## **Background Papers**

Department Business Plan  
Department Risk Review  
Department Business Plan Progress Report  
Risk Management Strategy

### **Contacts:**

John Smith (*Report author*)  
T: 020 7332 3258

E: [John.Smith@cityoflondon.gov.uk](mailto:John.Smith@cityoflondon.gov.uk)

# MCP PH&PP Committee Risk Report Appendix A

Report Author: John Smith


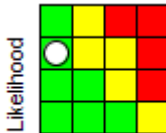

Generated on: 29 August 2017



Rows are sorted by Risk Score

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	Current Risk score change indicator
<b>CR21 Air Quality</b> 07-Oct-2015 Ian Avern	<p><b>Cause:</b> Small particulate pollution has chronic health impacts from long term exposure at very low concentrations and is in evidence within the City and central London. There is also a health impact associated with long term and short term exposure to nitrogen dioxide.</p> <p><b>Event:</b> Under certain atmospheric conditions there is a higher probability of poor air quality within the City and it is more likely that residents, workers and visitors would suffer the acute consequences.</p> <p><b>Effect:</b> The consequences both acute and chronic may include:                      An increase in hospital referrals placed upon both emergency services and the NHS for those already suffering from respiratory or cardiovascular conditions (it may also place a strain on City social services).                      An increase in deaths, particularly of those already suffering from respiratory or cardiovascular conditions (both residents and workers).                      Economic costs such as acting as a deterrent of businesses coming to London or staying and financial penalties for non-compliance with air quality limits.                      Persistent poor air quality may affect the longer term health of the City population.                      Persistent poor air quality may attract adverse media coverage making the City seem a less attractive place to live and work.</p>	<p>Likelihood</p> <p>Impact</p>	16	no change from previous assessment  29 Aug 2017	<p>Likelihood</p> <p>Impact</p>	6	31-Dec-2020	 No change

Action no, Title,	Description	Latest Note	Managed By	Latest Note Date	Due Date
CR21 001a Implement policies	Implement the policies contained in the City of London Air Quality Strategy 2015-2020. The strategy contains 10 policy areas with 60 specific actions. An annual report will be produced demonstrating progress with each action.	This action is now complete.	Jon Averbs	06-Oct-2016	31-Aug-2016
CR21 001b Review Air Quality	Review and assess air quality in line with statutory obligations of the Environment Act 1995. Submit all relevant statutory reports. Approval of all reports by Defra and the GLA will demonstrate compliance with statutory obligations.	This action is now complete.	Jon Averbs	06-Oct-2016	31-Aug-2016
CR21 001c Become an Exemplar Borough	Ensure the City Corporation becomes a Mayor of London Exemplar Borough for air quality.	This action is now complete.	Jon Averbs	06-Oct-2016	29-Dec-2017
CR21 001d Develop communication strategy.	Develop and implement a robust communications strategy to ensure people have sufficient information to reduce their exposure on days of 'high' air pollution.	This is now complete.	Jon Averbs	01-Mar-2017	31-Mar-2017
CR21e Develop plan	Develop and implement a plan for reducing the impact of diesel vehicles on air pollution in the Square Mile. This is to complement the work being undertaken by the Mayor of London to reduce air pollution in the central zone through the implementation of the Ultra-Low Emission Zone.	An initial feasibility study has been undertaken to look at options for reducing levels of pollution in Beech Street through vehicle management Vehicles have been restricted passing through Bank Interchange, the air quality impact is being assessed Several measures have been implemented in the City Low Emission Neighbourhood including: greening at a number of locations including Moor Lane, installation of 90 secure cycle parking spaces, audit of construction sites, detailed air quality monitoring, business engagement and workshops, business air quality grant scheme, freight surveys, clean air footprints and the provision of zero emission equipment for open spaces dept.	Jon Averbs	29-Aug-2017	31-Dec-2018

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	Current Risk score change indicator
<b>MCP-PHPP 001 Brexit</b>  08-Nov-2016 Jon Avern	<b>Cause:</b> UK decision to terminate membership of E.U (Brexit). <b>Event:</b> Legislative changes <b>Effect:</b> Increased risk to public, animal and environmental health. Increased risk to consumers. Reduction in income. Scarcity of qualified staff, e.g. Official Veterinarians (OVs). Potential for increased workload depending on agreement reached.	 Likelihood Impact	12	An independent report has been commissioned on the potential impacts of Brexit. An interim report is scheduled to go to the September 2017 Port Health Committee.  <b>13 Jul 2017</b>	 Likelihood Impact	3	29-Mar-2019	  No change

Action no, Title,	Description	Latest Note		Managed By	Latest Note Date	Due Date
MCP-PHPP 001a Liaison with Government departments and agencies.	Contribute to UK Government Listening mode.	Meetings continue to be held with relevant government departments and agencies, including hosting visits to the Port and HARC		Jon Avern	29-Aug-2017	29-Mar-2019
MCP-PHPP 001b Relevant legislation	Commission an independent report on the potential implications of the UK's exit from the EU on Animal Health and Port Health	The report has been commissioned and an interim report will go to the September 2017 PHES Committee.		Jon Avern	13-Jul-2017	30-Sep-2017
MCP-PHPP 001c Liaison with Remembrancer and other CoL depts.	Engage with stakeholders to assist in the identification of impacts and possible mitigations. Ensure Remembrancer and CoL depts. are fully aware of the implications of Brexit on PH and PP and that they lobby accordingly.	Meetings have been held with trade bodies, EDO and Remembrancer. A Senior Government Minister has been invited to visit Heathrow including the HARC on 25 September 2017.		Jon Avern	13-Jul-2017	31-Mar-2019
MCP-PHPP-001d Respond promptly to developments	Respond promptly to policy decisions from the UK Government and the outcome of negotiations.	No specific proposals received to date.		Jon Avern	13-Jul-2017	31-Mar-2019

# 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 left (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.

## Appendix B

### MCP Port Health & Public Protection Risk Report

#### (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)

#### (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

#### (B) Impact criteria

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

#### (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  
Version date: December 2015

<b>Committee:</b>	<b>Date:</b>
Port Health & Environmental Services - For information	19 September 2017
<b>Subject:</b> Period 1 (April-July) Cemetery & Crematorium Business Performance update	<b>Public</b>
<b>Report of:</b> Director of Open Spaces	<b>For Information</b>
<p style="text-align: center;"><b>Summary</b></p> <p>This report updates Members on the performance of the Cemetery &amp; Crematorium April-July 2017. The Cemetery &amp; Crematorium has continued to perform well and income is ahead of target.</p> <p><b>Recommendations</b></p> <p>Members are asked to:</p> <ul style="list-style-type: none"> <li>• Note this report</li> <li>• Approve the adjustment of Cemetery budget to include an increase in expenditure of £43,500 and a corresponding increase in income to fund a replacement charging bier, review of the Conservation Management Plan and customer survey</li> </ul>	

## Main Report

### Background

1. The Open Space's Departmental Business Plan for 2016-19 was approved by your Committee on 9 May 2017. That plan included several specific actions and four Performance Indicators for the Cemetery & Crematorium.
2. The Business Plan was based on the mission to "protect our treasured green spaces for people & wildlife and ensure that our outstanding heritage assets are protected, accessible and welcoming". This was supported by five objectives to:
  - a. Protect and conserve the ecology, biodiversity and heritage of our sites
  - b. Embed financial sustainability across our activities by delivering identified programmes and projects and continuously developing income generating endeavours
  - c. Enrich experiences by providing high quality and engaging visitor, educational and volunteering opportunities
  - d. Improve the health and wellbeing of the community through access to green space and recreation
  - e. Improve service efficiency and workforce satisfaction
3. The vision for the Cemetery and Crematorium is to provide the City of London Cemetery and Crematorium as a model cemetery and crematorium constituting both a site of excellence in bereavement services, a forerunner in

cemetery conservation and the greatest choice of burial and cremation facilities in the UK. This together with the Department's vision and objectives inform and direct the work of the service.

### Current Position

4. The Cemetery & Crematorium has performed well during the period April-July 2017. There were 296 burials and 185 cremations, resulting in gross income of £1,645,000.

### Key actions from the business plan

Action to deliver objective	Detail	Key Milestones 2017/18	Update
<b>Objective 1: Conserve and improve the ecology, biodiversity and heritage of our sites</b>			
<b>Continue to develop and implement strategies that direct the management of our open spaces</b>	Development, drafting, consultation and final production of a range of management plans and strategies across the service.	Cemetery and Crematorium Conservation Management Plan to Committee for approval – 2017/18	Carry forward request was not agreed. Use of local risk budget funded by increased income is now proposed  As the CMP will be revised during the course of this year, it is likely that the final version will not come to your Committee for approval until 2018.
<b>Objective 2: Embed financial sustainability across our activities by delivering identified programmes and projects and continuously development income generating endeavours</b>			
<b>Actively engage in key corporate procurement opportunities</b>	Active involvement in procurement process for City's new building, repairs and maintenance (BRM) contract	Input into BRM Customer Working Group – regular meetings up until July 2017	OSD participated in working group and were involved in contract evaluation
		New contractor on site	"BRM 2" is now in place. Skanska started in July and have been familiarising themselves with the sites. Feedback to date has been positive.
		*New* "Chandelier list"	Progress is continuing to develop and agree routes to market for specialist items which were excluded from the BRM contract. A contract for cremator repair and



			maintenance was recently agreed.
		Review and feedback	
<b>Ensure sustainable provision of the Cemetery and Crematorium service</b>	Assess and determine the most efficient and effective way to replace the Crematorium's cremators	Project Gateway submitted – early 2017 for Gateway 1 / 2	The Superintendent of the Cemetery continues to progress this project with the support of the City Surveyor and City Procurement. The Gateway 2 was approved by PSC on 7 September.
		Options appraisal completed and funding agreed – 2018/19	
		Procurement process completed, contract awarded and cremators installed 2020/21	

### Performance Indicators

5. The business plan included twenty four Specific, Measurable, Achievable, Relevant and Time bound (SMART) performance indicators. There were a number which were departmental which applied to the Cemetery:

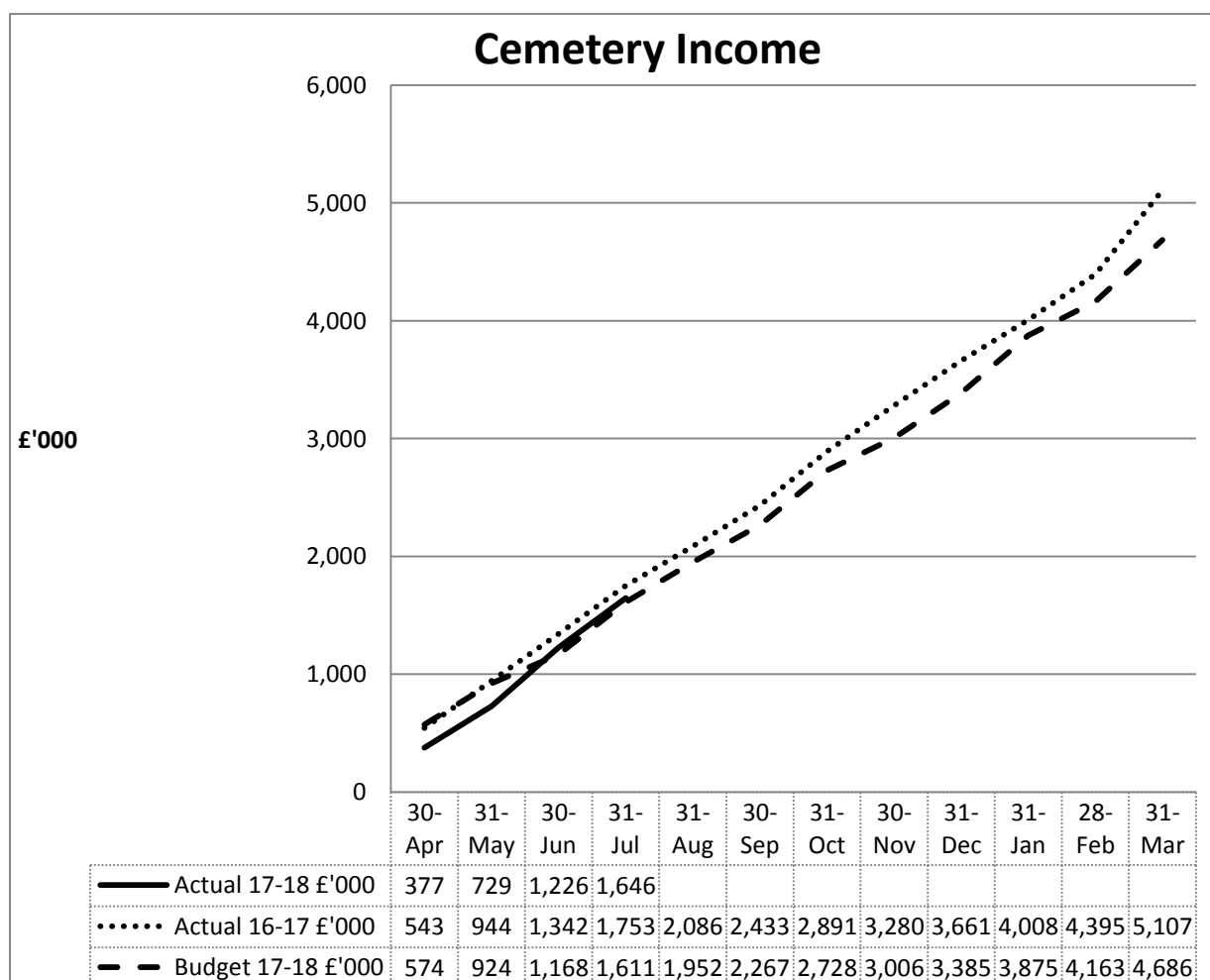
	<b>2016/17 performance</b>	<b>2017/18 Target</b>	<b>April-July Performance</b>
Retain 15 Green Flags and improve the overall band score achieved across our Green Flag sites by 2018/2019.	15 green flag sites overall band scores 53% = 80+ 27% = 75 – 79 20% = 70 - 74	Retain 15 green flags	Cemetery & Crematorium has retained its Green Flag and Green Heritage Awards, with scores of 80+  A full departmental list is being collated
Increase the percentage of H&S accidents that are investigated within 14 days.	100% (cemetery) 62% (entire department)	83%	100% - two accidents reported for this period, both investigated within 14 days.
Increase the percentage of Open Space's staff who state they are at least satisfied with their workplace in the annual staff wellbeing survey.	Survey not undertaken	94%	Survey not yet undertaken

6. There were a further four specific indicators for the Cemetery:

	2016/17 performance	2017/18 Target	April-July Performance
Maintain our market share of burials in relation to the Cemetery and Crematorium's seven neighbouring Borough's.	7.5%	7.5%	8.5%
Increase the number of burials.	868	868	296
Increase the number of cremations.	2,540	2,540	815
As a minimum, achieve local risk Cem & Crem income target.	Over achievement of income £452,787	£1,611,000 (April-July)	£1,645,000  Full year forecast is for an overachievement of income of £314,000

## Finance

7. Appendix 1 provides a summary of the budget position. Members will note the continued strong performance of the Cemetery, and the continued expectation that an additional £314,000 income will be generated in 2017/18.



8. The Superintendent has proposed adjusting his income target and proposed expenditure by £48,500 in order to fund a number of items in year. These support the operation and competitiveness of the cemetery:
  - a. A replacement charging bier - £23,500 (a charging bier is used to push the deceased and coffin into the cremator).
  - b. Conservation Management Plan Review - £15,000. A carry forward was requested but was not secured. The Cemetery is a Grade I listed landscape. The CMP supports this listing but is also essential for the operation of the cemetery. The CMP was last reviewed in 2011 and is now overdue a review.
  - c. External customer survey - £10,000. A customer survey was last conducted in 2012. The findings have informed the operation of the cemetery since then. Given that the community around the Cemetery has changed and societal expectations around disposal of the deceased and their commemoration is constantly evolving, it is now time for a new survey.
9. This adjustment in income targets and expenditure means that the Cemetery is projected to overachieve on income by some £260,000.
10. The Cemetery's strong financial performance should be put into the perspective of the requirement to achieve Service Based Review savings. The Cemetery was asked to achieve savings of £213,000 to further offset the cost of providing the Cemetery & Crematorium Service. £106,000 of additional income was achieved in 2015/16, £56,000 in 2016/17 and a further £51,000 in 2017/18. As costs continue to rise, the Superintendent continues to carefully manage his income and expenditure budgets at the Cemetery to ensure a high quality of service is maintained. This will be particularly important as from 2018/19, City departments are making 2% efficiency savings and budgets will not provide an allowance for pay and price increases.

## **Risk**

11. The Cemetery & Crematoriums risk register is attached as Appendix 2.
12. In respect of OSD CC011 – Tree and Plant diseases, Members should note that Oak Processionary Moth has been found at the Cemetery. The Forestry Commission has been informed and staff at the Cemetery and contractor are taking recommended actions. The Cemetery along with other Open Spaces sites had been undertaking a proactive monitoring regime in order to identify and respond to such infestations.
13. The Superintendent has confirmed that all risks are currently managed and controlled. Your Committee previously agreed the removal of the green risks from the register. There are five remaining amber risks – Financial failure; Deterioration of buildings, plant & machinery; Systems Failure; Extreme Weather and Tree & Plant Disease.

## **Corporate & Strategic Implications**

14. The Business Plan identifies how the department's improvement activities will support the aspirations of the organisation, as reflected in the Corporate Plan.
15. Delivering the Business Plan will support the Corporation's strategic aims to:
  - SA2 - Provide modern, efficient and high quality local services, including policing, within the Square mile for workers, residents and visitors
  - SA3 - Provide valued services, such as education, employment, culture and leisure to London and the nation.
16. In addition it will deliver the key policy priorities: KPP2, KPP3, KPP4, and KPP5 as defined in the [Corporate plan](#).

## **Implications**

17. The Cemetery & Crematorium continues to provide an important service to the local community. Performance has been strong and all risks are currently managed.

## **Conclusion**

18. The Cemetery & Crematorium is meeting or exceeding the targets agreed by your Committee. The Superintendent will continue to progress works related to the replacement of the cremators, and this will be the subject of further reports to your Committee.

## **Appendices**

- Appendix 1 – Budget
- Appendix 2 – Risk Register

## **Background Papers:**

Open Spaces Business Plan 2017/18-2020/21

## **Esther Sumner**

Business Manager

T: 020 7332 3517

E: [esther.sumner@cityoflondon.gov.uk](mailto:esther.sumner@cityoflondon.gov.uk)

**Appendix 1**

**Department of Port Health & Environmental Services Local Risk Revenue Budget - 1st April - 31st July 2017**  
**(Income and favourable variances are shown in brackets)**

	Latest Approved  Budget 2017/18 £'000	Budget year to date (Apr-Jul)			Actual year to date (Apr-Jul)			
		Gross Expenditure £'000	Gross Income £'000	Net Expenditure £'000	Gross Expenditure £'000	Gross Income £'000	Net Expenditure £'000	Variance Apr-Jul £'000
Open Spaces (City Fund) City of London Cemetery and Crematorium	(1,712)	1,025	(1,611)	(586)	973	(1,645)	(672)	(86)
TOTAL PORT HEALTH AND ENVIRONMENTAL SERVICES COMMITTEE LOCAL RISK	(1,712)	1,025	(1,611)	(586)	973	(1,645)	(672)	(86)

Forecast for the Year 2017/18			
LAB £'000	Forecast Outturn £'000	Over / (Under) £'000	Note
(1,712)	(2,026)	(314)	1
(1,712)	(2,026)	(314)	

**Notes:**

1. Income is 2% above target for the Cemetery for the opening quarter of the year due to backdated rent arrears being paid by two of the tenants. Owing to an increase in income from all sales at the Cemetery, the Superintendent expects income to be around last year's total, (£5m), which would lead to income taken coming in at around £314,000 over target at year-end.

This page is intentionally left blank

**Report Author:** Esther Sumner

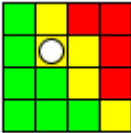
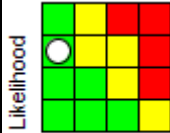

Generated on: 08 August 2017

Rows are sorted by Risk Score

[illegible]

Action no, Title,	Description	Latest Note	Managed By	Latest Note Date	Due Date
OSD CC 002 a Burial management	This work is on-going: <ul style="list-style-type: none"> <li>• The review of remaining and additional burial space informs operational planning.</li> <li>• Fees comparisons with neighboring/competitor facilities used to inform annual fees and charges</li> <li>• "Whole life" costs considered when setting fees and charges</li> <li>• Effective relationships developed with funeral directors.</li> <li>• Monitor any significant changes in competition or ownership of nearby crematoria</li> </ul>	The 'Burial Space Plan for the City of London Cemetery' Report to Port Health and Environmental Services Committee in March 2016 set out current availability and a plan for the next 15 years provision and beyond including the new space created by the Shoot and reuse of graves.  With the opportunity reuse graves, the cemetery capacity can be extended indefinitely.	Gary Burks	08-Aug-2017	31-Mar-2018
OSD CC 002 b Preventive maintenance management	This is ongoing:- Continue to work with City Surveyors to ensure that planned and preventative maintenance and CWP works for buildings and cremators is effective.	Cem & Crem Superintendent continues to work with City Surveyors, City Procurement and industry experts to take a cremator replacement project through the Gateway process. Gateway 2 was approved at PSC on 7 <sup>th</sup> September 2017.	Gary Burks	07-Sep-2017	31-Mar-2018
OSD CC 002 c Budget management	Regular monitoring of income and expenditure and budget adjustments made where appropriate and necessary	Regular and ongoing budget monitoring continues	Gary Burks	08-Aug-2017	31-Mar-2018



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	Current Risk score change indicator
<b>OSD CC 003 Deterioration of buildings, plant and machinery</b>  19-Aug-2015 Gary Burks	<b>Causes:</b> Inadequate proactive and reactive maintenance; failure to identify and communicate maintenance issues <b>Event:</b> Operational or public buildings become unusable. Plants and trees die. <b>Impact:</b> Service capability disrupted; ineffective use of staff resources; damage to corporate reputation; increased costs for reactive maintenance	 Likelihood Impact	6	The reduced CWP programme picks up urgent and important building works, cremators are currently operating well and repairs are being carried out to schedule. A contract to run alongside the City's main R&M contract has just commenced for cremator repairs and maintenance  <b>08 Aug 2017</b>	 Likelihood Impact	3	01-Aug-2017	  No change

Action no, Title,	Description	Latest Note			Managed By	Latest Note Date	Due Date
OSD CC 003 a Operational Property Review	ACTION COMPLETE Implementation of property review which aims to rationalise operational buildings across open spaces.	Cemetery actions complete - no further updates			Gary Burks	16-Nov-2016	31-Jul-2016
OSD CC 003 b Building R&M	Continue to develop relationship with City Surveyors and ways of working to ensure CWP works are delivered Regular meetings with CS's Property Facilities Managers The Superintendent was engaged in the development of the 2017 R&M specification and tender documents	Actions are ongoing.  Superintendent now sits on the BRM working Group to monitor the new contract as it progresses			Gary Burks	08-Aug-2017	31-Oct-2017
OSD CC 003 c BRM contract renewal	The current BRM contract expired in July 2017. It was agreed that the cremators should be removed from the overarching contract and subject to a separate procurement to find a specialist contractor.	A contract to maintain and service the cremators and ancillary equipment has been let and will run parallel to the main BRM contract. This has been in place since July 2017 and aims to ensure that our cremators receive the maintenance and repairs that they require, by appropriately skilled professionals.				08-Aug-2017	31-Mar-2018

[illegible]

Action no, Title,	Description	Latest Note	Managed By	Latest Note Date	Due Date
OSD CC 009 a Business continuity	Review continuity plans on a regular basis and following significant systems failures Ensure staff are familiar with 'alternate operations' as detailed in the continuity plans IS partners aware that C&C is recognised as a 'critical' service and failures are treated as a priority.	<ul style="list-style-type: none"> <li>• Use of mobile phones and manual systems is in place for burial and cremation. This has been required due to ongoing IT issues.</li> <li>• IT Business partner escalated issues to 'priority' status due to business impact</li> </ul>	Gary Burks	08-Aug-2017	31-Mar-2018

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	Current Risk score change indicator
<b>OSD CC 010</b> <b>Extreme weather</b>  21-Jun-2016 Gary Burks	<b>Cause:</b> Strong winds causing significant tree damage within the cemetery and crematorium landscape <b>Effect:</b> Roads closed, exclusion of the public, disruption to funerals <b>Impact:</b> Significant cost to division and possible loss of income/ negative publicity	 Likelihood	6	There continues to be a asignificant residual risk as we can do little to change the course of nature, but have systems in place to inspect our tree stock and experienced staff to deal with any such incident  <b>08 Aug 2017</b>	 Likelihood	6	31-Mar-2018	  No change

Action no, Title,	Description	Latest Note		Managed By	Latest Note Date	Due Date
OSD CC 010 a Wind damage  Page 281	A significant storm could (and has in the past) cause significant damage to tree stocks and buildings meaning that for a short period of time the cemetery roads could be closed and block, and one or more buildings could be out of action. This is managed through: <ul style="list-style-type: none"> <li>• Tree inspections</li> <li>• Maintain staff with chainsaw qualifications</li> </ul>	As previously <ul style="list-style-type: none"> <li>• Trees are surveyed and inspected with advisory works carried out. A group of staff within the cemetery team are trained in the operation of chainsaws for clearing fallen trees.</li> <li>• It is unlikely that storm damage would close the modern crematorium building but could damage other service chapels and block roads. The cemetery and crematorium service has 6 service chapels.</li> </ul>		Gary Burks	08-Aug-2017	31-Mar-2018

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	Current Risk score change indicator
<b>OSD CC 011</b> <b>Tree and plant diseases</b>  21-Jun-2016 Gary Burks	<b>Cause:</b> Tree Disease or infestation <b>Effect:</b> Loss of tree stock or exclusion of the public from certain areas of the cemetery <b>Impact:</b> Partial closure of site or loss of mature trees and the affect that this would have on the landscape	 Likelihood Impact	6	In June Oak Processionary Moth infestations were recognized in several trees towards the North East Corner of the cemetery site. The forestry Commission was notified and the Cemetery was served with a Statutory Notice. The Cemetery Team continue to work with the Commission and contractors to manage this infestation.  <b>08 Aug 2017</b>	 Likelihood Impact	6	31-Mar-2018	  Increased Risk Score

Action no, Title,	Description	Latest Note		Managed By	Latest Note Date	Due Date
OSD CC 011 a Tree surveys	Regular monitoring of trees Engagement of specialists where required	The proactive approach taken to monitor trees resulted in OPM being recognised and reported to the Forestry Commission. Expert advise on the management of OPM has been sought and is acted upon.  Regular inspections and the use of pheromone traps will continue.		Gary Burks	08-Aug-2017	31-Mar-2018

<b>Committee(s)</b>	<b>Dated:</b>
Port Health & Environmental Services Committee – For Information	19092017
<b>Subject:</b> Department of the Built Environment Risk Management – Periodic Report	<b>Public</b>
<b>Report of:</b> Director of the Built Environment	<b>For Information</b>
<b>Report author:</b> Richard Steele	

## Summary

This report has been produced to provide the Port Health and Environmental Services Committee with assurance that risk management procedures in place within the Department of the Built Environment are satisfactory and that they meet the requirements of the corporate Risk Management Framework.

This report only considers risks managed by the Department of the Built Environment that fall within the remit of the Port Health & Environmental Services Committee.

Risk is reviewed regularly as part of the ongoing management of the operations of the Department of the Built Environment. 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.

Since the last report to Members there have been no changes in the list of Corporate or Departmental risks managed by the department.

There is no Corporate Risk managed by the Department of the Built Environment. The Departmental Risks are listed at Annex 2.

Following the successful implementation of the Corporate Transport Policy the Departmental Key Risk (DBE- TP-01 - Road Traffic Collision caused by City of London staff or contractor who is unfit to drive while on City business) continues to be assessed as Unlikely. The Corporate Transport Policy “business as usual” compliance target has been increased from 80% to 85% and is expected to increase to 90% by the end of the Financial Year.

## Recommendation

Members are asked to:

- Note the report and the actions taken in the Department of the Built Environment to monitor and manage effectively risks arising from the department’s operations.

## Main Report

### Background

1. The Risk Management Framework of the City of London Corporation requires each Chief Officer to report regularly to Committee the risks faced in their department.
2. Risk Management is a standing item at the Senior Leadership Team meetings.
3. Risk owners are consulted and risks are reviewed between SLT meetings with the updates recorded in the corporate (Covalent) system.
4. Each risk managed by the Department of the Built Environment is allocated to either the Planning & Transportation Committee or the Port Health & Environmental Services Committees. **This report only considers risks managed by the Department of the Built Environment that fall within the remit of the Port Health & Environmental Services Committee.**

Parallel periodic reports are submitted to the Planning & Transportation Committee.

### Current Position

5. This report provides an update on the current risks that exist in relation to the operations of the Department of the Built Environment that fall within the remit of the Port Health and Environmental Services Committee.
6. In order to reduce the volume of information presented, and accordance with the Corporate Risk Management Strategy, this report includes all Corporate and Departmental level risks but not Service Level risks (unless there are changes which are considered to be likely to be of interest to Members).
7. The risk register captures risk across all four divisions within the department, (Transportation & Public Realm, District Surveyor, Development and Policy & Performance) but risks relating to the City Property Advisory Team are managed by the City Surveyor.

### Risk Management Process

8. Risk and control owners are consulted regarding the risks for which they are responsible at appropriate intervals based on the level of risk and the likelihood that this level will change. In general RED risks are reviewed monthly; AMBER risk are reviewed quarterly; and GREEN risks are reviewed quarterly, 6 monthly or annually depending on the likelihood of change.

9. Changes to risks were, historically, reported to Members as part of the Business Plan report. Members now receive this report quarterly<sup>1</sup> in accordance with the Corporate Risk Management Strategy.
10. All significant risks (including Health & Safety risks) identified by the Department have been added to the Covalent Corporate Risk Management System.

### **Significant Risk Changes**

11. Following the presentation to this Committee on 7 Jul 17 contract monitoring indicates that the likelihood the Service Level risk DBE-TP-05 (Continued significant service failure by major contractor) occurring remains Possible but good progress is being made and it is expected to revert to Unlikely by the end of October (at which point the risk will also revert to GREEN).
12. Members may wish to be aware that the Snow Plan has been reviewed for the coming winter and the risk remains GREEN.

### **Identification of New Risks**

13. New risks may be identified at the quarterly review of all risk; through Risk reviews at the Department Management Team; or by a Director as part of their ongoing business management.
14. An initial assessment of all new risks is undertaken to determine the level of risk (Red, Amber or Green). Red and Amber risks will be the subject of an immediate full assessment with Red risks being report to the Department Management Team. Green risks will be included in the next review cycle.
15. No new Departmental level risks have been identified since the last report.

### **Summary of Key Risks**

16. The Department of the Built Environment's Risk Register includes one Key Risk:

- **Road Traffic Collision caused by City of London staff or contractor who is unfit to drive while on City business (DBE-TP-01)**

Following implementation of the Corporate Transport Policy this risk continues to be assessed as having Impact 8 (Critical) and Likelihood 1 (Rare).

Since it is not possible to reduce the impact all our efforts continue to be directed to reduce the likelihood through compliance with the corporate Transport Policy.

Over 88% (up from 85% at the last report) of City of London staff have now completed Driver Check (the Training Needs Analysis). Whilst completion remains patchy no department is now below 66% (up from 50% at the last report) and only two departments are below 80% (down

---

<sup>1</sup> Due to the scheduling of meetings of the Port Health & Environmental Services Committee, and with the agreement of that Committee, these reports are presented at 4 months intervals instead of quarterly.

from three departments at the last report).

Completion of the Corporate Transport Policy online training course by drivers and their managers (as identified by Driver Check) is over 91% (up from 87% at the last report).

Overall compliance with both Driver Check and the online training course is now at 86.5% (up from 80% at the last report).

All departments are provided with periodic reports which include details of all staff who are not compliant.

Business As Usual monitoring ensures that compliance is maintained at a level to give assurance that the likelihood of this risk occurring remains Rare.

In view of the improved level of compliance for the completion of Driver Check and the online training course, to ensure that our targets are appropriately stretching, the Business As Usual compliance target has been increased from 80% to 85% and is expected to increase to 90% by the end of the Financial Year.

We have begun implementation of an online system (DAVIS) to maintain records of staff driving licences and, where staff use their own vehicle on business, the vehicle details. This system allows driving licences to be checked against DVLA records (normally every 6 months) to ensure drivers continue to be appropriately licenced.

## **Conclusion**

17. Members are asked to note that risk management processes within the Department of the Built Environment adhere to the requirements of the City Corporation's Risk Management Framework and that risks identified within the operational and strategic responsibilities of the Director of the Built Environment are proactively managed

## **Appendices**

- Appendix 1 – City of London Corporation Risk Matrix
- Appendix 2 – Register of DBE Corporate and Departmental risks (Port Health & Environmental Services Committee)

**Carolyn Dwyer**

Director of the Built Environment

T: 020 7332 1700

E: [carolyn.dwyer@cityoflondon.gov.uk](mailto:carolyn.dwyer@cityoflondon.gov.uk)



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

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

### (A) Likelihood criteria

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

### (B) Impact criteria

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

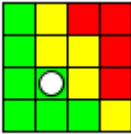
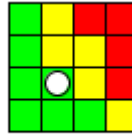

This page is intentionally left blank

## APPENDIX 2

Generated on: 06 September 2017

[illegible]

Action no, Title,	Description	Latest Note	Managed By	Latest Note Date	Due Date
DBE-TP-01c Business As Usual Mitigation	<p>Monitor the percentage of City of London staff who have completed Driver Check and ensure that it remains above 80%</p> <p>Monitor the percentage of City of London staff who have been identified, through Driver Check, as drivers (or managers of drivers) who have completed the Corporate Transport Policy online training course and ensure that it remains above 80%.</p> <p>Monitor overall completion rates for both driver check and the online training course and ensure that it remains above 80%.</p> <p>Monitor the collection and periodic monitoring of driver licence details (and, in the case of grey fleet drivers, vehicle details).</p>				31-Dec-2999

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	Current Risk score change indicator
<b>DBE-TP-07 A major incident, such as flooding or fire, makes Walbrook Wharf unusable as a depot</b> 27-Mar-2015 Steve Presland	Cause: A major incident, such as flooding or fire Event: Walbrook Wharf unusable as a depot Impact: Unable to clean streets; collect waste or maintain City of London Police vehicles. City of London unable to meet its contractual arrangements with third parties who use the depot for their commercial purposes.	 Likelihood	4	A Business Continuity exercise was successfully carried out in March 2017. The next exercise will be held in 2018 and the dates have been reset accordingly.  <b>07 Apr 2017</b>	 Likelihood	4		  No change

Action no, Title, File,	Description	Latest Note			Managed By	Latest Note Date	Due Date
DBE-TP-07a Business Continuity exercise	Conduct annual DBE business continuity exercise	A Business Continuity exercise was successfully carried out in March 2017. The next exercise will be held in 2018 and the dates have been reset accordingly.			Steve Presland	07-Apr-2017	30-Sep-2018

This page is intentionally left blank

TO: **PORT HEALTH AND  
ENVIRONMENTAL SERVICES  
COMMITTEE**

19 September 2017

FROM: **POLICE COMMITTEE**

13 July 2017

11. The Committee received a note of resolution from Port Health & Environmental Services Committee relating to the issue of illegal street traders within the City of London.

The note explained that the Port Health & Environmental Services Committee had received a report of the Director of Markets and Consumer Protection which sought approval on an action plan to stop these traders from operating. It was explained that there had been an increase in the number of violent incidents occurring when these traders were asked to cease their activities which had resulted in the requirement of Police assistance.

The Commissioner explained that in the event that it was established that violence is occurring, then the City of London Police would indeed commit appropriate response in order to resolve any incident. The Commissioner explained that no extra resources could be committed to an action plan of this nature without further consideration into evidence of violence taking place. If it was not evident that the incidents had escalated to violence then the issue should remain under the jurisdiction of Markets and Consumer Protection.

Members stated their approval of the issue being raised and in discussion suggested an increased focus from enforcement officers where possible in order to have a significant deterrent effect with minimal consumption of resources. The Commissioner agreed to monitor requests for police assistance and allocate resources accordingly through the Force tasking process in line with Force priorities.

It was agreed to send a resolution in response to the Port Health & Environmental Services Committee to communicate the discussion alongside the Commissioner's statements.

**RESOLVED** – That the Committee agree that a note of this discussion be sent to the next meeting of the Port Health & Environmental Services Committee.

This page is intentionally left blank



TO: **POLICE COMMITTEE**

13 July 2017

FROM: **PORT HEALTH AND  
ENVIRONMENTAL SERVICES  
COMMITTEE**

4 July 2017

9. The Committee received a report of the Director of Markets and Consumer Protection which sought approval on an action plan to stop illegal street traders. It was explained that there had been an increase in violence from illegal street traders when asked to cease their activities and this has resulted in a need for police assistance.

The Comptroller and City Solicitor explained that counsel's opinion had been sought to identify effective enforcement options available to the City when dealing with persistent illegal street traders. There were three options available to the City Corporation:

- Criminal behaviour orders
- Anti-social behaviour injunctions
- Prohibitory injunctions

The Comptroller and City Solicitor outlined the three options and explained that whilst the most appropriate form of enforcement would be dependent on the relevant facts in each individual case, criminal behaviour orders were the most cost effective method and would be adopted wherever possible.

A Member reported their concerns on the recent violence carried out by illegal street traders using an example of assault carried out in the Ward of Bridge and Bridge Without and added that there may be an element of organised crime associated with these traders such as human trafficking and funding organised crime. It was noted that the Council of Westminster had eradicated illegal street trading by introducing a number of measures to tackle this behaviour.

The Chairman explained that a police presence is required when confronting illegal street traders and with recent events within London requiring police resources, the traders and illegal ice cream vans were taking advantage of this situation by increasing their numbers. The Chairman confirmed that police resources were needed to address this issue, particularly in light of the recent escalation of violence and asked that a note be sent to the Police Committee to request assistance from the City of London Police.

In response to a Member's question on the use of signage to warn tourists and other persons on illegal street trading and whether this could be expedited and moved from the long term to short term actions, the Director of Port Health and Public Protection explained that although the current focus was on direct action, this would be looked into, as would the use of leafleting.

The Director of Port Health and Public Protection agreed to provide an oral update on this area at the September meeting and a written report for the November meeting.

**RESOLVED** – That the Committee agree:

- a) the recommended course of action detailed in paragraph 30 of the report before Members;
- b) and that a note of this discussion be sent to the next meeting of the Police Committee.

TO: **PORT HEALTH AND  
ENVIRONMENTAL SERVICES  
COMMITTEE**

19 September 2017

FROM: **ECONOMIC CRIME BOARD**

27 July 2017

The Sub-Committee received a report of the Director of Markets and Consumer Protection updating Members on the progress of Operation Offspring for which approval has been given by Port Health & Environmental Services to expand beyond the limits of the City of London into other London boroughs.

The Trading Standards Manager explained that the primary aim of the expansion was to include surrounding local authorities in the work to identify perpetrators of investment fraud as early as possible.

The Chairman asked if the City of London Corporation was adherent to the London Local Authorities Act 2007 and this was confirmed by the Trading Standards Manager.

The Trading Standards Manager explained that a new rise in popularity of Binary Options has been linked with a high volume of fraud cases, and as such has been outlawed by US financial regulators. The regulation of Binary Options in the UK is due to commence in 2018, though this will not resolve the issue of fraudulent companies based overseas that continue to operate outside of this regulatory framework. The Trading Standards Manager explained that the primary goal of fraudulent Binary Option schemes is to present as legitimate to their victims, thus there are frequent attempts to register addresses within the City of London, many illegitimately hijacking high profile brands such as the Virgin Group to lure victims to invest. The Virgin Group have publicly endorsed the IP Protection website, which illustrates the significant scale of this form of fraud and has raised the profile of investment fraud across the UK.

The Chairman noted that the funding for this project expansion was sourced from an underspend of the Port Health & Environmental Protection Committee, and Members agreed to send a note to the Committee to declare that they were very pleased to receive this report and with the joint working that was being encouraged.

**RESOLVED** – That a note of this discussion be sent to the next meeting of the Port Health & Environmental Services Committee.

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank



By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank



By virtue of paragraph(s) 1, 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank