



Port Health & Environmental Services Committee

Date: TUESDAY, 5 MARCH 2019
Time: 11.00 am
Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

Members:

Jeremy Simons (Chairman)	Graeme Harrower
Deputy Keith Bottomley (Deputy Chairman)	Christopher Hill
Deputy John Absalom	Deputy Tom Hoffman
Caroline Addy	Deputy Wendy Hyde
Alderman Nick Anstee	Deputy Jamie Ingham Clark
Alexander Barr	Shravan Joshi
Adrian Bastow	Vivienne Littlechild MBE
Deputy John Bennett MBE	Andrew McMurtrie
Peter Bennett	Andrien Meyers
Tijs Broeke	Deputy Brian Mooney
John Chapman	Deputy Joyce Nash
Peter Dunphy	Henrika Priest
Mary Durcan	Jason Pritchard
Deputy Kevin Everett	Deputy Richard Regan
Anne Fairweather	Deputy Elizabeth Rogula
Alderman David Graves	Mark Wheatley

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Lunch will be served at the rising of the Committee.
N.B. 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 15 January 2019.

For Decision
(Pages 1 - 14)

4. **OUTSTANDING ACTIONS**

Report of the Town Clerk.

For Information
(Pages 15 - 16)

5. **UPDATE ON THE IMPACT OF THE UK LEAVING THE EU (BREXIT) ON PORT HEALTH & PUBLIC PROTECTION**

Report of the Interim Director of Consumer Protection and Markets Operations.

For Information
(Pages 17 - 26)

6. **DEPARTMENT OF THE BUILT ENVIRONMENT: BREXIT UPDATE**

Report of the Director of the Department of the Built Environment.

For Information
(Pages 27 - 28)

7. **TFL DIRECT VISION STANDARD CONSULTATION RESPONSE**

Report of the Director of the Department of the Built Environment.

For Information
(Pages 29 - 34)

8. **CITY OF LONDON TRANSPORT STRATEGY, CLEANER AND QUIETER
OUTCOME – CONSULTATION RESPONSE**

Report of the Director of the Department of the Built Environment.

For Information
(Pages 35 - 72)

9. **CONSTRUCTION LEVY - CODE OF PRACTICE FOR DECONSTRUCTION AND
CONSTRUCTION SITES NINTH EDITION 2019**

Joint report of the Interim Director Consumer Protection and Markets Operations and the Chief Planning Officer and the Development Director.

For Information
(Pages 73 - 148)

10. **THE TRANSITION TOWARDS A ZERO-EMISSION FLEET**

Joint report of the Department for Built Environment and the Chamberlain.

For Information
(Pages 149 - 158)

11. **AGRICULTURE BILL AND FISHERIES BILL**

Report of the Remembrancer.

For Information
(Pages 159 - 164)

12. **DRINKING FOUNTAINS - DELIVERING ADDITIONAL WATER REFILL POINTS IN
THE CITY'S PUBLIC REALM**

Report of the Director of the Department of the Built Environment.

For Information
(Pages 165 - 184)

13. **FINAL DEPARTMENTAL HIGH-LEVEL BUSINESS PLANS 2019/20 –
DEPARTMENT OF THE BUILT ENVIRONMENT MARKETS & CONSUMER
PROTECTION OPEN SPACES**

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

For Decision
(Pages 185 - 202)

14. **DRAFT AIR QUALITY STRATEGY**

Report of the Interim Director of Consumer Protection and Markets Operations.

For Decision
(Pages 203 - 294)

15. **THE WALBROOK WHARF OFFICES FRONTING UPPER THAMES STREET - 3RD FLOOR TO BE DECLARED SURPLUS**

Report of the Director of the Department of the Built Environment.

For Decision
(Pages 295 - 296)

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

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

18. **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

19. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 15 January 2019.

For Decision
(Pages 297 - 298)

20. **PORT HEALTH AND ENVIRONMENTAL SERVICES DEBTORS - PERIOD ENDING 31 DECEMBER 2018**

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

For Information
(Pages 299 - 308)

21. **WAIVER REPORT - ELECTRIC VAN REPLACEMENT**

Report of the Interim Director of Consumer Protection and Markets Operations.

For Decision
(Pages 309 - 320)

22. **LONDON GATEWAY - NEW OFFICE ACCOMMODATION**

Report of the Interim Director of Consumer Protection and Markets Operations.

For Decision
(Pages 321 - 328)

23. **PROPOSED CHARGES FOR STREET CLEANSING, WASTE COLLECTION AND PUBLIC CONVENIENCES 2019/20**

Report of the Director of the Built Environment.

For Decision
(Pages 329 - 342)

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

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

Part 3 - Confidential Agenda

26. **DELEGATED POWERS - REPORT OF ACTION TAKEN**

Report of the Town Clerk.

For Information

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PORT HEALTH & ENVIRONMENTAL SERVICES COMMITTEE

Tuesday, 15 January 2019

Minutes of the meeting of the Port Health & Environmental Services Committee held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Tuesday, 15 January 2019 at 11.00 am

Present

Members:

Jeremy Simons (Chairman)	Alderman David Graves
Deputy Keith Bottomley (Deputy Chairman)	Graeme Harrower
Deputy John Absalom	Christopher Hill
Caroline Addy	Deputy Wendy Hyde
Adrian Bastow	Deputy Jamie Ingham Clark
Deputy John Bennett MBE	Shravan Joshi
Peter Bennett	Vivienne Littlechild
Tijs Broeke	Andrien Meyers
John Chapman	Henrika Priest
Peter Dunphy	Jason Pritchard
Mary Durcan	Deputy Elizabeth Rogula

In Attendance

Members:

Marianne Fredericks
Wendy Mead
Sylvia Moys
Barbara Newman

Officers:

Rofikul Islam	- Town Clerk's Department
Laura Simpson	- Town Clerk's Department
Sacha Than	- Town Clerk's Department
Jenny Pitcairn	- Chamberlain's Department
Paul Chadha	- Comptroller & City Solicitor's Department
Carolyn Dwyer	- Director of Built Environment
Paul Beckett	- Department of the Built Environment
Jim Graham	- Department of the Built Environment
Zahur Khan	- Department of the Built Environment
Mike Simmonds	- Department of the Built Environment
Richard Steele	- Department of the Built Environment
Jon Averbs	- Interim Director of Consumer Protection and Market Operations
Rachel Pye	- Department of Markets and Consumer Protection
Colin Buttery	- Director of Open Spaces

Gary Burks - Open Spaces Department
Gerry Kiefer - Open Spaces Department

1. **APOLOGIES**

Apologies for absence were received from Alexander Barr, Deputy Kevin Everett, Anne Fairweather, Deputy Tom Hoffman, Andrew McMurtrie, Deputy Joyce Nash, Deputy Richard Regan and Mark Wheatley.

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

There were no declarations.

3. **IMPROVING AIR QUALITY PRESENTATION**

The Air Quality Manager for City of London Corporation (City Corporation) gave a presentation to the Committee on the work carried out in collaboration with Sir John Cass's Foundation Primary School over the last 15 years in improving air quality, and for which the City Corporation had in 2018 received a National Air Quality News Award.

Members were informed of the monitoring work which had taken place with the School from 2003 onwards with the installation of a 24-hour air quality monitoring station in the playground. Policies were brought in to improve air quality such as the planting of air quality plants throughout the school grounds, green walls made from ivy screens, new air filtrations units in classrooms, and teaching pupils how to reduce their exposure to air quality. The filtration units would also be trialled by other schools.

As part of the air quality modelling, work was carried out within the Aldgate public space to consider how pollution varied. Work such as the removal of the Aldgate gyratory system, the planting of 71 trees and the creation of a new community space called Aldgate Square, as well as the widening of pavements, improvement of pedestrian access and cycling routes have all contributed to a drop-in pollution.

Work had been undertaken to monitor and analyse nitrogen dioxide (NO₂) and the small particles. Overall air pollution at the school had fallen below the legal annual limit and the data gathered and verified by King's College London showed that levels of NO₂ had fallen below annual limits in 2017. There had been a slight increase with regards to the particles, but this may be attributed to construction taking place.

The corporate risk with regards to air quality had been reduced from Red to Amber and this had been achieved through the support of the School. Officers would next be looking to carry out similar work with St Paul's Choir School.

In response to a Member's query on the health of children and the monitoring work taking place. The Air Quality Manager advised that a project was taking place with Kings College London where medical assessments were being conducted on the pupils, but as research projects take place over a long period of time, there were no results available yet.

The Chairman thanked officers on their work and their achievements in reducing air pollution in areas of the school.

The Chairman asked the Town Clerk to circulate the presentation to the Committee and those Members who were present at the meeting.

4. **MINUTES**

RESOLVED – That the public minutes and summary of the meeting held on 27 November 2018 be approved as a correct record.

Matters Arising

Plastic Wrapping:

A Member explained that the ward newsletter received by the residents in the Ward of Cripplegate had been wrapped in plastic and could the issue of plastic packaging be addressed. The Town Clerk explained they had spoken to the Head of Publishing who had advised that the new print management company had been given the instruction to use biodegradable wrapping and a paper insert had been used to alert readers that the wrapping was recyclable. The Head of Publishing had advised they would discuss this further with the printer. It was added that the wrapping used for Cityview was now biodegradable.

The Chairman suggested that all communications be biodegradable and whether the insert was needed.

5. **OUTSTANDING ACTIONS**

The Committee received the current list of outstanding actions.

Electric Vehicle Charging

The Director of Transportation and Public Realm advised that Transport for London had proposed to install a charging point on Noble Street in January 2019, but at present there was no further update. The Chairman advised Members that he had raised the concerns of the delay informally with the Chair of Transport for London.

A Member raised the point that the City Corporation was the only Local Authority without charging points for electric vehicles, aside from those in the car parks, and this needed to be resolved.

The Chairman asked the Director of Transportation and Public Realm to produce a report on this matter for the next meeting of the Committee setting out the background and proposals.

S.101 Agreements

The Interim Director of Consumer Protection and Market Operations advised that officers were awaiting the outcome of a cabinet meeting with Tower Hamlets due to take place in February 2019 where it was hoped the Section 101 Agreement would be signed which will enable City Officers to undertake

enforcement action against illegal street trading on the north side of Tower Bridge.

Water Refill Points

In response to a Member's request for an update on water readings and further information, the Assistant Director of Cleansing explained that eight water refill points would be installed, one in March 2019 and the remaining seven in August 2019. If any further points were to be considered, this would be reviewed as part of a business case. It was explained that the fountain at Carter Lane was unmetered but discussions were taking place with Thames Water and an update would be provided to Members in due course. Whilst meter readings were taken of the other fountains, there was concern as to what information this could provide due to seasonal variations. The Chairman asked for the data to be circulated to the Committee via the Town Clerk when available.

Bloomberg Litter Monitoring

The Assistant Director of Cleansing explained that a meeting with Bloomberg had taken place and a commitment had been given that Bloomberg would conduct street cleaning sweeps beyond their boundaries up to the Magistrates Court. They had also expressed interest in the City Corporation's Clean City Award Scheme and Plastics Campaign.

The Chairman advised that the following actions could be removed from the report as they had now been resolved: Bloomberg litter monitoring, modern slavery and vehicle alarms.

6. ANNUAL TERMS OF REFERENCE REVIEW

The Committee considered a report of the Town Clerk that sought approval to the Terms of Reference for subsequent submission to the Court of Common Council.

RESOLVED – That: -

- the terms of reference of the Committee be approved for submission to the Court of Common Council in April 2019;
- any subsequent changes required in the lead up to the Court's appointment of Committees be delegated to the Town Clerk in consultation with the Chairman and Deputy Chairman; and
- the frequency of meetings continues at six times per year.

7. BREXIT UPDATE

The Director of Consumer Protection and Market Operations provided an oral update in respect of Brexit adding that he would provide the majority of the update now, but there were some matters that he would raise in the Non-Public session of the meeting.

The Interim Director of Consumer Protection explained that a letter from the Chairman of the Policy and Resources, and Port Health and Environmental Services Committee had been circulated to the chairs of relevant parliamentary

select committees and MPs with ports in their areas. Funding bids had been sent to Government and officers were in regular contact with the Ports regarding relevant Brexit scenarios.

Officers were addressing risks, for example a bid had been submitted to the Department for Environment, Food and Rural Affairs for funding regarding the Heathrow Animal Reception Centre and if this were unsuccessful, officers would look to approach the Town Clerk to seek use of the Brexit contingency fund that had been established.

RESOLVED – That the Committee note the update.

8. **DEPARTMENT OF THE BUILT ENVIRONMENT RISK MANAGEMENT - PERIODIC REPORT**

The Committee received a report from the Director of the Built Environment which set out the risk management procedures in place within the Department of the Built Environment.

The Director of the Built Environment advised that following approval of the contract award by the Court of Common Council, the Cleansing and Waste Contract – Commercial Risk had been closed. Members were informed that overall compliance with the Driver Check and online training course was at 95.1%

A Member asked whether there was a risk regarding the time period between the implementation of the new waste cleansing contract and termination of the old contract, in response the Director of the Built Environment advised that there were plans in place to mitigate any risks and this would be monitored closely.

RESOLVED – That the Committee 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.

9. **LITTER INTERVENTION TRIAL**

The Committee received a report of the Director of the Built Environment which provided details of a litter intervention trial in partnership with Keep Britain Tidy.

In response to a Member's query on whether there was an adequate number of bins installed across the City, particularly as the public were being asked in the poster to "find a bin", the Assistant Director of Cleansing explained that the poster appended to the report before Members was not a final version and he would look at the wording used. The Assistant Director of Cleansing explained that the approach on the number of bins in the City had been agreed by the Committee in 2010 and officers were of the opinion that the current strategy was effective with high capacity bins used. The Assistant Director of Cleansing explained that adding further bins would require more resourcing and this would impact staffing, costs and maintenance. He surmised that it would be better to address the behaviour of people rather than increase the bins.

A discussion took place amongst Members on how to address behaviour regarding littering, it was suggested that a QR note be included within the posters which would provide a map of bins in the area. Members observed that littering was an issue and it would be helpful if the next report to Committee on this topic provided details on the success of the campaign and how this was measured.

A Member suggested that it would be timely to conduct another a review of the policy regarding the City's bins.

The Chairman asked the Director of the Built Environment to provide a report to either the May or July 2019 Committee meeting containing details on the number of bins in the City and the factors that had changed since 2010.

RESOLVED – That the Committee note the report.

10. CITY CORPORATION'S PROPOSED APPROACH TO CARBON OFFSETTING

The Committee received a report of the Director of the Built Environment on the City Corporation's proposed approach to Carbon offsetting. The London Plan in partnership with the City of London Corporation sought to reduce the carbon omission, through developing ideas with regards to the Building Regulations requirement.

Responding to a Member's question regarding achieving the carbon target, the Director of the Built Environment explained that the requirement of achieving zero carbon had only come into effect in 2019 therefore it was too soon to report on this, but the density of buildings within the City meant that some work could not be carried out such as the installation of solar powers due to shading caused by nearby buildings. The City Corporation would endeavour to get as close to the zero carbon target as possible.

RESOLVED – That the Committee approve the proposed approach to Carbon offsetting for the City of London.

11. DEPARTMENT OF THE BUILT ENVIRONMENT (CLEANSING SERVICES) BUSINESS PLAN PROGRESS REPORT FOR PERIOD 2 (AUGUST - NOVEMBER) 2018

The Committee received a report of the Director of the Built Environment, which set out the progress made during period two (August – November) against the 2015/18 DEB Business Plan for Public Conveniences, Waste Collection, Street Cleansing, Waste Disposal and Transport Services.

This Director of the Built Environment advised that one of the initiatives as set out in the report before Members would seek to improve recycling rates. In response to Member's questions on how the City Corporation monitored recycling and waste, the Director explained that a waste composition analysis was conducted every two years; the results provided from that was subsequently used to target residents and this formed part of the Recycling Action Plan.

The Chairman suggested it would be useful when sending residents their council tax bills, to also provide information as to what could be recycled as this varied within London Boroughs and it could be a challenge for people to know what was recyclable. for residents to be provided with information as to what could be recycled.

The Chairman asked the Director to look into providing additional guidance on what could be recycled.

RESOLVED - that the Committee note the report.

12. **PROJECT TO INCREASE RECYCLING ON MIDDLESEX STREET ESTATE**

The Committee received a report of the Director of the Built Environment which updated Members on improve recycling on Middlesex Street estate this included incentivising residents to increase their recycling performance.

A Member asked whether officers had information as to why the recycling performance at Middlesex Street estate was not better and queried whether incentivising people was the best method. In response, the Director of the Built Environment explained that some residents on the estate did recycle but not all and it was hoped that incentivising would assist in helping people buy into recycling in the long term, particularly amongst young people who could encourage their parents.

RESOLVED - that the Committee note the report.

13. **REVENUE AND CAPITAL BUDGETS - 2019/20**

The Committee considered a report of the Chamberlain, Director of the Built Environment, Interim Director of Consumer Protection and Market Operations, and Director of Open Spaces which sought the approval of the latest revenue budget for 2018/19 and provisional revenue budget for 2019/20, for subsequent submission to the Finance Committee.

Responding to a Member's query on whether the transfer of responsibility for the Built Environment Directorate from this Committee to the Planning and Transportation Committee would affect matters discussed by the Committee, the Chairman confirmed that the Committee would continue to consider the same business as usual.

RESOLVED – That the Committee:

- note the latest 2018/19 revenue budget;
- review the provisional 2019/20 revenue budget to ensure that it reflects the Committee's objectives and, if so, approve the budget for submission to the Finance Committee;
- review and approve the draft capital budget;
- agree additional funding of £3,492,000 in 2019/20 for the following items, which are over and above the resource base, subject to the agreement

of Resource Allocation Sub Committee and Policy and Resources Committee:

- Waste Contract, £3,218,000 (para 16 of the report before Members)
- Air Quality, £99,000 (para 17 of the report before Members)
- Coroner & Mortuary, £175,000 (para 18) of the report before Members;
- agree the transfer of responsibility for the Built Environment Directorate from this Committee to the Planning and Transportation Committee and authorise the Chamberlain to make the necessary budget adjustments (para 24 of the report before Members);
- agree that approval for any minor changes arising from the completion of the asset verification exercise be delegated to the Chamberlain; and
- authorise the Chamberlain to revise these budgets for changes in respect of recharges.

14. CEMETERY AND CREMATORIUM - FEES, CHARGES AND MARKETING

The Committee received a report of the Director of Open Spaces which set out the fees and charges for the service provided at the City of London Cemetery and Crematorium and proposed an increase of 3% increase for a number of items and services offered.

RESOLVED - that the Committee:

- agree the fees and charges as set out in the report and shown in the appendix for implementation with effect from 1 April 2019;
- note the marketing activities undertaken in 2018 and those planned for 2019 for the Cemetery and Crematorium.

15. CREMATOR REPLACEMENT - CITY OF LONDON CEMETERY AND CREMATORIUM

The Committee received a report of the Director of Open Spaces which set out options for the removal and replacement of the old cremators at the City of London Cemetery and Crematorium.

The Director of Open Spaces presented the Committee with three viable options to remove the cremators, Members agreed that option 5 should be taken forward which proposed the removal of the old cremators and they be replaced with two new cremators complete with fuel gas treatment plant.

RESOLVED - that the Committee:

- Agree option 5 be taken forward and implemented; and that the total budget of £1,100,000 be approved.

16. PERIOD 1 & 2 (APRIL - NOVEMBER) CEMETERY & CREMATORIUM BUSINESS PLAN PERFORMANCE AND RISK MANAGEMENT UPDATE

The Committee considered a report of the Director of Open Spaces which provided an update on the performance of the Cemetery and Crematorium for

the duration of April to November 2018 and sought approval of the removal of two risks from future risk reports.

The Chairman congratulated officers on their recent Celebrating Our People Award.

RESOLVED - that the Committee:

- note the performance of the Cemetery and Crematorium during this reporting period;
- approve the removal of the two “green” risks from future risks reports to the Committee as proposed in paragraph 19 and 20 of the report before Members.

17. ANIMAL RECEPTION CENTRE - HEATHROW AIRPORT: ANNUAL REVIEW OF CHARGES

The Committee considered a report of the Interim Director of Consumer Protection and Market Operations which sought the approval to increase the Schedule of Charges in respect of the services provided at the Heathrow Animal Reception Centre for the financial year of 2019/20. A general inflationary increase to the fees of 2.5% was proposed and a split fee for dogs, cats and ferrets travelling under the pet Travel Scheme.

The Interim Director of Consumer Protection and Market Operations explained that the proposed fee increase was in accordance with inflation. It was added that with regards to the proposed charge of £15 per consignment for all shipments that terminate at Heathrow, this be amended to £20.

RESOLVED - that the Committee:

- approve the charges included in the appendix to the report with effect from 1 April 2019, but with the £15 consignment charge being increased to £20 or as soon as practicable thereafter; and
- approve the proposed Byelaws contained in the Appendix to this report and recommend to the Court of the Common Council that the Byelaws be made, and that the Comptroller and the City Solicitor be instructed to seal the Byelaws accordingly.

18. MOOR LANE: ULTRA-LOW EMISSION VEHICLE ACCESS RESTRICTION

The Committee considered a report of the Interim Director of Consumer Protection and Market Operations which recommended postponing the introduction of a scheme, due to take place in April 2019, to introduce an ultra-low emission vehicle access only restriction at the southern section of Moor Lane for up to six months.

During discussion amongst Members it was confirmed that whilst the recommendation sought to postpone the scheme, the power to make the traffic order would reside with the Streets and Walkways Sub-Committee and the preferred option was for the ULEV pilot to operate 7am-11pm on weekdays and the current barriers closure to be maintained overnight and at weekends.

RESOLVED - that the Committee;

- Postpone the introduction of the scheme for up to 6 months to avoid confusion with the Mayor of London Ultra-Low Emission Zone and provide additional time for drivers to upgrade vehicles; and
- approve to purchase and install equipment before April 2019.

19. **MEASUREMENT AND MITIGATION OPTIONS FOR OPERATIONAL RAIL NOISE FROM LONDON UNDERGROUND AFFECTING THE BARBICAN ESTATE.**

The Committee considered a report of the Interim Director of Consumer Protection and Market Operations on how to mitigate and gain a reduction in the noise and vibration to the residents of the Barbican Estate affected by the operational rail noise from London Underground sub-surface train lines running beneath the estate.

The Chairman reminded Members that a six-page letter of response from London Underground had been circulated to Members of the Committee. The Interim Director of Consumer Protection and Market Operations advised that it was intended for officers, Cole Jarman and London Underground specialists to meet to agree on what mitigation measures could be implemented.

Members thanked the officers for the work carried out and for commissioning the Cole Jarman report which had been provided to the Committee, Members expressed their disappointment regarding the letter received from London Underground and asked that this issue continue to be considered by the Committee. The Chairman noted that representatives from Transport for London were in the public gallery and had heard the views of the Committee.

Discussion took place on the level of noise being experienced by residents and the impact this had, Members asked officers to explore the costs involved for City Corporation to progress to the next stage of works and ways in which the mitigation measures could be funded.

The Chairman asked that a report be provided to the March 2019 Committee meeting with an update on the meetings that were due to take place and asked whether Cole Jarman could provide further information regarding the proposed works, associated costs, and the impact this would have on residents. The Chairman noted that Members could not support the implementation of the night tube until these issues were resolved.

RESOLVED - that the Committee note the content of the report and endorse the actions as set out in paragraphs 15 to 18.

20. **PORT HEALTH & PUBLIC PROTECTION RISKS**

The Committee received a report on Port Health and Public Protection Risks from the Director of Markets and Consumer Protection. The report provided the Committee with assurance that risk management procedures in place within the Department of Markets and Consumer Protection were satisfactory and met the

benchmarks of the corporate Risk Management Framework. The report further noted risks were reviewed regularly by Senior Officers.

RESOLVED - that the Committee note the report and the actions taken in the Department of Markets and Consumer Protection to monitor and manage effectively risks arising from the operations.

21. **MARKETS AND CONSUMER PROTECTION BUSINESS PLAN 2018/2019: PROGRESS REPORT (PERIOD 2)**

The Committee received a report of the Interim Director of Consumer Protection and Market Operations which provided an update progress made by the Port Health and Public Protection Division during Period 2 of 2018/19 against the Market and Consumer Protection Business Plan 2018/2019.

The Interim Director of Consumer Protection and Market Operations provided Members with an update explaining that there was continued increase through the Ports, particularly London Gateway which was up by 35%. Filming had taken place at the Heathrow Animal Reception Centre and a new television series about the Animal Reception Centre entitled Animal Airport was due to be shown on More 4.

The Committee congratulated Beth Humphrey, Air Quality Officer on her recent Rising Star award at the City Corporation's Celebrating our people event.

RESOLVED - that the Committee note the report and its appendix.

22. **RESOLUTION OF THE PLANNING AND TRANSPORTATION COMMITTEE**

The Committee considered a resolution of the Planning and Transportation Committee from their meeting of 20 November 2018 which raised their concerns on the need to strengthen and align policies in the area of ventilation systems.

The Chairman advised Members that a report on this matter would be considered at Item 23 of the agenda.

RESOLVED – That the Committee note the resolution and Members' concerns.

23. **VENTILATION AND EXTRACTION REQUIREMENTS FOR RESTAURANTS/CAFES**

The Committee received a report of the Chief Planning Officer on Ventilation and Extraction Requirements for Restaurants/Cafes which set out the statutory context for controlling odours being extracted at ground floor level from restaurants and café premises.

The Chairman advised that the full report of Control of Odour and Noise from Commercial Kitchen Exhaust systems had been placed in the Members' Reading Room.

The Interim Director of Consumer Protection and Market Operations advised that since the report had been produced, officers had sought to include a more

robust approach within the Local Plan which would include maintenance and the keeping of records.

Responding to Members' comments on whether the Environmental Protection Act of 1990 could be update and noting issues they have experienced with old/existing premises regarding odour and ventilation issues, the Interim Director of Consumer Protection and Market Operations advised that there were no plans to update the Act but there was a high level of case law that had to be taken into account. When Environmental Health Officers undertook inspections of food premises, they looked at the ventilation arrangements in place. The Chairman added that if their ventilation was poor, this could affect their food hygiene rating score.

The Committee was advised that if Members had any concerns regarding local restaurants/cafes, they should contact the Department of Markets and Consumer Protection.

RESOLVED - that the Committee note the report.

24. **TREE PESTS AND DISEASES: OAK PROCESSIONARY MOTH URGENT UPDATE**

The Committee received the report of the Director of Open Spaces which provided an update on the Oak Processionary Moth (OPM) and the challenges being faced as it spread across the Open Spaces in the care of the City of London Corporation.

The Director of Open Spaces provided the Committee with an update on work being carried out to control the spread of the OPM which included nest removal or pesticide spraying and this was the most pragmatic approach.

RESOLVED - that the Committee note the report.

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

There were no questions.

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

There were no questions.

27. **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.

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28. **NON-PUBLIC MINUTES**

RESOLVED – That the non-public and summary of the meeting held on 27 November 2018 be approved as a correct record.

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

There were no questions.

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

The Committee considered a late report which sought approval of an urgent waiver.

The meeting ended at 12.44 pm

Chairman

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Port Health & Environmental Services Committee – Outstanding Actions

Item	Date	Action	Officer(s) responsible	To be completed/ progressed to next stage	Progress Update
1.	19 September 2017	Electric Vehicle Charging	Director of Transportation and Public Realm	March 2019	<p>The installation of a charging point in Noble Street was originally programmed for June 2018, however, there have been severe delays with some legal questions and programming with TfL.</p> <p>Officers now expect the installation by the end of March 2019.</p> <p>A hub of eight to ten charging points is planned for installation at Baynard House, TfL and CoL are still working to deliver this during 2019 if there are no major cost or technical difficulties.</p> <p>A Member raised the point that the City Corporation was the only Local Authority without charging points for electric vehicles, aside from those in the car parks, and this needed to be resolved.</p> <p>A Meeting of Members is planned for 28 February 2019 to discuss EV charging needs in more detail and a report would be coming to the Committee in May 2019.</p>
2.	21 November 2017	S.101 Agreements	Director of Port Health and Public Protection	May 2019	<p>To combat illegal street trading, the Committee gave authorisation for the City of London Corporation to enter into a S.101 Agreement with the London Borough of Southwark. Members further agreed that officers could enter into a S.101 Agreement with Tower Hamlets and was agreed at the Tower Hamlets Cabinet meeting on the 7th February 2019. In June 2018 Members were informed that an agreement had been reached and signed with Southwark.</p> <p>Enforcement is underway on all City bridges where officers have been authorised.</p>
3.	16 July	Water Refill Points	Director of	29 Jan 2019	Following the receipt of a paper setting out potential locations for

	2018		Transportation and Public Realm		<p>the water refill points in the City, it was asked whether a water refill point could be installed in Poultry at the site of the Great Conduit.</p> <p>The eight locations were recommended for delivery as part of this first phase of the project.</p> <p>All the existing fountains, except for Carter Lane, are metered and the readings has been collated and had been shared with the Committee. Metering of the Carter Lane fountain is the subject of on-going discussions with Thames Water.</p>
4.	27 November 2018	Garden Waste Recycling	Director of the Built Environment	May or July 2019	The Chairman requested a report on Garden Waste Recycling at a future meeting following progress with the new cleansing contract.
5.	15 January 2019	Litter intervention trial	Director of the Built Environment	May or July 2019	The Committee asked for a report, containing details on the number of bins in the City and the factors that had changed since 2010.
6.	15 January 2019	Measurement and mitigation options for operational rail noise from London Underground affecting the Barbican Estate	Director of Markets and Consumer Protection	5 March 2019	<p>A meeting between Cole Jarman and TfL engineers has been set for 11/3/19. This meeting will discuss the comments within the Cole Jarman report on groundborne rail noise, the TfL response and any additional information following the track walk on the 26 February. Both this meeting and the Track walk were delayed by the unavailability of key technical staff.</p> <p>Verbal update can be given at committee by Robin Whitehouse, Pollution Team Manager.</p>

Committee(s) Port Health & Environmental Services – For information	Date(s): 5 March 2019
Subject: Update on the impact of the UK leaving the EU (Brexit) on Port Health & Public Protection	Public
Report of: Interim Director of Consumer Protection and Markets Operations	For Information
Report author: Interim Director of Consumer Protection and Markets Operations	

Summary

This report outlines the current position relating to Brexit, and the representations made by PH&PP in line with the key principles previously agreed by your Committee for negotiation with Government and relevant agencies.

There is ongoing discussion and engagement with a number of the PHPP's key stakeholders as previously identified, and plans are in place to continue to work with them, share respective understanding of the impacts that a no deal Brexit will have on our organisations and how we may work together to mitigate where possible those adverse impacts.

Considerable efforts are continuing to be made and have been stepped up to prepare for a no deal outcome by senior managers in the PHPP Division. This covers internal arrangements for example, resources assessment and planning for future service delivery, and to that end a successful bid for additional resource capacity and capability for the Port Health Service has been made to the Food Standards Agency.

Through the support from the Office of the City Remembrancer, a number of key Parliamentarians, Chairs of relevant Parliamentary Committees and local MPs have been made aware of the concerns and risks from the impacts of Brexit, particularly in the case of a no deal outcome and this will continue. Discussions are also taking place with government officials, where the PH&PP is represented on a number of important government and local government led meetings and forums.

Recommendation(s)

Members are asked to:

- Note the report

Main Report

Background

1. Following the outcome of the referendum held in June 2016 in which the UK voted to leave the European Union, on 29 March 2017 the UK triggered Article 50 of the Treaty of Lisbon. This gave formal notice of withdrawal from the EU, which is due to take place on 29 March 2019. MPs held a series of votes in Parliament on 29 January on potential next steps for the UK's negotiations with the EU. Most amendments - including a bid to delay Brexit to prevent a no-deal departure - were defeated. However, MPs did back a (non-binding) amendment for the government to rule out a no-deal Brexit. MPs also backed a Government-supported amendment which called for the Northern Ireland backstop clause to be replaced with "alternative" arrangements. At the time of writing, the Prime Minister confirmed in a statement made on 12 February that if there was no successful meaningful vote in the House of Commons to support a deal by 26 February, MPs would again be able to suggest alternatives, including, for example, delaying Brexit or holding another referendum through votes on an amendable motion on 27 February.
2. The key principles previously agreed by this Committee, that have formed the basis of negotiations with the government and its agencies remain valid and relevant. However, as the deadline for 29 March 2019 gets ever closer, i.e. the date for the UK leaving the EU, the likelihood of a no deal outcome becomes greater and the risks to service delivery, integrity and efficiency, particularly in regard to the Port Health Service increase further.
3. Brexit is on the Departmental Risk Register and more recently has been classified as Corporate Risk. The latter includes the 'impact of Brexit on the movement of goods through the Port Health Authority/functions'.
4. Since the UK voted to exit the EU PH&PP officers have engaged closely with Government and its agencies as well as with other interested organisations. Further details of the most recent meetings are provided below.

Current Position

5. At the time of writing this report the draft Withdrawal Agreement for the UK's exit from EU has only been put to a vote once in the House of Commons – it was rejected by MPs on 15 January 2019. The outcome of votes in the House of Commons on the Government's 'next steps' which took place on 29 January 2019, form the basis of the changes the Prime Minister is currently seeking in further negotiations with the EU on the Withdrawal Agreement.
6. Presently, there is an increased risk of a no deal outcome. Government Departments have however, been planning for some months for such an outcome and have issued a series of Technical Notices, with a small number of these relevant to Port Health and Public Protection (PH&PP), particularly in relation to port health responsibilities. Officers from the PH&PP Division are closely scrutinising these and are in regular contact and dialogue with the

relevant Government officials to feedback information being asked of them and preparing as best they can to mitigate against foreseeable impacts from such an outcome.

Port Health – recent meetings/visits etc,

7. **Stakeholder engagement, meetings, discussions** – further discussions are planned or ongoing with key stakeholder organisations including the Local Government Association, the Chartered Trading Standards Institute, London Councils, the Association of Port Health Authorities, Which?, the International Meat Traders Association and the British Veterinary Association. This relates to PH&PP specific roles, responsibilities and shared understanding in relation to Brexit and where there is mutual benefit, work together and/or support City Corporations respective principles and aims.

Parliamentary Engagement

8. The Chair of the Policy Committee and the Chairman of your Committee sent a joint letter to key MPs outlining the City Corporations concerns in relation to 'no deal' focussing on issues previously reported to your Committee in connection to Port Health and Animal Health.

Joint CPR/Jeremy Simons letters have been sent to the following Select Committee chairs: -

- EFRA (Neil Parish)
- International Trade (Angus MacNeil)
- Brexit (Hilary Benn)
- Home Office (Yvette Cooper)
- Lords EU Energy and Environment (Lord Teverson)

And the following constituency MPs:-

- Jackie Doyle-Price (Tilbury)
 - Kelly Tolhurst (Thamesport)
 - Gordon Henderson (Sheerness)
 - Stephen Metcalfe (London Gateway)
9. A subsequent meeting has been arranged for the Policy Chair to meet with Lord Teverson on 5th March, and arrangements for meetings with Angus MacNeil and Yvette Cooper are underway.
 10. A briefing was provided to Labour's Shadow EFRA Spokesperson Baroness Jones for a Parliamentary Question on the no-deal risks in relation to transit goods. The City Corporation's concerns vis a vis this matter was highlighted during the short debate between Government Minister Lord Gardiner and his Shadow counterpart.
 11. The Government has now published its response to the Lords EU Energy and Environment Sub-Committee inquiry into Brexit and Biosecurity to which

PH&DD contributed and a briefing note has been prepared in response, a copy of which is at Appendix 1.

12. If further legislative intervention is required, the Parliamentary Team have concluded that the Environment Bill which has yet to be fully published would be the most obvious vehicle.
13. The Interim Director of Consumer Protection and Markets Operations (DCP) has attended the weekly meeting of the **Corporation's Brexit Planning Group** and updated the Group on the Division's continued engagement with government departments and the port health industry in relation to its port health and Animal Reception Centre operations and updated the Group's Action Tracker and corporate departmental Brexit risk register.
14. The Assistant Director, (Port Health) attends meetings and receives weekly updates from **HM Government's Border Delivery Group** (BDG) – which is a cross-government team led by HMRC and focuses on the operational and practical impacts of Brexit on UK borders. The updates are provided to ensure stakeholders are kept up-to-date and bring all EU Exit information together in one place. These in turn are shared on an ongoing basis with the relevant City of London Corporation stakeholders and networks. Additional information in the form of a Partnership Pack, leaflets, videos and industry days have also been provided by the BDG to its stakeholders.
15. The Assistant Director, (Animal Health) also attends meetings and receives updates from Defra led groups on the implementation of new software, import policy decisions and stakeholder engagement. The new software is intended to replace the current EU TRACES system. The AD also attends meetings led by Heathrow Airport Limited, with Defra, HMRC and Border Force on contingency planning and resilience of our operations.
16. **London Resilience Forum – a London Food and Brexit Round Table** as part of London Resilience was held on 29th November and attended by the IDCPMO which covered the short-term implications of a no deal Brexit on food supplies and implications of Brexit on food safety, regulations and legislation both in the short and long term and mitigation options.
17. **Chartered Institute of Environmental Health Conference held in London 30th January 2019.** The Assistant Director, (Port Health), gave a presentation as part of a panel of experts to over 130 delegates outlining the challenges to the London Port Health Authority (LPHA) if there is a no deal outcome, highlighting the likelihood of an increase in EU imported food and feed, including food and feed transiting through the EU to the UK from third countries. In addition, the mitigation measures proposed to minimise disruption to trade and food supplies coming through the London shipping ports were outlined.
18. At the same event the DCP gave a presentation on the wide range of measures being undertaken by the City of London Corporation to tackle air pollution in the square mile including its Air Quality Management Strategy, Low Emission Neighbourhoods, and the partnership with Sir John Cass

Foundation Primary School, Aldgate, to monitor and ultimately improve the air quality around the school.

19. **Regulatory Landscape of Post-Brexit Britain conference** – PH&PP are supporting Queen Mary University of London in the delivery of a conference, at the Mile End campus, which will consider the possible and feasible regulatory scenarios that the country will have after Brexit, emphasising the potential and desirable legal instruments to give certainty to business and regulators in relevant key areas.
20. **Government Technical Notices** – there have been a number of further Technical notices issued by the Government that whilst primarily aimed at the business community are important and relevant to the PH&PP Division. PH&PP Officers are scrutinising these and continue to ensure that where practicable necessary actions and measures are considered and where appropriate put in place to assist the Corporation's regulatory services in its planning for a no deal outcome.
21. **Official Veterinarians (OVs)** - The UK Government has developed the EU Settled Status scheme, which allows EU nationals currently residing in the UK to apply for settled status after Brexit. The scheme is currently being piloted but is not expected to be fully operational until March 2019. The Prime Minister has given a further commitment to EU citizens living in the UK that in the event of a no deal outcome their rights will be protected. However, there is still a lack of clarity in the form of a technical notice spelling out how EU citizens' rights will be safeguarded in a no deal Brexit outcome. This clearly has an impact on the OVs working for the London Port Health Authority and senior managers are keeping all staff fully informed on developments in this area.
22. The LPHA, at the request of the government has been testing its new Import Notification System (INS) to replace TRACES (Trade Control and Expert System). The INS system, now called IPAFFS (Imports of Products, Animals, Food and Feed System) is progressing but even if it works, it will not have full functionality. If there is a need to go back to a 'manual' system, it will increase bureaucracy and also breaks the link with the HMRC system adding delays to the process, further compounding pressure on the services' resources. Consequently, this is now a Departmental Red Risk.

Financial Implications

23. The City Corporation has created a Brexit contingency fund of £2M in 2018/19 with provision to carry forward any unspent funds into 2019/20 to support the organisation in engagement activities in the lead up to and post exit from the EU. If necessary, the PH&PP Division will submit a bid for funding. However, before doing so, it will continue to explore all other avenues of external funding, as it has with the recent successful financial bid to the Food Standards Agency for additional resources to support the expected increased work load for the LPHA post Brexit.

24. **A bid to the Food Standards Agency (FSA)** for additional resources to increase the staffing levels at the London Port Health Authority in anticipation of increased workloads after Brexit has been made by senior managers in the Port Health and Public Protection Division and has now been agreed by the FSA. The FSA has agreed to cover the costs of Brexit preparation and planning incurred during 2018/19 and has given a commitment to some funding for 2019/20. FSA has asked for further bids for financial year 2019/2020 and we will be for additional funds.
25. The DCP is waiting to hear if a funding bid to Defra, to cover the increased demand and throughput expected at the Heathrow Animal Reception Centre is successful. This will enable additional temporary staff to be recruited and in place as soon as is practicable after 1st April 2019 and will be reviewed during September 2019.
26. James Brokenshire MP, Secretary of State for Housing, Communities and Local Government has written to the Leaders of English local authorities updating them on the preparations for Brexit his department has been undertaking and included confirmation on funding allocations for local authorities both in the current financial year and financial year 2019/20. £1.5 million will be allocated in 2018/19 only to specific local authorities facing immediate impacts from local ports, with details of the allocation and distribution of that funding to be announced shortly.

Corporate & Strategic Implications

27. The action taken to date and the above proposals are in accordance with previous decisions taken by your Committee, the PH&PP Business Plan, and the Departmental/Corporate Risk Registers.
28. The Government's Brexit related legislation is being monitored by the Remembrancer who will continue to facilitate appropriate representations being made and support PH&PP where possible.

Conclusion

29. The Brexit agenda is a dynamic one and there is no certainty what the final outcome will be in terms of any future withdrawal agreement that satisfies both the UK Government and the EU, and the UK Parliament, or if there is a no deal outcome.
30. Officers continue to represent the interests of your Committee to protect City Corporation interests in relation to the implications of Brexit. This has included seeking additional funding from Government for resources needed for increased workloads for the LPHA and the HARC post Brexit.
31. Work is being undertaken as part of the Corporation's Brexit Planning Group, in respect of risk to service delivery from a range of Brexit scenarios, the management of those risks and planned mitigating measures to reduce the predicted impacts.

32. Ongoing communications and dialogue is also taking place with colleagues in identified key stakeholder organisations to share our respective experience and understanding, and continue to explore further ways to work together to ensure the Government is fully aware of our concerns and are clear on what the City Corporation's key principles are in respective Brexit outcomes.

Appendices

- Appendix 1 - The City Corporation's response to the Government's response to the Lords EU Energy and Environment Sub-Committee; Brexit: Plant and Animal Biosecurity

Background Papers

- Impact of the UK leaving the EU (Brexit) on Port Health & Public Protection – report to Port Health & Environmental Services Committee, 19 September 2017.
- Update on the impact of the UK leaving the EU (Brexit) on Port Health & Public Protection – report to the Port Health & Environmental Services Committee, 6 March 2018.
- Update on the impact of the UK leaving the EU (Brexit) on Port Health & Public Protection – report to the Port Health & Environmental Services Committee, 16 July 2018.
- Update on the impact of the UK leaving the EU (Brexit) on Port Health & Public Protection – report to the Port Health & Environmental Services Committee, 27 November 2018.

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BRIEFING NOTE

Government Response to the House of Lords European Union Energy and Environment Sub-Committee Report 'Brexit: Plant and Animal Biosecurity'

The City of London Corporation's Response

Introduction

1. In its capacity as the Port Health Authority for the tidal Thames and as the Animal Health Authority for Greater London, the City of London Corporation undertakes border controls at all of London's ports, docks and wharves. The City Corporation is also responsible for animals that enter the UK through the Heathrow Animal Reception Centre (HARC), which totals 80% of the live animals imported by air into the UK. The City Corporation's functions are fundamental to the maintenance of UK biosecurity standards.
2. Consequently, the City Corporation made [a detailed submission](#) to the House of Lords EU Energy and Environment Sub-Committee's Inquiry regarding [Brexit and Plant and Animal Biosecurity](#). The City Corporation welcomed the Government's [response](#) to the Inquiry's report which it read with great interest.
3. The City Corporation wishes to outline its views on this response. The Government's responses to the Committee's recommendations are in bold text whilst the City Corporation's comments are in plain text.

Legislation

4. **The UK has been fully involved in the development of the new EU Animal Health Law. This law is due to come into force after we leave the EU and its provisions are still being finalised. We will wish to review the final legislation before committing to adopt it in full, taking into account our intention to maintain the highest standards of biosecurity in the UK in future. (Paragraph 7)**

The City Corporation wishes to offer its expertise in assisting the Government in developing the technical and regulatory requirements and standards in the new EU Animal Health Law in line with its intention to maintain the highest standards of biosecurity.

UK-EU Cooperation

5. **The Government agrees with the Committee that continued participation in EU pest and disease notification systems would be desirable and we would like to retain full access to EU disease notification systems where possible. There is some precedent for third country access to EU notification systems, and access to these is something that we will seek to negotiate with the EU. (Paragraph 11)**

The HARC is a recipient of this information for live animal disease notifications and therefore the City Corporation welcomes the Government's commitment to seek access to these notification systems.

6. **All of the EU notification systems have publicly available elements which the UK will continue to be able to access after EU exit. These public notifications will be supplemented with extensive intelligence gathering from other organisations, agencies and networks, and will be supported by enhanced bilateral relationships with key trading partners and our nearest neighbours. Functionality has already been added to the UK-owned plant-health portal to replace some of the EU notification system functions, and we constantly look for opportunities to enhance our existing plant and animal disease risk intelligence systems. (Paragraph 11)**

The City Corporation wishes this to be carried out quickly, efficiently and sufficiently tested to ensure both the robustness and integrity of the various replacement notification systems. There is an opportunity to further improve functionality of existing systems and incorporate those improvements into any new proposed systems. The City Corporation is happy to contribute to such a future workstream.

7. **The Government agrees with the Committee that the ability to trace the movement of animals and plants is an important component of biosecurity. The new imports notification system for the UK is currently being developed and this should be ready for end-to-end testing in January 2019. We are also currently evaluating contingency options with the Food Standards Agency and Port Health authorities should any aspects of the new system not be fully functional in time for EU exit. (Paragraphs 14 and 15)**
8. The City Corporation welcomes the progress of the new imports notification system. However, we are concerned that it will not have full functionality in time for the UK's withdrawal from the EU. We are also concerned that if we are forced to return to a 'manual' system that this will break the existing link with the HMRC system and will add delays to the process and a subsequent pressure on our resources.

Trade and inspections

9. **The Animal and Plant Health Agency (APHA) initiated a recruitment of additional Plant Health Inspectors in the late summer to ensure that it has sufficient trained resource to administer and inspect any increased number of Phytosanitary Certificates required post Exit. We are also engaging with industry to ensure they are able to implement the change in regime effectively. (Paragraph 24)**

The City Corporation would welcome additional information from the Government on more APHA veterinarians and increases to CITES licensing staff.

10. **The Government is committed to maintaining high standards of biosecurity and food safety whilst minimising any disruption to trade. Following our exit from the EU, we expect that standards in the EU will remain constant in the short term, and the biosecurity and public health risks posed by EU imports are therefore unlikely to change immediately upon EU exit. Defra is working with the Food Standards Agency, and has stated publicly their commitment to maintaining the current risk-based control approach to imports from the EU in the short term to ensure a smooth transition as the UK leaves the EU. (Paragraphs 25 and 26)**

The City Corporation is working closely with the Food Standards Agency, along with Suffolk Coastal Port Health Authority, and has had a bid for funding agreed by the FSA to increase resources for its Port Health functions to include the London Gateway Port, the Port of Tilbury and Thamesport. This will help to mitigate against increase in workloads predicted post Brexit.

11. **In the future, Defra considers that controls on imports should be risk-based and proportionate, taking advantage of available technologies to facilitate as frictionless trade as possible. As part of establishing risk-based and proportionate controls we will be considering related infrastructure needs. Defra and the Food Standards Agency are working closely together to develop proposals and will consult on these proposals in 2019. (Paragraphs 25 and 26)**

It is important that consultation is carried out as soon as is practicable and again the City Corporation can provide expert input into the logistics and practicalities for the necessary infrastructure that the UK Government is looking to provide at both the pre-consultation and consultation stages.

12. **We have published Technical Notices on Gov.uk setting out changes that would come into effect should WTO rules apply. This guidance stated that in the initial months following EU exit there are no plans to change current import controls for animals, animal products and high-risk food and feed from the EU. Details are also provided in the published Technical Notice for imports of plants and plant products, including new arrangements for imports from the EU, currently covered by the plant passport system. This guidance also explained that the UK would require importers to pre-notify the Food Standards Agency of imports from the EU using the UK's new import notification system. Defra and the Food Standards Agency are working closely together to develop proposals for the import controls that would apply after the initial period. (Paragraph 27)**

The City Corporation believes that local authority led Port Health Authorities should be properly consulted on any proposals coming forward from Defra and the Food Standards Agency, for future import controls, planned for the medium to long term.

Staff

- 13. The Government has guaranteed the rights of EU citizens and their family members living in the UK, and UK nationals living in the EU. The immigration White Paper published on 19 December sets out the foundation for a single immigration system, where it is workers' skills that matter, not where they come from. The future system will focus on high skills, welcoming talented and hardworking individuals that will support the UK's dynamic economy, enabling employers to compete on the world stage. Additionally, should it be necessary the Veterinary Surgeons Act 1966 (VSA) will be amended to ensure that those holding non-UK veterinary degrees can still register to practice in the UK. These amendments will not affect the rights of EEA nationals already registered to practice veterinary surgery (with the Royal College of Veterinary Surgeons, RCVS) in the UK or in the process of registering by 30 March 2019. These changes will continue to allow the overwhelming majority EEA veterinary degree holders to continue to have their degrees automatically recognised after EU exit as long as they meet equivalent RCVS standards. This will allow employers to continue to recruit non-UK veterinary surgeons to fill key roles, such as Official Veterinarians across a number of sectors. (Paragraph 31)**

This is vitally important for the London Port Health Authority. The specialised nature of roles such as Official Veterinarians and Port Health Officers mean that recruitment and training of new staff is complex and requires forward planning. This is compounded by an existing shortage of qualified staff for these roles.

We recognise an underlying vacancy rate of around 11 percent across the profession. We are working closely with the British Veterinary Association and the Royal College of Veterinary Surgeons to ensure sufficient capacity not only upon exiting the EU but also in the longer-term. This includes work to emphasise the importance and attractions of the veterinary role and to build capacity in the education system. We are pleased that around 70 additional vets will be graduating in June 2019 in the UK in comparison to the previous year.

Improving the UK's biosecurity

- 14. Depending on our future relationship with the EU, the UK's exit could provide an opportunity to examine and adjust our biosecurity measures on imports from the EU. For example, due to the rules of the EU Single Market, it is currently simpler for the UK to impose restrictions on the import of plants from outside the EU than it is on plants from within the EU when there is a threat to the UK. Similarly, the EU may deprioritise or delist animal diseases that we would still wish to restrict or control. We point the Committee to the example of Xylella on which Defra gave evidence to the Committee previously. (Paragraphs 40 and 44)**

The London Port Health Authority, along with colleagues working at ports of entry nationwide, and through their respective Local Government Associations and professional bodies, have a practical insight into the risk based assessment and management of food and feed products imported into the UK. The Government should ensure that consultations are fully inclusive to take maximum benefit from the sector's expertise.

*February 2019
Office of the City Remembrancer*

Committee(s)	Dated:
Port Health & Environmental Services Committee – For information	05 03 2019
Subject: Department of the Built Environment: 'Brexit' Update	Public
Report of: Carolyn Dwyer, Director of the Built Environment	For Information
Report author: Richard Steele, DBE	

Summary

This short report updates Members on the potential implications of Brexit for the Department of the Built Environment.

The report notes that risks are also being considered corporately and focusses on those issues which have a particular relevance for the Department. A key consideration is to ensure that the plans, strategies, projects and services being delivered by the Department can still be delivered during and after Brexit. The Department's role in 'shaping' the future City will remain important to ensure that it remains a 'vibrant and thriving City, supporting a diverse and sustainable London within a globally-successful UK', as set out in the Corporate Plan.

Recommendation(s)

Members are recommended to:

- Note this initial report and that further update reports will be made to subsequent meetings of the Committee.

Main Report

Background

1. The UK Government's commitment to the withdrawal of the UK from the EU will have wide ranging implications for the country, the City, the City Corporation and the Department of the Built Environment. It will create opportunities to be seized and risks to be mitigated. The opportunities and risks will depend on the detailed withdrawal arrangements which are yet to be agreed. Meanwhile a priority is to ensure that foreseeable risks have been mitigated where practical and that the service remains resilient in uncertain times.

Risks

2. Risks which apply to all parts of the organisation are being addressed corporately, but these will still need to be mitigated to some extent at departmental level to ensure that the Department remains in a position to implement its business plan. Examples include the potential short-term and longer-term impacts on supply chains, staff retention, income streams and the demand for services. Such risks could affect delivery of the Department's projects and services if they were to constrain availability of staff and materials. They could also affect the Department's income streams and the demand for its services if Brexit were to lead to significant changes in behaviour. These risks affect all departments and the Director of the Built Environment represents the Department at the corporate working group.
3. Brexit will have short-term and long-term effects on economic and employment growth, in the City and elsewhere, depending on the detailed arrangements to be agreed. Whatever those arrangements, London's strong underlying strengths as a global business centre will remain, meaning it is necessary to plan for sustainable long-term growth.

Conclusion

4. At this stage the Department considers that it will be able to deliver its services and implement its business plan during and after Brexit. However the uncertain wider situation means that further updates will continue to be provided by the Director in spoken or written form to subsequent committee meetings as appropriate.

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Committee(s): Planning and Transportation Committee Port Health and Environmental Services Committee	Date(s): 29/01/2019 05/03/2019
Subject: TfL Direct Vision Standard Consultation Response	Public
Report of: Director of the Department of the Built Environment	For Decision For Information
Report author: Rory McMullan, Road Danger Reduction & Behaviour Change Team, Department of the Built Environment	

Summary

Heavy Goods Vehicles (HGVs) are disproportionately involved in fatal collisions with cyclists and pedestrians on the streets of London despite constituting only 4% of vehicles on the City's streets. A leading contributory factor in collisions is restricted driver vision or "blind spots".

The Mayor announced, in 2016, the establishment of a Direct Vision Standard (DVS) for HGVs to protect vulnerable road users and meet Vision Zero targets (eliminating road deaths by 2041). DVS uses a star system to rate HGVs over 12 tonnes from 0-5 stars based on how much a driver can see directly through their cab windows.

The proposals include:

- Establishing an HGV safety permit scheme which would require HGVs over 12 tonnes to hold a safety permit to enter Greater London from 2020.
- Permits would only be issued to vehicles meeting the minimum DVS star rating (1 star in 2020 and 3 in 2024) or those meeting the requirements of an evolving safe system (industry recognised mitigating measures such as sensors).
- 3 step process to obtain an HGV Safety Permit:
 1. Identify if vehicle is within the scheme's scope
 2. Obtain DVS star rating
 3. Application for permit via online application portal
- The scheme would be enforced by Automatic Number Plate Recognition.

TfL have completed two rounds of consultation focusing on the principles of DVS and their proposals for an HGV permit scheme. The responses have been used to develop the final scheme proposals which are now under consultation.

A representative of TfL requested a response from the City of London Corporation in phase 2b of the consultation.

This report evaluates response options and proposes that the City Corporation supports firmly DVS, HGV permits, and the phased restrictions of low star rated HGVs.

Recommendation(s)

Members are asked to approve the City Corporation's response to TfL's DVS consultation as shown in appendix 2.

Main Report

Background

1. HGVs are disproportionately involved in collisions which result in serious or fatal injuries, especially those involving vulnerable road users. The Mayor of London has committed to the elimination of road deaths by 2041 and has endorsed the establishment of DVS and HGV safety permits.
2. TfL announced its plans to combat HGV caused road deaths through the establishment of a DVS and accompanying permit scheme.
3. TfL have conducted two prior phases of consultation on their DVS proposals. The initial consultation outlined the case for HGV driver direct vision and sought feedback on the plan to introduce a DVS and the principles of the standard itself. Responses showed that, in general, there was support for a DVS. TfL then consulted on the star rating boundaries and the process by which different implementation options were examined and used to develop the HGV permit scheme. Responses demonstrated support for the permit scheme.

Current Position

4. Large goods vehicles make up only 4% of vehicles on the City's streets. However, 38% of collisions that result in someone being killed involved a large goods vehicle, as do 21% that result in a serious injury.
5. The City Corporation has committed to ensuring compliance with the Fleet Operator Recognition Scheme (FORS) which aims to raise the level of quality within fleet operations. The City Mark accreditation will be maintained and continue to be a symbol of best practice.
6. The City Corporation has maintained FORS Gold accreditation for its own fleet since 2012 and was one of the first local authorities to do so, adhering to all the standards set. Members of the City's transport team sit on the FORS Executive working group, as well as other sub working groups to promote the scheme and consult on the policy documents.
7. The City is a champion of the Construction Logistics and Community Safety Scheme (CLOCS) and sits on the various working groups. The City fleet is already complying with the DVS with its vehicles and has worked with the Highways contractor Riney to have one of the first DVS tipper lorries on the City contract 5 star rated. Currently the City has 5 star rated vehicles within the fleet that exceed the minimum standard for 2020. The City has already retrofitted vehicles with mitigating safety features in line with the permit scheme to comply with the proposals.

8. City officers within DBE worked with manufacturers of large goods vehicles on the design of DVS vehicles working especially in construction, this included: Dennis Eagle, Mercedes, Scania, Volvo and DAF amongst others. Dennis Eagle produced the design construction vehicle from these discussions. The City is continuing to influence these manufacturers on various applications such as construction vehicles, waste vehicles and Mechanical sweeping vehicles.
9. The City Corporation's Responsible Procurement Strategy has outlined a commitment to taking active steps to address the safety of construction vehicles by working towards compliance with FORS. This includes hiring or retrofitting vehicles with the relevant safety features.
10. TfL has proposed the development of a DVS and accompanying HGV permit scheme. Permits would be issued only to those HGVs (over 12 tonnes) that meet the minimum star rating requirements dictated by the DVS or those not meeting the star rating but complying with the progressive safe system. Those failing to meet the standard (1 star in 2020 and 3 stars in 2024) would be denied a permit and the ability to operate within Greater London. Detailed proposals, including DVS and the safe system requirements, can be found in appendix 1.
11. A request was made from TfL for the City Corporation's response in the consultation on the final DVS proposals.

Options

12. Endorse TfL's proposals and appendix 2 as the official Corporation response. There will be no cost commitments and would be beneficial as support for policies that the City Corporation already champions.
13. Endorse the proposals with amendments based on members' queries or concerns. No cost commitments are associated but might enable members to influence London-wide policy.
14. Do not respond to the consultation.

Proposals

15. Endorse appendix 2 as the official Corporation response which expresses strong support for TfL's DVS proposals. This action is recommended.

Corporate & Strategic Implications

16. Endorsement of TfL's proposals is in line with the City Corporation's corporate plan and commitment to ensure that people are safe and feel safe.
17. The proposals are supported by the draft Transport Strategy which discusses encouraging DVS as part of FORS.

18. CLOCS and FORS standards are now included in planning consent and going forward will we seek to also include the DVS standards as proposed in this TfL consultation, subject to legal confirmation.
19. The City Corporation has already committed to safer freight operation, including DVS, in the Road Danger Reduction and Active Travel plan and draft Transport Strategy. These proposals could help deliver on its pledge to ensure the safest HGVs operate within the Square Mile.

Implications

20. No additional financial implications.

Conclusion

21. HGVs are disproportionately involved in collisions resulting in death and serious injury and a common contributory factor is drivers' restricted view out of the cab.
22. The aims of the DVS and HGV permit scheme represent an effective approach through which the problem of dangerous HGVs can be tackled. Delivery of this scheme would help improve safety of vulnerable users and help the City Corporation in the fulfilment of its corporate and strategy commitments.
23. TfL has requested a response to their consultation from the City Corporation.
24. Subject to approval, a response will be delivered giving the opinions, as outlined by committee members, of the City Corporation.

Appendices

- Appendix 1 – Phase 2b Policy Consultation document, and supporting background papers –please follow link.
<https://consultations.tfl.gov.uk/roads/direct-vision-standard-phase2b/>
(Please note the consultation closes on 18th February, therefore the above link may not work after that date. Please contact Committee Clerk for the background papers. Rofikul.Islam@cityoflondon.gov.uk)
- Appendix 2 – City of London draft consultation response

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Have your say on making London's lorries safer: Direct Vision Standard (DVS)

Closed 18 Feb 2019

Our proposals

We have presented our final scheme proposals in the documents included as part of this consultation and we would like your views on them.

1. To what extent do you agree or disagree with our proposed process for obtaining a vehicle star rating? (Please refer to pages 15-19 of the consultation document).

☒ Strongly agree ☐ Agree ☐ Neither agree nor disagree ☐ Disagree
☐ Strongly disagree

2. To what extent do you agree or disagree with our proposals for the permit application process? (Please refer to pages 15-19 of the consultation document).

☒ Strongly agree ☐ Agree ☐ Neither agree nor disagree ☐ Disagree
☐ Strongly disagree

3. To what extent do you agree or disagree with our proposed safe system mitigating measures - for example cameras and mirrors. (Please refer to pages 10-14 of the consultation document).

- ☒ Strongly agree ☐ Agree ☐ Neither agree nor disagree ☐ Disagree
☐ Strongly disagree

4. To what extent do you agree or disagree with our proposals for how we enforce the scheme and how appeals will be dealt with? (Please refer to pages 20-21 of the consultation document).

- ☒ Strongly agree ☐ Agree ☐ Neither agree nor disagree ☐ Disagree
☐ Strongly disagree

5. Do you have any further comments on our final scheme proposals?

The City Corporation strongly agrees with all the above proposals. The City witnesses a great deal of construction traffic and amongst the highest levels of walking and cycling in London. This traffic mix leads to increased risks of collisions that lead to fatal or serious injuries. We have therefore implemented a number of schemes to improve the safety of driving and vehicles entering the Square Mile. While we completely support the creation of a Direct Vision Standard and the accompanying star rating and permit scheme, we feel a more ambitious timeline is required in the context of the City of London. The City Corporation, already meeting the basics outlined in your proposals, would be keen to pilot any London-wide schemes.

If responding on behalf of an organisation, business or campaign group, please provide us with the name:

Please note: If you are responding on behalf of an organisation it should be in an official capacity.

Organisation

The City of London Corporation

Committee(s)	Dated:
Port Health and Environmental Services	5 March 2019
Subject: City of London Transport Strategy, Cleaner and quieter outcome – consultation response	Public
Report of: Director of the Built Environment	For Information
Report author: Samantha Tharme – Department of Built Environment	

Summary

The City of London Transport Strategy will set the 25-year framework for future investment in, and management of, the Square Mile's streets and for improvements to transport connections.

One of the Strategy's outcomes is: The Square Mile's air and streets are cleaner and quieter. This outcome includes proposals relating to air quality, electric vehicles, vehicle noise and street cleansing.

This report provides an update on the 'Cleaner and quieter' outcome following consultation on the draft Transport Strategy.

The majority of respondents to the consultation supported the draft proposals and no significant changes are required. Feedback received during the consultation is summarised in the report, with further details provided in Appendix 2.

The Transport Strategy is currently being finalised following consultation and is expected to be submitted for adoption by the Planning & Transportation Committee, the Policy & Resources Committee and the Court of Common Council in the Spring.

Recommendation(s)

Members are asked to:

- Note the report

Main Report

Background

1. Over the last 12 months the City of London Corporation has developed and consulted on its first ever long-term Transport Strategy. The Transport Strategy is currently being finalised following consultation and is expected to be adopted in the Spring.

2. The Strategy sets out the City Corporation's approach to investing in and managing the City's streets over the next 25-years and aspirations for improved transport connections.
3. Delivering the Transport Strategy will help facilitate the forecast growth of the City and accommodate the increased numbers of people travelling to and around the Square Mile. It will improve the experience of spending time on the City's streets with the aim of ensuring the Square Mile remains a healthy, attractive and easy place to live, work and visit.
4. The development of the Transport Strategy has been informed by extensive engagement with the public and organisations with an interest in transport in the Square Mile.
5. The first phase of engagement was held in February and March 2018, this included almost 2,000 responses to the City Streets survey. One of the key themes raised during this first phase of engagement was the need to urgently improve air quality in the Square Mile.
6. A second phase of engagement, in June and July 2018, consulted on the proposed vision, aims and outcomes for this Strategy. Over 500 people and organisations responded to this consultation. 87% of respondents supported the Cleaner and quieter outcome.
7. Consultation on the draft Transport Strategy ran from 10 November 2018 to 13 January 2019. The consultation was widely promoted, including through Ward newsletters, social media, the Transport Strategy and Active City Network mailing lists, flyers and the City of London website home page.
8. The main consultation activities were:
 - **Consultation website:** A bespoke consultation website allowed people and organisations to indicate their level of support for and comment on all proposals. To maximise the volume of feedback received and cater for all interest levels the website allowed users to tailor the level of detail and respond to by choosing one of the following options:
 - Ten 'key proposals' that are likely to be of most interest and will result in some of the most significant changes
 - Proposals grouped by topic or topics, e.g. transport mode
 - All proposals, organised by outcome
 - **Stakeholder briefings:** 47 representatives from stakeholder organisations attended briefing sessions at the Guildhall Art Gallery on 30 November.
 - **Drop-in sessions:** Eight public drop-in sessions were held over the consultation period in the City Corporation's libraries and in Guildhall reception.
9. Almost 2,900 individual responses and 6,900 comments were received through the consultation website, with a further 70 submissions by email. Over 60 organisations also responded to the consultation.

Consultation results for ‘Cleaner and quieter’ proposals

10. Levels of support for the proposals to deliver the Cleaner and quieter outcome are summarised in the table below, with further details provided in Appendix 1. These scores were generated through the consultation website, with respondents indicating their level support on a scale of 1 (oppose) to 5 (support).

Proposal	Score
Support and champion a central London Zero Emission Zone (Key proposal)	4.1
Install additional electric vehicle charging infrastructure	4.1
Request an accelerated roll out of zero emission capable buses	4.6
Support small businesses to accelerate the transition to zero emission capable vehicles	4.3
Make the City of London’s own vehicle fleet zero emissions	4.6
Reduce the level of noise from motor vehicles	4.3
Reduce noise from streetworks	4.3
Encourage innovation in air quality improvements and noise reduction	4.4
Ensure street cleansing regimes support the provision of a world-class public realm	4.4

11. The consultation website also allowed individuals and organisations to leave comments on proposals. Comments were also received through written submissions. Comments for each proposal are summarised below, along with a summary response and details of proposed changes. Further details are provided in Appendix 2 and updated proposals (with tracked changes) are provided in Appendix 3.

Proposal 29: Support and champion a central London Zero Emission Zone

12. There was a high level of support for this proposal with many people asking for it to go further than the two local Zero Emission Zones (ZEZ) proposed for the City Cluster and Barbican and Golden Lane. Concerns expressed were predominantly around the need to manage implementation timescales for any ZEZ with a realistic approach to access issues for residents and restrictions that reflect the availability of zero emission capable vehicles, particularly for freight.
13. Response: No changes are proposed as a result of consultation comments. The need to consider phasing for vehicle class/type and possible exemptions for certain users is reflected in the proposal and will be considered during the development of local ZEZs. Residents, businesses, the freight industry and other street users will be engaged as part of this process.

Proposal 30: Install additional electric vehicle charging infrastructure

14. This proposal received a high level of support with people commenting that it is essential to support a transition to electric vehicles. The inclusion of hub sites was welcomed by some freight operators and taxis, although two larger freight operators noted the need for charging facilities at their own depots, as they would need to charge overnight not whilst delivering. Many commented on the need to ensure charge points are not installed on pavements.
15. Response: No substantive changes are proposed in response to the consultation. However, the proposal has been updated to include a commitment to produce an Electric Vehicle Charging Action Plan in 2019. This will identify how many additional charge points are required up to 2022 in the Square Mile and where they should be installed. This action plan will include consideration of the charging needs of residents and disabled drivers. Locations will be identified through engagement with the TfL EV Infrastructure Taskforce, which includes EV industry representatives, as well as wider consultation.

Proposal 31: Request an accelerated roll out of zero emission capable buses

16. This proposal was well supported. Many people also commented on the need to tackle buses as one of the 'worst' polluters when responding to proposal 29. TfL have responded that by the mid-2020 all buses serving the Square Mile will be hybrid or zero emission.
17. Response: The proposal has been updated to reflect the TfL timetable and include a longer-term target for all buses to be zero emission (electric or hydrogen) by 2030.

Proposal 32: Support small businesses to accelerate the transition to zero emission capable vehicles

18. This proposal received relatively few suggestions for changes, with the main request being that support should also be offered for switching to non-motor vehicle, e.g. cargo bikes. TfL offered to support and assist with promotion of the existing financial incentives and scrappage schemes available.
19. Response: The proposal has been updated to include supporting businesses to switch to non-motor vehicles as well as zero emission capable vehicles. The proposal has also been updated to reflect changes in legislation on battery weight and vehicles weight limits for drivers' licences that were passed after the draft Strategy was produced.

Proposal 33: Make the City of London's own vehicle fleet zero emissions

20. This proposal was generally supported, with a couple of comments noting that given this is fully within the Corporation's control an earlier target should be set. Others suggested that the Corporation fleet should include more cargo bikes, and that an overall reduction in vehicles should be part of the policy.
21. Response: No changes are proposed. The size of the City Corporation fleet has already been reduced and corporate policy includes the need to reduce the number of fleet vehicles. At present the issue of retrofits/alternatives for some

HGVs still affects the corporation fleet, but we are actively working to find appropriate vehicles, such as the waste collection electric vehicles.

Proposal 34: Reduce the level of noise from motor vehicles

22. This was supported although some concerns were expressed about safety and electric vehicles.
23. Response: No changes are proposed. The need to understand potential safety impacts of quieter electric vehicles is already included in Proposal 20: Apply the safe system approach and the principles of road danger reduction to deliver Vision Zero

Proposal 35: Reduce noise from streetworks

24. This proposal was supported with no notable comments.
25. Response: No changes are proposed.

Proposal 36: Encourage innovation in air quality improvements and noise reduction

26. This proposal was well supported, with some comments noting the need to reduce motor vehicles overall and not just see technical solutions as the fix to poor air quality.
27. Response: No changes are proposed.

Proposal 37: Ensure street cleansing regimes support the provision of a world-class public realm

28. This was supported with a few comments highlighting the need for better cleansing regimes and an equal number noting that good standards of cleansing already exist.
29. Response: No changes to the proposals are recommended.

Corporate and strategic implications

30. The Transport Strategy is aligned with the draft Air Quality Strategy and supports the delivery of the following outcomes from the Corporate Plan:
- Outcome 2 'People enjoy good health and wellbeing'
 - Outcome 11 'We have clean air, land and water and a thriving and sustainable natural environment'

Financial implications

31. A costed Delivery Plan outlining the projects that will be delivered or initiated in the first three years of the Strategy will be published alongside the adopted Transport Strategy. The Delivery Plan will include a funding strategy and be updated on an annual basis.

Health implications

32. Delivering the Transport Strategy will help bring air quality on the Square Mile within legal and healthy limits.

Conclusion

33. Overall, responses to the Transport Strategy, including proposals to deliver the Cleaner and quieter outcome have been positive and no substantive changes are proposed.

Appendices

Appendix 1: Summary results from consultation website

Appendix 2: Comment summaries and responses

Appendix 3: Changes to Transport Strategy proposals 29 to 37

Background papers

Draft Transport Strategy <https://www.cityoflondon.gov.uk/services/transport-and-streets/Documents/draft-transport-strategy.pdf>

Phase 1 Engagement report <https://www.cityoflondon.gov.uk/services/transport-and-streets/Documents/transport-strategy-phase-1-engagement-report.pdf>

Phase 2 Engagement report <https://www.cityoflondon.gov.uk/services/transport-and-streets/Documents/transport-strategy-phase-two-engagement-report.pdf>

Samantha Tharme

Strategic Transport Team – Department of the Built Environment

T: 020 7332 3160]

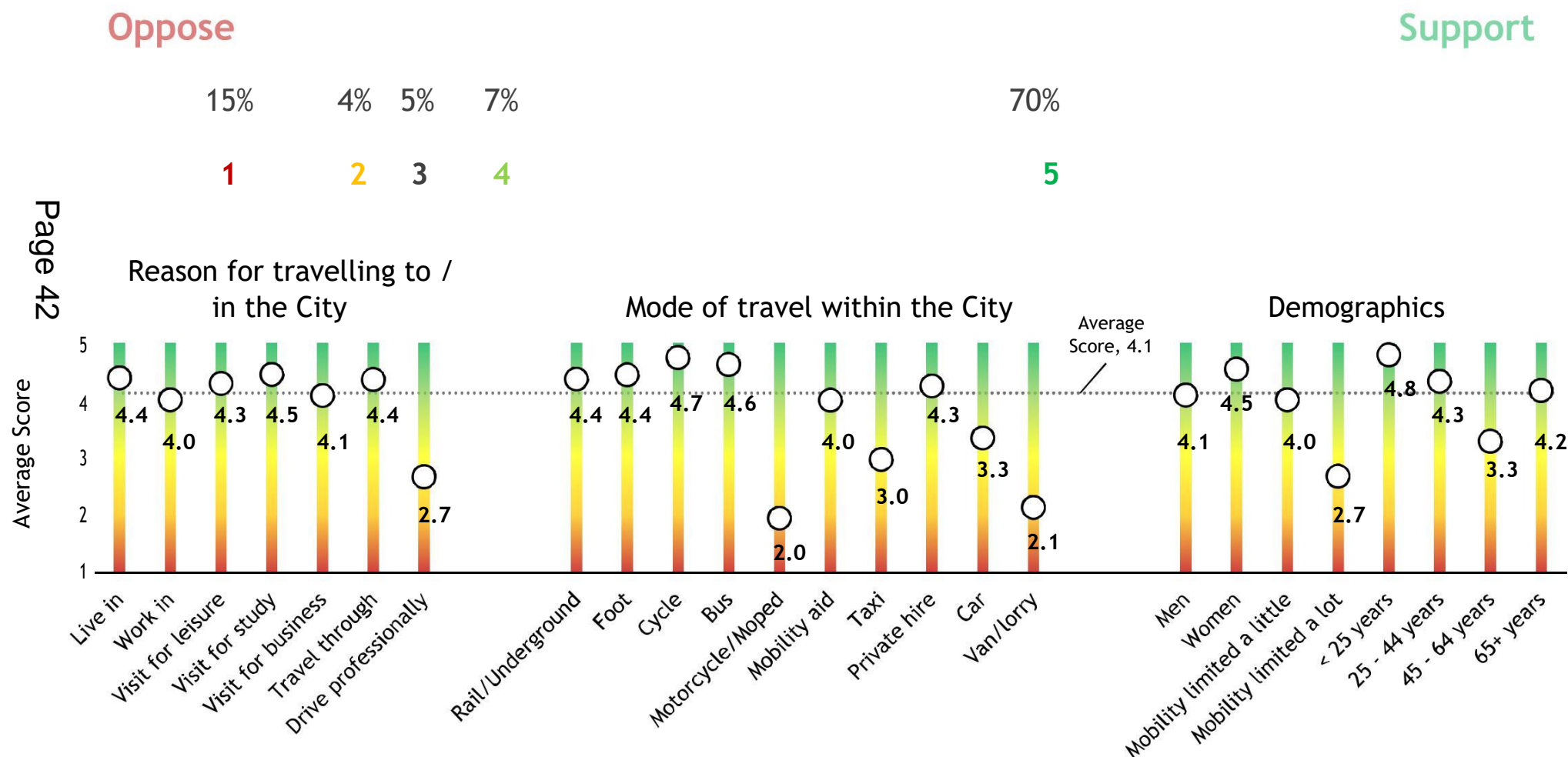
E: Samantha.Tharme@cityoflondon.gov.uk]

Appendix 1: Summary results from consultation website

Proposal 29 Support and champion a central London Zero Emission Zone

2016 Responses

4.1 Average score

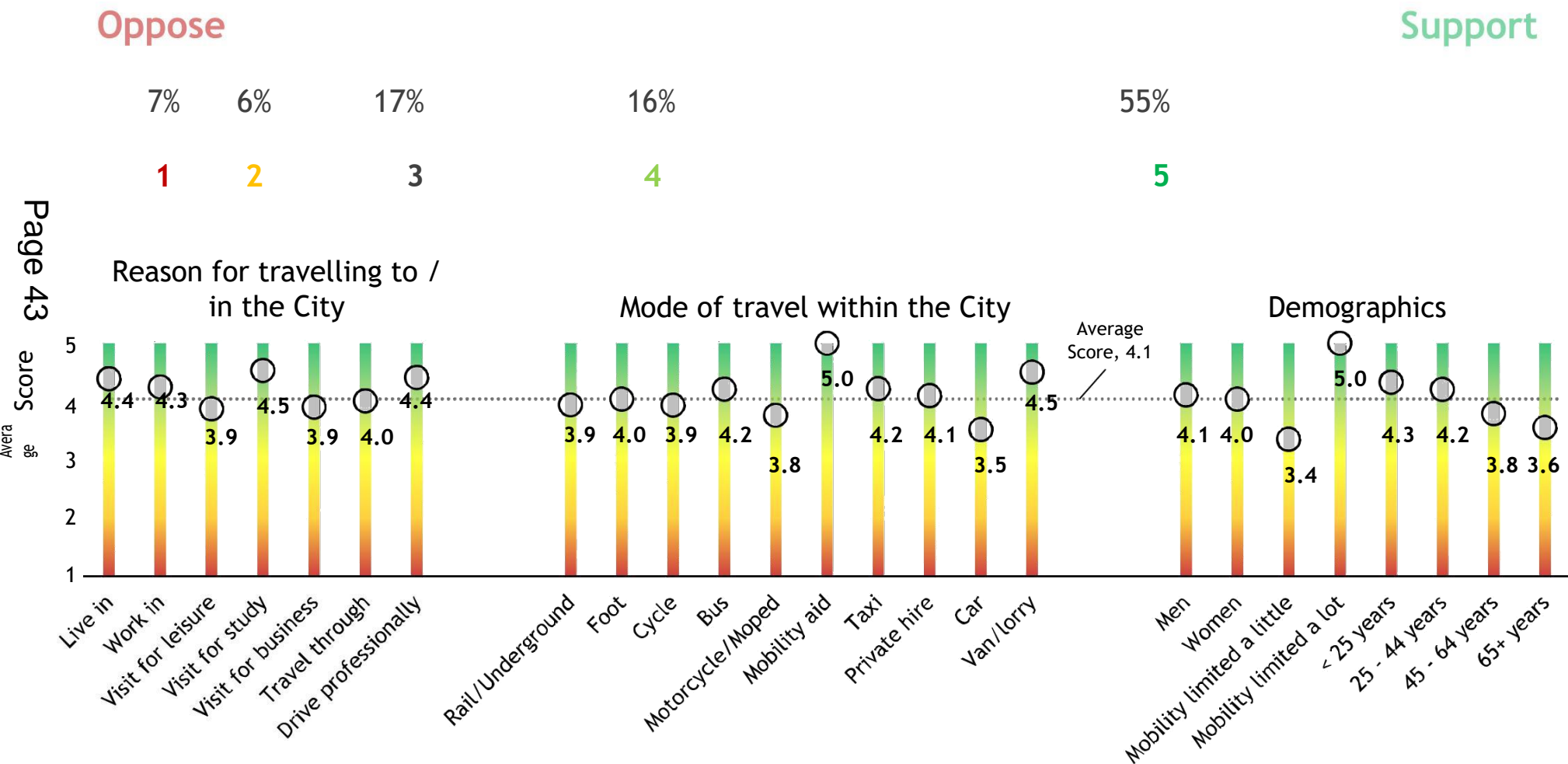


Proposal 30

Install additional electric vehicle charging infrastructure

198 Responses

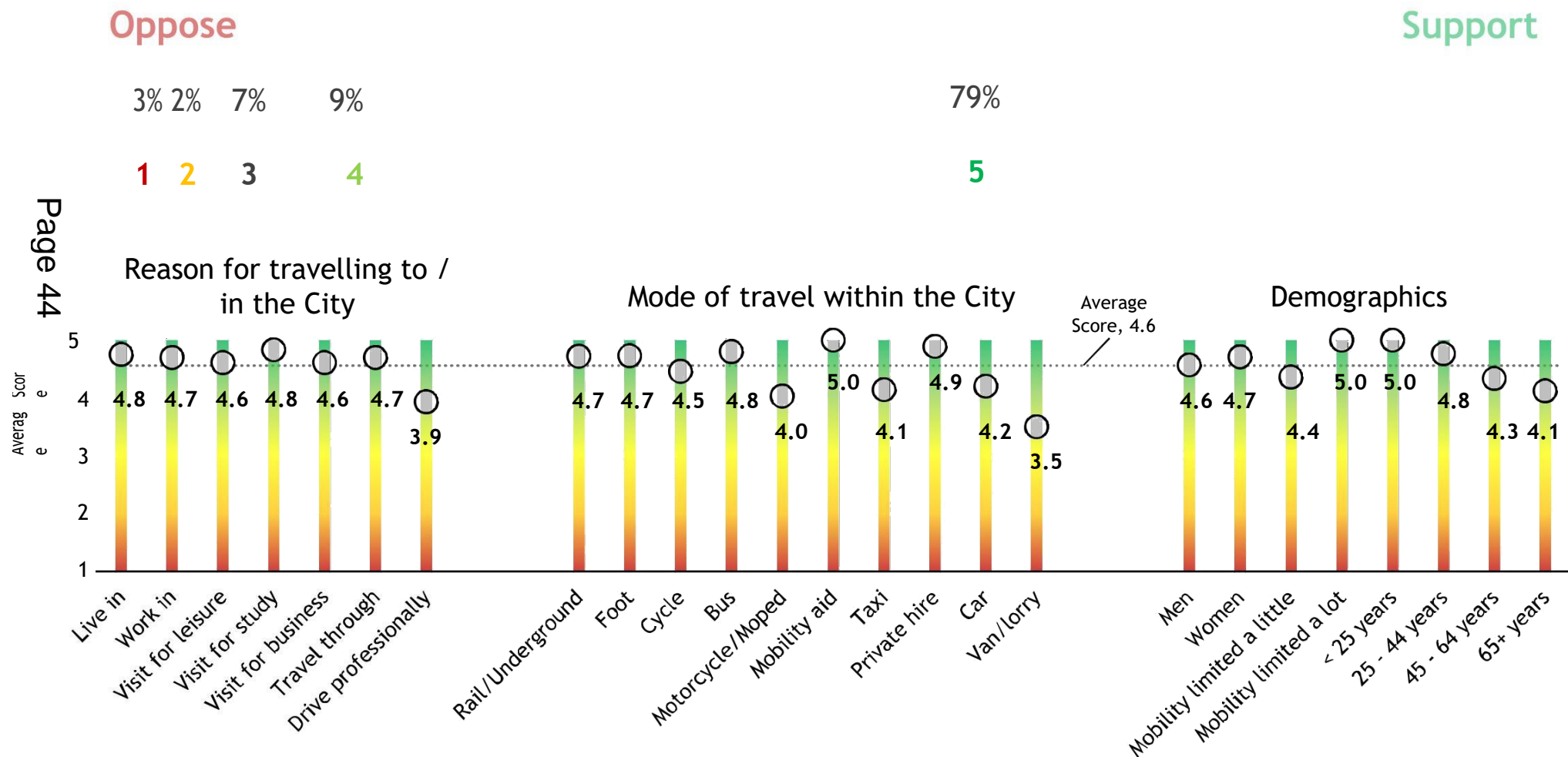
4.1 Average score



Proposal 31 Request an accelerated roll out of zero emission capable buses

208 Responses

4.6 Average score

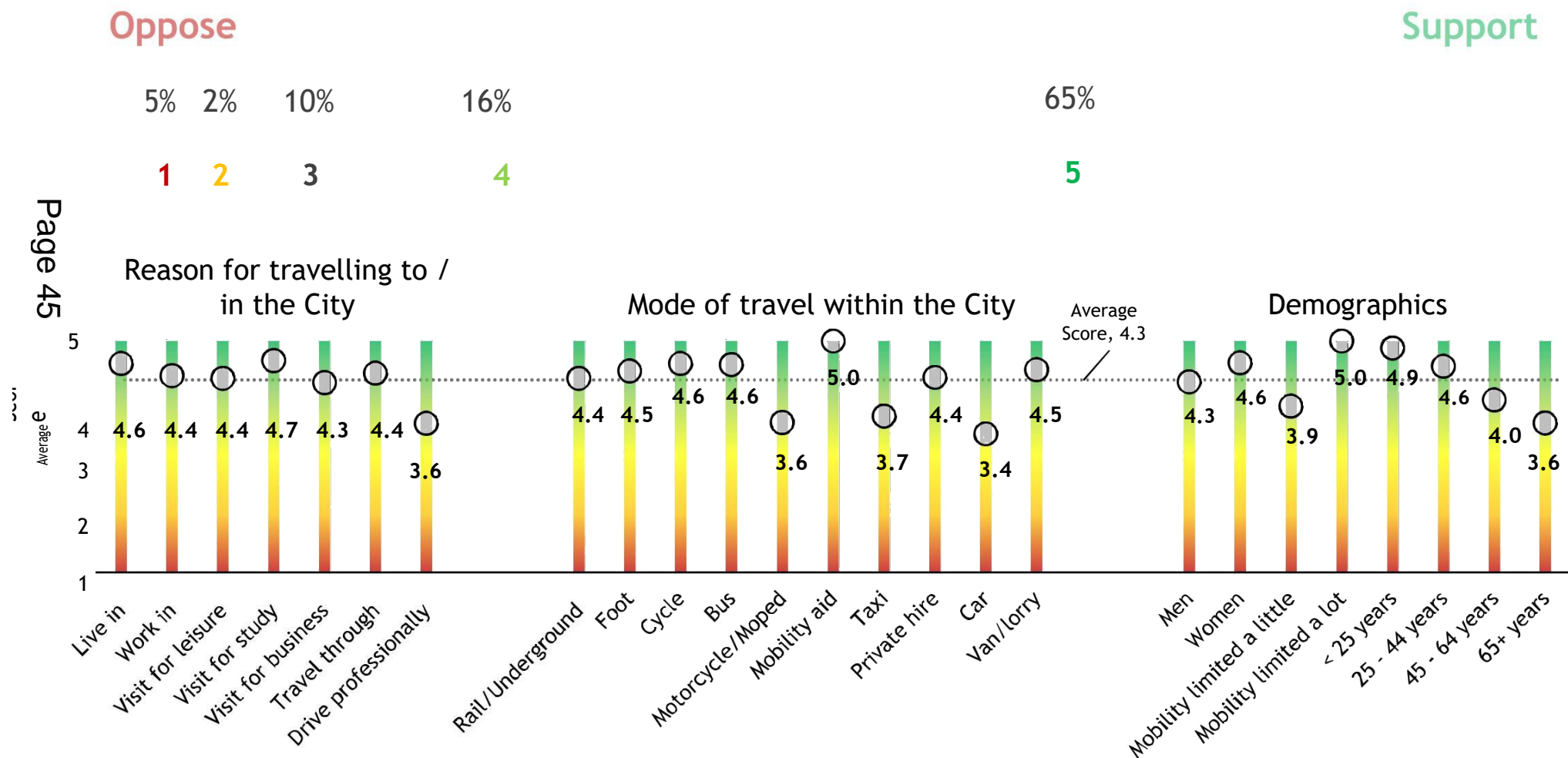


Proposal 32

Support small businesses to accelerate the transition to zero emission capable vehicles

182 Responses

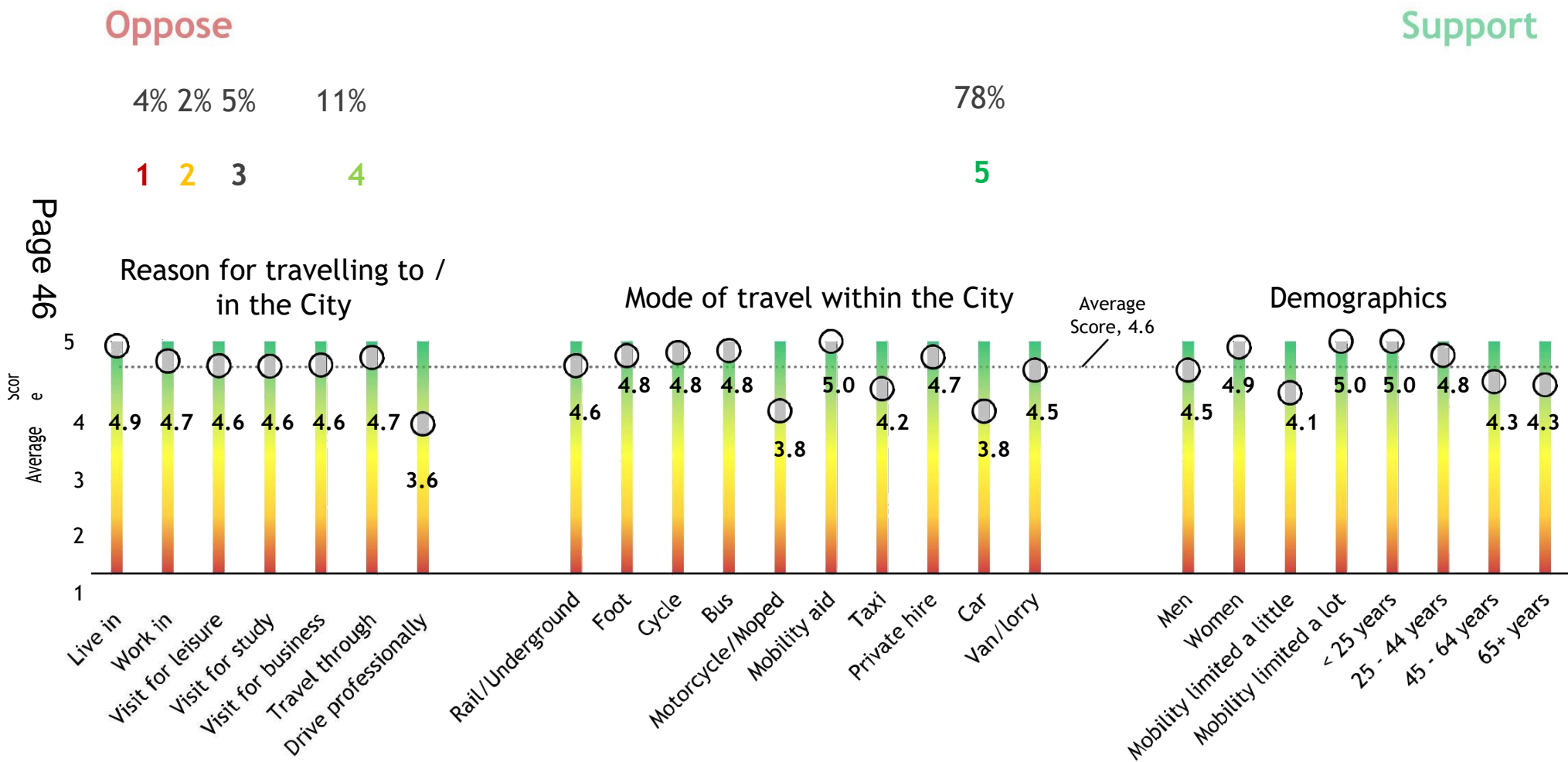
4.3 Average score



Proposal 33 Make the City of London’s own vehicle fleet zero emissions

194 Responses

4.6 Average score

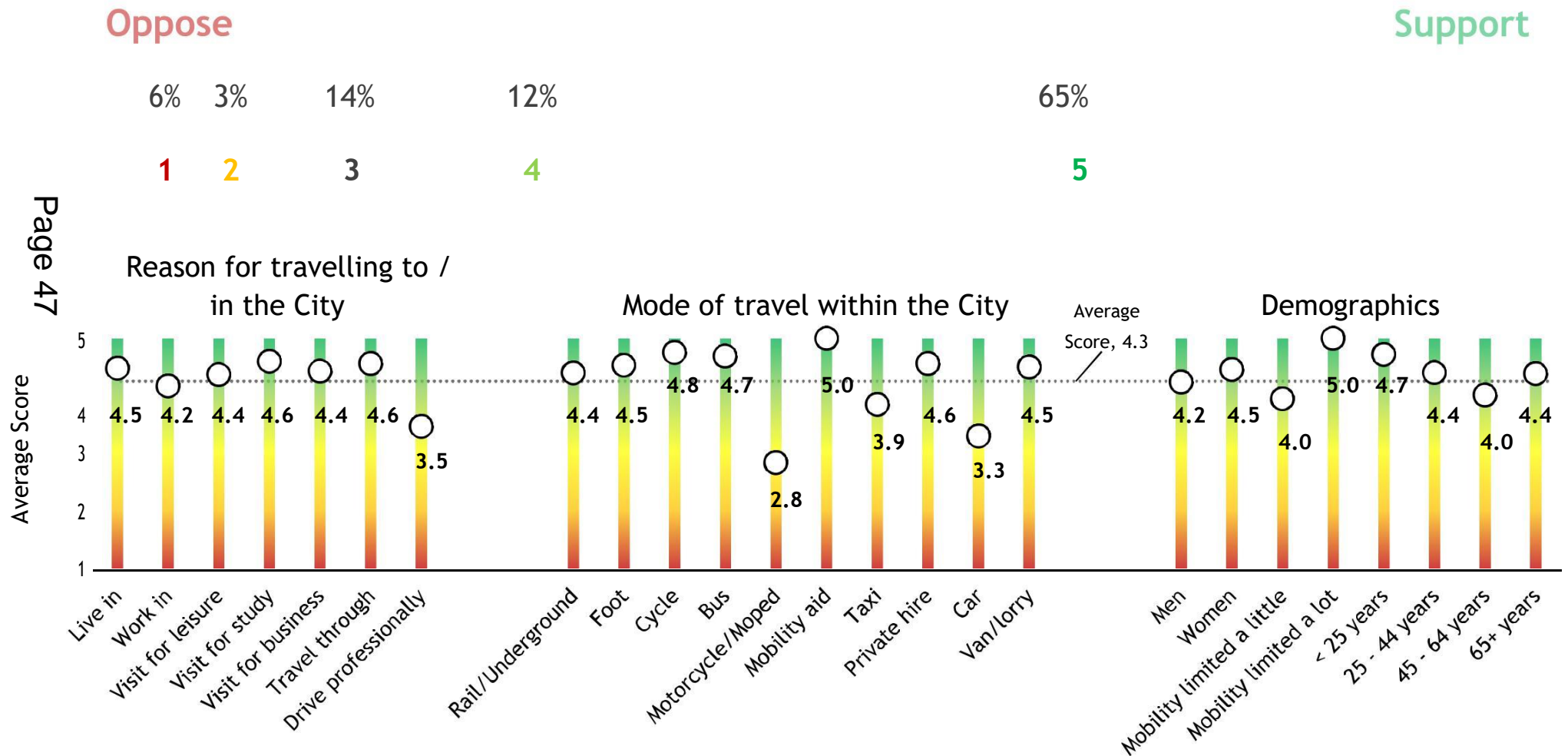


Proposal 34

Reduce the level of noise from motor vehicles

196 Responses

4.3 Average score

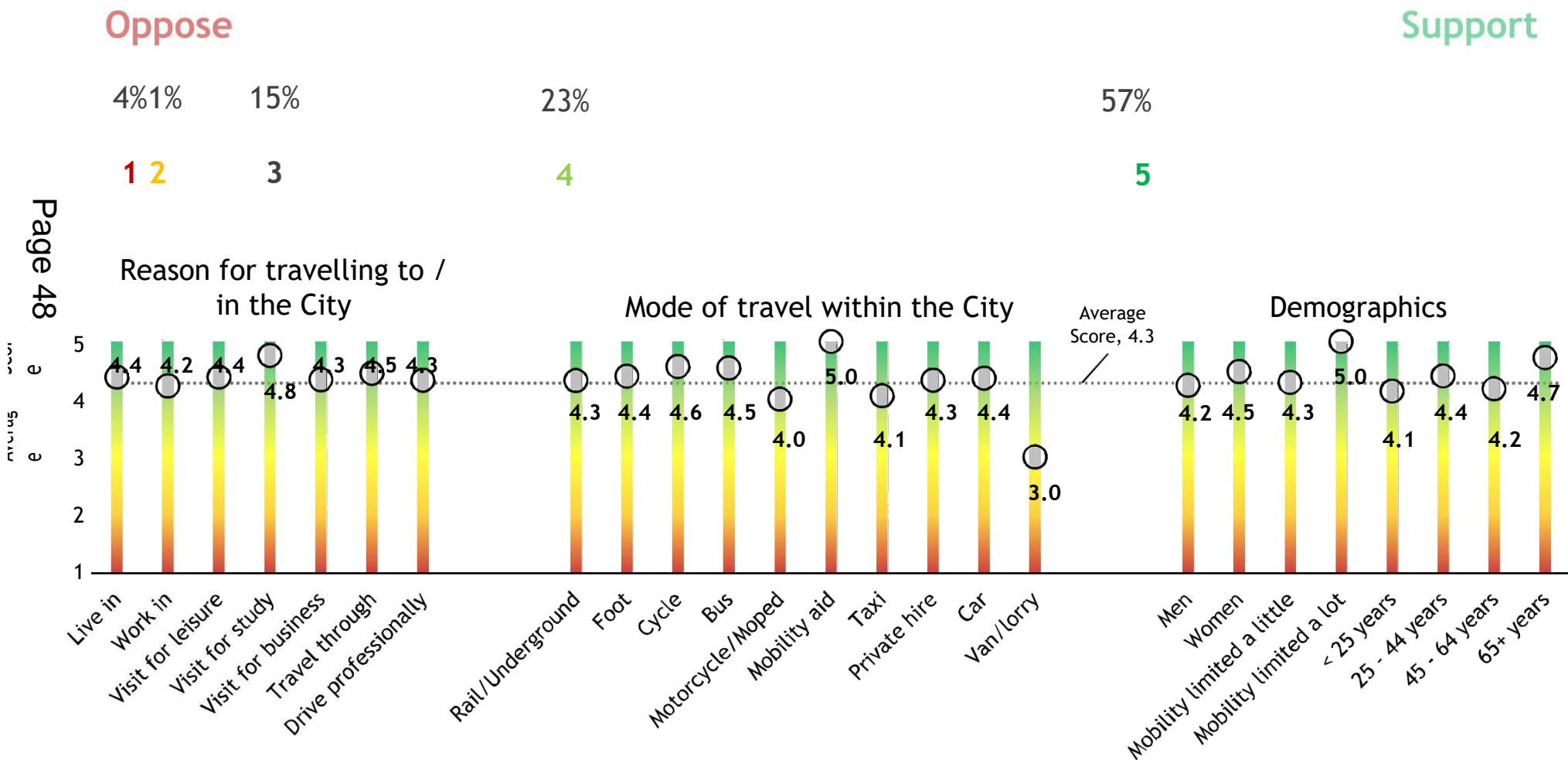


Proposal 35

Reduce noise from streetworks

171 Responses

4.3 Average score

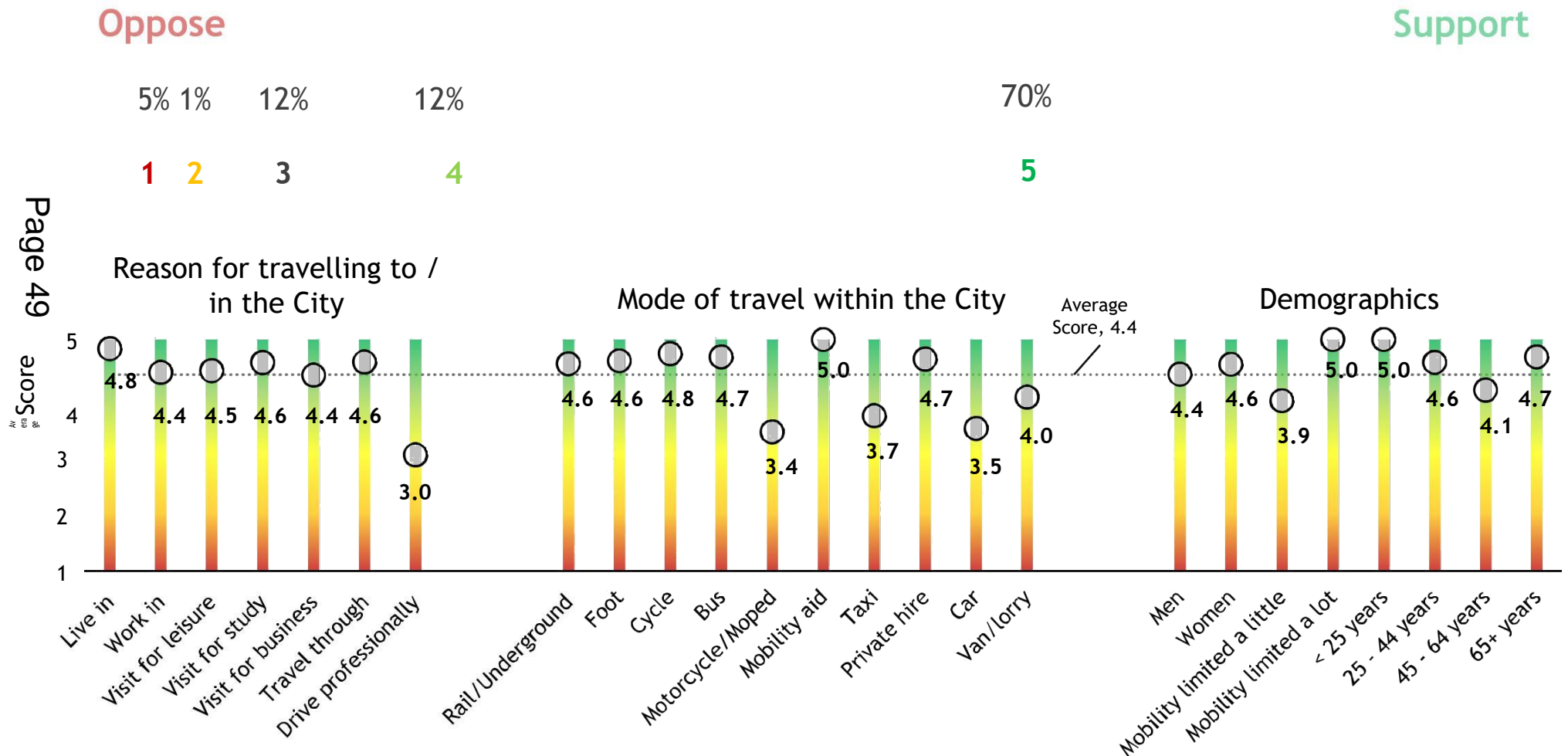


Proposal 36

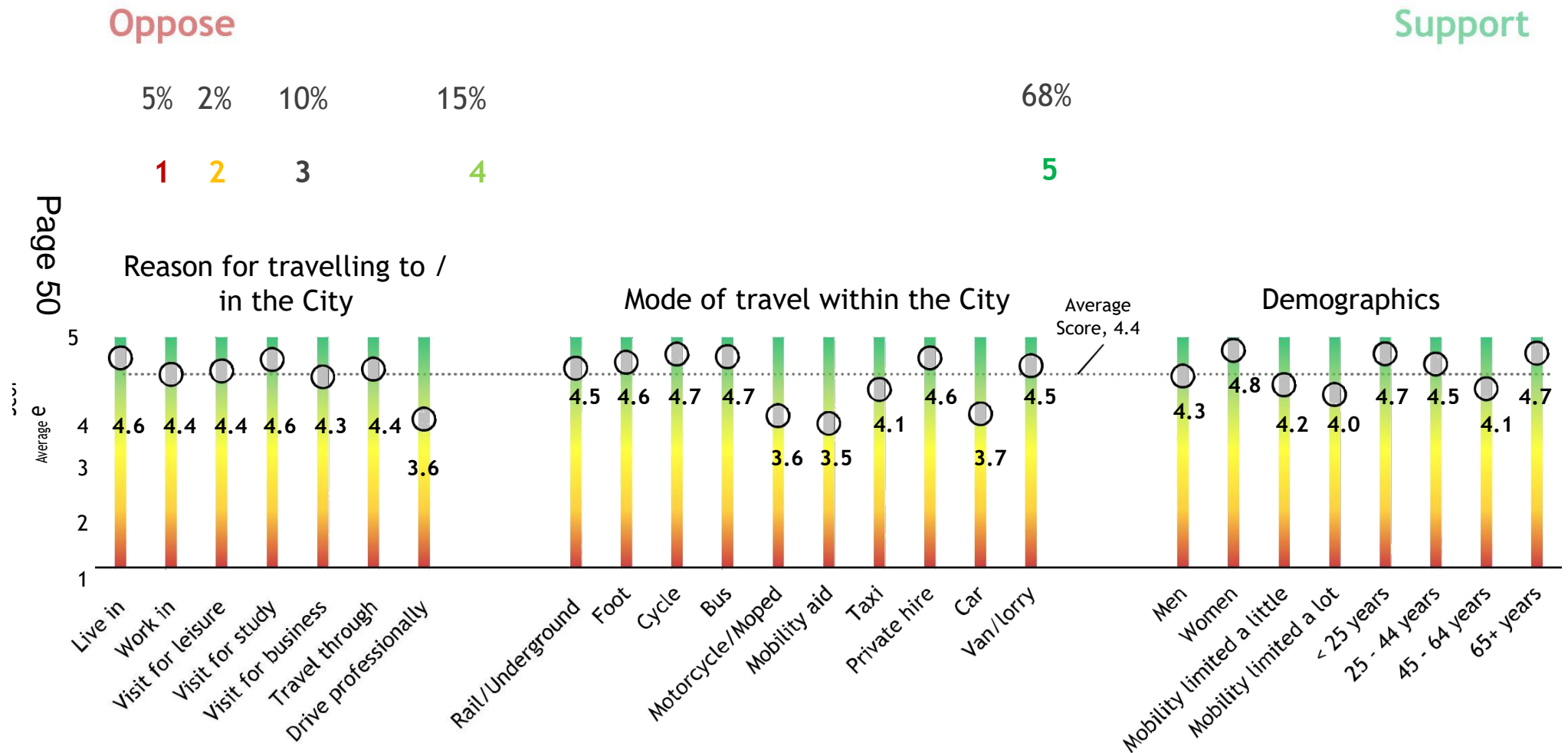
Encourage innovation in air quality improvements and noise reduction

185 Responses

4.4 Average score



4.4 Average score



Appendix 2: Comment summaries and responses

Proposal 29: Support and champion a central London Zero Emission Zone (Key proposal)

General expressions of support

275 people and the organisations listed below expressed their support for this proposal (in full or in part) and made no specific suggestions for changes.

- | | | |
|------------------------------------|-------------------------------------|--|
| • Railfuture | • City Property Association | • AWT Investments Limited |
| • Stop Killing Cyclists | • City Property Association NextGen | • Skc |
| • Brake | • Transport for London | • The Heron, 5 Moor Lane,
Residents Committee |
| • Bike Taxi Ltd | • CIC | • Wheels for Wellbeing |
| • Living Streets | • Lancefield St residents | • Ramblers Inner London Area |
| • Port of Tilbury London Ltd | • Roadpeace | • Quarter One |
| • Systra | • Flit Technologies Limited | • Flit Technologies Limited |
| • SALIX | • A1X Limited | |
| • Barbican Association – Residents | • TheTin Ltd | |

The following organisations expressed general support but also made suggestions or highlighted concerns which are addressed in the table below.

- **City of London Access Group (COLAG)** raised the issue that there is a very limited range of electric vehicles which meet the requirements for some disabled drivers and that there are currently no hybrid or electric vehicles available for people requiring wheelchair accessible vehicles.
- **St Paul's Cathedral School** would welcome inclusion of additional zero emission streets or zone around St Paul's Cathedral.
- **The London Taxi Driver Association (LTDA)** support the proposal but would like to see a temporary exemption for taxis while the trade transitions to zero emission capable taxis.
- **Stop Killing Cyclists, Brake and Bike Taxi Ltd**, noted that the introduction of Zero Emission Zones needs to be complemented by overall traffic reductions as zero emission capable vehicles still contribute to particulate matter produced by tyre and brake wear as well as congestion and road danger.
- **London Tourist Coach Operators Association (LTCOA)** expressed concern that zero emission coaches are still in their infancy with much of the technology either untested or not yet tested to an extent that proves its robustness. LTCOA would welcome further discussion to explore the potential need for a compromise that minimises the impact on the coach industry while still supporting overall emission reductions.
- **Freight Transport Association, Royal Mail and Federation of Small Businesses** all expressed interest in the detail and a willingness to work with City of London Corporation to help deliver a workable ZEZ.

General expressions of opposition.

56 people expressed their opposition for this proposal (in full or in part) and made no specific suggestions or requests for changes.

5 people thought that the motivation proposals was for raising 'tax' through fines for non-compliant vehicles rather than genuinely for air quality improvements

The following organisations expressed general opposition but also made suggestions or highlighted concerns which are addressed in the table below.

- **Motorcycle Action Group (MAG)** oppose the introduction of ZEZ on the grounds of confusion and undemonstrated cost/benefit of introducing higher emission standards than those required by the wider 2019 ULEZ. They are also concerned that this is changing the targets, as they feel people will upgrade to meet ULEZ 2019 requirements and that to go further in a short space of time is unreasonable. MAG also suggested the transition to zero emission capable vehicles should be market led and that fines/upgrades of vehicles would have a greater impact on lower income groups.
- **Alliance of British Drivers (ABD)** contest the need for a ZEZ on the grounds that air pollution is not as damaging as the evidence suggests and that it is unnecessarily costly. ABD argued that diesel buses and HGVs are the biggest contributors to poor air quality and there is no effective alternative to them.
- **La Fromagerie** noted that no ZEC refrigerator vans are currently available.
- **Smithfield Market Tenants' Association** noted that no ZEC HGVs will be available within the next 5 years.

Specific concerns and suggestions for changes

Comment group/theme	Comments summary, including organisational responses with organisations names in bold	Response/commentary
<p>Support the proposal but request that it to go further (106 comments)</p>	<p>48 people suggested the local ZEZs should cover a wider area or that vehicles should be banned completely. St Paul's Cathedral School and a number of individual respondents asked for the area around St Paul's to be a ZEZ, highlighting the health impacts of air pollution on children.</p> <p>29 people thought the proposal for local ZEZ should be implemented earlier than 2022, citing poor air quality and health impacts as the reason for faster action.</p> <p>Tyre and brake wear 22 people as well as Stop Killing Cyclists, Brake and Bike Taxi Ltd highlighted the need to reduce particulate matter from tyre and brake wear alongside exhaust emissions.</p> <p>Reduce non-vehicle emissions. 16 individuals and the following organisations expressed concern that we need to also be addressing emissions from fossil fuels at power stations, where these would still be the source of the power supply.</p> <p>A number of people raised the point of needing to deal with emissions associated with uses other than transport, including emissions from non-road mobile machinery (NRMM) used by the construction industry.</p>	<p>The timescale proposed for 2022 implementation is considered appropriate given the need for engagement, challenges of implementation, vehicle availability and the need to consider access requirements.</p> <p>The proposal to introduce two local ZEZs, where covering areas of the Square Mile with the greatest concentrations of people working and living, is anticipated to deliver benefits from reduced vehicle pollution across the Square Mile, as the routes to ZEZs will have a greater proportion of ZEC vehicles. As we develop these zones, we will consider the possibility of other areas or extensions.</p> <p>We recognise the need to reduce particulate matter from tyre and brake wear. This will be in part addressed by proposals to proactively reduce the number of motor vehicles in the Square Mile. Proposals to encourage safe speeds and behaviours as part of Vision Zero will result in slower speeds and less aggressive braking should also reduce tyre/brake wear.</p> <p>Electric vehicles are for more efficient in fuel use/CO2 output than combustion engines. The wider need to reduce the use of fossil fuels is set out in the City of London Responsible Business Strategy and the City Corporation has agreed to a renewable energy policy for its own direct use. Measures to reduce emissions from NRMM are set out in the City of London Air Quality Strategy.</p>

<p>Potential exemptions and ZEC vehicle availability (95 comments)</p>	<p>Exemptions for residents and freight 31 people, mostly residents, and the Barbican Association, raised the need for exemptions for residents who may not be able to switch to fully electric vehicles by 2022 and still require vehicles for essential journeys. Respondents noted that residents only use vehicles infrequently and do not make a significant contribution to emissions. Residents also expressed concern about taxis access, particularly for disabled residents, and access restrictions on deliveries and servicing, such as plumbers and electricians.</p> <p>Exemptions for motorcycles and mopeds 40 people suggested that motorcycles and mopeds should be exempt from any restrictions as they are lower emission than other vehicles.</p> <p>Exemptions for taxis 3 people, the RMT and the LTDA suggested that taxis should be exempt from restrictions as they need to access all areas, are fully accessible and that the taxi trade is already transitioning to ZEC taxis. Some respondents also suggested that those drivers who had invested in ZEC taxis should be given some priority within ZEZs such as dedicated ranks</p> <p>3 comments expressed an alternative view, suggesting that taxis should not be exempt for ZEZ restrictions, as older vehicles are particularly bad on vehicle emissions.</p> <p>Vehicle availability 18 people and range of organisations raised concerns about the availability of zero emission capable vehicles. The LTCOA noted that zero emission coaches are still in development. Freight Transport Association , Freight Traffic Control 2050 , Smithfield Market Tenants'</p>	<p>We recognise the need to take account of the needs of residents and the availability of ZEC vehicles when developing and implementing ZEZs. The need to consider phasing for vehicle class/type and possible exemptions for certain users is reflected in the current drafting of this proposal and will be considered during the development of local ZEZs. Residents, businesses, the freight industry and other street users will be engaged as part of this process.</p>
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	<p>Association and Thames Tideway and La Fromagerie expressed concern that there is still a very limited amount of choice for HGV and LGVs that will meet the requirements.</p> <p>SMMT and the Federation of Small Businesses suggested that introduction of ZEZ should be in line with commercial availability of vehicles. Royal Mail note that they would welcome early engagement on proposals so that service needs can be met effectively and avoid unintended consequences of additional vehicles being required.</p>	
<p>Financial impacts on businesses and individuals (58 comments)</p>	<p>The need for subsidies or price equality 29 people suggested that further subsidy is required to enable a shift to EVs, or that implementation of any further restrictions should be delayed until there is price equality for EVs.</p> <p>People on low incomes (27 comments) 27 people and MAG raised concerns that the need to upgrade vehicles or pay a fine for vehicles not meeting new requirements will unfairly impact on people on low incomes.</p> <p>Others commented that this proposal effectively allows preferential treatment for those who could afford to pay. Some people thought this should therefore mean a complete ban on vehicles not meeting the requirements rather than fines which allow people to 'pay to pollute'; others thought it should be managed by complete bans of all vehicles, not permitting EVs either.</p> <p>Let market lead; allow more time for transition to EVs 2 people and MAG suggested that the transition to zero emission capable vehicles should be market led. A number of other respondents suggested that the implementation of ZEZ restrictions should be delayed due to the costs and availability of replacement vehicles. Motorcycle Action Group and the ABD do not support a ZEZ, London wide or</p>	<p>Grants and financial incentives are available through the Office of Low Emission Vehicles and TfL. The market for small goods vehicles, taxis and private cars is becoming established and for some vehicle types purchase cost will soon be equal to equivalent petrol/diesel vehicles. (expected to be reached by 2020). The operating costs of electric vehicles are notably lower than those of petrol/diesel at present.</p> <p>Comments referring to the low-income groups were mostly relating to residents and will be addressed during the development of the ZEZ, for example through 'sunset' periods that provide time limited exemptions to residents.</p> <p>The mechanisms to manage access mean that it is likely to be necessary to impose fines on offending vehicles. Consideration of what level this should be at to reduce infringements to a minimum will be part of the full feasibility study prior to implementation.</p> <p>The Square Mile, as well as many other parts of London, is still in breach of air quality targets that should have been met by 2005 for PM10 and 2010 for NO2 (EU regulations). The market is not delivering new vehicles at a rate deemed necessary from a health perspective, recognised by UK, EU governments and World Health Organisation.</p>

	local zones, particularly by 2022. Their view is that this should be allowed to happen with the market, and not accelerated. They do not see a valid case in cost/benefit terms of the cost to motorists against the health benefits.	
EV charging infrastructure (34 comments)	34 people stressed the need to provide EV charging infrastructure to support the introduction of Zero Emission Zones.	This is addressed in <i>Proposal 30, Install additional electric vehicle charging infrastructure</i> .
Proposals should target worst polluters (23 comments)	23 people commented that diesel buses, taxis and HGVs are the worst polluters and that the proposal should be concentrating on these, rather than a blanket approach for all vehicles.	Reductions in emissions from all types of vehicle will be required to meet air quality targets. TfL have set out a timetable for the transition to ultra-low and zero emission buses and taxis, which is being delivered through contract and licencing requirements. Currently there is a lack of alternative vehicles for HGVs but the Transport Strategy includes proposals to reduce the number of motorised freight vehicles in the Square Mile.
Relationship with central London ULEZ 2019 and neighbour boroughs. (5 comments)	<p>A small number of people and MAG questioned the need from restrictions that go beyond those being introduced as part of the central London ULEZ in April 2019.</p> <p>Brewery Logistics Group, Freight Traffic Control 2050, John Lewis Partnership and SMMT highlighted the need for a consistent approach between the City and neighbouring boroughs, or across London, when implementing any local ZEZ restrictions. TfL recommended that the City of London refers to forthcoming guidance when preparing its future proposals.</p>	<p>Modelling has shown that the air quality on our busiest streets will still be in breach of the UK and WHO health-based limits after the introduction of the ULEZ in April 2019.</p> <p>The risk of confusion and need for consistency is recognised and addressed in the proposal. We will work closely with neighbouring boroughs, London Councils and TfL to ensure a consistent approach.</p>
Will redistribute pollution elsewhere (5 comments)	5 people thought that vehicles avoiding a ZEZ would increase pollution elsewhere, with no net benefit.	Given the scale of the local ZEZs proposed we do not think that there will be a redistribution of traffic.

Proposal 30: Install additional electric vehicle charging infrastructure.

24 people and the organisations listed below expressed their support for this proposal (in full or in part) and made no specific suggestions for changes.

- | | | |
|--|-------------------------------|---|
| • Smithfield Market Tenants' Association | • London Living Streets | • The Heron, 5 Moor Lane, Residents Committee |
| • Gett. | • SALIX | • Ramblers Inner London Area |
| • Freight Traffic Control 2050 | • City of London Access Group | • Transport for London |
| • Bike Taxi Ltd | • Sustrans | • SMMT |
| • Living Streets | • Flit Technologies Limited | |
| | • The Tin Ltd | |

General expressions of support.

UPS, Freight Transport Association and Confederation of Passenger Transport support the proposal particularly with reference to hub sites and depots (rather than on-street) given the operational needs of delivery companies.

SMMT support provision and provide detailed comments which will help inform the Action Plan for delivery of new charge points.

TfL supports the proposal and notes its target for 300 rapid charging points will be delivered by the end of 2020 asking local authorities to identify 20 sites each. Additionally, dedicated taxi rapid charging points are required in the Congestion Charge Zone to encourage electric taxi uptake. **TfL** wish to discuss including the City of London's proposals in the EV Taskforce's charter of commitments.

LTDA support this proposal but expressed their disappointment at the rate of progress so far, London wide and within the City.

16 people expressed support and stressed the need to keep any charge points off footways, protecting space for walking and especially maintaining fully accessible footways. This point was also supported by **Bike Taxi Ltd, London Living Streets, Living Streets. London Cycling Campaign, QuarterOne, Roadpeace and Sustrans** made similar comments when commenting on proposal 17. 2 people commented that alternative systems for charging such as wireless or induction charging should soon be available.

16 people commented on the need to cut total motor vehicles in total and not just replace existing numbers with EVs, which is addressed in proposal 11.

The following organisations expressed support and raised some concerns which are addressed in the table below.

- **Barbican Association - Residents** comment on the ability of the background power network infrastructure being sufficient to cope with installation of sufficient EV charge points.
- **UPS** raised a similar point on the funding of the background power infrastructure and questioned who should pay for the upgrades required.
- **City of London Access Group** support and would like to see dedicated provision for disabled drivers.

There were no comments expressing opposition to this proposal from individuals or organisations.

Specific concerns and suggestions for changes.

Comment group/theme	Comments summary, including organisational responses with organisations names in bold	Response/commentary
Prioritisation of different users (8 comments)	A number of comments were received from individuals and organisations emphasising the need for prioritisation for particular user groups. These included the City of London Access Group with respect to the needs of disabled (blue badge) holders; TfL with respect to priority points for taxis. UPS and Freight Transport Association with respect to freight, this included the need to provide at depots as well as hub sites.	The proposal has been updated to include an Action Plan to be completed by the end of 2019 which will include consideration of all user groups.
Comment on non-exhaust emissions (3 comments)	3 people commented that EV charge points could still be using power from fossil fuels and that emissions would therefore be generated at source	EVs still provide an immediate improvement in local air quality and are more efficient in their use of fossil fuels where that is the source of power. The City Corporation is taking steps to increase our own use of renewable power supplies through its Renewable Electricity Policy and Sourcing Strategy.
Network Power infrastructure provision	Barbican Association - Residents questioned the ability of the background power network infrastructure being sufficient to cope with installation of sufficient EV charge points. UPS raised a similar point on the funding of the background power infrastructure and questioned who should pay for the upgrades required.	Working with TfL and utilising the EV taskforce we will address these matters as we assess the next stage of charge point installations. Work in the industry on a wider scale is looking at how to address infrastructure provision and we will look to best practice and encourage innovation.

Proposal 31: Request an accelerated roll out of zero emission capable buses

14 people and the organisations listed below expressed their support for this proposal (in full or in part) and made no specific suggestions for changes.

- Alliance of British Drivers
- City of London Access Group
- Bike Taxi Ltd
- SALIX

Additional comments were made on the viability of zero emission capable buses and the need to promote advanced technology such as wireless charging. Two people thought we should use financial support to speed up the change with buses, and one felt we should allow TfL to determine priorities across London.

Transport for London noted that by the middle of 2020 all buses serving the Square Mile will be hybrid or zero emission and that these latest ultra-low emission buses will deliver up to a 95% reduction in NOx emissions from buses, making a significant improvement to air quality. The proposal will be amended to reflect this timetable and include a target for all buses to be zero emission (electric or hydrogen) by 2030.

There were no comments opposing this proposal.

Proposal 32: Support small businesses to accelerate the transition to zero emission capable vehicles

3 people and the organisations listed below expressed their support for this proposal (in full or in part) and made no specific suggestions for changes.

- **Alliance of British Drivers**
- **City of London Access Group**
- **RMT London Taxi Branch**
- **TfL**

4 people made comments on the availability of zero emission vehicles, which was also raised for Proposal 29 and our response is outlined above.

6 people and **Bike Taxi Ltd** expressed support with the concern that it would be unfair for there to be a subsidy for electric vans and none for bikes/cargo bikes; 5 additional people thought that we should ensure electric bikes are included. The proposal will be updated to include supporting businesses to switch to non-motor vehicles as well as zero emission capable vehicles

Freight Transport Association support the proposal in principle with the exception of preferential pricing for vehicles in this category.

Only 1 person expressed opposition for this proposal.

Proposal 33: Make the City of London's own vehicle fleet zero emissions

12 people and the organisations listed below expressed their support for this proposal (in full or in part) and made no specific suggestions for changes.

- Alliance of British Drivers
- City of London Access Group
- Bike Taxi Ltd.
- IAM
- TfL

Freight Transport Association support this proposal, with additional point that the market of available vehicles will be better understood by CoL. They also noted that this may lead to higher upfront costs for contractors.

Expressions of support included comments that cargo-bike/cycles and electric bikes/scooters should be part of the City's fleet of vehicles. That there should be a net reduction in City vehicle fleet as well as a switch to zero/low emission.

A couple of people commented that given this is within City Corporation control it should have an earlier target – the City Corporation policy on fleet procurement requires ZEC vehicles to be considered first when replacement or retrofit of a vehicle is required. This policy also includes a 'no-replacement' requirement as first principle in decision making, with the aim of delivering a net reduction in the City Corporation's vehicle fleet. A few comments also noted the lack of alternative options for HGVs, which the City Corporation is keen to address and will continue to trial HGVs where appropriate such as the all-electric refuse trucks.

One person expressed opposition because they felt this proposal would be a waste of financial resource.

Proposal 34: Reduce the level of noise from motor vehicles

General expression of support

20 people and the organisations listed below expressed their support for this proposal (in full or in part) and made no specific suggestions for changes.

- Bike Taxi Ltd
- SMMT
- TfL

8 people expressed concern that electric vehicles add a safety risk if people can't hear them and the **City of London Access Group** noted need to maintain siren noise for blind and visually impaired people. This issue is recognised and addressed in Proposal 20, which sets out our intention to work with industry and access groups to understand and address safety implications arising from the use of quieter vehicles.

Freight Transport Association expressed support whilst asking that any 'no-idling' enforcement campaigns/regulations recognise that some vehicles have operational needs that require them to keep engines running while stationary.

General expression of opposition

4 people expressed opposition to this on the grounds that silent electric vehicles would be dangerous (addressed above) and that implementing the proposals is a waste of resources. The **ABD** question whether a problem that needs resolving.

Proposal 35: Reduce noise from streetworks

11 people and the organisations listed below expressed their support for this proposal (in full or in part) and made no specific suggestions for changes.

- Barbican Association – Residents
- City of London Access Group
- Bike Taxi Ltd
- Transport for London

Supportive comments included noting that getting works done quickly effectively reduced the length of any noise impact. A few comments noted that the details of the proposal should already be in place.

One comment that any further controls were unnecessary in busy city centre. No other opposing comments were received.

Proposal 36: Encourage innovation in air quality improvements and noise reduction

12 people and the organisations listed below expressed their support for this proposal (in full or in part) and made no specific suggestions for changes.

- City of London Access Group
- Bike Taxi Ltd
- Freight Transport Association
- Ramblers Inner London Area
- The Aldgate Partnership
- The Tin Ltd
- The Heron, 5 Moor Lane, Residents Committee

Sustrans expressed support with the caveat that technological developments should only be supported if they include measures to reduce motor traffic, which is part of Proposal 11. **Flit Technologies Limited** support the proposal and recommended use of apps to allow customers for deliveries or taxis to specifically select ZEC vehicles. **SALIX** support this proposal but wish to see specific proposals with targets.

2 people commented that more greenery/green space should be utilised improve air quality and 2 suggested that powered two wheelers are already part of the solution

General expressions of opposition.

3 people expressed opposition to the proposal but made no specific suggestions for changes.

Proposal 37: Ensure street cleansing regimes support the provision of a world-class public realm

15 people and the organisations listed below expressed their support for this proposal (in full or in part) and made no specific suggestions for changes.

- City of London Access Group
- Bike Taxi Ltd
- Living Streets
- Transport for London
- The Heron, 5 Moor Lane, Residents Committee
- The Tin Ltd
- Sustrans
- Flit Technologies Limited
- The Aldgate Partnership
- Ramblers Inner London Area

Specific comments included that we should require businesses to be responsible to meet the costs of managing packaging/litter and recycling, and that the reduction in cigarette litter was needed. A couple of comments were made that streets should be included, and this has been made more explicit in the proposal.

Two people were concerned that a smoking ban should not be part of the proposal – we do not propose to introduce a smoking ban in public areas as part of this proposal but do seek better behaviour on reducing litter from smoking.

Only 2 people expressed opposition for this proposal on the basis that they consider the Square Mile to be clean enough already. A number of other respondents also highlighted that standards for street cleansing are already high.

Appendix 3: Changes to Transport Strategy proposals 29 to 37

The Square Mile's air and streets are cleaner and quieter

By 2044, transport related local air pollution and carbon emissions will have been cut to virtually zero and streets will be quieter more relaxing places. Together with wider action to reduce emissions from buildings and development, this will mean that the City enjoys some of the cleanest urban air in the world. There will be fewer motor vehicles and those remaining will be powered by electricity or other zero emission technologies. Emerging automation technology will reduce speeds and avoid aggressive acceleration and braking, leading to less tyre and brake wear. New approaches to noise management will mean that street works cause less disturbance.

A recent study commissioned for the Greater London Authority identified that up to 9,500 premature deaths a year were attributable to air pollution. Exposure to high concentrations of Nitrogen Dioxide (NO₂) can irritate the airways of the lungs, increasing the symptoms of those suffering from lung diseases. Fine particles can be carried deep into the lungs where they can cause inflammation and a worsening of heart and lung diseases.

Air quality in the Square Mile does not currently meet the safe limits set by the European Union or World Health Organisation (WHO) for NO₂. Levels of exposure to particle matter (PM₁₀ and PM_{2.5}) are within the UK/EU limit value, however they exceed more stringent WHO standards and the WHO recognises that there is no safe limit for these types of pollutants.

Road transport is responsible for 26% of NO_x emissions, 48% of PM₁₀ and 60% of PM_{2.5}, in the Square Mile. Current air quality monitoring records limit breaches for NO₂ on our busiest streets. In some locations recorded concentrations are twice the safe limit value. Projections show that NO₂ levels will still exceed safe limits on many of our busiest streets after the central London Ultra-Low Emission Zone's (ULEZ) restrictions on the most polluting vehicles come into effect. Brake and tyre wear mean that motor vehicles will also continue to be a significant source of particulate matter even once the majority of vehicles are zero emission capable.

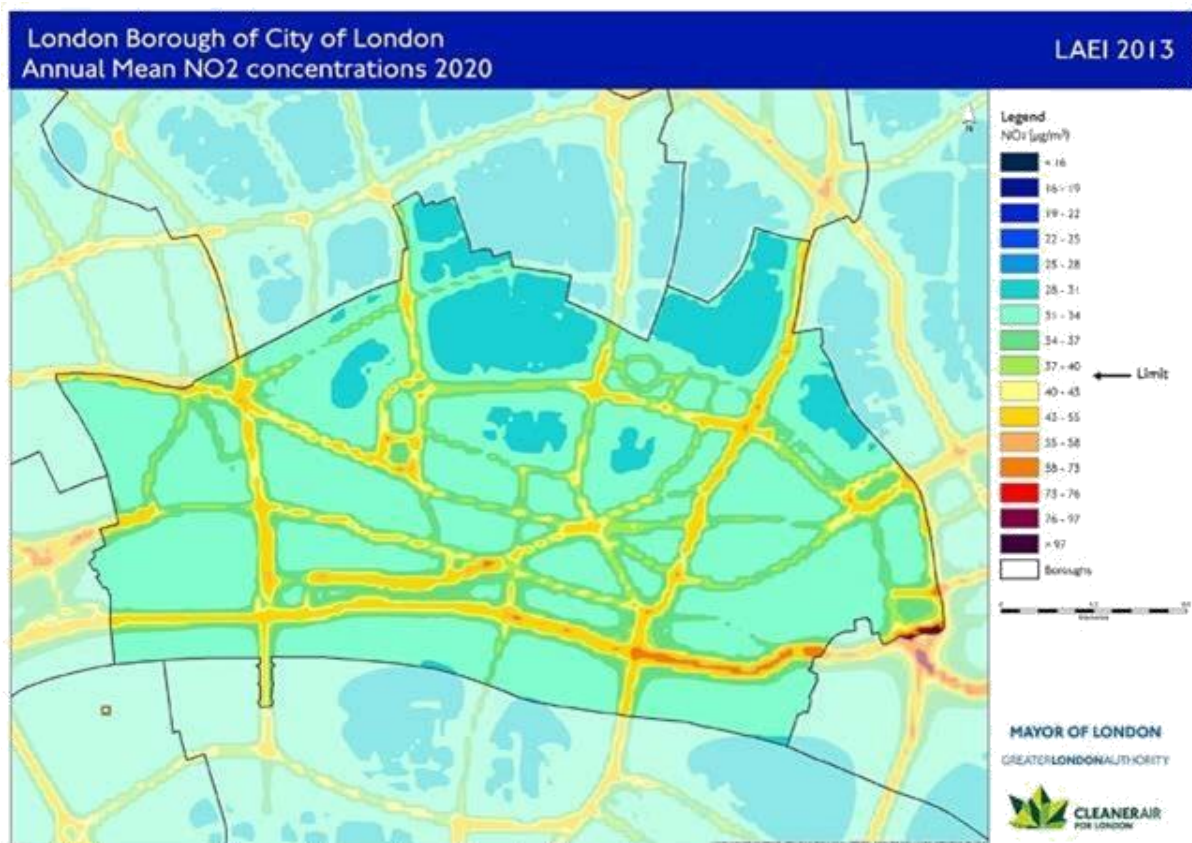


Figure 10: City of London Annual mean NO₂ concentrations 2020 (LAEI 2013)

In 2018, 7% of the Square Mile's CO₂ emissions are produced by motor vehicles. The carbon emissions from electric vehicles are dependent on the source of electricity. However, electric vehicles are far more efficient in fuel use/CO₂ output than combustion engines. An EU study based on expected performance in 2020 found that an electric car using electricity generated solely by an oil-fired power station would use only two-thirds of the energy of a petrol car travelling the same distance.

The direct health impacts of noise pollution include sleep disturbance, stress, anxiety, high blood pressure, poor mental health and school performance, and cognitive impairment in children. Risk of cardiovascular disease increases significantly when noise levels exceed 60 decibels, as they often do on urban streets. Noise can also discourage people from walking, cycling and spending time on streets. 41% of respondents to a recent survey on people's experience and perceptions of noise in the Square Mile cited noise from traffic as a negative factor. Traffic noise was the most significant negative noise or sound identified, followed by noise from construction/building works, which was identified by 12% as an issue.

Proposal 29: Support and champion a central London Zero Emission Zone

We will support and champion the introduction of a Zero Emission Zone (ZEZ) covering central London within the next Mayoral term

We will seek a phased introduction of ZEZ restrictions with the aim of ensuring that 90% of motor vehicles entering the Square Mile are zero emission capable by 2030. This is likely to be achieved through a combination of access restrictions and charging for non-zero emission capable vehicles.

If a clear commitment to introduce a central London ZEZ is not set out in the next Mayor's election manifesto, or commitments are insufficiently ambitious, we will explore the feasibility of implementing a City-wide ZEZ, working with London Councils and boroughs neighbouring the City to ensure a coordinated approach.

Local Zero Emission Zones

While the Central London ZEZ is being developed, we will introduce local ZEZs covering the Barbican and Golden Lane estates and the City Cluster by 2022. Proposals will be developed in consultation with residents and businesses and will reflect the availability of zero emission capable vehicles, while seeking to accelerate their uptake. We will coordinate proposals with TfL, London Councils and London's boroughs to ensure alignment with other existing and planned zero emissions areas and streets.

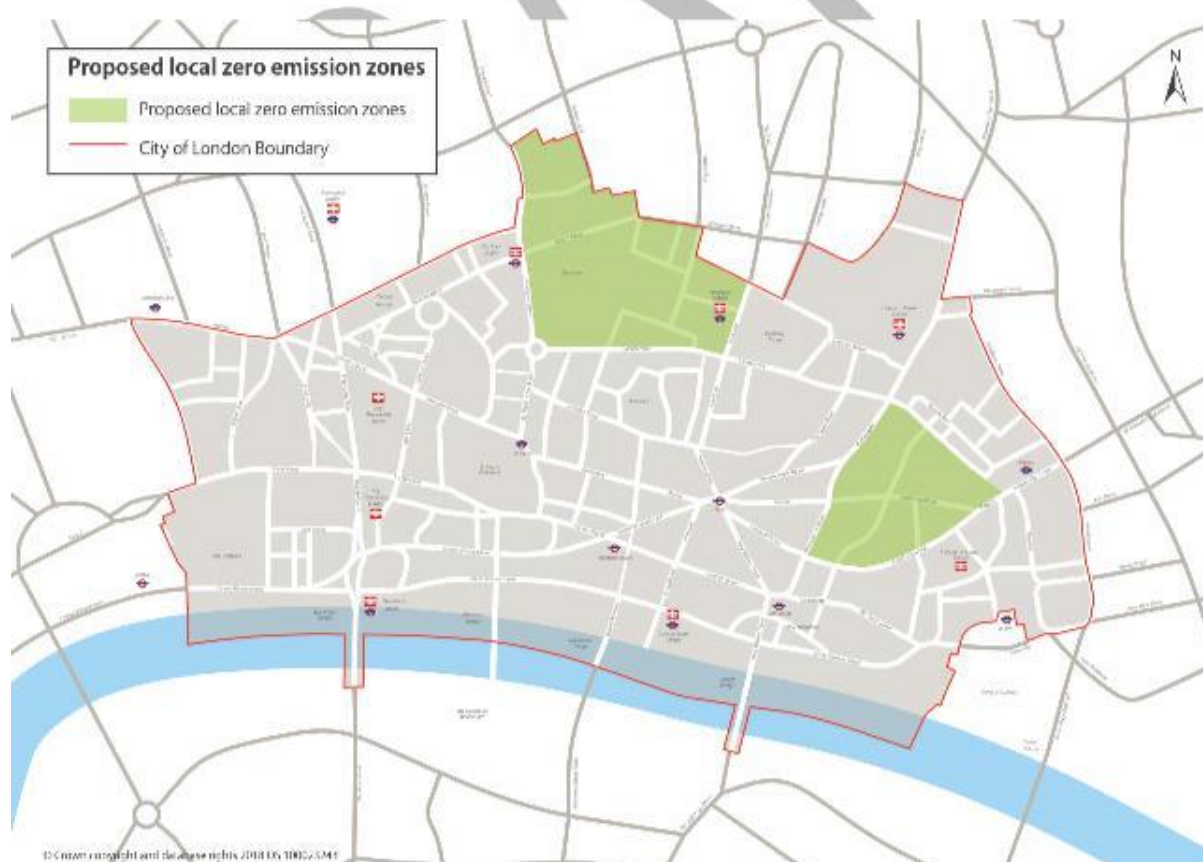


Figure 11: Proposed Local Zero Emission Zones (larger map available on the City of London Transport Strategy webpage)

Proposal 30: Install additional electric vehicle charging infrastructure

We will install additional publicly accessible electric vehicle (EV) rapid charge points ~~by 2025~~ to support the transition to zero emission capable vehicles. An EV Charging Action Plan will be produced published by December 2019. This which will identify how many charge points, including charging hubs, are required up to 2022, as well as longer-term forecasts. In developing the Action Plan we will consider the charging needs of:

- residents
- Blue Badge holders
- taxis
- freight and servicing
- electric two-wheelers: motor cycles and mopeds
- electric bikes

~~, including exploring the potential for a charging hub with priority access for commercial vehicles. We will assess the need for additional charge points for taxis and investigate the charging infrastructure required to encourage a transition to electric powered two-wheelers.~~

Locations will be identified through engagement with the TfL EV Infrastructure Taskforce, ~~which includes EV industry representatives and wider consultation.~~ The first preference will be to install any charge points in car parks or other suitable off-street locations. Where it is essential to locate on-street, charge points will be installed in the carriageway rather than on the pavement

Through the planning process we will require the installation of rapid charge points in new developments with off-street loading. We will also encourage the owners, managers and occupiers of existing buildings with loading bays to install rapid charge points.

The provision of charging infrastructure will be kept under review to ensure it is sufficient to meet the needs of residents and vehicles serving the City without generating additional traffic. Reviews will also consider the need to update, and potentially reduce, charging infrastructure as battery technology improves.

-----TEXT BOX START-----

Existing electric vehicle charging provision

Fast charge points are currently available in all City Corporation public car parks and in the Barbican residents' car park. We are working in partnership with TfL to deliver a rapid charging hub for taxis in Baynard House car park and a single taxi only rapid charge point on Noble Street.

-----TEXT BOX END-----

Proposal 31: Request an accelerated roll out of zero emission capable buses

We will urge TfL to prioritise zero emission capable buses on routes through the Square Mile, with the expectation that all buses serving the City will be hybrid or zero emission by 2020. In the longer-term ~~We~~ we will request that all buses serving the City are electric or hydrogen by zero emission capable by 2030~~2030~~, ahead of TfL's current commitment for all single deck and 80% of double deck buses to be ~~zero emission or hybrid by 2035~~electric or hydrogen by 2035.

Proposal 32: Support small businesses to accelerate the transition to zero emission capable vehicles

We will work with the Government, TfL and manufacturers to develop incentive schemes and favourable leasing arrangements that support small businesses in acquiring zero emission capable vehicles. This will include supporting the switch to non-motor vehicle alternatives, such as cargo bikes. We will consider opportunities, such as preferential pricing for parking/loading for vehicles in this category, to provide time limited incentives to invest in zero emission capable vehicles.

~~We will encourage the Government to introduce legislative change to exclude battery weight from vehicle weight limits.~~

Proposal 33: Make the City of London's own vehicle fleet zero emissions

The City Corporation will upgrade its vehicles which operate in the Square Mile to meet the standards we set for local ZEZs. Contractors vehicles that operate within the Square Mile will also be required to meet these standards. Where possible EV charging infrastructure in City Corporation operational sites will be made available to contractors' vehicles.

Proposal 34: Reduce the level of noise from motor vehicles

The transition to zero emission capable vehicles and general traffic reduction will help to reduce noise from motor traffic. Other measures to reduce noise will include: well-maintained carriageway surfaces and utility access covers; campaigns to reduce engine idling and the inappropriate use of horns; and working with the emergency services to reduce the use and volume of sirens.

We will work with the City of London Police to undertake targeted noise enforcement of motor vehicles that do not comply with legal requirements to maintain an appropriate/type approved exhaust or are not within legal decibel limits for the vehicle type.

Proposal 35: Reduce noise from streetworks

The City Corporation will manage and seek to reduce the noise impacts of streetworks through the Code of Practice: Minimising the Environmental Impact of Streetworks. This requires contractors working for the City Corporation and third parties to use the 'best practicable means to minimise the effects of noise and dust, including:

- Restricting periods of operation of noisy activities
- Undertaking liaison with neighbours
- Using less noisy methods and equipment
- Reducing transmission and propagation of noise, for example by using noise enclosures or barriers
- Managing arrangements including contract management, planning of works, training and supervision of employees to ensure measures are implemented

A review of the Code of Practice will be undertaken by 2020 to ensure it reflects best practice, with further updates as required. The review will also consider how we can better work with TfL, utility companies and contractors to improve the level of adherence to the Code.

Proposal 36: Encourage innovation in air quality improvements and noise reduction

We will work with the Government, TfL, industry and other partners to encourage the development of innovative solutions to reduce transport related noise and emissions. For example, by supporting trials, sponsoring competitions and awards, and hosting conferences and seminars.

Proposal 37: Ensure street cleansing regimes support the provision of a world-class public realm

The City's street cleansing regime will ensure all walking routes, cycle routes and public realm areas as well as streets are cleaned to a high standard and kept free of litter.

We will reduce litter from smoking, working with Public Health to support campaigns and initiatives to stop smoking and, if necessary, prosecuting offenders.

We will continue to work with businesses to minimise the impact of waste collection on the public realm, including through time banded collections that restrict the times when rubbish and recycling can be left on the street.

Committee(s)	Dated:
Port Health and Environmental Services Planning and Transportation	05/03/2019 18/03/2019
Subject: Construction Levy - Code of Practice for Deconstruction and Construction Sites Ninth Edition 2019	Public
Report of: Interim Director of Markets and Consumer Protection Chief Planning Officer and Development Director	For Information (PHES) For Information (PT)
Report author: Robin Whitehouse, Pollution Control Team Manager	

Summary

The City of London Corporation Code of Practice for Deconstruction and Construction (the Code) Ninth Edition requires developers to pay a Monitoring Fee to assist the City of London to fund officers to liaise with and monitor developers and contractors undertaking development within the City of London to ensure that works meet the standards within the code and any scheme of protective works required through the planning process.

Construction sites have now triggered the Monitoring Fee and payment is now being sought from developers and contractors. These fees will be used to enhance the monitoring that is undertaken on construction sites to improve further the level of compliance.

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

This report details the processes that are now in place to implement the requirement of the Code.

Recommendation

It is recommended that, subject to comments received at your meeting;

- The contents of this report are noted
- That a further report is presented to this Committee annually detailing the activity associated with the monitoring contribution fees.
- This report is presented to the Planning and Transportation Committee (P&T).

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 City of London Corporation Code of Practice for Deconstruction and Construction sites Ninth Edition (the Code) 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 impact on neighbours due to deconstruction and construction activities affecting them through the development process.
2. 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.
3. 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.
4. To ensure that the City Corporation can adequately resource this activity and undertake the necessary monitoring and liaison a monitoring fee was introduced in the eighth edition of the Code, approved by Port Health and Environmental Services Committee (PHES) on 19th September 2017 and P&T on 3rd October 2017. The Code has since been updated (9th Edition) with minor changes to the code.
5. The Code and the associated fees are actioned through the Planning process. A condition (Appendix 1) is placed on appropriate developments that the Code shall be adhered to.
6. The Code also details the actions that can be expected from the Pollution Control Team in monitoring and liaising with developers and contractors. This includes advising applicants regarding the scheme of protective works, regular liaison including site visits, the timely processing of developers/contractors site hour variations, attendance at community liaison events, reviewing works programmes, noise and air quality monitoring, assistance with liaison with other regulatory bodies such as Highways and the assessment of monitoring data.
7. The Pollution Control Team has liaised with the Planning development team and finance teams to produce a framework for monitoring and managing the income from the fees. The flow chart shown in (Appendix 3) details the process of applying a condition to a planning permission through to the invoicing of the developer. This process will continue to be developed once significant funds start to be received.

8. The planning condition has been applied to relevant development from January 2018.
9. Due to the long lead time for many of the construction projects there is considerable delay between planning approval and the triggering of payment which is set at the commencement of deconstruction or construction works.

Key Policies and Proposals

10. The monitoring fee required by the Code will allow a greater ability to work proactively and should ensure wider compliance with the Code and 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.

Proposals

11. This report does not introduce new proposals but outlines progress on existing commitments.

Financial Implications

12. Appendix 2 Code of Practice for Deconstruction and Construction sites (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

13. The fees have been calculated on a full cost recovery basis, and will be updated annually by officers.
14. 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 fees are calculated on a full cost recovery basis so the monitoring scheme should be cost neutral overall.

15. Information relating to site commencement and site visits undertaken indicate that 35 sites may have now triggered payment under the condition and each of the developers has been written to advising them of the situation and that payment under the condition is due. A table of size of developments that have triggered and estimated payments due is shown below.

Site Category	Number of sites triggered*	Fee		Total**
		Year 1 £	Subsequent Years £	
1 (Large Major Development)	5	53,820	46,460	733,700
2 (Medium Major Development)	6	30,935	25,760	494,730
3 (Minor Development)	24	5,060	5,060	121,440
Total	35			

*This is subject to confirmation depending on individual site details

**This is based on an estimation of the duration of the projects as 3 years for category 1&2 and 1 year for category 3.

16. It is expected that there will be a need for additional staff during 2019/20 to undertake the necessary work regarding the sites that are now commencing. Any additional staff will be appointed on fixed term contracts and financed through the monitoring fee.
17. Existing work carried out by the Pollution Control team in relation to the Code will 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

18. 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

19. The Draft Code underwent full internal and external consultation in 2017 and the results of this were reported to PHES and P&T committees in 2017.

Conclusion

20. The monitoring fees required by the Code of Practice for Deconstruction and Construction Ninth edition have triggered and payments are now being requested. Subject to comments received at your meeting following on from receipt of the relevant fees the additional activities required will be undertaken to ensure the best environmental options in planning and managing construction and deconstruction are undertaken by contractors and developers. Additional staff will be appointed as necessary to undertake the work, ensuring that any additional staffing costs are met fully through the monitoring fee scheme.
21. Background Papers:

Code of Practice for Deconstruction and Construction Sites Ninth Edition

<https://www.cityoflondon.gov.uk/business/environmental-health/environmental-protection/Documents/Code-of-Practice-for-Deconstruction-and-Construction-Sites-9th-Edition.pdf>

Appendix 1

Approved Planning condition requiring compliance with the Code.

Appendix 2

Code of Practice for the Deconstruction and Construction sites Ninth Edition

Appendix 3

Process chart -application of condition to requesting payment.

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Appendix 1

Monitoring Fee Planning Conditions

- M10F 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 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 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.*

- M11G 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 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 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.*

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Appendix 2

City of London

Code of Practice for Deconstruction and Construction Sites

Ninth Edition

January 2019



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Foreword

This is the ninth 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 ninth edition of the code generally revises and updates the eight edition. It contains further guidance on the prevention of air pollution from activities on site, a minor revision to the schedule of monitoring contributions and changes to standard Saturday working hours.

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
December 2018

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Forward by Jeremy Simons

Chairman of Port Health and Environmental Services Committee

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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

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


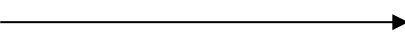
Site Sensitivity 	High	Category B Site	Category A Site	Category A Site
	Medium	Category C Site	Category B Site	Category A Site
	Low	Category C Site	Category C Site	Category B Site
		Minor Development	Medium Scale Major Development	Large Scale Major Development
		Size and nature of development 		

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

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

Figure 2.3 - Scope of Information to be Provided

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

Figure 2.4 - Scheme of Protective Works

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

- 2.4 For Category A, B and C 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 re-evaluate 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;

Fig 2.5 – Communication Requirements per Site Category	Category A Site	Category B Site	Category C Site
Identification of neighbours who may be affected	✓	✓	✓
Notification of works to Ward Member(s), neighbours and community groups	✓	possible	
Initial Consultation			
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	✓		
On-going Communication			
Regular communication e.g. newsletters	✓	✓	
Display board / information outside site	✓	✓	✓
Other Communication			
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);
 - 09:00 - 14:00 hours (Saturday);
 - No noisy working is permitted on Sundays, Bank or Public Holidays.

3.6 **Reduced Impact Hours**

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

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

'**reduced impact 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 reduced impact hours**

Outside '**standard hours**' and during '**reduced impact 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 '**reduced impact 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 any noisy activities within the '**reduced impact 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 the 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 to all occupiers (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 affecting all City occupiers 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, using low impact techniques such as bursting, munching, cutting or bending, if impact methods must be used then works should be undertaken 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/m² 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 Government's 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 PM₁₀ (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 deconstruction 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 (SPG): 'The Control of Dust and Emissions During Construction and Demolition'. 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/airqualityplanning

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 (Dust) 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, unpredictable air flow 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_{2.5} and PM₁₀. 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 PM₁₀ go above a set threshold. The threshold value, type and location of any monitoring equipment should be agreed with the Pollution Control Team in advance. The threshold value is normally initially set at 150µg/m³ for PM₁₀ 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 action 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 fueled 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 with a net power between 37kW and 560kW used in the 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 are 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. **Where the above commitments cannot be met the matter should be discussed and agreed with the Environmental Health Officer.**

Prior to the commencement of any works, all developments within the City must register relevant NRMM online at 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.

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.

- 4.13 **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, 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 A Scheme of Protective Works will need to be submitted to the City Corporation and approved prior to works commencing on-site; it 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 a 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; and
- **working methodologies and control 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 Mayor's SPG, the phases of 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, in discussion with the City Corporation, the AQDMP should detail why they have not been adopted.

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. *On/Off Site inspections:* Carry out regular 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); and
- checking buildings within 100m of site boundary (cleaning to be provided if necessary).
- c. Record inspection results, and make an inspection log available to the Pollution Control Team when asked. The frequency of site inspections should be increased (by those accountable for dust and air quality pollutant emission issues) when activities with a high potential to produce dust and emissions 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 complaint log available to the Pollution Control Team when asked.

4.23 **General site Management and Operations:**

The operator should ensure fumes and/or dust does not escape from the site and affect members of the public and the surrounding environment, the following should be adhered to:

- a. Use 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 a 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 bowsers
 - 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; and
- j. 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;
- i. The generation of dust whilst loading or unloading materials must be controlled; and
- 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 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 fully 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 City of London 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 is 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 CLAIRE 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

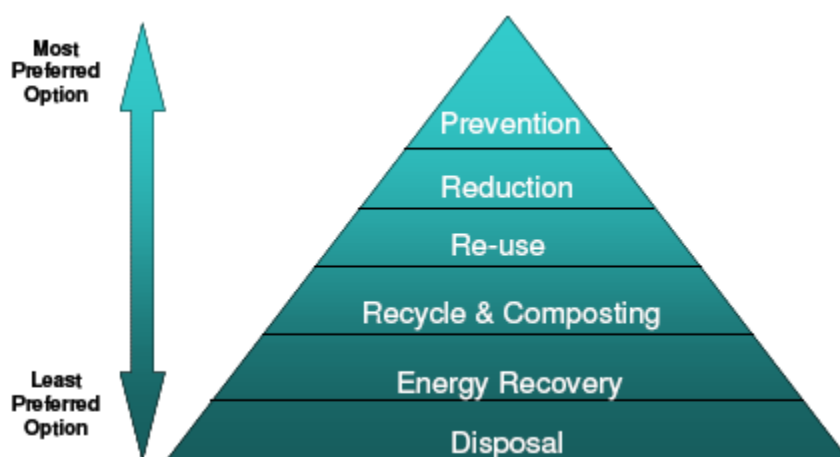
Summary

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 and 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). 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 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

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 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

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

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

Parking dispensations & Highway Closures: Tel: 020 7332 3553
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

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

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)

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

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

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 the City there are rodents present within the sewers and special rodent control is therefore required, historically the measures the City 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 City 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: -

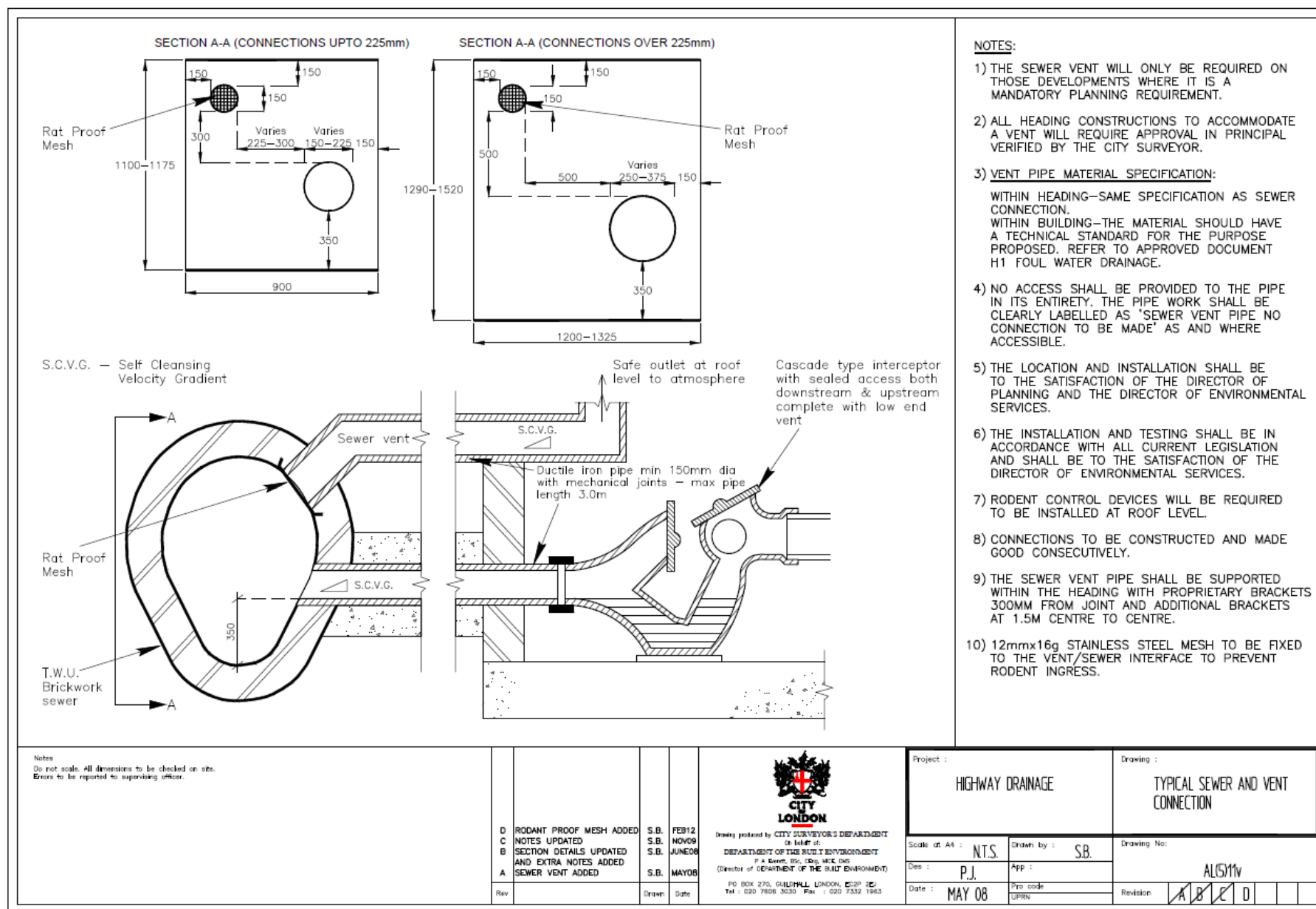
1. *Charging of costs and expenses involved in attending site and auditing works.*
2. *Copies of documents concerning any default being placed on our Land Charges Register and disclosed to all subsequent enquiries*
3. *Charging for remedial works done in default and costs recovered from responsible person(s)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



28/06/2008 16:17:26 Baynes, Scot H:\Projects\New Structures\CAD\HCHWAYS\Drainage & Sewer Subways - Caddes - 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

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

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

Appendix H

SITE HOURS VARIATION REQUEST SHEET

Department of Markets and Consumer Protection
Port Health and Public Protection – Pollution 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

This form must be completed and returned to the Pollution 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 an Environmental Health Officer.

Date of Application:	
Date(s) of Proposed Operations:	
Proposed Working Hours:	
Site Name and Address:	
Site Contact Name and Number:	
Site Contact Email Address:	
Details of Operation:	
Reasons For Operation:	
Contractor Company and Office Contact Details:	
Contractor Company Contact Details for Onsite Operations: (i.e. Name, Number, and Email)	
Plant and/or tools to be used:	
Mitigation measures to minimise levels of noise:	

<p>Details of residential locations, hotels and other businesses likely to be affected.</p> <p>Access to our interactive map is available here.</p>	
<p>Copies of communications to residents and businesses must be attached to this application. Out of hours activities will not be approved unless these are received.</p>	

The above works are approved, subject to the following conditions and comments.

Environmental Health Officer:	
Signature:	
Date:	

The City of London Corporation is a data controller, and processes personal data in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. For full details of how and why the City of London Corporation processes personal data, please refer to the full privacy notice at www.cityoflondon.gov.uk/privacy. Alternatively, you can request a hard copy. Please direct all data protection queries to the Information Compliance Team at information.officer@cityoflondon.gov.uk



APPENDIX I

Environmental Health MOBILE PLANT & STRUCTURES NOTIFICATION

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.

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

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

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

Authorisation Declaration (to be signed by environmental officer)

State Name: (of environmental officer) [see Map]	Authorised Signature:	Date: (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:

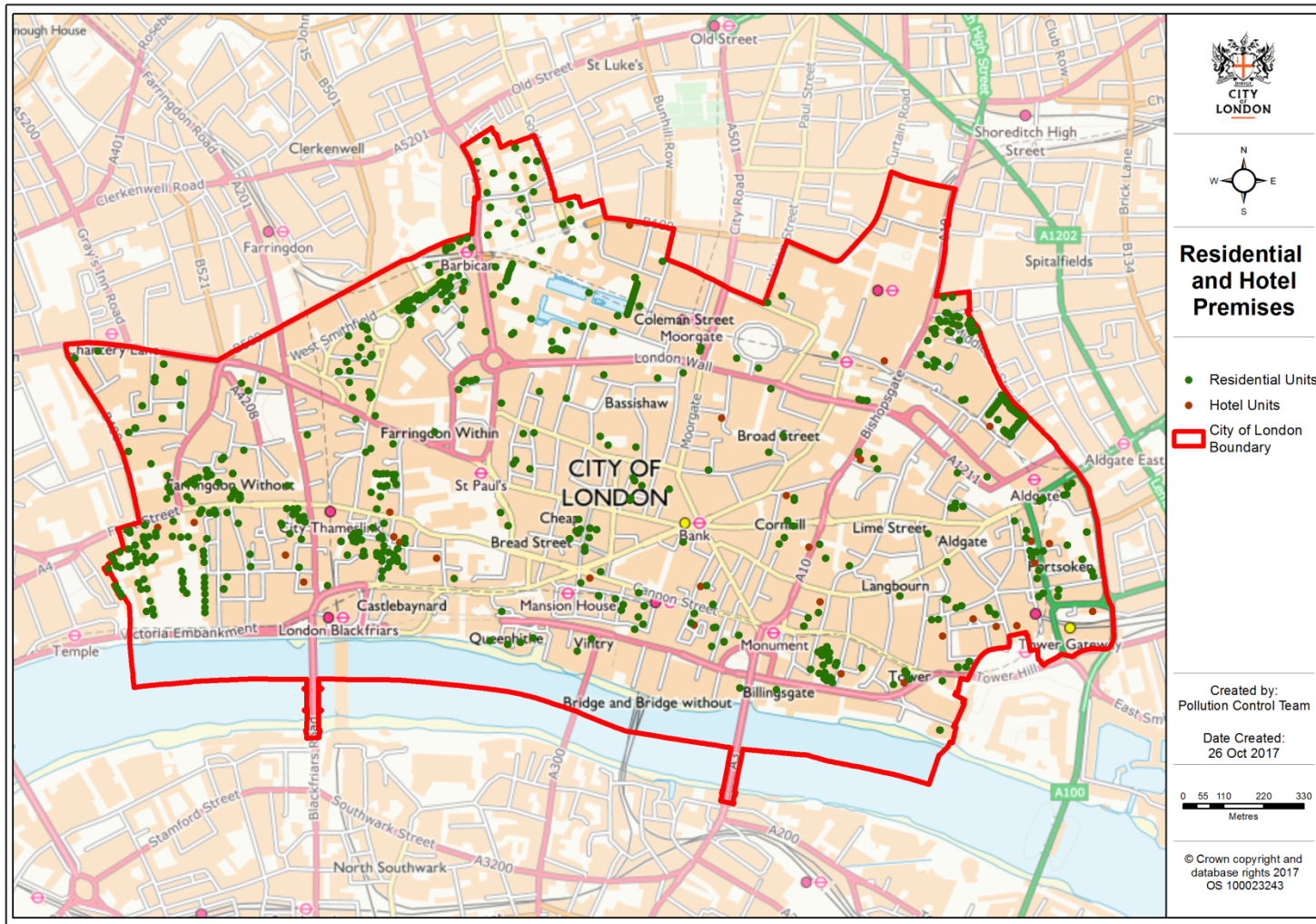
If you fail to produce this form (signed by environmental health and crane company) at your appointment, you may have to book another appointment which will delay your operation.

To be completed by Street Management Services Officer at appointment:

INDEMNITY NUMBER:		DATES AGREED:	
SMS OFFICER:			
DATE:			

Appendix J

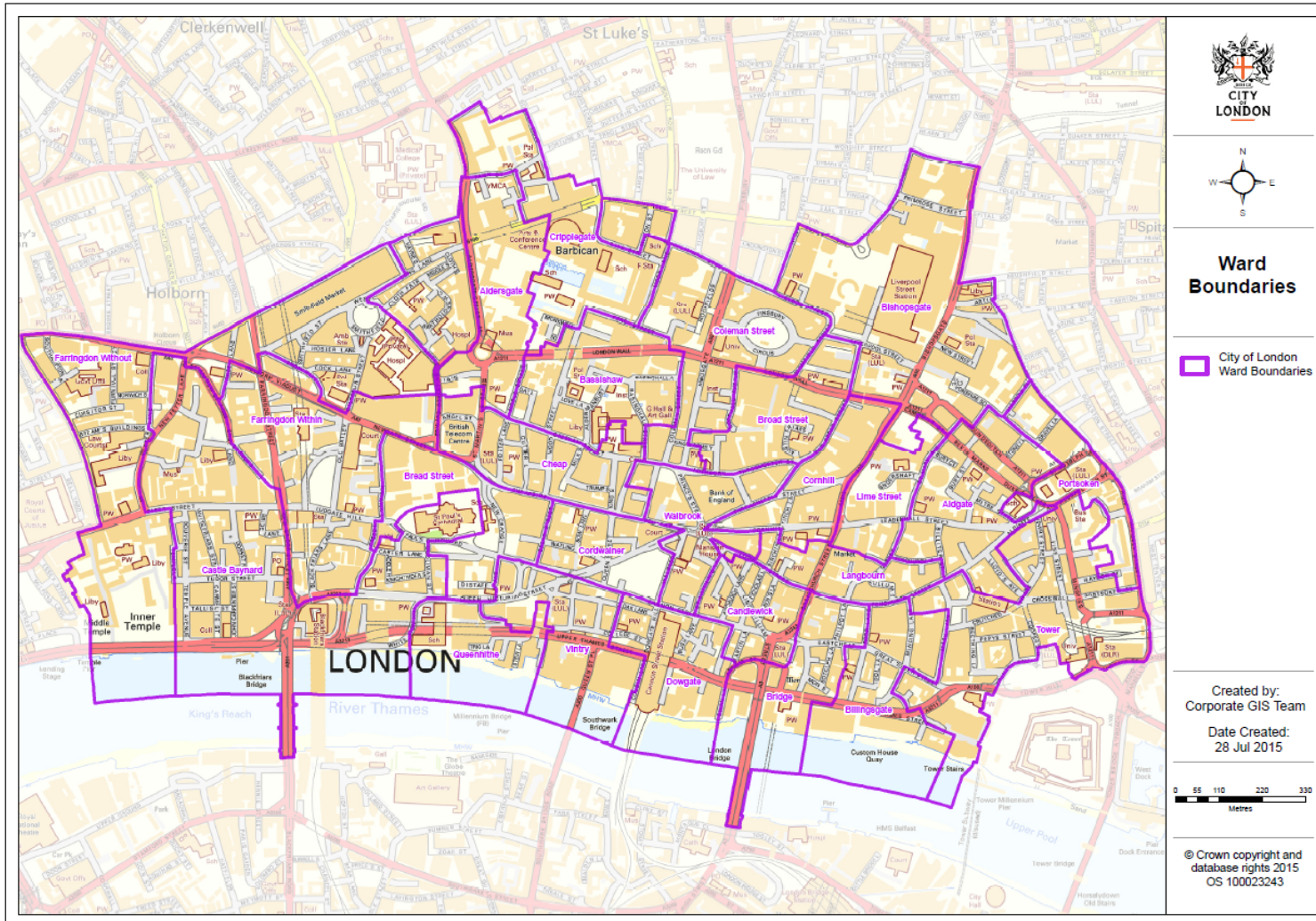
Search online to view the most up-to-date: "Planning/Property and Land Use" layers shown below
<http://www.mapping.cityoflondon.gov.uk/geocortex/mapping/?viewer=compass>



Appendix K

Search online to find a ward member:

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.

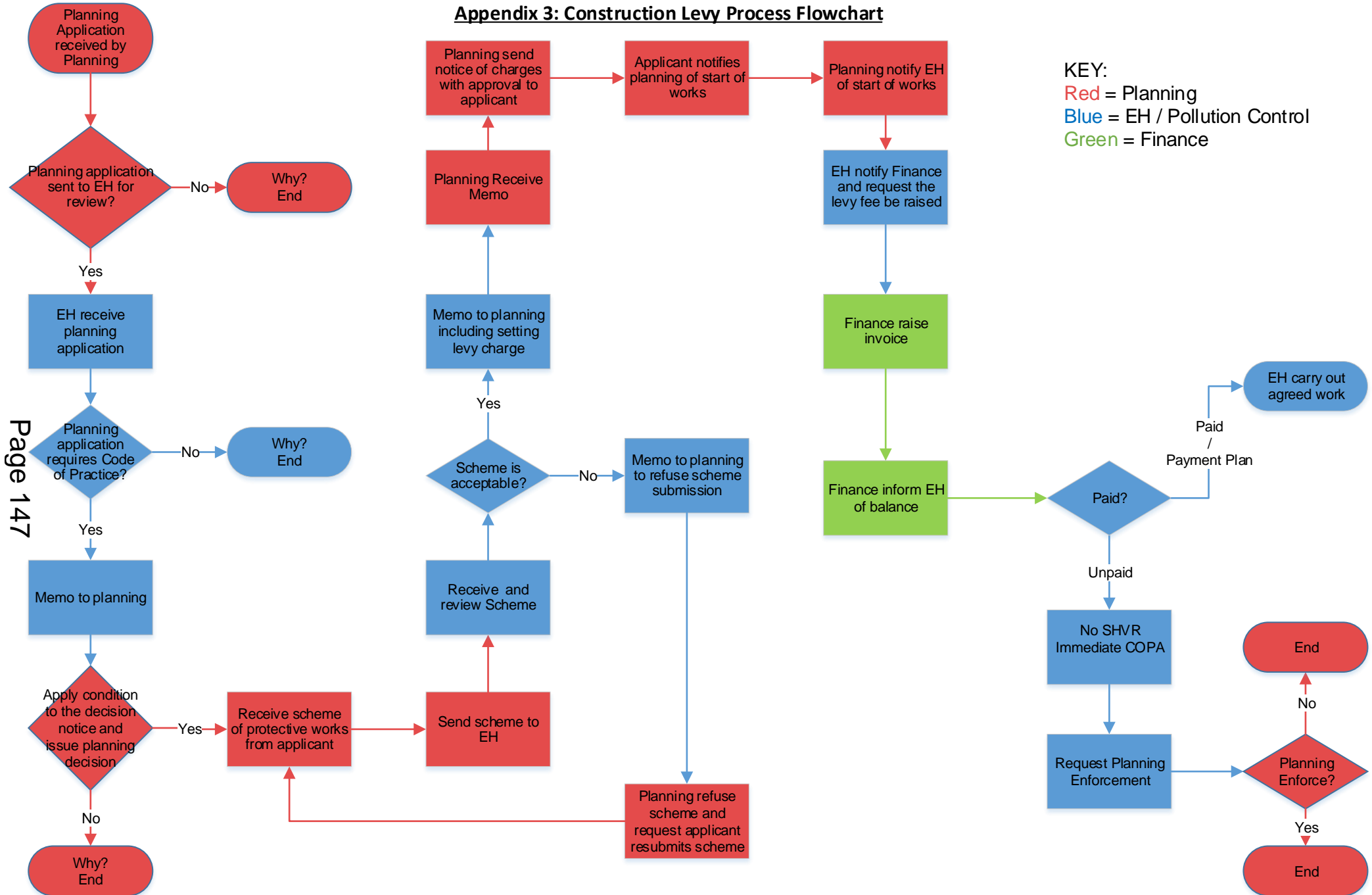
Category 1 Site (site example: construction and or deconstruction sites)	Services required
	Advice to applicants relating to environmental requirements e.g. full scheme of protective works including noise and dust mitigation measures. Meetings and follow up correspondence as required for first year site 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.
	Cost for Category 1 site: £53,820 for first year of project. £46,460 for each year thereafter.

Category 2 Site (site example: retainment of façade with internal works)	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 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.
	Cost for Category 2 site: £30,935 for first year of project. £25,760 for each year thereafter.
Category 3 Site (site example: involving a refurbishment only)	Services required
	Complaints investigation and follow up.
	Review and approval of Site Hours Variation Requests.
	Cost for Category 3 site: £5,060 per annum.

There will be some circumstances where the impact of the works will be very small, for example where planning permission was required because of a buildings listed status and the works are very minor. In such cases the sites will be considered "out of category" and will not be required to pay any fee. Such consideration will be on a case by case basis and such exemptions are expected to be few.

Appendix 3: Construction Levy Process Flowchart

KEY:
 Red = Planning
 Blue = EH / Pollution Control
 Green = Finance



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Committee(s): Policy & Resources Committee – For decision Planning & Transportation Committee – For Information Port Health & Environmental Services Committee – For information Open Spaces Committee – For information	Date(s): 21/02/2019 19/02/2019 05/03/2019 08/04/2019
Subject: The Transition towards a Zero-Emission Fleet	Public
Report of: Department for Built Environment and Chamberlain's	For Decision
Report author: Vince Dignam (DBE) and Natalie Evans (CHB)	

Summary

Around half of emissions of oxides of nitrogen (NOx), which contribute to illegal levels of nitrogen dioxide (NO2), and particulate matter (PM) come from transport. These pollutants are collectively estimated to cause around 9,400 equivalent deaths every year in Greater London and impose an economic cost between £1.4bn - £3.7bn a year.

In response to this, City Corporation officers have worked to; reduce City of London Police and corporate fleet, trial new electric technologies, replace diesel vehicles with electric, hybrid or petrol models, install electric vehicle charging infrastructure and encourage our supply chain to minimise their emissions.

Part of the Mayor of London's approach to improving air quality is the Ultra Low Emission Zone (ULEZ) initiative, which will impose a daily charge on vehicles operating in the Central Charging Zone with emissions of NOx and PM higher than the specified requirements. The first phase of ULEZ comes into effect on 08 April 2019.

The introduction of ULEZ has highlighted the need for a clear corporate policy on fleet reduction, replacement or retrofitting to accelerate the City's transition to a zero-emission fleet. The purpose of this report is to set out an ambitious yet practical policy, which requires departments to opt for the cleanest possible vehicle or other solution, in line with operational need, technology availability and best value. It proposes this policy be implemented consistently and rigorously through enhanced governance by the Transport Coordination Group (TCG).

The proposed policy would see the following vehicles removed, replaced or retrofitted:

- ULEZ 2019 non-compliant vehicles operating in the Square Mile, immediately (29 Corporate and 44 police vehicles)
- Historically exempt/ residential (temporarily) exempt and ULEZ-compliant fossil fuel vehicles of reputational significance, immediately (5 VIP/ Mayoral vehicles)
- All remaining vehicles used outside the Square Mile/ ULEZ Zone, as and when they reach operational end-of-life or lease

Recommendation(s)

Policy & Resources Committee is asked to:

- Endorse a new policy which requires departments to apply the following priority order to decision-making, when an existing vehicle is non-compliant with air quality regulations or comes to the operational end of life:
 1. not replace the vehicle and cover operational requirements with other available vehicles
 2. swap the vehicle with a low emission equivalent currently being used outside the ULEZ 2019 Central Charging Zone (Square Mile)
 3. replace or retrofit the vehicle with the cleanest possible alternative that:
 - a) meets operational need
 - b) applies the following hierarchy:
 - i. Full electric
 - ii. Plug-in hybrid
 - iii. Petrol hybrid (regenerative braking)
 - iv. Petrol
 - v. (Euro 6/ VI) Diesel
 - c) utilises sufficiently reliable technology and
 - d) constitutes best value for money within the vehicle class.

Planning and Transportation Committee, Port Health & Environmental Services Committee and Open Spaces Committee are asked to:

- Note the report.

Main Report

Background

1. Around half of emissions of oxides of nitrogen (NOx), which contribute to illegal levels of nitrogen dioxide (NO₂), and particulate matter (PM) come from transport. These pollutants are collectively estimated to cause around 9,400 equivalent deaths every year in Greater London and impose an economic cost between £1.4bn and £3.7bn a year.
2. The Ultra Low Emission Zone (ULEZ) is a Mayor of London initiative designed to improve air quality, which will impose a daily charge on vehicles with emissions of NOx and PM higher than the specified requirements. Daily charges are £12.50 per day for smaller vehicles, £100 per day for larger vehicles (>3.5 tonnes).
3. The first phase of ULEZ comes into effect on 08 April 2019 and covers vehicles operating in the Central Charging Zone. See Appendix 1 for a map of the area covered. The second phase of ULEZ comes into force on 25 October 2021, covering the area between the North and South Circular. See Appendix 2 for a map of the area covered.
4. As a responsible business and in alignment with the City's Corporation's ambition to improve air quality, 'phase one' of the transition to a zero-emission fleet has involved officers working to; reduce City of London Police and corporate fleet, trial new electric technologies, replace diesel vehicles with electric, hybrid or petrol

models, install electric vehicle charging infrastructure and encourage our supply chain to minimise their emissions. Officers have also been involved in industry boards and with manufacturers and other counterparts to progress improvements in air quality alongside road danger reduction. Details can be found in Appendix 3.

Current Position

5. There are 29 corporate vehicles operating in the Square Mile that do not comply with ULEZ 2019 emissions standards and 54 City of London Police vehicles, ten of which have a 'sunset period' until October 2021 as further time is needed to develop some technology types used by the emergency services.
6. The City Corporation has a Transport Coordination Group (TCG), currently chaired by the Department of Built Environment. The group consists of representatives from across the organisation, including Chamberlain's, Markets and Consumer Protection, Open Spaces, Town Clerks and the Built Environment. All vehicle procurement and leasing is governed by the TCG, which provides scrutiny on whether or not there is an operational need for the vehicle along with all other legislative, operational and policy requirements.
7. The introduction of ULEZ has highlighted and accelerated the need for a clear corporate policy on fleet reduction, replacement or retrofitting.

Options

8. The purpose of this report is to set out an ambitious yet practical policy, which requires departments to opt for the cleanest possible vehicle or other solution, in line with operational need, technology availability and best value. It proposes this policy be implemented consistently and rigorously through enhanced governance by the Transport Coordination Group (TCG). Alternative options available to the City Corporation include:
 - a) Electing not to replace Square Mile vehicles and pay the daily ULEZ charge for all non-compliant vehicles. This would cost £300,000 per year and could imply significant reputational risk.
 - b) Electing to only replace those vehicles that do not meet ULEZ 2019 requirements immediately, delaying the replacement of historical vehicles and others forming part of the Mayoral/ Shrieval fleet until required to do so by the Mayor of London in October 2021. This could have significant reputational impacts due to the visibility of these vehicles and the Lord Mayor's role to champion the City of London as a world leader as part of this year's Mayoral Programme (see Appendix 4 for further details).
 - c) In the interest of cost saving, electing not to buy electric and replace all vehicles with hybrid/petrol where possible or if not Euro VI/6 diesel models, even if electric vehicles are available and relatively prevalent. This would directly contradict the City Corporation's 'No Diesel unless absolutely operationally necessary' Policy and would go against all other policies, strategies and programmes outlined in Appendix 4. As such it would also imply reputational

risk. According to current cost estimations, electing not to buy new electric vehicles would save £180k. This saving would be offset by the fact that increased congestion charges on fossil fuel vehicles are coming in as part of ULEZ 2021.

Proposals

9. The proposed policy would require departments to apply the following priority order to decision-making when an existing vehicle is non-compliant with air quality regulations or comes to the operational end of life:
 1. not replace the vehicle and cover operational requirements with other available vehicles (*e.g. hiring prestige vehicles for specific events, using electric cargo bikes, reconfiguring operations to make fuller use of existing fleet, using corporate contracts such as couriers, pooling resources between departments to share similar vehicles*)
 2. swap the vehicle with a low emission equivalent currently being used by the City Corporation outside the ULEZ 2019 Central Charging Zone (Square Mile)
 3. replace the vehicle with the cleanest possible alternative that:
 - a) meets operational need
 - b) applies the following hierarchy. (*Correct as of February 2019 but to be reviewed regularly by the Transport Coordination Group (TCG) and updated according to advances in vehicle technology and availability of infrastructure of e.g. hydrogen*):
 - i. Full electric
 - ii. Plug-in hybrid
 - iii. Petrol hybrid (regenerative braking)
 - iv. Petrol
 - v. (Euro 6/ VI) Diesel
 - c) utilises suitably reliable technology (*incl. trials and availability of maintenance and repair facilities*) and
 - d) constitutes the most cost-effective option within the vehicle class.
10. The following be removed / replaced / retrofitted according to the proposed policy:
 - ULEZ 2019 non-compliant vehicles operating in the Square Mile, immediately (29 Corporate and 44 police vehicles)
 - Historically exempt/ residential (temporarily) exempt and ULEZ-compliant fossil fuel vehicles of reputational significance, immediately (5 VIP/ Mayoral vehicles)
 - All remaining vehicles used outside the Square Mile/ ULEZ Zone, as and when they reach operational end-of-life or lease
11. It is proposed that the Transport Co-Ordination Group be Chaired from February onwards by the Commercial Director, in order to ensure best value solutions are opted for by departments, in line with all other aspects of the newly proposed policy.
12. After this stage of the transition to a zero-emission fleet in response to ULEZ 2019 has been achieved, collaboration between the TCG and Commercial Fleet Management (CFM) review team will take place, who will seek to future proof against increasingly rigorous legislation, whilst at the same time taking a fresh look at the way the City uses its fleet as a whole, considering the corporate commercial opportunities for the organisation and the ability to gain service improvement.

Corporate & Strategic Implications

13. A table outlining the policies, strategies and programmes that underpin a transition to a low/zero emission fleet can be found in Appendix 4. It covers relevant aspects of the City Corporation's Air Quality Strategy, 'No Diesel' Policy, Responsible Procurement Strategy, Responsible Business Strategy, Corporate Plan, Mayoral Programme, draft Transport Strategy and draft Climate Action Strategy.

Implications

14. The table below sets out predicted costs according to departmental preferences on replacement vehicles. This is the maximum cost range as it does not factor in residual (trade in) values of existing fleet or fuel savings. Appendices detailing all intended vehicle models and associated costs are available on request, but it should be born in mind that each vehicle replacement request will be scrutinised on a case-by-case basis as part of TCG's governance procedures, so figures will be continuously reviewed and amended.

Fleet	Total purchase cost	Equivalent annual cost to purchase (7 years life)	Lease costs per annum	Total lease cost (3 year term)
Corporate	£1.1m - £1.5m	£153k - £221k	£240k - £355k	£775k - £1.2m
Police	£1.7m - £1.8m	£247k - £260k	n/a	n/a

15. A parallel report on ULEZ funding (see background papers) was submitted to Finance Committee on 19 February 2019 proposing the specific mechanism by which the costs of procuring/ leasing vehicles could be met by departments, if they do not have sufficient local risk budget available to meet the total cost. The report sets out a process whereby each department would submit a fleet business case, this would consider the age, condition and a residual (trade in) value estimate of the current vehicle along with details of the proposed replacement options with associated costs. It would also include any current local risk budget set aside for vehicle replacement and in those cases where an electric vehicle is replacing a conventional fuel vehicle, existing fuel costs would be provided.

16. The 'Net Uplift Cost' for the vehicle would be provided via a loan and transferred to the local risk budget, with repayments phased over an agreed period no longer than 5 years. The loan would be managed via the Chamberlain's Department, would be set at 2% above base rate, and would cease to be available from the financial year 2023-2024 when all fleet vehicles should have been transitioned.

Figure A – Net uplift Cost per vehicle formula

Net Uplift costs = New Vehicle Costs – Current Local Risk Budget

(Existing Budget + trade in value + fuel budget offset)

17. A project to install new electric charging infrastructure will progress through the gateway process as soon as a clearer prediction can be made on the number of electric vehicles that will be bought/ leased/ retrofitted. This prediction depends on Policy & Resources Committee endorsing this report, in which case there is likely

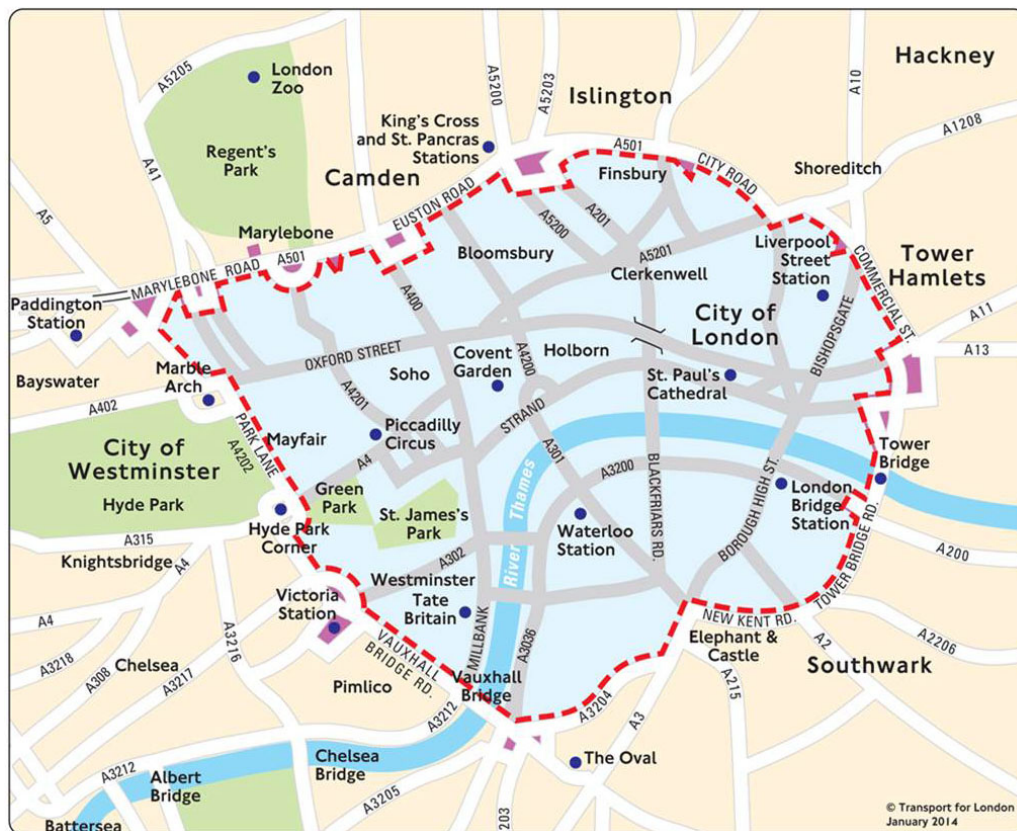
to be eight charge points installed at five locations. If an alternative option is selected, infrastructure decisions will be adapted accordingly. The estimated timeline for completion is July - Sept 2019. The Cleansing team within Department for Built Environment will work closely with City Surveyor's, City Procurement and other relevant departments to arrange workable contingency measures to charge electric vehicles until the infrastructure is ready.

Conclusion

18. The harmful levels of air pollution in the Square Mile are known to be a health hazard and the City Corporation has committed to improving air quality. The Mayor of London's strategy on air quality and introduction of the ULEZ along with increasingly rigorous emissions legislation, are key initiatives which the City Corporation supports. It is therefore important the City Corporation is seen to lead by example and reduce the emissions from its activities as far as reasonably possible.

Appendices

1. The geographical area covered by ULEZ 2019 © Transport for London 2014



2. The geographical area covered by ULEZ 2021 © ThumbSnap.com



3. Phase One achievements

Work undertaken as part the City Corporation's Transition to a Zero-Emission Fleet so far has involved officers working to achieve the following:

- i. reduce City of London Police fleet (from 125 to 91) and corporate fleet (from 200 to 118)
- ii. trial eight new electric technologies over the last three years, including the UK's first fully electric Refuse Collection Vehicle (RCV).
- iii. replace diesel vehicles with electric, hybrid or petrol models – we now operate eight electric vehicles and four hybrid models and have swapped two diesel chauffeured vehicles to petrol.
- iv. liaise with the Lord Mayor's Office to undertake a series of trials and three demonstrations giving a holistic view of available hybrid and electric vehicles
- v. install electric vehicle charging infrastructure – 50 charge points are now available to the public in the Square mile in City Corporation owned car parks and 30 points are available in the Barbican Resident's car park.
- vi. Survey five City Corporation sites to assess costs and viability of installing additional infrastructure needed to charge new electric vehicles added to the corporate fleet in 2019. This project will be progressed through the gateway process to seek funding for these charge points and associated labour. The number of charge points will be determined by the final decision made on this current report.
- vii. incorporate requirements for phasing in full electric refuse collection and other alternative fuel vehicles into the corporate waste collection contract.
- viii. encourage our supply chain to minimise their emissions – every contractor that has tendered for work involving vehicle movements in the City is required to undertake at least one action of their choice as part of the contract (e.g. green driver training, trailing clean vehicle technologies etc.).
- ix. Officers are involved in industry boards and with manufacturers and other counterparts to progress improvements in air quality alongside road danger reduction including working with six manufacturers on concept vehicles, being board members on the Fleet Operator recognition Scheme (FORS), CLOCs and TfL's LoCity initiative and hosting the international Future Fleet Forum for the last two years.

4. Existing City of London policies, strategies and programmes that underpin a transition to a low/zero emission fleet

	Guidance on fleet, air quality and related topics
Air Quality Strategy – Square Mile. (New draft for consultation in March 2019)	<ul style="list-style-type: none">• Focus on air quality monitoring; demonstrating leadership, collaborative action; reducing emissions from a range of sources in the Square Mile and raising awareness• Work is underway to pilot an ultra-low emission vehicle only access restriction in Moor Lane. This pilot will provide useful information for local zero emission zones as detailed in the draft Transport Strategy and improvements in air quality in Beech Street
No diesel policy	<ul style="list-style-type: none">• Driven by the Air Quality Strategy 2015 – 2020, a 'No Diesel' policy was implemented in January 2016, banning the purchase or lease of diesel vehicles by departments unless absolutely operationally necessary. This is managed and overseen by TCG.

Transport Strategy (draft) Proposal 33:	<ul style="list-style-type: none"> Commits to making the City of London's own vehicle fleet zero emissions', the commitment states 'the City Corporation will upgrade its vehicles which operate in the Square Mile to meet the standards we set for local zero emission zones. Contractors vehicles that operate within the Square Mile will also be required to meet these standards. Where possible charging infrastructure in City Corporation's operational sites will be made available to contractors' vehicles'.
'Shaping Tomorrow's City Today'	<ul style="list-style-type: none"> The Mayoral Programme aims to promote innovation and technology, champion digital skills and address digital and social inclusion, with a specific commitment to electrify the City Corporation's fleet.
Climate Action Strategy (in progress)	<ul style="list-style-type: none"> The Zero Emissions City report estimates that if all vehicles in the City switched to 100% renewable electricity the City's overall carbon emissions would decrease by 7%. This would make a significant contribution to the aim of becoming a zero carbon City by 2050. Electrifying the City Corporation's fleet would demonstrate leadership on this agenda providing evidence to City businesses of the feasibility of using an all-electric fleet and encouraging them to follow suit.
Responsible Business Strategy	<ul style="list-style-type: none"> Minimise the use of diesel vehicles being used by staff and Members to travel to and from work and during work, by promoting and facilitating more environmentally-friendly forms of travel. Significantly increase the number of clean vehicles in our fleet and continue to trial new technology. Encourage and facilitate the uptake of clean alternative vehicles throughout our supply chain. Increase the number of electric vehicle charge points across our sites
Corporate Plan	<ul style="list-style-type: none"> We have clean air, land and water and a thriving and sustainable natural environment' Provide a clean environment & reduce negative effects our activities.
Responsible Procurement Strategy	<ul style="list-style-type: none"> The 'Procurement Policy to support the Air Quality Strategy', which forms part of the Responsible Procurement Strategy lists actions to comply with the City Corporation's Air Quality Strategy, Transport Policy, or both, including disallowing the purchase of diesel vehicles, requiring investigation by officers into alternative fuel vehicles, setting emissions requirements for non-road mobile machinery (NRMM) and committing to the use of petrol-hybrid taxis as a minimum within corporate contracts and agreements. Further intended actions to support the above include exploring the use of consolidation centres for our own deliveries and those of works contractors, incentivising relevant suppliers to use zero emission capable vehicles.

Background Papers

ULEZ Funding – Finance Committee 19/02/2019

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Committee(s):	Date(s):
Open Spaces Port Health & Environmental Services	
Subject: Agriculture Bill and Fisheries Bill	Public
Report of: Remembrancer Report Author: Philip Saunders	For Information
<p style="text-align: center;">Summary</p> <p>Both Bills are prompted by the UK's departure from the EU. The Agriculture Bill</p> <ul style="list-style-type: none"> • makes provision to replicate funding currently provided by the EU's Common Agricultural Policy • makes substantial changes to the way in which public funding for agriculture will be assessed <p>The Bill is of interest to the City in relation to certain activities in open spaces.</p> <p>The Fisheries Bill</p> <ul style="list-style-type: none"> • sets out a framework for rules about the licensing of fishing boats, unauthorised catches of sea fish and fish stock conservation. The Bill is not of direct interest to the City Corporation. <p>Recommendation</p> <ul style="list-style-type: none"> • It is recommended contents of this Report are noted. 	

Main Report

Background

1. Describing the aims of the Agriculture Bill, Environment Secretary Michael Gove said "Every measure in the Bill is designed to ensure that our farmers receive the support that they deserve to give us the healthy food that we enjoy and the beautiful rural environment on which we all depend". He told MPs that during the consultation ahead of the Bill "not one of the submissions we received requested that the CAP status quo should remain". Defining 'public good' for the purposes of the Bill, he said it was "about clean air, soil quality and making sure that we invest in carbon sequestration, that farmers get supported for the work that they do

to keep our rivers clean and our water pure, that the public have access to our glorious countryside and that the contribution that farmers make to animal health and welfare is recognised. We all benefit from those public goods, but, at the moment, our farmers are not adequately rewarded for them”.

2. Gove’s Labour shadow, Sue Hayman, said her party “absolutely agrees with the need to shift financial assistance in the way proposed by the Bill, from support for simply owning land to the principle of public money for public good to help those who work our land to restore and improve the natural environment. This has been rightly welcomed by environmental campaigners as a real turnaround in the Government’s thinking. I join those campaigners in applauding the Secretary of State in this regard”. The Bill did not, however, go sufficiently far on three areas: targets for environmental improvements; a commitment to “producing healthy, home-grown food in a post-Brexit world”; and “protecting the people of this country from food poverty”.
3. Introducing the Fisheries Bill, Michael Gove garnered agreement across the House when he stated that “the common fisheries policy did damage. It did environmental damage to fish stocks and to our marine environment. It also did economic damage to the fishing industry, which has been such a critical part of this country’s heritage and which can again become a vital part of our economic future. The common fisheries policy did social damage as well, because coastal communities suffered. Their economies were hollowed out and businesses collapsed as a result of its operation”. The Bill provides, Gove explained, for the UK to be an independent coastal state from 2021.
4. Labour’s Sue Hayman supported the Bill’s broad aims and indicated her party would support the proposals. She protested, however, that the proposals did not go sufficiently far to ensure catch quotas were evenly spread amongst fishermen.

The Agriculture Bill

2. The City Corporation cares for almost 12,000 acres of natural and historic open space. They include internationally important wildlife habitats, Sites of Special Scientific Interest and National Nature Reserves for the public to enjoy. In Epping Forest and Burnham Beeches the management of the ancient wood pasture landscape is undertaken in a way that is in keeping with its ecology built up over many centuries. In sympathy with ancient methods of woodland management, areas of trees are pollarded on a

rotating basis, so as to allow cattle to graze, thus reducing the impact on the land and maintaining delicate forest ecosystems.

5. Cattle are grazed because of the ecological and historic value they bring to the wood pasture landscape. The methods used to maintain and preserve Epping Forest have remained substantially the same for hundreds of years.
7. The Bill is an enabling Bill which creates many delegated powers. It sets out a framework for the UK's departure from the Common Agricultural Policy (CAP) and for a replacement system based on the use of public money for 'public good'. It also makes provision for a change to 'farming' payments in the long term.

Common Agricultural Policy

8. CAP is a highly complex system of agricultural subsidy. In England, broadly stated, the resulting payments fall into 3 categories – basic payments, green, and young farmer. Basic payments are made direct, they are decoupled from production and are based on the hectares farmed. The amount changes depending on other payments such as those made under the green or young farmer categories. The full amount of direct payments is only made where the farmer complies with a range of other EU rules (eg on plant health, water resource protection and food safety).
9. The current arrangements under CAP will continue post-Brexit because the laws governing the scheme will become 'retained EU law'. In relation to the current subsidy framework, there will be a transition period of at least 7 years during which direct payments based on CAP will be phased out. The Bill creates a power for the Government to modify elements of the retained CAP regulations regarding the finance, control and reporting regime that applies across the CAP. The modification powers could, for example, allow the government to change elements of the inspection regime or system of penalties. The Bill creates powers to repeal EU aid schemes for fruit and vegetable producer organisations. The Bill clarifies that existing rural development payment schemes will continue (even if the overall rule framework were to change).

Public Good payments

10. The Government's aim is to move to a new Environmental Land Management Scheme which will make payments for 'public good' in farming and land management. Farmers are already familiar with

schemes such as the ones sketched in the Bill – the Countryside Stewardship scheme is one example. Given that the Bill creates only a high-level framework, details of the future schemes are not yet available.

11. The Bill provides a power that would allow the government to pay farm support in a lump sum so as, for example, to give a farmer the ability to make a substantial capital investment.
12. Reaction from farming organisations and environmental groups has been broadly supportive but some concerns have been expressed regarding the certainty of long-term funding arrangements.

The Fisheries Bill

13. Under the Bill it is proposed that the existing rights of EU nations to access UK waters will be revoked and the UK will licence individual vessels from other nations. Ministers have repeatedly asserted that the Bill, similarly to the Agriculture Bill, will focus on conservation and environmental matters.
14. The Bill introduces a new system similar to the widely-commended system operated in New Zealand which will allow fishermen to catch and land ‘bycatch’ but, in relation to fish thrown back to the sea, there would be fines for exceeding throw-back limits. This provision is intended to gradually eliminate discards of fish, on a case-by-case basis, by avoiding and reducing, as far as possible, unwanted catches, and by gradually ensuring that catches are landed.

Consultation

15. The Markets & Consumer Protection has been consulted in the preparation of this Report.

Conclusion

16. Some City Corporation open spaces receive a relatively modest amount of EU funding which helps to support its environmental and farming management. Higher level stewardship payments form a substantial part of this funding in recognition of the sympathetic stewardship carried out by the City Corporation.
17. Given the Government’s commitment to continue to provide the same cash total in funds (approximately €4bn per year) for farm support across the UK until the end of this parliament, expected in 2022, it is not

anticipated that there will be any funding issues. Indeed, if the Bill's proposals to give greater weight to the quality of environmental stewardship are enacted, it is possible that the City's sensitive stewardship of its open spaces will receive additional government assistance. The City Corporation has given support to funding methodologies which recognise high-quality management of the landscape and promote care for ecologically important areas, land heritage and sensitive sites.

18. In relation to fisheries, the City Corporation's activities as the London Port Health Authority for the tidal Thames relate to the collection of shellfish and dispatch of the same to laboratories for testing.

Philip Saunders

Parliamentary Affairs Counsel

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Committees: Port Health & Environmental Services <i>[for information]</i>		Dates: 05 March 2019
Subject: Drinking Fountains – Delivering Additional Water Refill Points in the City’s Public Realm Unique Project Identifier: 12015		Progress Report Next gateway to be passed: Outcome report (Gateway 6)
Report of: Director of the Built Environment Report Author: Emmanuel Ojugo		For Information
<h1>PUBLIC</h1>		

Dashboard Coversheet attached

1. Reporting period	1.1 This report covers the period since the Gateway 5 approval (7 December 2018).																				
2. Progress to date	<p>2.1 The Gateway 5 report set out the eight confirmed locations for new refill points in the City, with another two being delivered as part of existing public realm projects. A map of the existing and proposed water refill point sites in the City is shown in Appendix 2. Further information showing proposed water refill points by location are shown in Appendix 5.</p> <p>2.2 Since the approval of the Gateway 5 report officers have been liaising with Thames Water to develop a detailed installation programme. The current programme for delivery of the new units is shown in Appendix 3.</p> <p>2.3 Officers have also been assessing the usage of the City’s existing refill points. A summary of the usage figures for these units is shown in Table 1 below; a full breakdown by month is shown in Appendix 4.</p> <p>Table 1: Summary of Annual Usage Readings</p> <table><tr><th>Location</th><th>Period</th><th>Litres of water</th><th>Equivalent Plastic (0.5 litre) Bottles saved</th><th>Comments</th></tr><tr><td>St. Lawrence Jewry Statue</td><td>Feb 18 – Jan 19</td><td>5,849</td><td>11,698</td><td></td></tr><tr><td>St. Paul’s Churchyard</td><td>Feb 18 – Jan 19</td><td>19,910</td><td>39,820</td><td></td></tr><tr><td>Cheapside</td><td>Feb 18 – Jan 19</td><td>6,532</td><td>13,054</td><td></td></tr></table>	Location	Period	Litres of water	Equivalent Plastic (0.5 litre) Bottles saved	Comments	St. Lawrence Jewry Statue	Feb 18 – Jan 19	5,849	11,698		St. Paul’s Churchyard	Feb 18 – Jan 19	19,910	39,820		Cheapside	Feb 18 – Jan 19	6,532	13,054	
Location	Period	Litres of water	Equivalent Plastic (0.5 litre) Bottles saved	Comments																	
St. Lawrence Jewry Statue	Feb 18 – Jan 19	5,849	11,698																		
St. Paul’s Churchyard	Feb 18 – Jan 19	19,910	39,820																		
Cheapside	Feb 18 – Jan 19	6,532	13,054																		

	Middlesex Street	Feb 18 – Jan 19	11,349*	22,698	Figures based on Feb + Jun to Jan because of issues related to the meter from Mar – May.
	Monument	Feb 18 – Jan 19	15,479	30,958	Meter repositioned in February.
	Aldgate Square	Jul 18 – Jan 19	2,272	4,544	New fountain installed June 2018.
	Total		61,391	122,782	
<p>2.4 Meter readings from the refill point in Carter Lane Gardens have not been generated owing to a technical issue which is currently under investigation. A Thames Water engineer is scheduled to survey this refill point in early March 2019 and will assess what remedial measures may be required.</p>					
3. Next steps	<p>3.1 An offer from Thames Water to install smart meters at all water refill points has been accepted in principle and a programme of retro fitting will be agreed in due course. The smart meters will provide usage reports every 15 minutes. The data can be used to help us understand better the usage and users of are using the refill points, what further actions might be required, and also to enable faults to be identified more quickly.</p> <p>3.2 The first of the new units to be installed will be at Bow Churchyard. This unit has been funded by the Cheapside Business Alliance (CBA). The new unit will be launched at a small ceremony organised by the CBA on 20 March 2019, to coincide with a variety of activities taking place across the City as part of World Water Day (which is on 22 March 2019).</p> <p>3.3 The new refill point in St Mary Axe, which is being delivered as part of an existing public realm project, has been installed and is due to become operational on the day of the official opening of the adjacent building (70 St Mary Axe, the ‘Can of Ham’), anticipated to be in late March 2019.</p> <p>3.4 The remaining refill points will be delivered according to the programme shown in Appendix 3, between May and August 2019.</p>				

Appendices

Appendix 1	Project Coversheet
Appendix 2	Map of existing and proposed refill points
Appendix 3	Programme for delivery of new refill points
Appendix 4	Detailed usage figures for existing refill points
Appendix 5	Proposed Water Refill Points by Location

Contact

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Telephone Number	020 7332 1158

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APPENDIX 1

Project Coversheet

[1] Ownership

Unique Project Identifier: 12015 **Report Date:** 5 March 2019
Core Project Name: Drinking Fountains – Delivering Additional Water Refill Points in the City's Public Realm
Programme Affiliation (if applicable): Plastic Free City initiative
Project Manager: Emmanuel Ojugo
Next Gateway to be passed: 6

[2] Project Brief

Project Mission statement: Delivery of eight publicly-accessible drinking water bottle refill points as part of the Plastic Free City (PFC) initiative.

Definition of need: Reduce the use of single use plastic by providing free publicly accessible drinking water points

Key measures of success:

- 1) Install the first new drinking fountain at Cheapside (Bow Churchyard) by March 2019.
- 2) Eight new drinking fountains are installed across the Square Mile by 31st August 2019.
- 3) Funding is secured to deliver both the installation of the fountains, and their ongoing maintenance.
- 4) Encourage an increase in the use of water bottle refill points in the City.

[3] Highlights

Finance:

Total anticipated cost to deliver [£]: 80,000

Total potential project liability (cost) [£]: N/A

Total anticipated on-going commitment post-delivery [£]: 20,000

Programme Affiliation [£]: Plastic Free City initiative

[A] Budget Approved to Date*	[B] New Financial Requests	[C] New Budget Total (Post approval)
£100,000	N/A	£100,000
[D] Previous Total Estimated Cost of Project	[E] New Total Estimated Cost of Project	[F] Variance in Total Estimated Cost of Project (since last report)
£100,000	£100,000	£0
[G] Spend to Date	[H] Anticipated future budget requests	
£15,000 (CBIS)	It is anticipated that any future budget requests will involve the pursuit of external funding sources to fund additional Water Refill Points as required.	

Headline Financial changes:

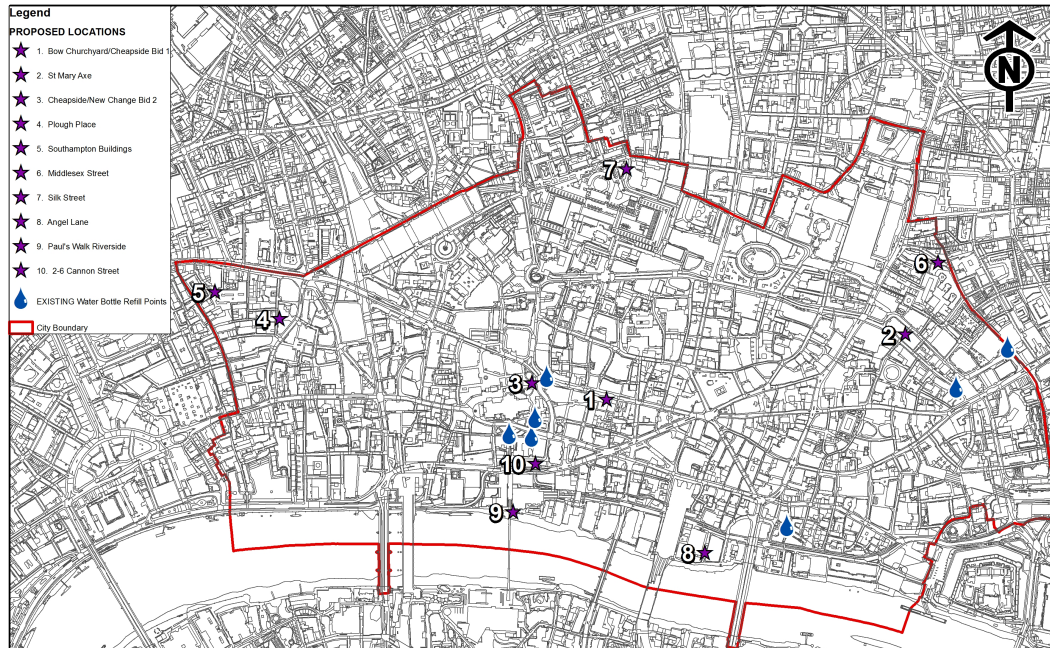
Since 'Project Proposal' (G2) report:

► £15,000 – pre-evaluation stage.

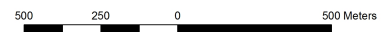
Since 'Options Appraisal and Design' (G3-4) report:

APPENDIX 1

<p>► N/A</p> <p>Since 'Authority to start Work' (G5) report:</p> <p>► £85,000 – total approved funding to implement the project</p>																		
<p>Project Status:</p> <p>Overall RAG rating: Green</p> <p>Previous RAG rating: Green</p>																		
<p>[4] Member Decisions and Delegated Authority</p> <p>GW1-2 Corporate Projects Board (21 Aug 2018), Projects Sub (12 Sept 2018)</p> <p>GW3-4 – Streets & Walkways (), Projects Sub ()</p> <p>GW5 10 December 2018 (Delegated)</p>																		
<p>[5] Narrative and change</p> <p>Date and type of last report:</p> <p>GW5 (Delegated)</p> <p>Key headline updates and change since last report.</p> <p>See main report.</p> <p>Headline Scope/Design changes, reasons why, impact of change:</p> <table border="1"> <tr> <td> <p>Since 'Project Proposal' (G2) report:</p> <p>N/A</p> </td> </tr> <tr> <td> <p>Since 'Options Appraisal and Design' (G3-4 report):</p> <p>N/A</p> </td> </tr> <tr> <td> <p>Since 'Authority to Start Work' (G5) report:</p> <p>N/A</p> </td> </tr> </table> <p>Timetable and Milestones:</p> <p>Expected timeframe for the project delivery: March – August 2019</p> <p>Milestones:</p> <table border="1"> <tr> <td>1) Excavation of footway to facilitate connections to the new Water Bottle Refill Point</td> </tr> <tr> <td>2) Installation of Cheapside Bid Drinking Fountain (Bow Churchyard) by March 2019</td> </tr> <tr> <td>3) Agree Thames Water programme for sign-off of the installation programme</td> </tr> </table> <p>Are we on track for this stage of the project against the plan/major milestones? Yes</p> <p>Are we on track for completing the project against the expected timeframe for project delivery? Yes</p> <p>Risks and Issues</p> <p>Top 3 risks:</p> <table border="1"> <tr> <td><i>Risk description</i></td> <td><i>Sites are not viable to accommodate new fountains</i></td> </tr> <tr> <td><i>Risk description</i></td> <td><i>Existing funding is not sufficient to deliver the fountains</i></td> </tr> <tr> <td><i>Risk description</i></td> <td><i>Insufficient funds available for maintenance</i></td> </tr> </table> <p>See 'risk register template' for full explanation.</p> <p>Top 3 issues realised</p> <table border="1"> <tr> <td><i>Issue Description</i></td> <td><i>Impact and action taken</i></td> <td><i>Realised Cost</i></td> </tr> <tr> <td>Escalation of implementation programme</td> <td>Officers have engaged with Thames Water at an early stage to establish a delivery programme that is achievable.</td> <td>N/A</td> </tr> </table> <p>Has this project generated public or media impact and response which the City of London has needed to manage or is managing?</p> <p>The project has generated a small amount of media coverage, mostly tying in with the Mayor of London's campaign to install new refill points across Greater London.</p>	<p>Since 'Project Proposal' (G2) report:</p> <p>N/A</p>	<p>Since 'Options Appraisal and Design' (G3-4 report):</p> <p>N/A</p>	<p>Since 'Authority to Start Work' (G5) report:</p> <p>N/A</p>	1) Excavation of footway to facilitate connections to the new Water Bottle Refill Point	2) Installation of Cheapside Bid Drinking Fountain (Bow Churchyard) by March 2019	3) Agree Thames Water programme for sign-off of the installation programme	<i>Risk description</i>	<i>Sites are not viable to accommodate new fountains</i>	<i>Risk description</i>	<i>Existing funding is not sufficient to deliver the fountains</i>	<i>Risk description</i>	<i>Insufficient funds available for maintenance</i>	<i>Issue Description</i>	<i>Impact and action taken</i>	<i>Realised Cost</i>	Escalation of implementation programme	Officers have engaged with Thames Water at an early stage to establish a delivery programme that is achievable.	N/A
<p>Since 'Project Proposal' (G2) report:</p> <p>N/A</p>																		
<p>Since 'Options Appraisal and Design' (G3-4 report):</p> <p>N/A</p>																		
<p>Since 'Authority to Start Work' (G5) report:</p> <p>N/A</p>																		
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Escalation of implementation programme	Officers have engaged with Thames Water at an early stage to establish a delivery programme that is achievable.	N/A																



Appendix 2: Map of existing and proposed refill points



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Appendix 3 | Programme for delivery of new refill points

No.	Preferred Water Refill Locations	Delivery vehicle	Expected Delivery
1	Cheapside 1 (Bow Churchyard)	Water Bottle Refill Point	March 2019
2	St Mary Axe	To be delivered as part of an existing project	March 2019
3	Cheapside 2 (Western Footway)	Water Bottle Refill Point	June 2019
4	Plough Place	Water Bottle Refill Point	July 2019
5	Southampton Buildings	Water Bottle Refill Point	July 2019
6	Middlesex Street	Water Bottle Refill Point	August 2019
7	Silk Street	Water Bottle Refill Point	August 2019
8	Angel Lane	Water Bottle Refill Point	August 2019
9	Paul's Walk	Water Bottle Refill Point	August 2019
10	2-6 Cannon Street - Distaff Lane (Garden)	To be delivered as part of an existing project	August 2019



Approved Water Bottle Refill Point



To be delivered as part of an existing project

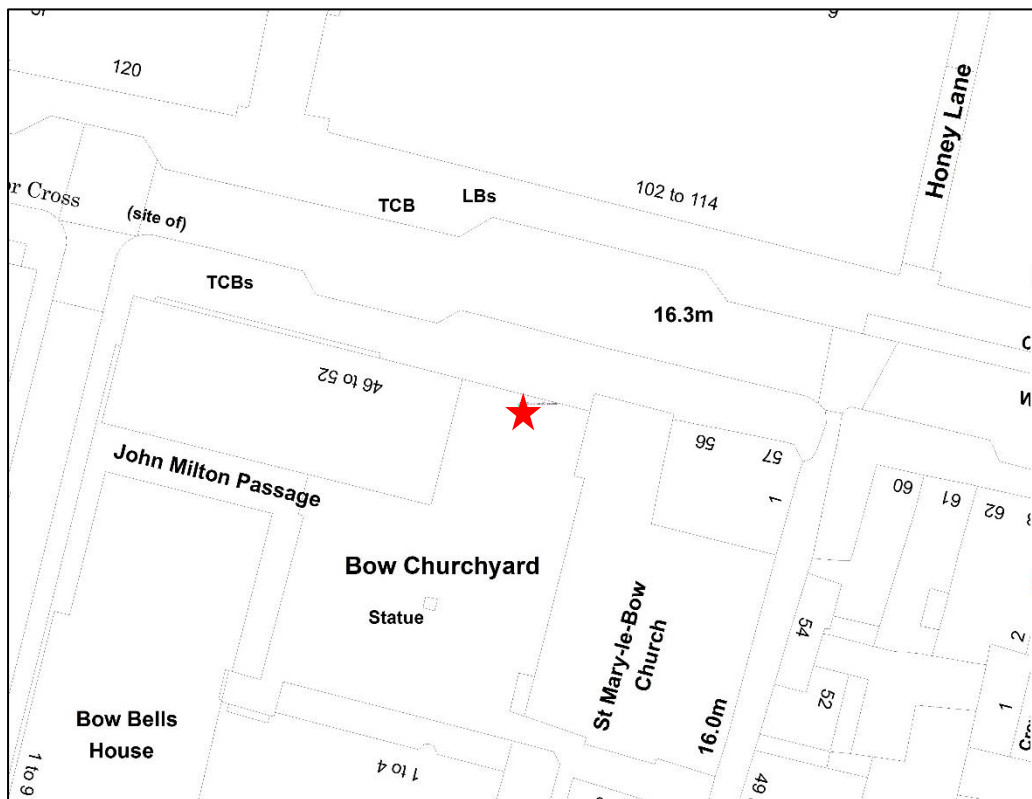
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APPENDIX 4 | Detailed usage figures for existing refill points - 2018 (11 months)

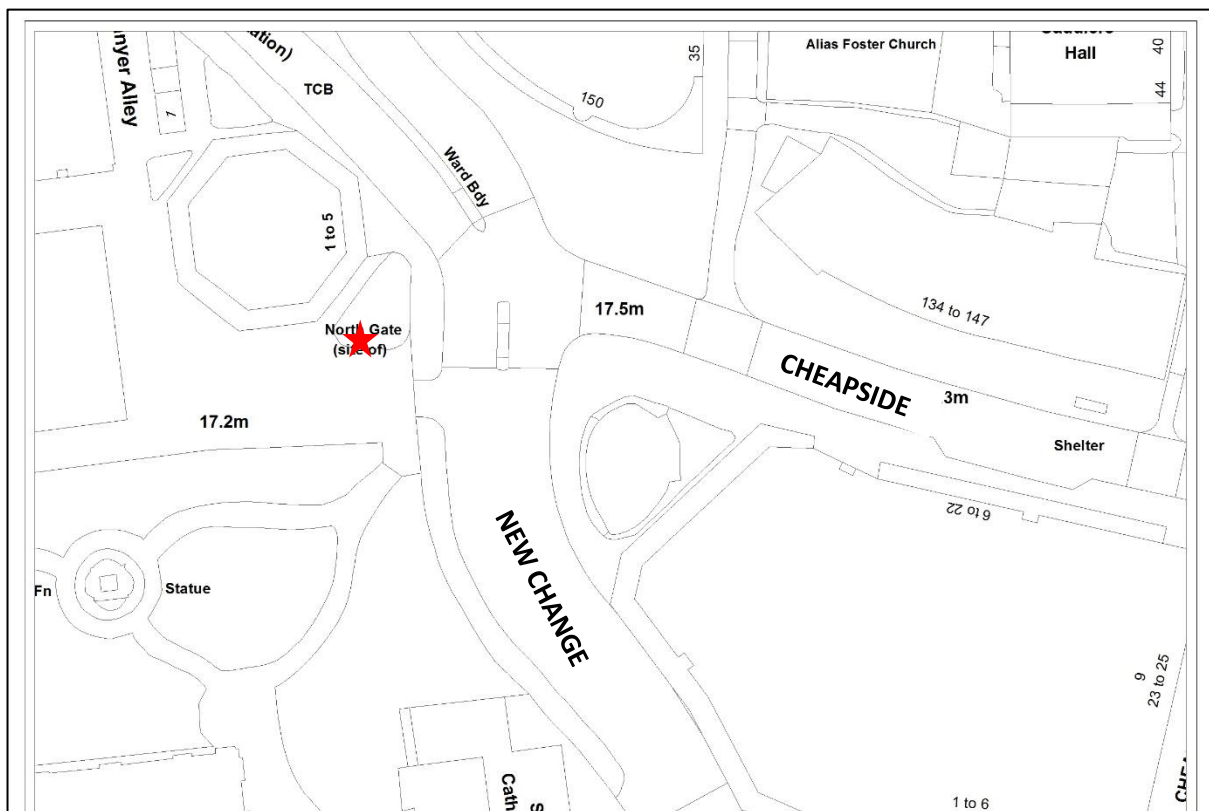
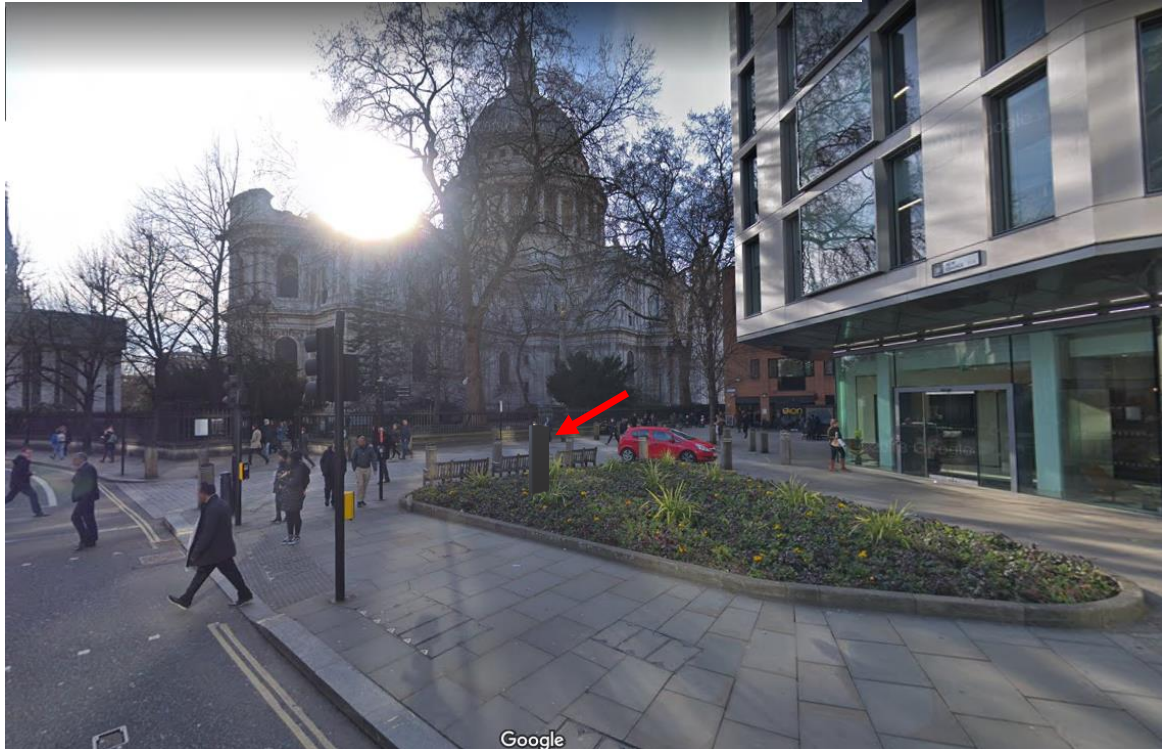
Location	Jan-18	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Totals	comments
St. Lawrence Statue > Meter Reading in M3.ltrs	59.100	59.100	59.710	60.020	61.100	61.840	62.470	62.531	63.170	63.950	63.980	64.000	64.120		
a. Monthly usage in M3.ltrs	N/A	0.000	0.610	0.310	1.080	0.740	0.630	0.610	0.649	0.780	0.300	0.020	0.120	5.849	Total cubic metres p.a.
b. equivalent 0.5L bottles per month	N/A	0	1220	620	2160	1480	1260	1220	1298	1560	600	40	240	11698	Equivalent total of 0.5L bottles p.a.
St. Paul's Churchyard > Meter reading in M3.ltrs	76.930	77.490	80.010	80.790	82.700	85.830	91.870	93.000	94.610	95.010	96.180	96.250	97.840		
a. Monthly usage in M3.ltrs	N/A	0.560	1.520	0.780	1.910	3.130	6.040	1.130	1.610	0.400	1.170	0.070	1.590	19.910	Total cubic metres p.a
b. equivalent 0.5L bottles per month	N/A	1120	3040	1560	3820	6260	12080	2260	3220	800	2340	140	3180	39820	Equivalent total of 0.5L bottles
Cheapside > M3.ltrs > Meter reading in M3.ltrs	5.312	5.382	8.154	8.375	8.608	9.163	10.194	10.371	10.494	11.500	11.517	11.525	11.839		
a. Monthly usage in M3.ltrs	N/A	0.070	2.772	0.221	0.233	0.560	1.031	0.177	0.123	1.006	0.017	0.008	0.314	6.532	Total cubic metres p.a.
b. equivalent 0.5L bottles per month	N/A	140	5544	442	466	1120	2062	354	246	2012	34	16	628	13064	Equivalent total of 0.5L bottles
Middlesex Street > Meter reading in M3.ltrs	8.900	10.700	17.172	50.181	8.587	9.885	12.124	13.111	15.109	15.129	17.778	17.780	19.104		Meter was changed in May so figures represent Feb + Jun - Jan. * March and April considered high and not included in calculations.
a. Monthly usage in M3.ltrs	N/A	1.800	6.472	33.009	Meter change	0.330	2.239	0.987	1.998	0.020	2.649	0.002	1.324	11.349	Total cubic metres (Feb + Jun - Jan)
b. equivalent 0.5L bottles per month	N/K	3600	12944*	66018*	Meter change	660	4478	1974	3996	40	5298	0	2648	22698	Equivalent total of 0.5L bottles.
Monument > Meter reading in M3.ltrs	Meter relocated	5.700	25.000	51.180	54.277	56.681	60.465	63.531	64.027	64.067	65.719	65.730	66.609		Meter was relocated in February. March and April reading seems high. Figures represent May - Jan. with average added to total (but not usage total in row a and b)
a. Monthly usage in M3.ltrs	N/A	N/K	19.300	26.180	3.097	2.454	3.784	3.066	0.496	0.040	1.652	0.011	0.879	20.638	May - Jan actual total p.a 15.479
b. equivalent 0.5L bottles per month	N/K	N/K	38600*	52360*	6194	4908	7568	6122	992	80	3304	22	1758	41276	May - Jan actual total p.a 30,948
Aldgate Square > Meter reading in M3.ltrs	N/A	N/A	N/A	N/A	N/A	911.160	911.567	911.810	911.861	911.887	912.251	912.260	912.729		Meter reading at start was 911.160 at installation in June
a. Monthly usage in M3.ltrs	N/A	N/A	N/A	N/A	N/A	N/K	0.417	0.343	0.410	0.260	0.364	0.009	0.469	2.272	Total cubic metres
b. equivalent 0.5L bottles per month	N/A	N/A	N/A	N/A	N/A	N/K	834	686	820	520	728	18	938	4544	Equivalent total of 0.5L bottles.3606

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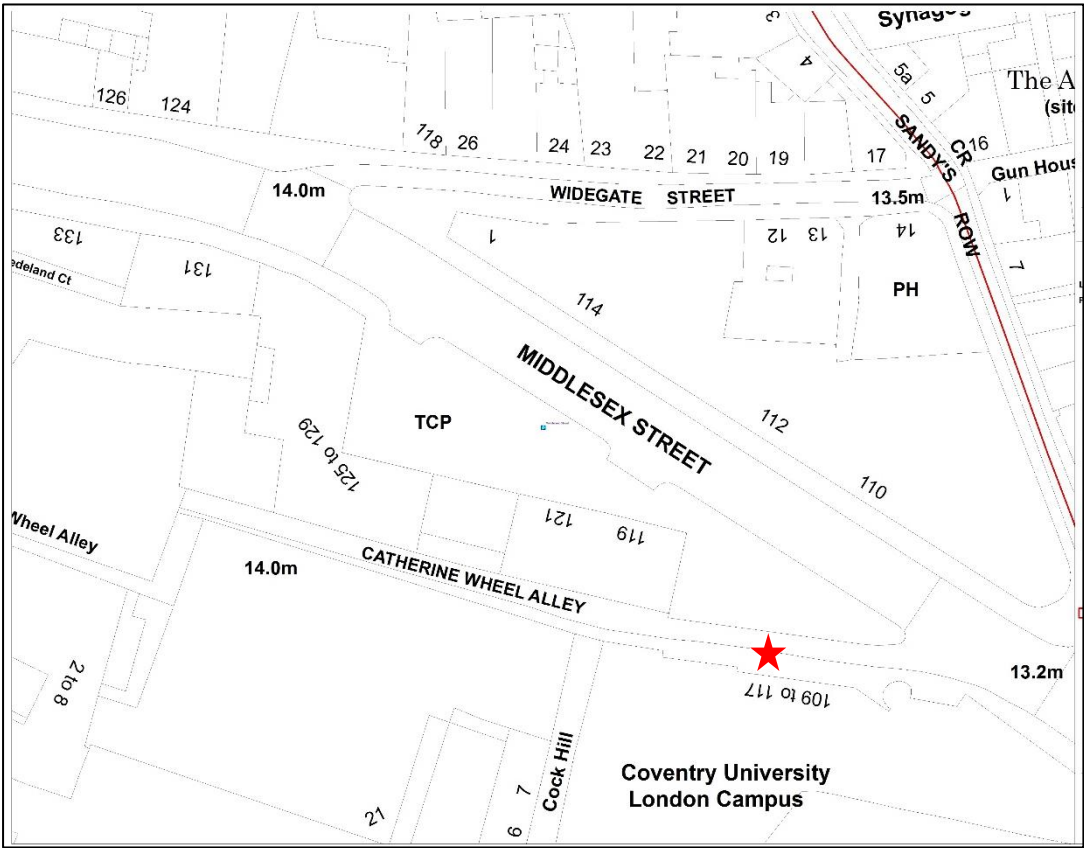
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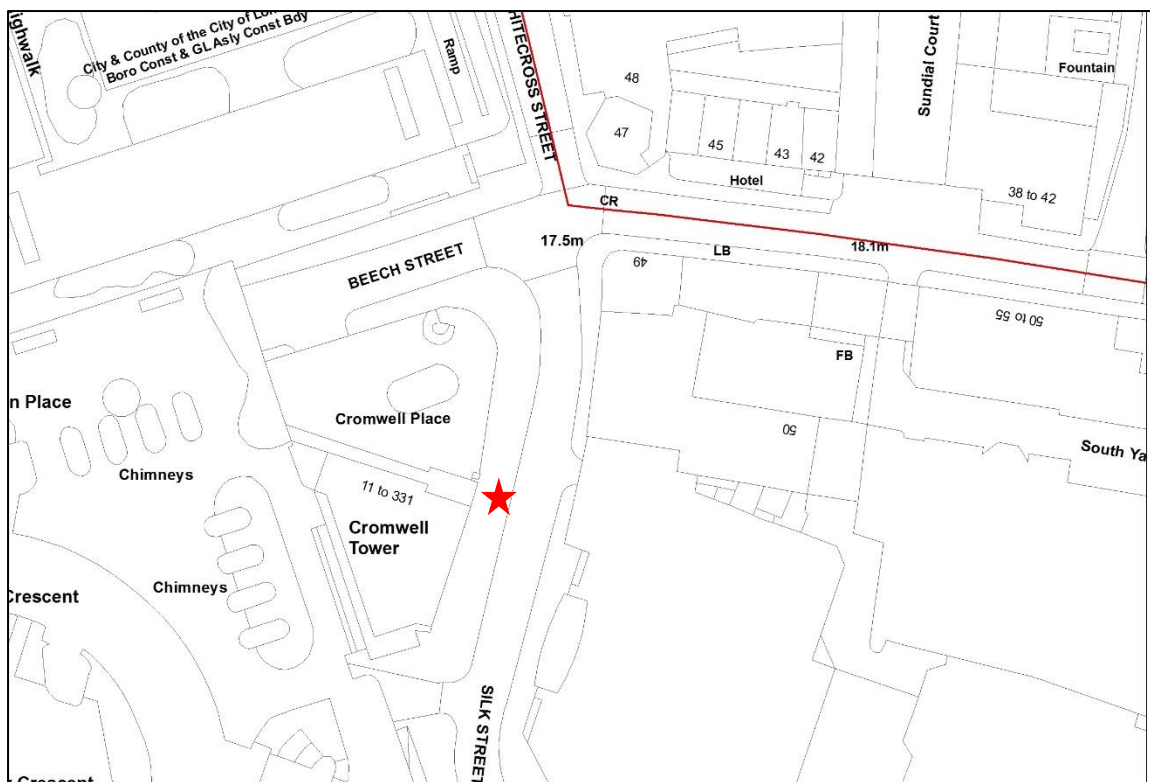
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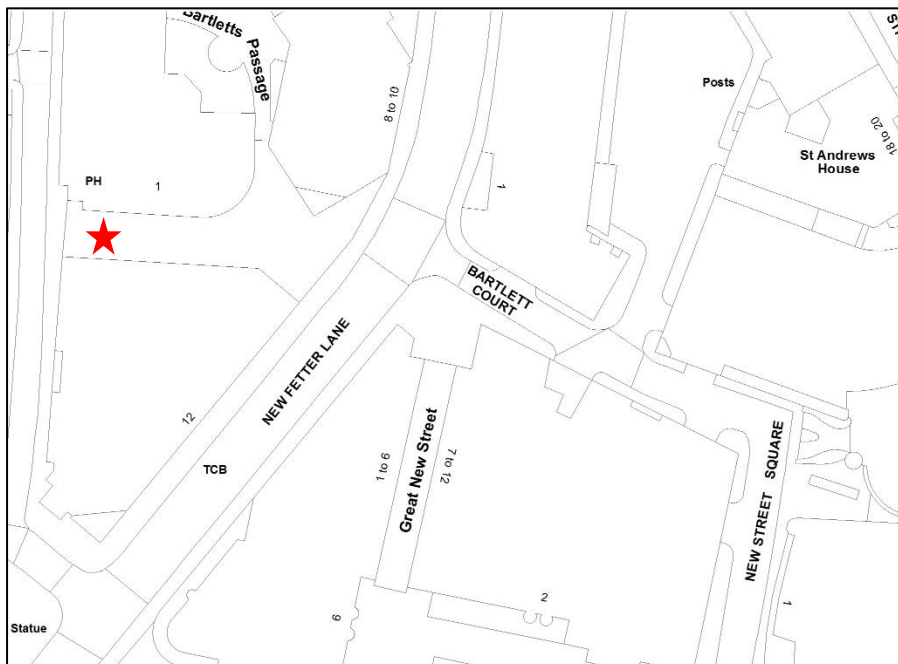
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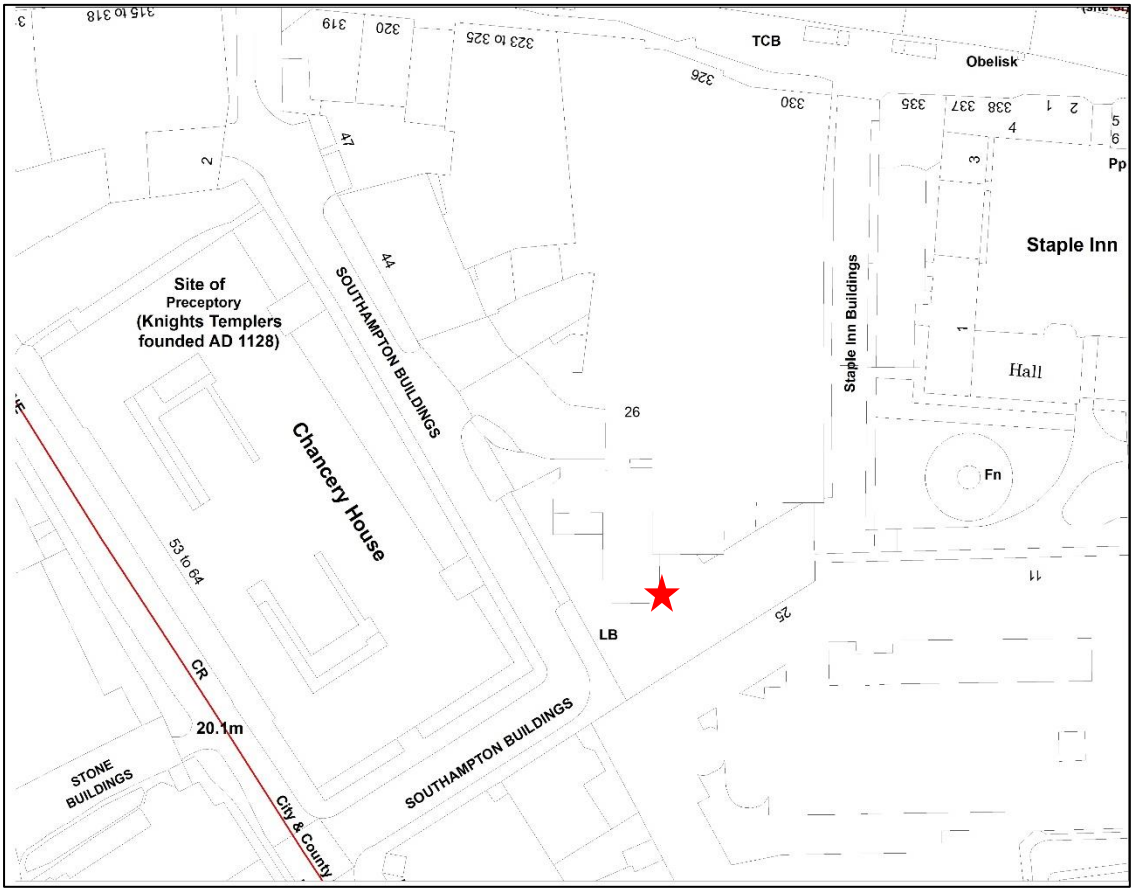
4. Silk Street



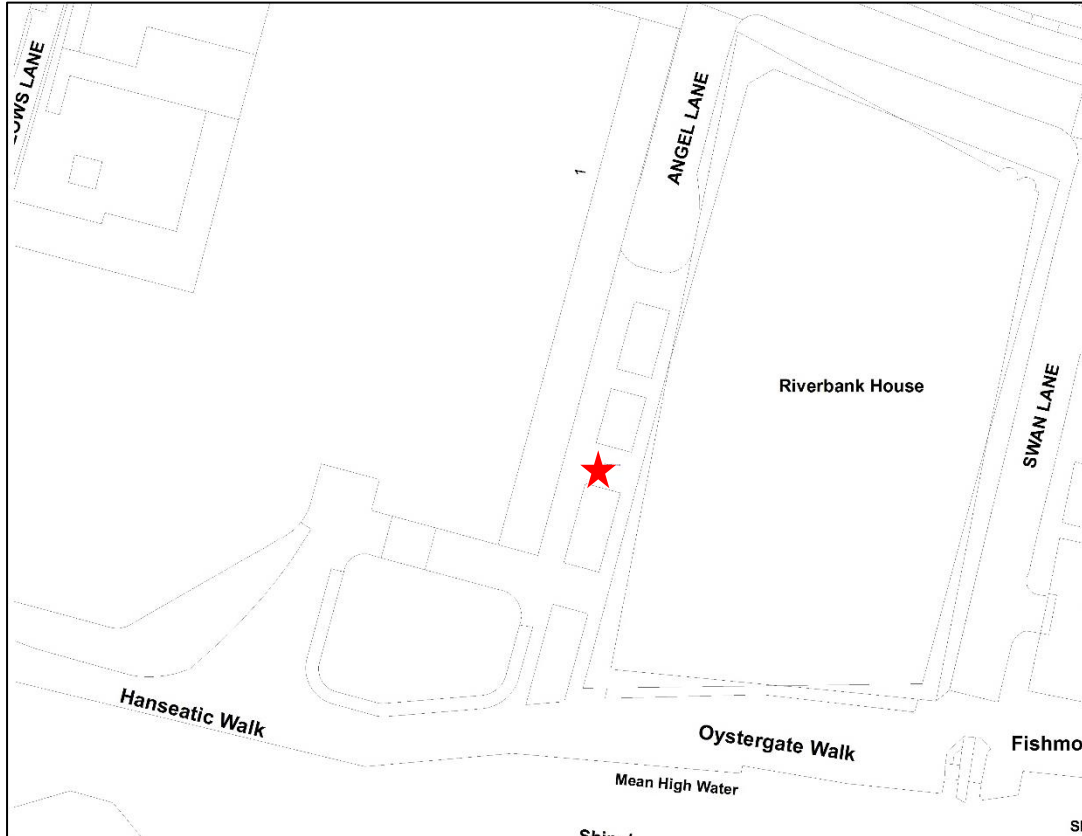
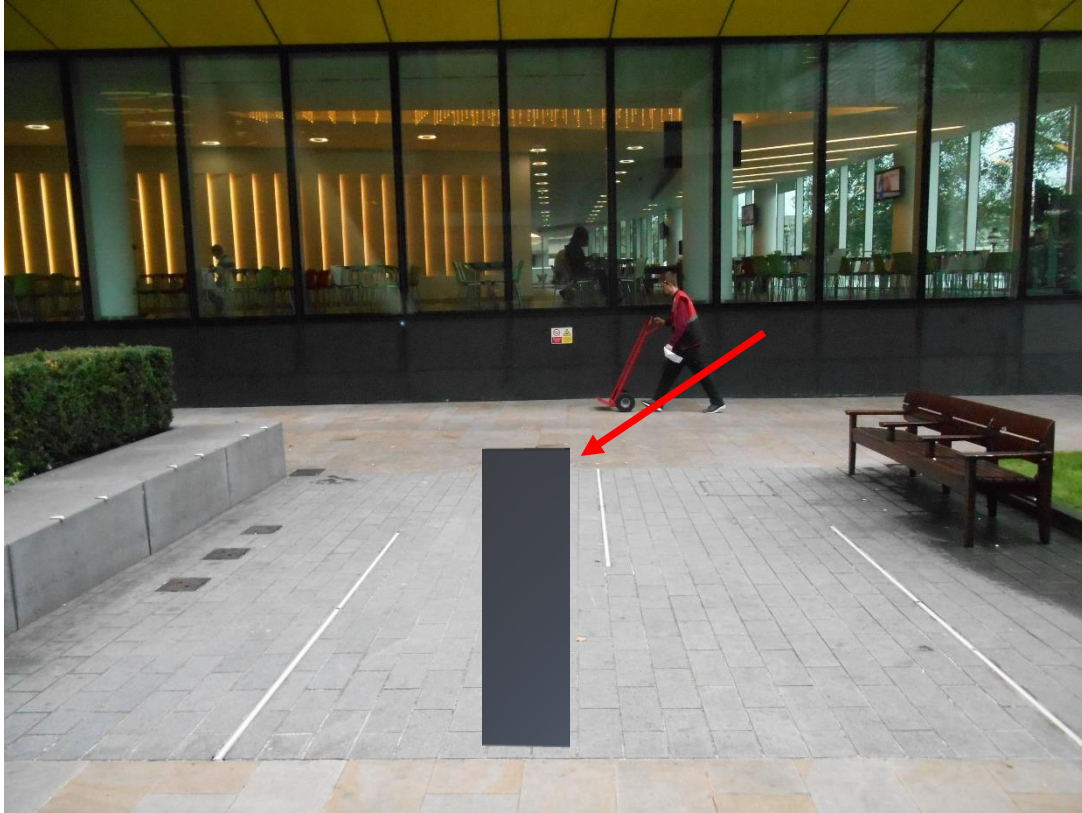
5. Plough Place



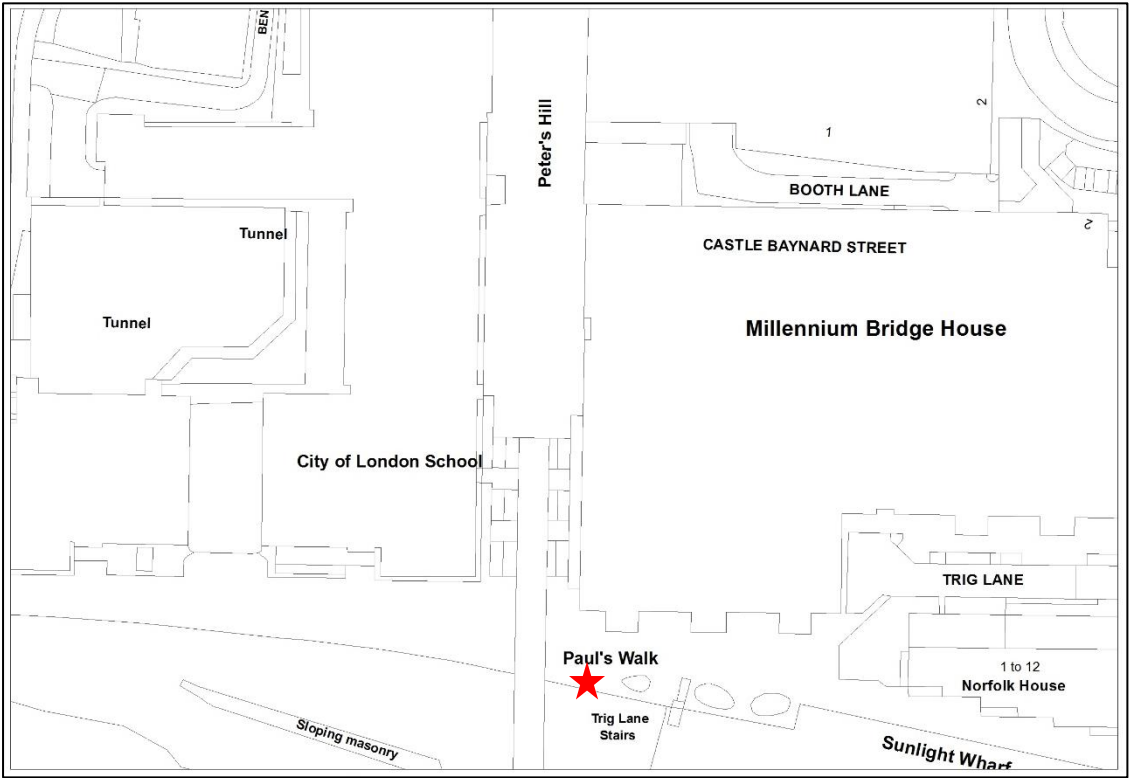
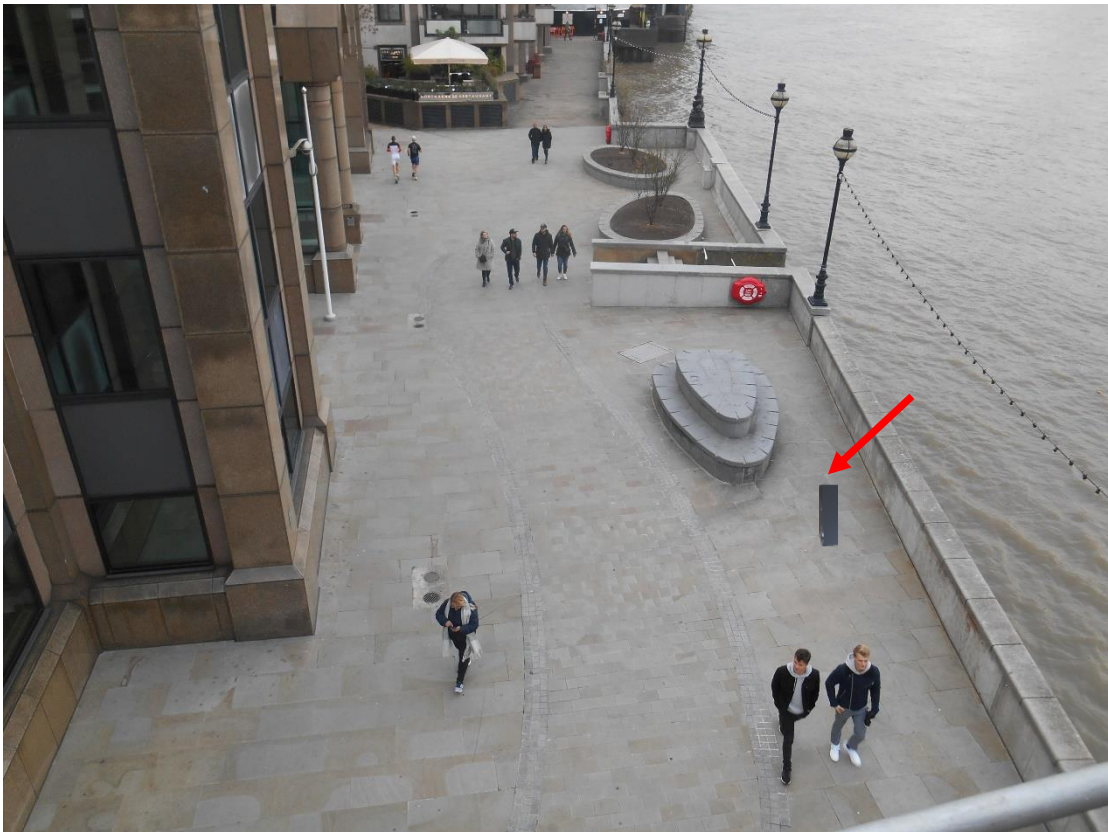
6. Southampton Buildings



7. Angel Lane



8. Paul's Walk



Committee:	Date:
Port Health and Environmental Services Committee	5 March 2019
Subject: Final Departmental High-level Business Plans 2019/20 – Department of the Built Environment Markets & Consumer Protection Open Spaces	Public
Report of: Director of the Built Environment, Director of Markets & Consumer Protection and Director of Open Spaces	For Approval
Report authors: Elisabeth Hannah, Department of the Built Environment Don Perry, Markets & Consumer Protection Department Gerry Kiefer, Open Spaces Department	

Summary

This report presents for approval the final high-level Business Plans for 2019/20 for the Department of the Built Environment, Markets and Consumer Protection Department, and the Open Spaces Department (with the Cemetery and Crematorium).

Recommendation

Members are asked to approve and provide feedback on the final high-level Business Plans for 2019/20 for the Department of the Built Environment, Markets and Consumer Protection Department, and the Open Spaces Department (including the Cemetery and Crematorium Business Plan).

Main Report

Background

1. As part of the new framework for corporate and business planning, departments were asked to produce standardised high-level, 2-side Business Plans for the first time in 2017/18. Members generally welcomed these high-level plans for being brief, concise, focused and consistent statements of the key ambitions and objectives for every department.
2. For 2018/19, departments were again asked to produce high-level plans in draft, which were presented to Service Committees in November and December 2017 alongside the departmental estimate reports, so that draft ambitions could be discussed at the same time as draft budgets. This represented the first step towards integrating budget-setting and priority-setting.
3. For 2019/20, to secure deeper Member engagement with Business Plans, a series of four informal 'cluster' meetings took place in early February to allow Chairmen and Deputy Chairmen of relevant approving Committees to scrutinise how departments are using their 2019/20 Business Plans to prioritise activities towards

corporate goals. These meetings were chaired by the Chair and Deputy Chairman of Resource Allocation Sub Committee.

4. To give all Members a chance to ask questions and put their views to their Chairmen and Deputy Chairmen in advance of these meetings, a 'Business Plan Surgery' was held on 10 January (immediately before Court of Common Council).
5. Taken together, these sessions replace the submission of draft high-level Business Plans to Committees. Final high-level Business Plans are still subject to Committee approval, as in previous years.
6. Work has also taken place to review the content and format of the supporting detail beneath the high-level Business Plans. This includes: information about inputs (e.g. IT, workforce, budgets, property and assets); improved links to risk registers; EEE Health Checks (economy, efficiency and effectiveness), and schedules of measures and key performance indicators for outputs and outcomes. This is a key element in the move towards business planning becoming a joined-up service planning process that links directly to Corporate Plan outcomes.

Final High-level Business Plans for 2019/20

7. This report presents at Appendices 1, 2, 3 and 4 the final high-level Business Plans for 2019/20 for:
 - Department of the Built Environment
 - Markets and Consumer Protection Department
 - Open Spaces Department (and an accompanying Cemetery and Crematorium Business Plan)

Department of the Built Environment

8. The high-level plan for the Department of the Built Environment (Appendix 1) presents a strategic approach to achieve our vision of 'Creating and facilitating the leading future world class city'. This supports the Corporate Plan and ensures we continue to deliver excellent services.
9. The high-level plan for the Built Environment presents our strategic aims and objectives for the future, focusing on our portfolio of programmes and strategic ambitions which support the Corporate Plan.
10. The high-level plan is supported by the Department's statutory duties. For this Committee, our regulatory team, based in the Cleansing team ensure the City provides residents, visitors and workers with a clean and safe environment by taking enforcement action on activities such as fly posting, graffiti and littering including smoking related litter. Providing waste and recycling information and advice for City businesses and residents. Commercial sites in the City of London can also join the Clean City Awards Scheme, to share best practice in waste management and apply for an annual award. We ensure excellent customer service and a high-quality environment, and this team currently provides the first line of response to all 'out of hours' noise complaints and some other areas of enforcement on behalf of the Department of Markets and Consumer Protection.

11. Programmes specifically related to the work of this Committee are highlighted below. The following programmes contain specific projects relating to the work of this Committee:

- Cleansing and Waste programme: finalising demobilisation of the outgoing waste collection and street cleansing contract and mobilisation of the new contract; undertaking a review and restructure of the street environment officer and contract client team; increasing the recycling rate and reducing general waste arisings; implementing and embedding the new corporate fleet management system; reviewing and updating the City's Waste Strategy
- Eastern City Cluster/Future Public Space: Cleansing supports the healthy streets agenda, particularly around the management of the Eastern City Cluster and maintaining the quality of current and future public spaces.

12. The work of the Cleansing and Waste team, which is in the remit of this Committee, supports the department in achieving our Corporate Plan, in particular:

- People are safe and feel safe (Outcome 1)
- We inspire enterprise, excellence, creativity and collaboration (Outcome 10)
- Our physical spaces have clean air, land and water and support a thriving and sustainable natural environment (Outcome 11)
- Our spaces are secure, resilient and well-maintained (Outcome 12)

Markets and Consumer Protection Department

13. The high-level summary Business Plan draws together the wide range of services provided, and regulatory functions carried out, by the whole Markets and Consumer Protection Department. The Department reports to three separate Committees (Port Health and Environmental Services Committee; Licensing Committee; Markets Committee) for discrete aspects of its work.

14. The ambitions, objectives and performance measures contained within the high-level Business Plan are underpinned by the Department's statutory duties, core functions and its commitment to supporting corporate priorities.

15. Areas of the Business Plan that the Port Health and Environmental Services Committee does not need to consider have been "greyed out" in Appendix 2.

16. The Department's business priorities for the forthcoming year include to:

- Continue to evaluate, and put in place actions to address, the impacts of Brexit on the services provided by PH&PP.
- Publish a new Air Quality Strategy 2019–2025 to deliver measurable improvements in nitrogen dioxide across the City.
- Investigate, and implement, new income generation proposals across the department.

17. We will continue the practise of maximising income from our assets and services, and increasingly utilise the benefits of modern technology. This will become

increasingly important as we endeavour to deliver the high standards that our customers expect with pride, pace, passion, and professionalism.

Open Spaces Department

18. This report presents as Appendix 3 the final high-level summary Business Plan (Plan) for 2019/20 for the Open Spaces Department.

19. This Plan reflects the breadth of the Department recognising the services provided at: the City's Cemetery and Crematorium, Tower Bridge and the Monument, Keats House and our Open Spaces across and beyond London.

20. The three top line objectives for the Department are:

- Open spaces and historic sites are thriving and accessible
- Spaces enrich people's lives
- Business practices are responsible and sustainable

Below these sit twelve outcomes. Using numbers, the Plan aims to show how the Department's outcomes help deliver the twelve outcomes of the Corporate Plan 2018–2023.

21. Page two of the Plan identifies key activities which will be progressed over the next year across the Department. These activities have been mapped against the Corporate Plan and the pie chart on the front of Appendix 3 shows proportionally the outcomes we are delivering.

22. Delivery of the Departmental Business Plan is driven through divisional plans and activities. The Cemetery and Crematorium has used the business plan template to produce their own Business Plan, attached as Appendix 4. This shows the budget specific to the Cemetery and Crematorium and lists the main Corporate plan aims and outcomes that the Cemetery and Crematorium is helping to deliver. Page two of appendix 4 identifies the main activity that will be undertaken in 2019/20 by the Cemetery and Crematorium team including progressing the replacement of the ageing cremators, developing the grave use and reclamation programme and implementing actions arising from the Conservation Management Plan.

23. At a Departmental level there are a range of performance measures some of which the Cemetery and Crematorium help to achieve e.g. Green Flag awards, Green Heritage accreditation

24. Page three of Cemetery and Crematorium Business Plan details the specific measures that the Cemetery and Crematorium will use to judge their performance. Some of these are new performance measures linked to the significant work that has been undertaken to:

- provide cheaper burial options for customers – the performance measures are:
 - number of early drop offs, and
 - % of early time slots taken up
- reduce the negative impact on the environment – performance measures are:
 - amount of gas used to heat the modern crematorium, and
 - energy generation from solar power

Conclusion

25. This report presents the final high-level Business Plans for 2019/20 for the Department of the Built Environment, Markets and Consumer Protection Department, and the Open Spaces Department (along with the Cemetery and Crematorium Business Plan), for Members to approve and provide feedback.

Appendices

- Appendix 1: Department of the Built Environment
- Appendix 2: Markets and Consumer Protection Department
- Appendix 3: Open Spaces Department
- Appendix 4: Cemetery and Crematorium

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Creating and facilitating the leading future world class city

The corporate outcomes we aim to impact on are:

- People are safe and feel safe (1)
- People have equal opportunities to enrich their lives and reach their full potential (3)
- We are a global hub for innovation and enterprise (7)
- We have access to the skills and talent we need (8)
- Our spaces are digitally and physically well-connected and responsive (9)
- Our spaces inspire excellence, enterprise, creativity and collaboration (10)
- Our physical spaces have clean air, land and water and support a thriving and sustainable natural environment (11)
- Our spaces are secure, resilient and well maintained (12)

What we do is:

- Help promote and position the City to compete with other world class cities
- Ensure the City is a welcoming, safe and inclusive place for visitors, workers and residents
- Create, improve and maintain public spaces to provide a thriving, inclusive urban centre
- Secure and support innovation to advance technological solutions to major challenges
- Lead the way in creating a diverse and flexible City which supports modern workforces
- Enable the development of world class architecture to ensure high quality choice of business space
- Develop innovative approaches to safeguarding and sustaining our heritage, built and natural environment
- Promote safer and more environmentally efficient use of street spaces

2019-20 budget:

	Exp £'000	Inc £'000	Net £'000
Local Risk	(£35,858)	£15,935	(£19,923)
Central Risk	(£13,664)	£19,401	£5,737
Recharges	(£17,053)	£2,833	(£14,220)
Total	(£66,575)	£38,169	(£28,406)

DBE 2019/20 capital programme forecast spend is £28m (based on project manager forecasts in Oracle)

Future estimated CIL income for 2019 totals £12.7m, and for 2020 £4.6m and DBE allocation is £5.08m and £1.84m respectively

Our top line objectives are:

1. Advancing a flexible infrastructure that adapts to increasing capacity and changing demands.
2. Promoting the construction of high quality, inspiring buildings which attract diverse uses and users
3. Enabling digital connectivity that meets business and lifestyle needs
4. Creating an accessible and inclusive City which is stimulating, safe and easy to move around in
5. Leading and initiating research into microclimate issues for the benefit of London and the UK; to increase our environmental resilience and lead on Climate Action
6. Enabling a rich and thriving social and cultural offer
7. Improving quality and safety of the environment for workers, residents and visitors
8. Prioritise capital programme to ensure that the four major corporate projects are incorporated in the wider delivery plan.
9. Prioritise and plan for future budget pressures

What we'll achieve:

- Increased office capacity
- Security measures integrated into development and public realm
- Implementation of Vision Zero (road danger reduction)
- Accessibility and environmental sustainability integrated into development, public realm and transportation projects
- Deliver the lighting strategy, piloting the latest technologies and innovations
- Deliver a cleaner and more sustainable environment
- Deliver urban greening in developments and public realm projects
- Working with developers, occupiers and freight industry to improve the efficiency of servicing and delivery
- Working with TFL and other operators to improve public transport access
- Implement the new cleansing contract, deliver successful implementation
- Publish information gathered in relation to microclimate issue
- 5G roll out/street furniture/lampposts
- Beech Street closure trial, to support Culture Mile
- Implementation of new corporate fleet management system



As a Department we have developed a Portfolio of Programmes which will help us deliver our Business plan ambitions and outcomes. The Programmes and ‘live’ prioritised Projects are listed below. **Note that these are currently under review and so are subject to change**

1. **Culture Mile:** Look and Feel Strategy, Beech Street, City Wayfinding, MoL, Centre for Music, CM Pop Ups
2. **Gigabit City** – Infill of 4G Connectivity, (5G connectivity – in the pipeline)
3. **Strategic Transport** – Transport Strategy, Freight Strategy
4. **Strategic Infrastructure** – Crossrail and Thames Tideway
5. **RDR & Active Travel** – RDR Annual Plan and RDR Travel 5 Year Plan
6. **Future Public Space** – Bank Junction Transformation
7. **Cleansing and Waste** – Implementation of new contract post April 2019
8. **City Cluster** – City Cluster Master planning, 22 Bishopsgate
9. **Policy and Strategy** – Local Plan, Smart City, Climate Action Strategy, Local Flood Risk Management Strategy
10. **Foremost Services** – Planning Transformation, Transportation & Public Realm review, Building Control options

How we plan to develop our capabilities this year:

- Continue to develop and expand effective partnerships, stakeholder relationships and cross-team working
- Continue to strategically link in with the Corporate Plan and Summit Group
- Enhance our profile through communication and promotion
- Advance a consistent approach to programme and project management including clear project prioritisation.
- In conjunction with the IT Division, embrace and implement new technologies and practices to modernise and enhance business processes
- Develop succession plans, strengthen resilience and nurture talent to meet City needs through our Talent Management Programme
- Embed and support our apprentices
- Establish a radical approach to problem solving and service improvement
- Move to a new cloud-based, hosted and browser-accessed line of business system in a joint project with M&CP
- Develop a strategy for the implications of Brexit in DBE

What we’ll measure:

- Achievement of the City’s efficiency savings with a balanced budget
- The increase in the number of cyclists using the City’s streets
- Businesses using consolidation centres
- Reduction in the number people killed or seriously injured in road traffic accidents
- The % of City land that has unacceptable levels of litter, detritus, graffiti and flyposting
- Increase in office floorspace stock and employment
- An increased SME presence and broader range of occupiers in the City
- Increase public permeability, open space, seating, greenery and public access
- Increased number of apprenticeships
- The number of water refill points
- Improve air quality
- Reduction in energy consumption from street lighting
- Increase number of electrical charging points
- Increase the % of open spaces, green space and trees in the City
- Increase in pedestrian priority

What we’re planning to do over the coming years

- Managing intensification, diversification of the City and the changing nature of its workforce
- Build on our intellectual capital to develop smart solutions
- Provide relevant, high quality end to end services for City developers
- Facilitate delivery of the City’s four major projects and the Culture Mile
- Enforcement Plan to be reviewed in 2020
- Deliver City Plan 2036 and Transportation Strategy
- Develop and deliver the City’s future transport programme, encourage and enable the transition to zero emission vehicles
- Implement the recommendations of the Hackitt Report
- Work with the Bridge House Trust to facilitate the Bridges 50-year plan
- Review and update the City’s Waste Strategy

We provide vital public services by advising and regulating a wide variety of businesses in the Square Mile and beyond to protect consumers and communities through regulatory enforcement and fraud prevention. We also provide a vital link in the food supply chain for the catering and hospitality sectors in London and the South by operating three thriving wholesale food markets.

APPENDIX 2

The Corporate Plan outcomes we aim to impact on are:

Outcome 1: People are safe and feel safe.

Outcome 2: People enjoy good health and wellbeing.

Outcome 3: People have equal opportunities to enrich their lives and reach their full potential.

Outcome 4: Communities are cohesive and have the facilities they need.

Outcome 5: Businesses are trusted and socially and environmentally responsible.

Outcome 6: We have the world's best regulatory framework and access to global markets.

Outcome 7: We are a global hub for innovation in financial and professional services, commerce and culture.

Outcome 8: We have access to the skills and talent we need.

Outcome 9: We are digitally and physically well-connected and responsive.

Outcome 11: We have clean air, land and water and support a thriving and sustainable natural environment.

Outcome 12: Our spaces are secure, resilient and well-maintained.

What we do is:

Through publication of a new **Air Quality Strategy 2019-2025**, we raise awareness of the impact of poor air quality on health; take action to improve air quality; demonstrate leadership for London; and champion new powers to deal with non-road sources of air pollution (**Outcomes: 2, 11**)

Our **Public Protection** teams meet the current and future needs of stakeholders by protecting consumers and businesses through the enforcement of a wide range of Environmental Health and Trading Standards legislation and undertaking appropriate interventions. (**Outcomes: 1, 2, 5, 6**)

Our **Trading Standards** Service collaborates with City of London Police and other relevant partner organisations to tackle economic crime, particularly investment fraud. (**Outcomes: 1, 6**)

We set the benchmark nationally for **Licensing Policy** and other Schemes that promote the four Licensing objectives (as set out in the Licensing Act 2003): The prevention of crime and disorder; public safety; The prevention of public nuisance; The protection of children from harm. We carry out enforcement against illegal street trading. (**Outcomes: 1, 4, 5, 6**)

As the London Port Health Authority, our **Port Health Service** is responsible for a district extending 151 kilometres along the River Thames from Teddington to the outer Estuary. The service protects, enhances, and improves public, environmental, and animal health by controlling: food and feed imports; food standards, food safety and water quality; infectious disease control; civil contingencies; ship sanitation; environmental protection and shellfish control. (**Outcomes: 1, 2, 6, 9**)

Our **Animal Health & Welfare Service** provides animal health services London-wide and holds contracts with most London Boroughs and some Unitary Authorities in the Home Counties to discharge their statutory animal health duties. The Service also runs the Heathrow Animal Reception Centre (HARC), the Border Inspection Post for live animals, at Heathrow Airport. (**Outcomes: 1, 7, 9**)

We operate three thriving **wholesale markets** which play a central role in the economies of the communities in which they operate. The markets supply produce to a host of food service sectors. Customers range from catering companies and retail markets to restaurants, schools, small local businesses and members of the public. (**Outcomes: 4, 7**)

Our budget by Committee* for 2019/20 is:

Total Gross Expenditure	£'000
Port Health & Environmental Services	(10,906)
Licensing	(911)
Markets	(18,755)
Total Gross Income	£'000
Port Health & Environmental Services	6,417
Licensing	786
Markets	20,739
Total Net Expenditure	£'000
Port Health & Environmental Services	(4,489)
Licensing	(125)
Markets	1,984

* - Local risk, central risk and recharges

Our top line objectives are (links to Corporate Plan Outcomes and Actions are shown in brackets):

Service deliverables

1. Continue to evaluate, and put in place actions to address, the impacts of Brexit on the services provided by PH&PP. **(6b)**
2. Publish a new Air Quality Strategy 2019–2025 to deliver measurable improvements in nitrogen dioxide across the City. **(11a)**
3. The Licensing Team will continue to develop the Safety Thirst Award Scheme, which aims to promote responsible management and reduce crime and anti-social behaviour. **(1b)**
4. The Licensing Team will undertake enforcement against illegal street traders, especially on and near City bridges. **(1b)**
5. The Trading Standards Team will maintain its focus on preventing financial fraud. **(6c)**
6. The Commercial Environmental Health Team will focus on the food and health and safety interventions and projects derived from its annual Service Plan including the further development of Primary Authority. **(1c)**
7. The Pollution Team will continue to implement the Action Plan of the Noise Strategy 2016-2026 through implementation of site monitoring of noise from building sites, and the outcome of the consultation on Saturday morning working. **(1c)**
8. Investigate, and implement, new income generation proposals across the department. **(9b)**
9. Work with the Project Team to ensure that the Markets Consolidation Programme receives adequate, timely input and that the requirements of Markets' stakeholders are taken into account as the programme progresses. **(4b)**

Corporate programmes and projects

- Air Quality Programme: ensure that the City complies with the statutory requirements for London Local Air Quality Management. Demonstrate leadership for London by implementing a refreshed Air Quality Strategy for 2019-2025. **(11d)**
- Corporate Apprenticeship Scheme: support the scheme by continuing to offer a range of suitable placements for candidates. **(8d)**
- Energy Efficiency Programme: focus on further reductions in energy usage. **(11c)**
- Secure City Programme: contribute to the development of the Joint Contact and Control Room and the Customer Relationship Management System, which aim "to provide a secure city environment for all to visit, work and live". **(12b)**

Departmental programmes and projects

- PH&PP will move to a new cloud-based, hosted and browser-accessed line of business system in a joint project with DBE. **(9b)**
- Complete a review of CCTV across all three markets and prepare specifications for procurement. **(12b)**
- Work with Heathrow Airport Limited in a project to relocate the Animal Reception Centre to a 'Single Examination Area' on the airport boundary. **(9c)**
- In liaison with the IT Department, continue to develop the use of technology and mobile working solutions. **(9b)**

How we plan to develop our capabilities this year

- Improve working relationships with partners, Government Departments and other agencies including through collaboration and sharing information and expertise. **(7b)**
- Continue to review and develop our Departmental Workforce Plan and implement the actions identified therein. **(8c)**
- Continue to develop our workforce, including the delivery of a departmental Talent Management Programme. **(3c)**

What we plan to do in the future:

- Investigate and develop new business models for Port Health and Heathrow Animal Reception Centre to capitalise on opportunities that arise as a result of Brexit. **(6b)**
- Improve air quality and manage the risk to our residents and stakeholders. Work with third parties to influence London-wide and national strategies. **(11d)**
- Implement the findings of the market testing review for a potential Primary Authority Service Unit. **(7a)**
- Investigate alternative, more efficient methods of delivery across all the services we provide. **(5b)**

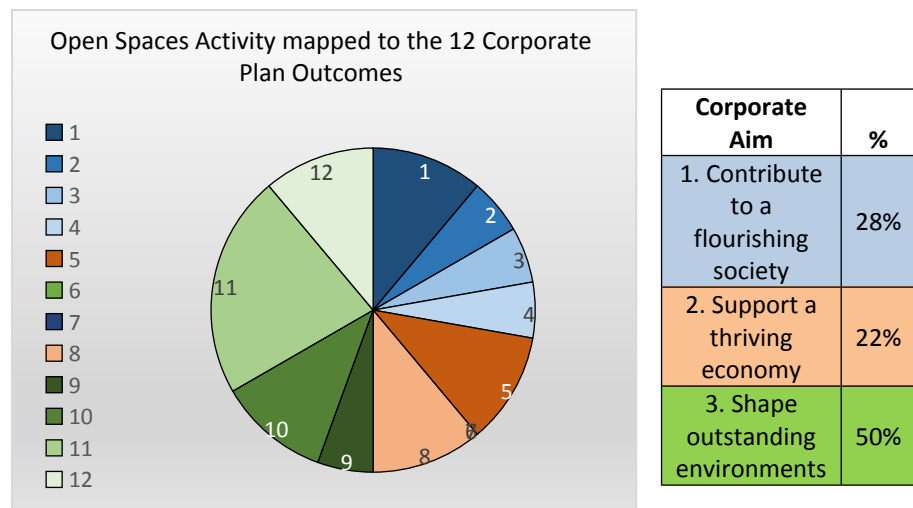
What we'll measure:

1. Compliance with Government requirements and expectations as Brexit arrangements progress. **(6b, 7b)**
2. Air pollution in the City: achieve an average 5% reduction in annual average nitrogen dioxide concentrations, by 31/03/2020. **(2b, 11a)**
3. Number and quality of applications received for the Safety Thirst Award Scheme. **(1b, 5c)**
4. Numbers of interventions and prosecutions taken against illegal street traders. **(1b, 6a)**
5. Number of reported incidences of City residents experiencing financial fraud. **(1b, 6c)**
6. The change in the overall Food Hygiene Ratings Scheme (FHRS) ratings profile for City food establishments. **(1c, 6a)**
7. Delivery of key actions of the Noise Strategy, income generated, and the number of sites monitored. **(1c, 11a)**
8. Income levels. **(5b, 9b)**
9. Markets' stakeholders are fully engaged in consultation about the programme and their requirements are reflected at each stage. **(4b, 7c)**

We enrich people's lives by enhancing and providing access to ecologically diverse open spaces and outstanding heritage assets across London and beyond.

APPENDIX 3

The Department's Business Plan Activity is mapped below to the 12 Corporate Outcomes and 3 Corporate Aims



The Department manages open spaces across London and beyond, a Cemetery & Crematorium, Keats House, the Monument & Tower Bridge.

City Gardens and the Crematorium and Cemetery operate as local authority functions funded by City's Fund. The other Open Spaces & Keats House are Charitable Trusts and with The Monument, are funded by the City of London through City's Cash. Tower Bridge is funded by Bridge House Estates.

Our total 2019-20 budget is:	(Expenditure) (£000)	Income £000	Net cost (£000)
DIRECTORS'S LOCAL RISK:			
City's Fund	(5,013)	5,626	613
City's Cash	(15,543)	4,422	(11,121)
Bridge House Estates	(6,435)	6,217	(218)
TOTAL Director's Local Risk	(26,991)	16,265	(10,726)
City Surveyor's local risk (across all funds)	(4,898)	-	(4,898)
Recharges (across all funds)	(7,345)	1,330	(6,015)
Central risk (across all funds)	(1,121)	1,522	401
GRAND TOTAL ALL CHARGES	(40,355)	19,117	(21,238)

Our three top line objectives and twelve outcomes are:

A. Open spaces and historic sites are thriving and accessible.

1. Our open spaces, heritage and cultural assets are protected, conserved and enhanced (12)
2. London has clean air and mitigates flood risk and climate change (11)
3. Our spaces are accessible, inclusive and safe (1)
4. Our habitats are flourishing, biodiverse and resilient to change (11)

B. Spaces enrich people's lives.

5. People enjoy good health and wellbeing (2)
6. Nature, heritage and place are valued and understood (3)
7. People feel welcome and included (4)
8. People discover, learn and develop (3)

C. Business practices are responsible and sustainable.

9. Our practices are financially, socially and environmentally sustainable (5)
10. London's natural capital and heritage assets are enhanced through our leadership, influence, investment, collaboration and innovation (10)
11. Our staff and volunteers are motivated, empowered, engaged and supported (8)
12. Everyone has the relevant skills to reach their full potential (8)

What we'll measure:

- Green Flags Awards & Green Heritage Accreditation
- Condition of our Sites of Special Scientific Interest
- Our negative environmental impact
- Planning influence
- Active veteran tree management
- Internet access
- Learning
- Visits to our heritage attractions
- Customer satisfaction
- Tennis participation
- Net budget
- Income generation
- Volunteering
- Apprenticeships
- Short term sickness
- Health and safety investigations

KEY: The numbers in brackets show how the Open Spaces Outcomes link to the twelve Corporate Plan Outcomes 2018-2023.

We will work across the Department, with colleagues in City Surveyors, Chamberlains, Town Clerks, Comptrollers, Remembrancer's, Built Environment, Community and Children's Services and with Members, partners, stakeholders and our local communities to deliver our activities which will help us achieve our Departmental objectives and outcomes.

Departmental activity

A. Open Spaces and Historic Sites Are Thriving and Accessible

- a) Protect our heritage: developing partnership funding bids where possible (A1) (10d)
- b) Progress reviews, drafting, approval and implementation of management / conservation / heritage plans (A1) (11b)
- c) Reduce the negative environmental impacts of our activities (A2 & C9) (11a)
- d) Engage with the local planning process to mitigate and protect against the impact of development on our open spaces (A4) (12b)
- e) Review security and access control provision (A3) (1c)
- f) Protect and enhance our sites' biodiversity and determine the 'value of our green infrastructure'. (A4) (11b)

B. Spaces Enrich People's Lives

- g) Provide a sustainable range of sports and recreational opportunities (B5) (2d)
- h) Improve the visitor and cultural offer, including the development of facilities, new technologies, customer service and a programme of events celebrating our anniversaries, historic sites and nature. (B6 & B7) (4a)
- i) Determine our 'learning offer' (B8) (3b)

C. Business practices are responsible and sustainable.

- j) Maximise the value and opportunities of our built and natural assets (C9) (10c)
- k) Deliver opportunities arising from improved management capability from the City of London Corporation (Open Spaces) Act 2018 (A1) (1c)
- l) Develop innovative approaches to income diversification (C9) (5c)
- m) Make more effective use of IT and technology and adopt 'smarter' ways of working (C9) (9b)
- n) Support the development of asset management plans and master plans for each site and influence the City Surveyors implementation of their operational property review (C9, C10) (12a)
- o) Maintain our regional and national influence with regard to environmental, open space, burial, heritage and tourism matters (C10) (11d)
- p) Implement the recommendations arising out of the workforce plan, staff and customer surveys (C11) (8a)
- q) Develop our apprenticeship programme and volunteering opportunities across the Department (C12) (8d)
- r) Commence the process for prioritisation of services to mitigate efficiencies and establish long term sustainable service provision (C9) (5c)

Key:

The letter/number in brackets (e.g. A2) shows which Open Spaces outcome our activities are helping to achieve.

The number/letter in brackets (e.g. 2a) shows which Corporate Plan activity our activities are helping to achieve.

See appendix 1 for the detail behind these synopsised Departmental activities

Corporate programmes and projects:

In addition to those programmes and projects listed above and in appendix 1, we will support the delivery of Corporate Strategies in particular: Responsible Business Strategy, Apprenticeships, Volunteering, Education Social Mobility and the emerging strategies including: Customer Service, Climate Action, Transport, Visitor Destination, Local Plan.

We will contribute to development of the Culture Mile.

How we plan to develop our capabilities this year:

Actions k), m), p) and q) particularly show how we will develop our capabilities including those of our staff and volunteers. This is also reflected within Appendix 1.

The Open Spaces Cultural Values

which staff should uphold in the course of their work are:

**Collaborative and Inclusive,
Passionate and Driven,
Respectful and Open
Honest and Responsible**

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The Open Spaces Department's Vision is: we enrich people's lives by enhancing and providing access to ecologically diverse open spaces and outstanding heritage assets across London and beyond. **APPENDIX 4**

The 2019/20 Cemetery & Crematorium activity will help deliver the following Corporate Plan Outcomes:

Contribute to a flourishing society

3. People have equal opportunities to enrich their lives and reach their full potential

Support a thriving economy

5. Businesses are trusted and socially and environmentally responsible
7. We are a global hub for innovation in finance and professional services, commerce and culture
8. We have access to the skills and talent we need

Shape outstanding environments

9. We are digitally and physically well-connected and responsive
10. We inspire enterprise, excellence, creativity and collaboration
11. We have clean air, land and water and a thriving and sustainable natural environment

What we do at the Cemetery & Crematorium:

provide high quality burial and cremation options to all in a magnificent Grade I listed landscape whilst consciously protecting the heritage value of our site.

CEM & CREM LOCAL RISK BUDGET

	2019/20 approved budget is:		
	(Expenditure) (£000)	Income (£000)	Net (£000)
Total Employee Expenses	(2,477)	-	(2,477)
Total Premises Related Expenses	(369)	-	(369)
Total Transport Related Expenses	(146)	-	(146)
Total Supplies and Services	(414)	-	(414)
Total Customer, Client Receipts	-	5,089	5,089
Total Local Risk Budget	(3,406)	5,089	1,683
City Surveyor's local risk (Cem & Crem)	(821)	-	(821)
Recharges (Cem & Crem)	(1,680)	-	(1,680)
Central risk (Cem & Crem)	-	-	-
GRAND TOTAL ALL CHARGES	(5,907)	5,089	(818)

The Open Spaces Department's top line objectives and outcomes are:

A. Open spaces and historic sites are thriving and accessible.

1. Our open spaces, heritage and cultural assets are protected, conserved and enhanced (12)
2. London has clean air and mitigates flood risk and climate change (11)
3. Our spaces are accessible, inclusive and safe (1)
4. Our habitats are flourishing, biodiverse and resilient to change (11)

B. Spaces enrich people's lives.

5. People enjoy good health and wellbeing (2)
6. Nature, heritage and place are valued and understood (3)
7. People feel welcome and included (4)
8. People discover, learn and develop (3)

C. Business practices are responsible and sustainable.

9. Our practices are financially, socially and environmentally sustainable (5)
10. London's natural capital and heritage assets are enhanced through our leadership, influence, investment, collaboration and innovation (10)
11. Our staff and volunteers are motivated, empowered, engaged and supported (8)
12. Everyone has the relevant skills to reach their full potential (8)

We will measure:

- Net budget position
- Gross Income
- Market share of burials
- Number of burials, cremations, early drop offs
- % of cremations that take up early time slots
- Amount of gas used to heat the modern crematorium
- Energy generation from solar power

We will also contribute to a range of Department wide performance measures.

See targets on page 3.

KEY: The numbers in brackets show how the Open Spaces Outcomes link to the twelve [Corporate Plan Outcomes 2018-2023](#).

The Cemetery and Crematorium's Vision is:

to provide 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.

To achieve our vision, we will:

- Serve the City and all surrounding areas the highest standards in customer care, conservation management and sustainable burial and cremation services.
- Develop the Cemetery so that it will be appreciated for the site's history and beauty as much as it is now valued as a place to mourn, remember, respect and appreciate the dead.
- Contribute a unique area of cemetery open space for the public to enjoy nature, admire architecture and landscape design, and learn about London's history.
- Ensure that the City of London is at the forefront of sharing best practice in the ongoing and dynamic management and conservation of a historic cemetery and crematorium landscape that provides ecologically sustainable facilities for the disposal of the dead whilst meeting the needs of the bereaved.

Cemetery and Crematorium activity:

Open Spaces and Historic Sites Are Thriving and Accessible

1. Implement the year one actions arising out of the Conservation Management Plan (CMP) review, including: reducing Haywood Rhododendron Clumps in Church and Chapel Avenue, breaking-up and softening the South Boundary railings with clumps from the Haywood, Robertson Pallet Screen the fence-line in area 32a. (A1) (10d)
2. Landscape Projects – Continued development of the 'shoot' burial area. Removal of large conifers. Planting of more appropriate hedging in the memorial gardens. Improve pathways to the Classic Ash Grave area. (A3 & A4) (11b)

Spaces Enrich People's Lives

3. Develop our audience and accessibility to the service by working in partnership with local schools, universities and representative organisations, providing free heritage tours for individuals and groups and organising an Open House event. (B6 & B8) (3b)
4. Continue to work in partnership with our established consultative groups and offer training to funeral directors around the new forms introduced in April 2018. (B7 & C10) (7a)

Business practices are responsible and sustainable.

5. Work with City Surveyors Department to progress the replacement of the ageing cremators with new abated ones. (A2 & C9) (5c)
6. Develop our grave reuse and reclamation programme as a model system for creating the sustainable UK cemetery – by increasing grave reclamation in management zone 2. (C9) (5b)
7. Develop the use of sustainable energy using Photovoltaic cells and increasing the use of waste heat recycling to operational areas of the modern crematorium. (C9) (11a)
8. Work to expand and develop our 'cleaner greener' fleet and machinery. (C9) (11a)
9. Implement the recommendations arising out of the workforce plan, staff and customer surveys as well as developing staff. (C11) (8a)
10. Develop our apprenticeship programme and volunteering opportunities. (C12) (8d)
11. Develop a name search facility for the online burial register system. (B7 & B8 & C9) (9b)
12. Develop staffs' wider understanding in relation to managing the landscape whilst providing services and running a business. (C11 & C12) (8d)

Key:

The letter/number in brackets (e.g. A2) shows which Open Spaces outcome our activities are helping to achieve.

The number/letter in brackets (e.g. 2a) shows which Corporate Plan activity our activities are helping to achieve.

The Open Spaces Department's **Cultural Values** which staff should uphold in the course of their work are:

Collaborative and Inclusive, Passionate and Driven, Respectful and Open, Honest and Responsible

Key Performance Measures

Description	Target 2018/19	Target 2019/20
1. The overall net expenditure target for the Cemetery and Crematorium (OSD local risk only)	£1,665,000	£1,683,000
2. The overall income target for the Cemetery and Crematorium (OSD local risk only)	£4,821,000	£5,089,000
3. Market share of burials in relation to the Cemetery and Crematorium's seven neighbouring Borough's	7.8%	7.5%
4. Number of burials	861	861
5. Number of adult cremations	2,528	2,528
6. Number of early drop offs	New measure for 2019/20	82
7. % of early time slots taken up	New measure for 2019/20	30%
8. Amount of gas used to heat the Modern Crematorium - kWh	New measure for 2019/20	Establish baseline
9. Energy generation from Solar Power - electricity in kWh	New measure for 2019/20	Establish baseline

Awards Achieved in 2018/19

- Green Flag Award
- Green Heritage Accreditation
- Winner of the Equality and Inclusion Category of the CoL's 'Celebrating Our People Awards'

<https://www.cityoflondon.gov.uk/things-to-do/green-spaces/cemetery-and-crematorium/Pages/default.aspx>

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Committee	Dated:
Port Health and Environmental Services Health and Wellbeing Board	5 March 2019 26 April 2019
Subject: Draft Air Quality Strategy	Public
Report of: Interim Consumer Protection and Markets Operations	PHES: For Decision HWB: For information
Report author: Ruth Calderwood, Air Quality Manager	

Summary

The City of London Corporation's (City Corporation's) existing Air Quality Strategy 2015 – 2020 was approved by the Port Health and Environmental Services Committee in July 2015. A decision was taken to publish a new strategy for consultation ahead of time following the relatively recent publication of the Mayor of London Environment Strategy, the Government's Clean Air Strategy, draft London Plan, draft City of London Transport Strategy, draft City Local Plan and City Corporation Responsible Business Strategy.

The draft Air Quality strategy fulfils the City Corporation's statutory obligation to assist the Government and Mayor of London to meet European Limit Values for nitrogen dioxide and fine particles (PM₁₀). It also assists with the City Corporation's obligations under the Health and Social Care Act 2012 to improve the public health of its population.

The overarching aim of the draft strategy is to ensure that nitrogen dioxide in over 90% of the Square Mile meets health-based Limit Values and World Health Organisation (WHO) Guidelines by the beginning of 2025. There is also a commitment to achieve the WHO Guidelines for particulate matter in the shortest possible time through coordinated action. This recognises that dealing with air pollution in the centre of London is a complex issue, and we cannot achieve this alone.

The draft strategy contains six policy areas with 65 actions. It demonstrates how action to improve air quality has been firmly embedded across the organisation, the amount of collaborative work underway and how the City Corporation will continue to provide leadership in this area.

Many actions contained in the draft strategy will be delivered using existing resources. However, a request has already been made to increase the Air Quality base budget to cover the increasing costs of air quality monitoring and increased public demand for information about air pollution. A request has also been made for an additional post to assist with monitoring, data analysis, projects and communications. An application for Priorities Investment Pot funding has been submitted to support delivery of some actions. Actions that are currently unfunded include a sub action to source funding for delivery.

Air quality in the City is improving and will continue to improve as a result of action contained within the draft strategy. It will continue to be monitored very closely using the City Corporation's dense network of monitoring equipment.

Recommendation

Members of PHES are asked to:

- Approve the content of the draft Air Quality Strategy for public consultation, subject to comments received at the Committee meeting

Members of Health and Wellbeing Board are asked to:

- Note the content of the Air Quality Strategy and continue to provide support for reducing the impact of poor air quality on public health

Main Report

Background

1. The City Corporation has a statutory duty to assist the Mayor of London and the UK Government in taking action to reduce levels of air pollution so that concentrations of pollutants do not exceed set limits. The City Corporation also has a responsibility to improve public health.
2. The City of London's existing Air Quality Strategy 2015 – 2020 outlines action to fulfil the City Corporation's statutory responsibility for London Local Air Quality Management, and for reducing the health impact of air pollution on residents and workers.
3. A decision was taken to publish a new strategy for consultation ahead of time following the relatively recent publication of the Mayor of London Environment Strategy, the Government's Clean Air Strategy, draft London Plan, draft City of London Transport Strategy, draft City Local Plan and City Corporation's Responsible Business Strategy.
4. Air quality in the City is improving, particularly away from busy roadsides. This is set to continue with the wide range of action being taken by both the City Corporation and the Mayor of London. Mayor of London policies that will have the greatest benefit on local air quality in the City are the forthcoming ultra-low emission zone, cleaning the bus fleet and the new electric (range extender) taxi for London.
5. Improving air quality is now firmly embedded into key policy areas across the organisation. This cross departmental support, together with reduction in levels of pollution measured, has enabled the Corporate risk rating to be reduced from red to amber.

Draft Air Quality Strategy

6. The aims of the draft Air Quality Strategy are to:

- a. fulfil statutory obligations for London Local Air Quality Management and improving public health
- b. ensure that air quality in over 90% of the Square Mile meets the health-based Limit Values and World Health Organisation Guidelines for nitrogen dioxide by the beginning of 2025
- c. achieve, World Health Organisation Guidelines for particulate matter (PM₁₀ and PM_{2.5}) in the shortest possible time through coordinated action

Once the 2019 London Atmospheric Emissions Inventory has been published an assessment will be undertaken to determine when particulate levels are likely to meet WHO Guidelines. The Mayor of London, in his Environment Strategy, has made a commitment to ensure that WHO Guideline levels for particulates are met across London by 2030.

7. The above aims will deliver three main outcomes:

- a. the Square Mile has clean air
- b. people enjoy good health through reduced exposure to poor air quality
- c. the City Corporation is a leader for air quality policy and action and inspires collaboration across London

8. The outcomes will be achieved by action across 6 policy areas:

- air quality monitoring
- leading by example
- collaborating with others
- reducing emissions from transport
- reducing emissions from non-transport sources
- public health and raising awareness.

There are 65 actions associated with these policies with detail on how they will be taken forward, timelines, departmental responsibility and relative costs.

9. The draft strategy demonstrates the strong cross departmental support for improving air quality and reducing the impact on public health. This is evidenced most strongly in the City Corporation Corporate Plan 2018 - 2023, draft Transport Strategy, Responsible Business Strategy, Responsible Procurement Strategy and draft City Plan.

Corporate & Strategic Implications

10. The draft Air Quality Strategy supports the following outcomes from the Corporate Plan 2018 to 2023.

- Outcome 2 'People enjoy good health and wellbeing'

- Outcome 11 'We have clean air, land and water and a thriving and sustainable natural environment'

11. The Department of Markets and Consumer Protection wrote the draft strategy, with the following departments providing support:

- a. Built Environment
- b. Community and Children's Services
- c. Chamberlains
- d. Town Clerks
- e. City Surveyors

Financial and Resourcing Implications

12. The table of actions in the Appendix 1 of the strategy includes the relative cost of each item. Many actions will be delivered using existing resources.

13. A request has been made to increase the Air Quality base budget to cover the costs of additional air quality monitoring and increasing public demand for information about air pollution in the City. The requested base budget increase, totaling £99,000, would also fund an additional post to assist with monitoring, data analysis, projects and communications. If this funding request is not approved air quality monitoring in the City would have to be scaled back impacting on the City Corporation's statutory obligations for air quality management and delivery of actions 1 and 4 of the draft strategy. Monitoring equipment in the City is old and needs replacing over the next few years, this would not be possible without this additional funding. Without an additional post, large aspects of air quality communication work would cease. This has become more essential as the profile of air quality has increased. This would impact on the delivery of actions 59, 60, 61, 62, 64 and 65. This work has been covered over the past two years by an external grant.

14. An application for Priorities Investment Pot funding for £110,000 over two years has been submitted to support business engagement, some aspects of collaboration and leadership and for air quality modelling to assess compliance with the aims of the strategy. These are all commitments in the Responsible Business Strategy. Without this funding, significant aspects of business engagement would cease (action 25), we would not be able to demonstrate compliance with the aims of the strategy (action 6) and aspects of London wide collaboration would not be possible (action 7). Collaborative work is essential for improving air quality in the City as the City Corporation cannot resolve the problem alone.

15. Any item for which funding is not currently available includes a sub action to source funding for its delivery. In addition to the above items, this includes:

- electric vehicles charging infrastructure for City residential estates (action 10)
- supporting research by London Universities (action 20)

- supporting the Port of London Authority Air Quality Strategy (action 22)
- undertaking a survey of combustion plant in the City (action 24)
- rolling out cost effective interventions following pilot projects in the City's Low Emission Neighbourhood
- supporting trials of zero emission technology for street works, filming and events (action 51)
- supporting trials to reduce emissions from other combustion plant in the City
- investigating the use of emergency generators for demand side response (action 53)
- improvements to the free City smartphone app (action 58)

Public Sector Equality Duty

16. An equality analysis has been undertaken and has not indicated any potential discrimination or adverse impact on protected groups.

Security Implications

17. There are no security implications.

Conclusion

18. An updated draft Air Quality Strategy has been produced for consultation. It contains a wide range of action that will be taken to deliver the following outcomes:

- a. the Square Mile has clean air
- b. people enjoy good health through reduced exposure to poor air quality
- c. the City Corporation is a leader for air quality policy and action and inspires collaboration across London

19. The draft strategy will be published for statutory consultation, subject to comments received at Committee. The final strategy will be brought back to committee for approval in July 2019.

Appendices

Appendix 1: Draft Air Quality Strategy

Background Papers: Equalities Analysis for the draft Air Quality Strategy

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City of London Air Quality Strategy

Delivering healthy air in the City of London

Draft for Consultation

March 2019



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This report will be available on the City of London web site <http://www.cityoflondon.gov.uk/air>

Foreword

To follow

Jeremy Simons, Chairman Port Health and Environmental Services Committee

Air Quality Strategy 2019 – 24: Delivering healthy air in the City of London

Our definition of healthy air:

Concentrations of nitrogen dioxide (NO₂), small and fine particles (PM₁₀ and PM_{2.5}) that meet health-based Limit Values and World Health Organisation (WHO) Guidelines.

Why us:

The City of London Corporation has a statutory obligation to take a wide range of action to improve air quality and protect public health. Improving air quality and ensuring good health and wellbeing is a key organisational priority outlined in our Corporate Plan (CP) for 2018-23, through which we aim to contribute to a flourishing society, support a thriving economy and shape outstanding environments.

Who we will work with:

Residents, workers, schools, businesses, Barts Health NHS, Greater London Authority, Transport for London, London Councils, London Boroughs, Government, Environment Agency, London's Universities, Third Sector, Port of London Authority, Cross River Partnership

Our Vision

The Square Mile has air that is healthy to breathe.

Our Aim

For nitrogen dioxide to meet health-based Limit Values and WHO Guidelines in over 90% of the Square Mile by 2025 and achieve WHO Guidelines for PM₁₀ and PM_{2.5} in the shortest possible time

Our Outcomes

The Square Mile has clean air

People enjoy good health through reduced exposure to poor air quality

We are a leader for air quality policy and action and inspire collaboration across London

Links to CP Outcome 11

Links to CP Outcome 2

Links to CP Outcome 11

Our Activities

- Reduce emissions of air pollutants from our fleet, buildings and through our contracts
- Ensure new developments, transport and public realm schemes and proposals have a positive impact on local air quality
- Pilot innovative measures

- Provide robust and reliable information and data
- Make use of public health networks to disseminate information
- Develop tailored action plans for City of London schools
- Further develop the free smartphone App CityAir

- Develop a Private Members Bill to improve air quality
- Work closely with a wide range of stakeholders on air quality policy
- Facilitate collaboration across London's air quality community

Demonstrating success

A measure of success for the strategy will be consistent compliance with health-based air quality limits and guidelines measured using a network of robust air quality monitoring equipment. Over the next five years, we will also continue to be recognised as a leading and highly regarded authority in the field of air quality.

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1. Introduction

The City of London, also known as the Square Mile, is the historic heart of London. It is home to approximately 7,500 permanent residents and 24,000 businesses. There is a working population of over 510,000 people. This is projected to increase to 640,000 by 2036. In addition to workers and residents, each year the City of London welcomes over 10 million tourists, along-side people who visit for business.

Like much of central London, the City of London can experience high levels of air pollution. The pollutants of current concern are nitrogen dioxide (NO₂), a colourless and odourless gas that is a product of fuel combustion, and small particles, of which there are a wide range of sources, including combustion. These particles are referred to as PM₁₀ (small particles) and PM_{2.5} (fine particles). These are particles below 10 and 2.5 micrometres in diameter respectively.

The City of London Corporation (City Corporation) is required by statute to measure air pollution and develop and implement an improvement plan if health-based air quality limits are not met. Following detailed air quality monitoring, the whole of the Square Mile was declared an Air Quality Management Area (AQMA) in January 2001 for nitrogen dioxide and small particles (PM₁₀). This was due to levels of these pollutants being higher than the required limits. These limits were set in European Directives and transposed into domestic legislation.

The framework for air quality policy and action by London local authorities is called London Local Air Quality Management (LLAQM). It is overseen by the Mayor of London who provides templates and tools to assist with action planning and monitoring.

The City Corporation has had an air quality action plan in place since 2002. In 2011, the action plan was incorporated into an Air Quality Strategy outlining steps that would be taken to both improve local air quality and reduce the impact of air pollution on public health. The strategy was updated in 2015, detailing further measures that would be taken through to 2020¹. This strategy builds upon previous action and details measures that will be taken to 2024. A complete table of actions, with expected outcome, is reported in Appendix 1. The current legal framework for improving air quality is in Appendix 2.

Despite the implementation of a wide range of action by the City Corporation to improve air quality, the health-based limits for nitrogen dioxide are still not met everywhere in the Square Mile. Extensive monitoring, however, demonstrates that levels of nitrogen dioxide are reducing year on year, particularly away from busy roads.

¹ City of London Air Quality Strategy 2015 – 2020

The limits set in European Directives for small particles (PM₁₀ and PM_{2.5}) are generally met everywhere in the City of London. The only exception is adjacent to the busiest roadsides in unfavourable weather conditions. The World Health Organisation (WHO) has set its own Guidelines² for concentrations of PM₁₀ and PM_{2.5}. These are tighter than the limits set in European Directives. Fine particulate pollution has health impacts even at very low concentrations. No threshold has been identified below which no damage to health is observed. Therefore, the WHO Guidelines aim to achieve the lowest concentrations of particulate matter possible. Reducing levels of air pollution to meet the tighter WHO Guidelines will therefore continue to improve health outcomes.

The aims of this Strategy are to ensure that:

- **the City Corporation fulfils its statutory obligations for London Local Air Quality Management and improving public health**
- **air quality in over 90% of the Square Mile meets the health-based Limit Values and World Health Organisation Guidelines for nitrogen dioxide by the beginning of 2025**
- **through coordinated action, World Health Organisation Guidelines for particulate matter (PM₁₀ and PM_{2.5}) will be achieved in the shortest possible time**

These aims will deliver three main outcomes:

- the Square Mile has clean air
- people enjoy good health through reduced exposure to poor air quality
- the City Corporation is a leader for air quality policy and action and inspires collaboration across London

The outcomes will be met by a range of action across six areas:

² Air Quality Guidelines - Global Update 2005 Particulate matter, ozone, nitrogen dioxide and sulfur dioxide



City Corporation Corporate Plan 2018 – 23

This draft strategy supports the delivery of the City Corporation Corporate Plan 2018 -2023. The Corporate Plan sets out the over-arching strategic direction for the organisation. It has been shaped around three areas of public value - economy, environment and society. This Air Quality Strategy supports two Corporate Plan outcomes:

- Outcome 2: People enjoy good health and wellbeing
- Outcome 11: We have clean air, land and water and a thriving and sustainable natural environment

Other Corporate strategies that support the aims of this draft Air Quality Strategy are:

- Health and Wellbeing Strategy and Joint Strategic Needs Assessment
- Responsible Business Strategy
- Transport Strategy (draft)
- Local Plan and City Plan (draft)
- City Tree Strategy
- Open Spaces Strategy
- Procurement Strategy (in development)
- Climate Action Strategy (in development)

1.1 Source of air pollution in the City of London

The quality of the air in the City of London is influenced by a range of factors. Being at the heart of London, it is heavily influenced by emissions generated across Greater London. Over 75% of PM₁₀ particle pollution measured in the City of London originates from outside the City of London boundary. This highlights the importance of London-wide and national action to support the local action being taken by the City Corporation. Under certain weather conditions small particles can be brought to London from the European continent, and even from as far as Africa. For sources of pollution generated within the Square Mile itself, the main contributors are stationary and mobile combustion, largely associated with buildings and road traffic.

The Greater London Authority produces an Atmospheric Emissions Inventory for London. It is known as the LAEI. It is a large database of emission sources that contribute to air pollution in the capital. Information on the sources of emissions of oxides of nitrogen (NO_x) and fine particles are detailed in Appendix 3. The latest version, issued in 2016, is referred to as the LAEI 2013. It contains emissions across London with 2013 presented as a baseline. The database forecasts that in 2020, NO_x emissions from buildings in the City of London will be over twice that from road transport. This is a significant change from the emissions estimated for 2013, where traffic pollution was the dominant source. This change is due to the wide range of action being taken to reduce emissions from vehicles. Whilst the absolute values should be treated with caution, it demonstrates that action increasingly needs to focus on emissions from non-road sources of pollution as well as road transport.

Diesel vehicles, particularly taxis, buses, vans and lorries, are the dominant source of emissions from road transport in the City of London. Many of these vehicles are servicing business needs. Pollution from demolition and construction sites also impact on local air quality. Further detail can be found in Appendix 3.

1.2 Health impacts of air pollution

Exposure to air pollution has a range of impacts on health. Short term exposure mainly affects people who are already classed as 'vulnerable', which means they have an existing condition which is aggravated by high levels of air pollution. Air pollution can exacerbate asthma and affect lung and heart function. There is evidence that both PM_{2.5} and PM₁₀ cause additional hospital admissions on high pollution days for those suffering from respiratory or cardiovascular disease.

Long-term exposure to high levels of pollution affects the whole population, not just the vulnerable. This is particularly the case for long-term exposure to fine particles,

PM₁₀ and PM_{2.5}.³ Nitrogen dioxide has also been associated with adverse effects on hospital admissions, a decrease in lung function and growth, increase in respiratory disease, and incidences of asthma and cancer. Further information is outlined in Appendix 4.

³ Fine Particulate Matter (PM_{2.5}) in the United Kingdom 2012 Air Quality Expert Group for Defra

2. Air Quality Monitoring

Commitment: The City Corporation will monitor air pollutants to assess compliance with Air Quality Limit Values and World Health Organisation Guidelines. Data will also be used to support research, evaluate the effectiveness of policies to improve air quality and to provide alerts when pollution levels are high.

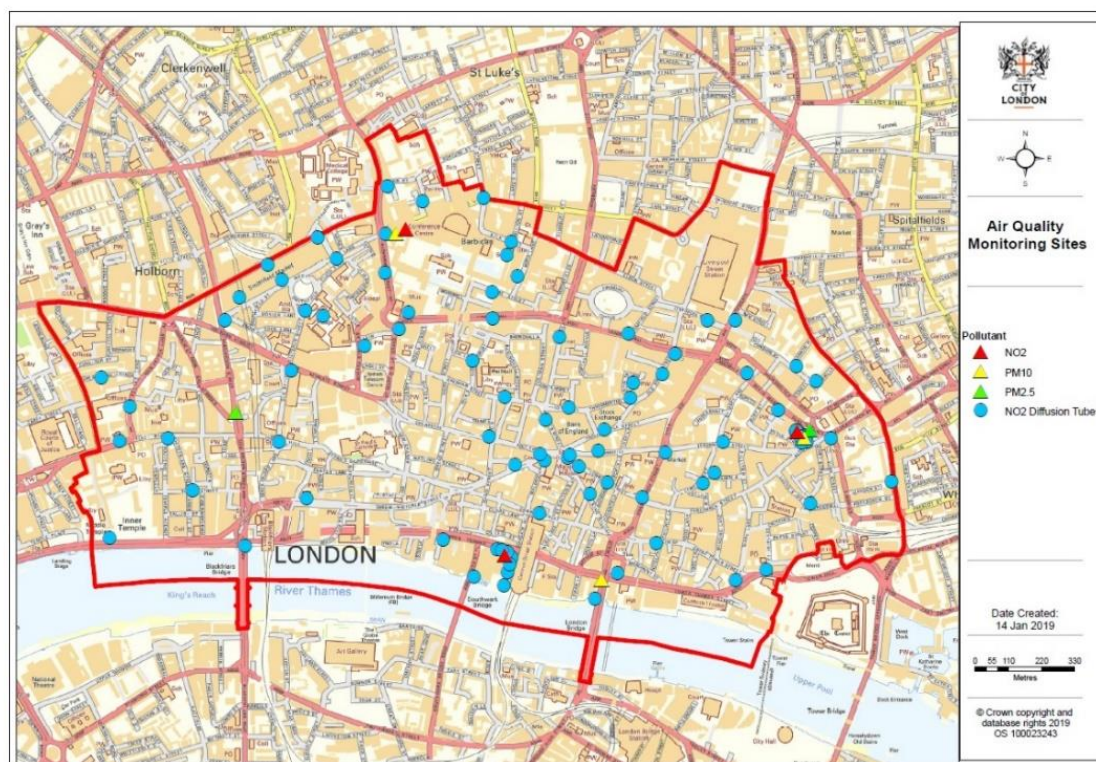
The City Corporation has been monitoring air quality for many years at a range of locations across the Square Mile. Monitoring is a vital component of air quality management and fulfils the following functions:

- to check compliance against air quality objectives, Guidelines and Limit Values, and consequently the impact on health
- to assess long term trends and the effectiveness of policies and interventions to improve air quality
- to raise awareness and provide alerts to the public when air pollution levels are high

The focus of monitoring in the City of London is to obtain reliable and accurate data for nitrogen dioxide, PM₁₀ and PM_{2.5} as these are the pollutants of concern. Data collected shows that levels of air pollution across the City of London, particularly levels of nitrogen dioxide, are decreasing. Given the substantial interest in air pollution, and the importance placed on it by the City Corporation, the amount of monitoring has increased significantly in recent years.

The air quality monitoring requirements in the City of London are under constant review. Figure 2.1 shows locations where air quality was monitored during 2018. The triangles represent the continuous monitoring sites and the circles are where diffusion tube monitoring was carried out. In addition, to the locations shown on the map, diffusion tube monitoring was carried out by the Cheapside Businesses Alliance in the Cheapside area.

Figure 2.1: Continuous and diffusion tube monitoring sites in 2018



2.1 Nitrogen dioxide

Measuring nitrogen dioxide

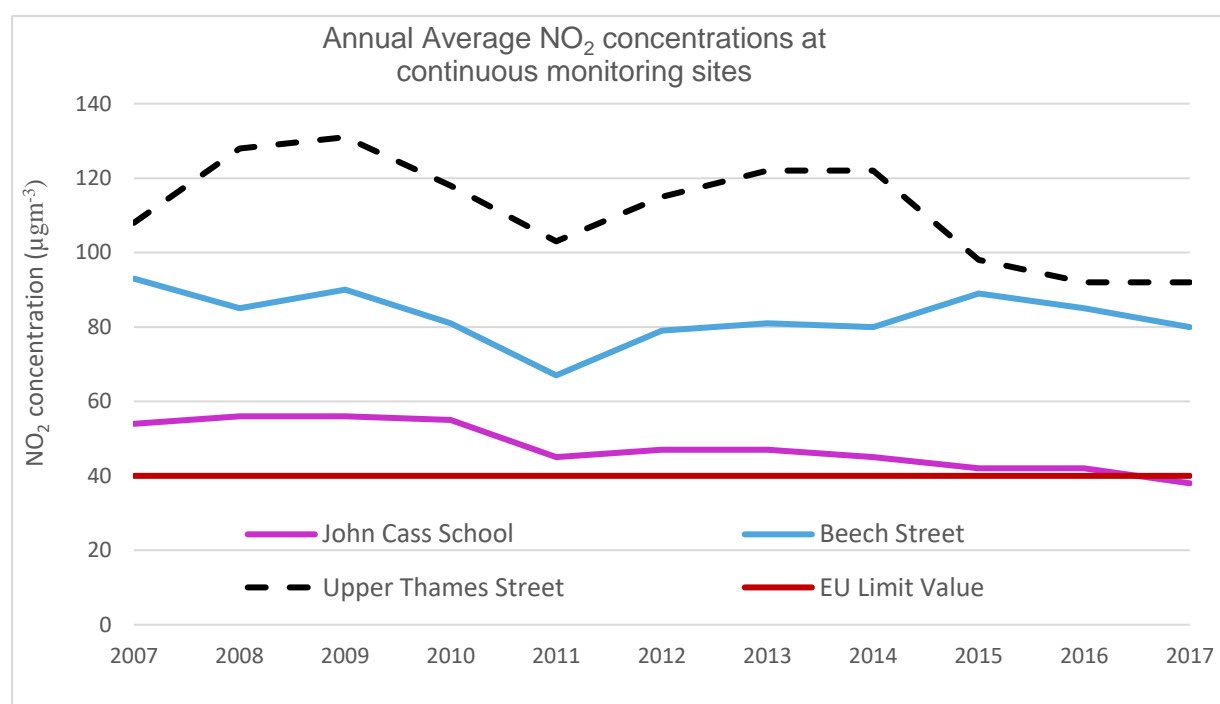
Continuous monitoring

Air quality monitoring is undertaken using different types of equipment depending on the purpose. One method of measuring nitrogen dioxide is with a continuous analyser. They are called continuous analysers as they take a measurement every minute and provide 15-minute average data. These are the most accurate instruments available and provide hourly average readings. The instruments are calibrated regularly and audited twice a year. They are measuring nitrogen dioxide in Beech Street, Upper Thames Street and at Sir John Cass's Foundation Primary School. The data is subject to very detailed checks by Kings College London and made available to the public on the web site www.londonair.org.uk.

Figure 2.2 details the data collected at these three sites from 2007 to 2017. At the time of writing this draft Strategy ratified nitrogen dioxide data for 2018 is not available. It will be included in the final version of the Strategy. The high concentrations seen at Upper Thames Street and Beech Street are associated with the monitoring taking place at busy roadsides. Upper Thames Street is a 3-lane

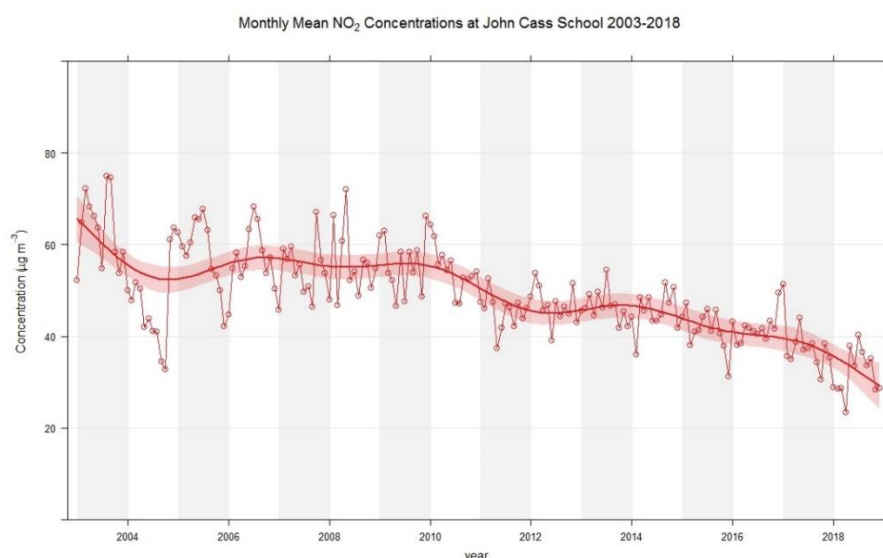
narrow road with tall buildings either side and Beech Street is a covered road. At Sir John Cass's Foundation Primary School, nitrogen dioxide is measured in the rear playground and the site is relatively open, so concentrations are lower. This site is classed as an 'urban background' site. The reduction in concentrations at all sites in 2011 was due to the weather conditions that year. The reduction in concentrations at Upper Thames Street from 2015 followed the installation of the cycle super highway when the lanes of traffic reduced from 4 to 3.

Figure 2.2 Annual Average NO₂, 2007 to 2017



Data collected at Sir John Cass's Foundation Primary School reveals that background concentrations of nitrogen dioxide have been reducing year on year. For the first time in 2017 concentrations were below the annual average EU Limit Value of $40\mu\text{g}/\text{m}^3$. Figure 2.3 shows the monthly average data for Sir John Cass's Foundation Primary from 2003 to 2018 and reveals a continuous improvement over this period.

Figure 2.3: Monthly Average NO₂, Sir John Cass's Foundation Primary School, 2003 - 2018

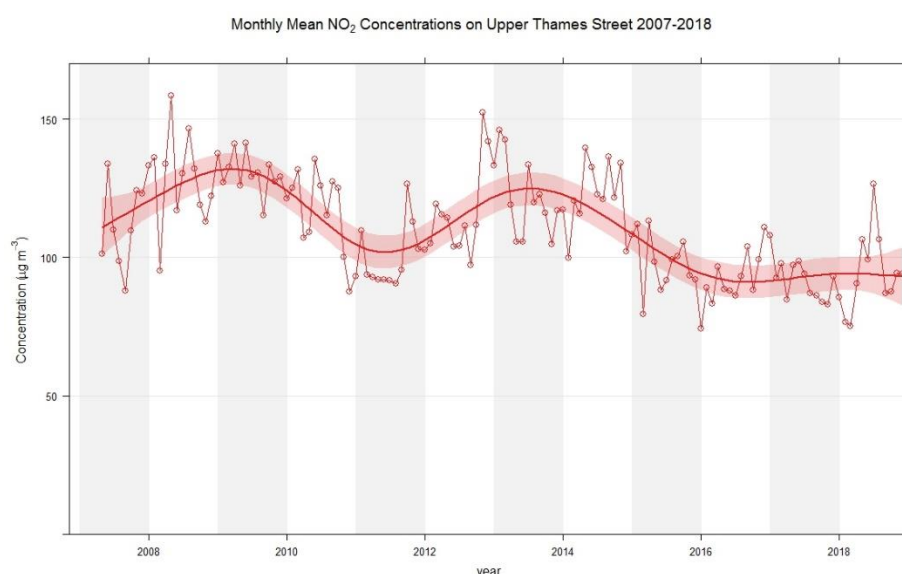


Concentrations of nitrogen dioxide at roadside are also reducing, although they remain high. Figures 2.4 shows the monthly average nitrogen dioxide in Upper Thames Street from 2007 to 2018.

The ongoing high levels of nitrogen dioxide at roadside are due to a range of factors, most significantly the failure of vehicle Euro Standards to meet the required reduction in emissions of oxides of nitrogen (NO_x) in diesel vehicles. There has also been an increase in the use of diesel in the fleet, partly due to national policy to encourage lower carbon fuels.

Further charts showing the variation of pollution over different days of the week and months of the year are presented in Appendix 5.

Figure 2.4: Monthly Average NO₂ in Upper Thames Street, 2007- 2018.



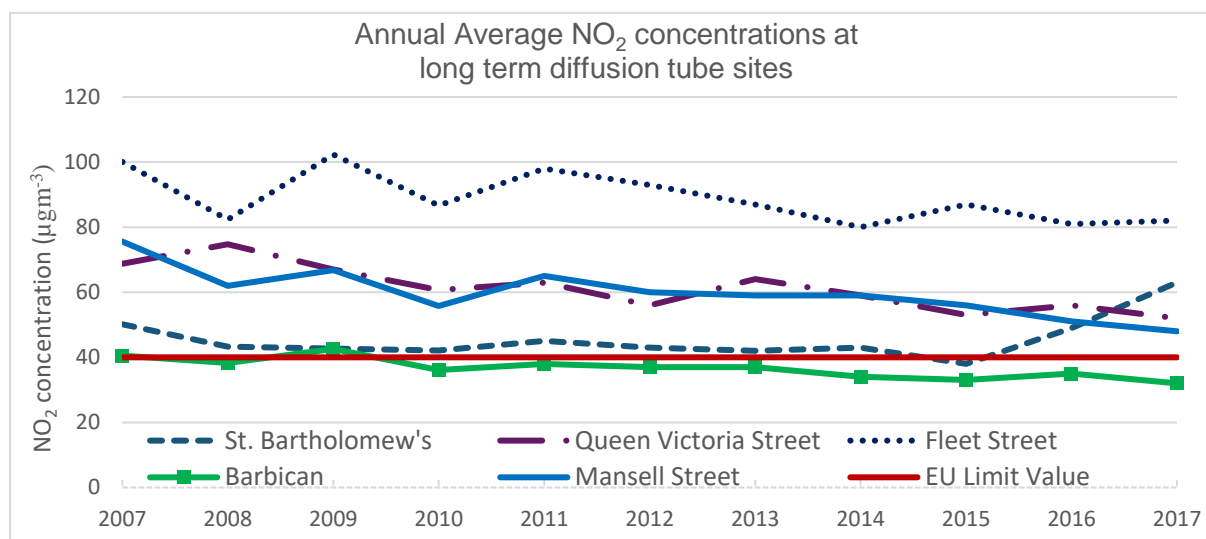
The profile of air quality and interest in data has increased in recent years. As a result, there are many air quality sensors on the market that vary in terms of accuracy and reliability. Good quality data is essential to support air quality management and for people to be able to make sound choices if they want to avoid high levels of air pollution. The City Corporation will therefore support trials of new sensors to establish their accuracy.

Non-continuous monitoring

Data collected from continuous analysers is supplemented by data collected using diffusion tubes. Diffusion tubes are low cost, low maintenance sensors that are less accurate than continuous analysers. Their use is limited as they provide data averaged over a month. The data is very useful however for comparing levels to the annual mean Limit Value, revealing long term trends, and detecting hot spots. Due to the increased interest and concern about air pollution, diffusion tubes are currently in place at approximately 100 locations across the Square Mile to monitor both long term trends and the impact of interventions.

Figure 2.5 details concentrations of nitrogen dioxide measured over 10 years at five sites using diffusion tubes. A similar pattern to that in Figure 2.2 is observed with roadside sites having the highest concentrations with the overall trend being downwards. A significant increase in concentrations was measured at St. Bartholomew's Hospital in 2016 due to an energy centre being introduced down wind of the equipment.

Figure 2.5: Annual Average NO₂ Measured with Diffusion Tubes, 2007 to 2017

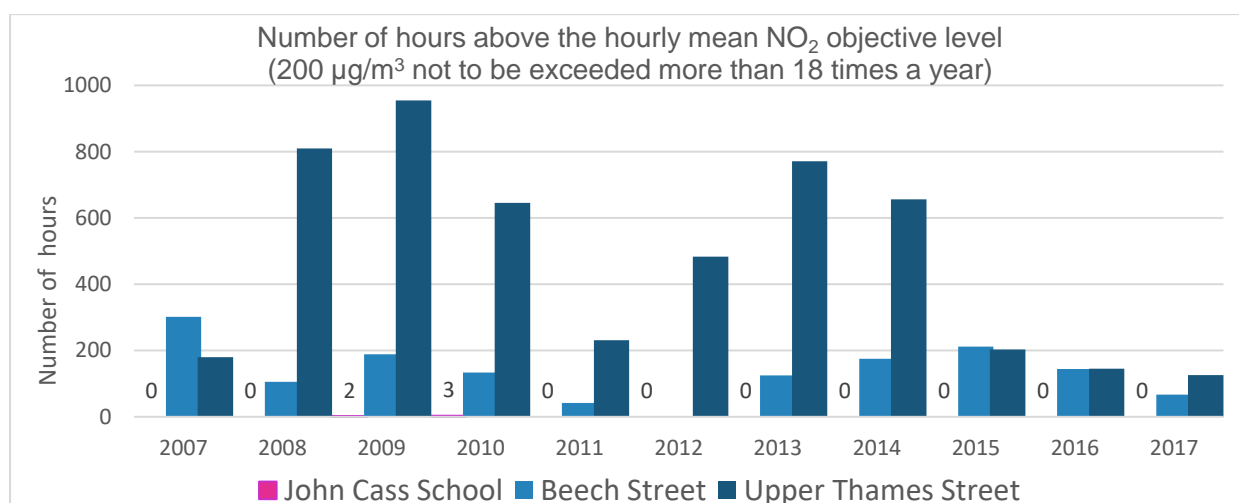


Hourly average concentrations of nitrogen dioxide

In addition to an annual average limit for nitrogen dioxide, there is also an hourly average that should not be breached. This hourly limit is 200 µg/m³. Eighteen

breaches of this limit are acceptable in a year to allow for unusual weather conditions. This can only be evaluated using continuous analysers although it is assumed that if the annual average nitrogen dioxide is above $60\mu\text{g}/\text{m}^3$ the hourly average may be breached. This 18-hour limit is breached every year at Upper Thames Street and Beech Street. It is also likely to be breached in Fleet Street given the very high annual average concentration. The number of hours above $200\mu\text{g}/\text{m}^3$ has dropped significantly since 2015 at the Upper Thames Street monitoring site, see Figure 2.6.

Figure 2.6: Breaches of the hourly average NO_2 , 2007 to 2017



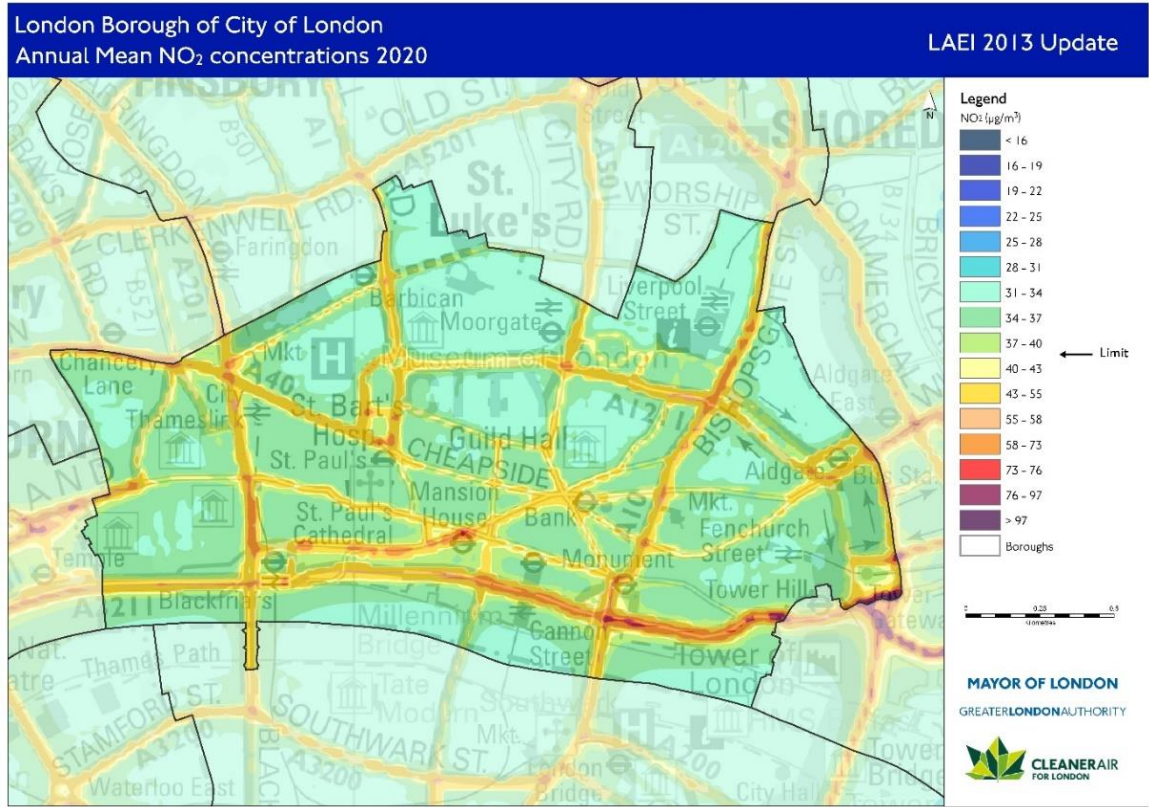
Note: the number of hours above $200\mu\text{g}/\text{m}^3$ at Sir John Cass's Foundation Primary School are shown numerically.

Computer modelling

Air quality monitoring provides data for specific locations. This data is supplemented by computer modelling. Modelling is also used to predict future concentrations of air pollution. Computer model maps, particularly forecast maps, should not be viewed as an accurate representation of concentrations. Instead they are used as a tool to establish where air pollution may be a problem or may continue to be a problem in the future.

Figure 2.7 shows computer modelled concentrations of annual average nitrogen dioxide for 2020 using data from the 2013 London Atmospheric Emissions Inventory. The computer model predicts that the Limit Value for annual average nitrogen dioxide, $40\mu\text{g}/\text{m}^3$, will continue to be breached along all main roads. Monitoring data supports this assumption. An updated LAEI should be published during 2019 and if available, the data will be included in the final version of this Strategy.

Figure 2.7: Modelled concentrations of annual average nitrogen dioxide forecast for 2020

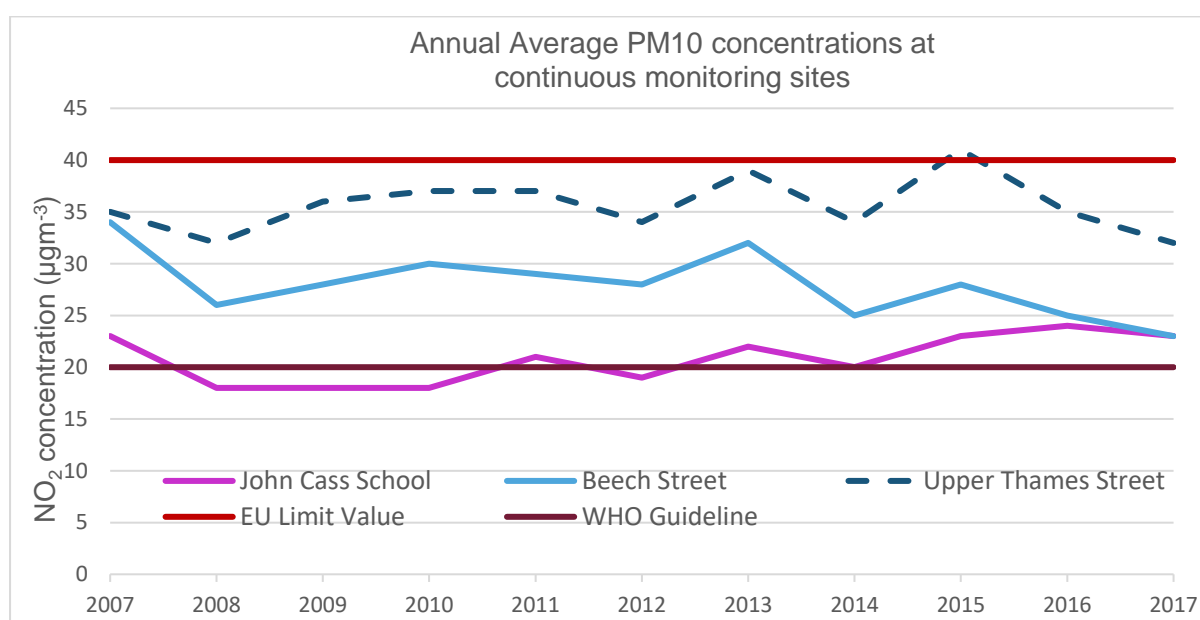


2.2 Small particles (PM₁₀)

Small particles (PM₁₀) are measured using continuous analysers in Upper Thames Street, Beech Street and at Sir John Cass's Foundation Primary School. The data is available on the web site londonair.org.uk

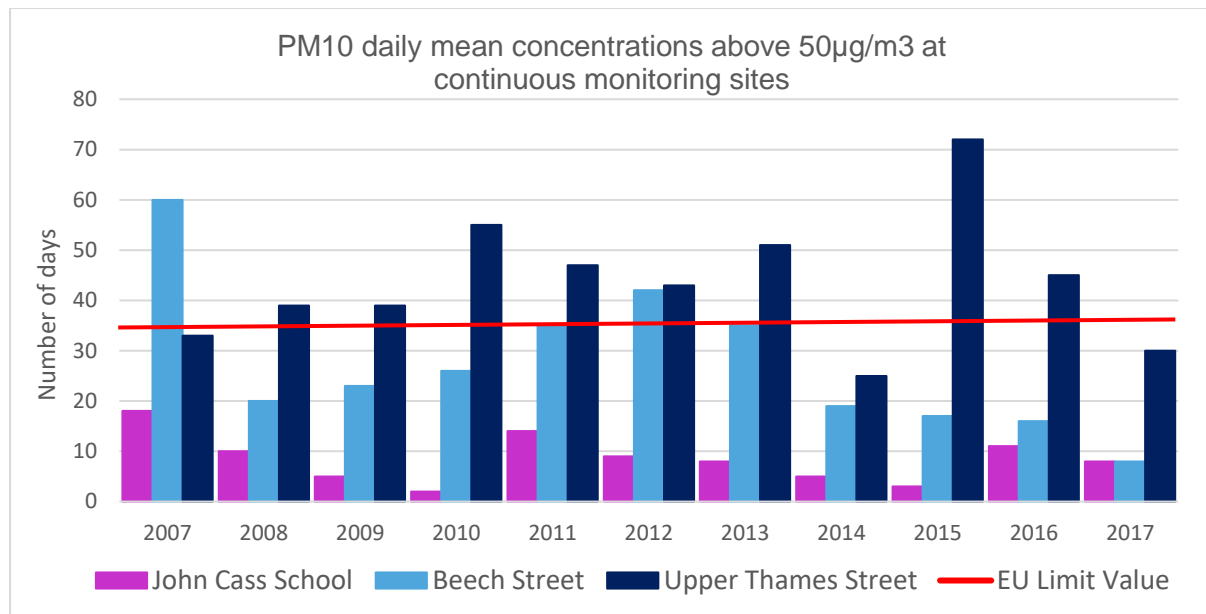
Annual average concentrations of PM₁₀ meet the Limit Value of 40 µg/m³ at all monitoring sites. Since 2007, the Limit Value has only been breached once in Upper Thames Street. This is thought to be associated with the construction of the cycle superhighway. Although the Limit Value is met, the World Health Organisation Guideline for PM₁₀ level of 20 µg/m³ as an annual average is breached at all sites.

Figure 2.8: Annual Average PM₁₀, 2007 to 2017



The Limit Value for daily average PM₁₀ is 50 µg/m³. PM₁₀ is made up of a range of materials including metals, carbon, minerals, sulphates and nitrates. Concentrations are highly influenced by the weather and sources outside the Square Mile. Little can be done locally and in isolation that will have a measurable impact on this pollutant. The regulations allow the daily Limit Value to be breached up to 35 days in any given year. This tends to happen in Upper Thames Street. Beech Street has met the daily Limit Value since 2013. Daily average PM₁₀ at Sir John Cass's Foundation primary has never breached the Limit Value.

Figure 2.9: Breaches of the Daily Average PM₁₀, 2007 to 2017



There is less variation in modelled annual mean concentrations of small particles as there are a greater range of sources that contribute to the problem, not just road traffic.

Figure 2.10 shows the modelled concentrations of annual average PM₁₀ for 2020. The limit is set at 40 µg/m³. The map suggests that this could be breached in just a small area along Byward Street and Tower Hill.

Figure 2.10: Modelled concentrations of annual average PM₁₀, forecast for 2020

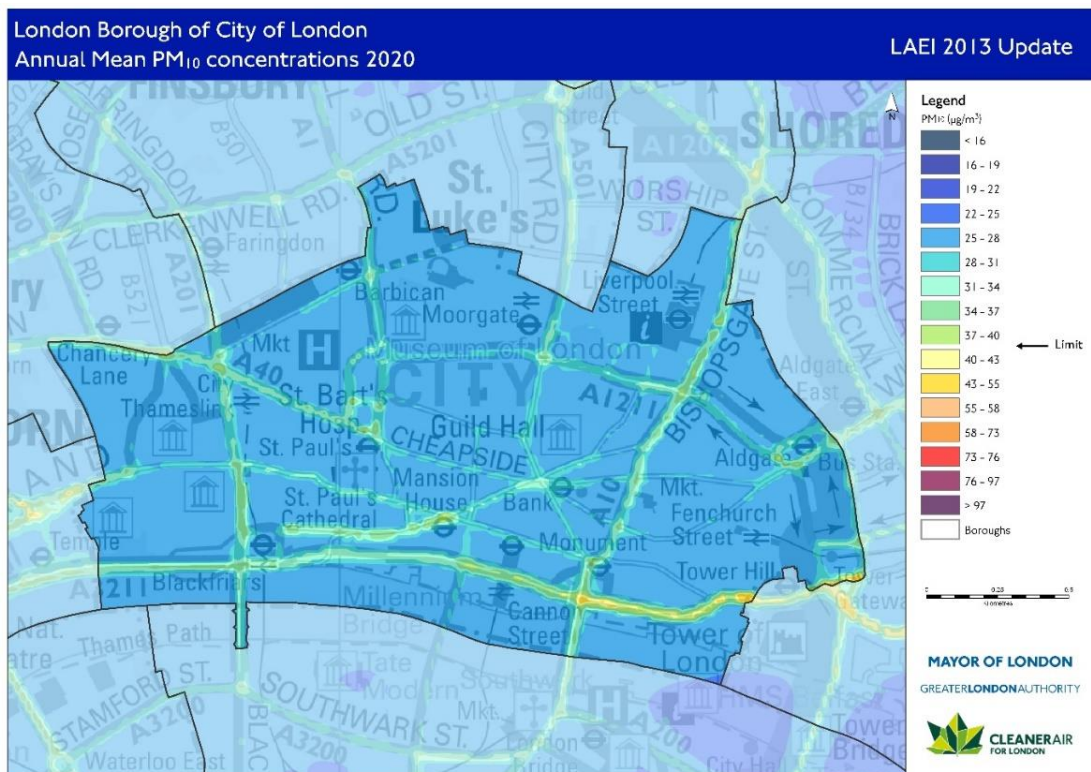
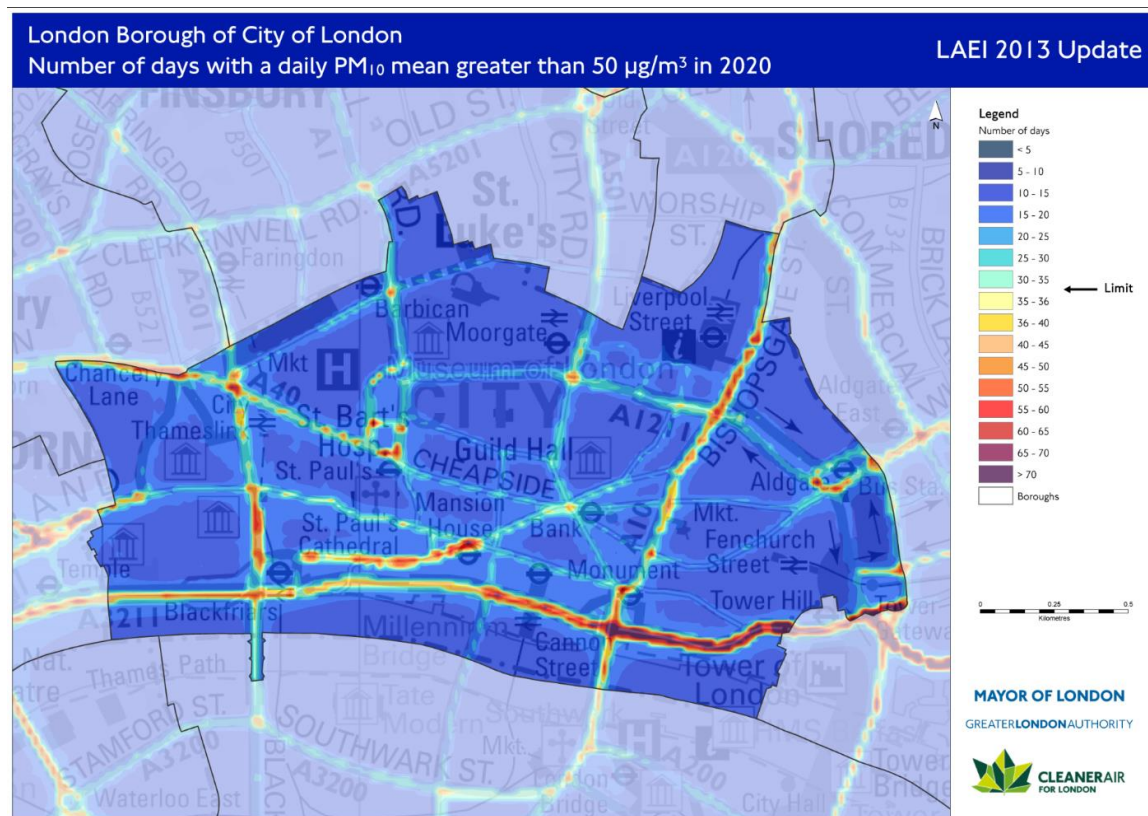


Figure 2.11 shows the number of days the daily average PM₁₀ level is likely to be breached in 2020. The map suggests this may occur adjacent to the busiest roads.

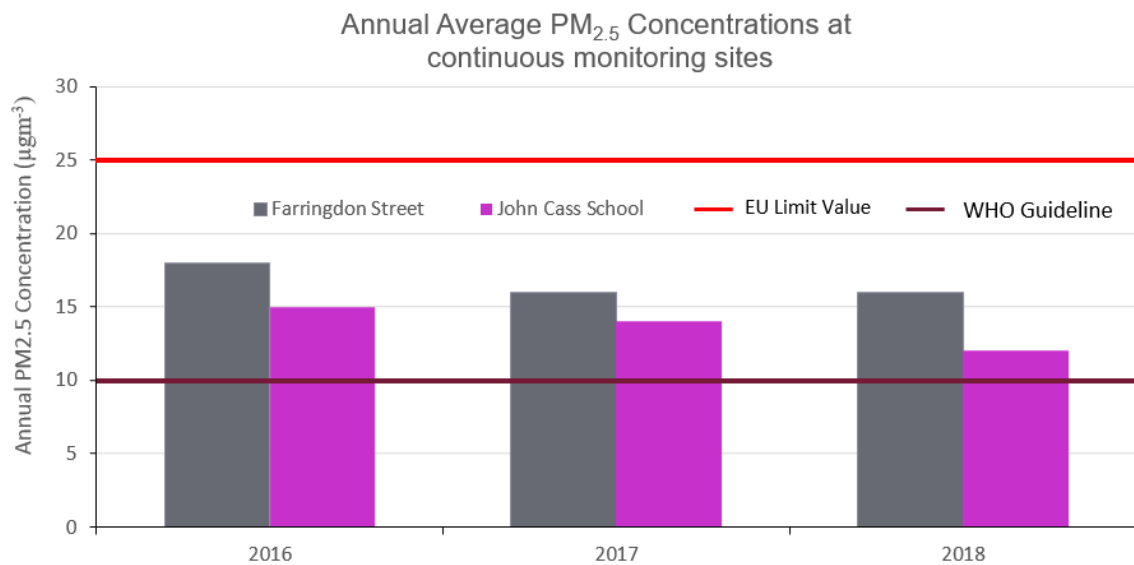
Figure 2.11: Number of days above the daily average PM₁₀, forecast for 2020



2.3 Fine particles (PM_{2.5})

PM_{2.5} is measured in Farringdon Street and at Sir John Cass's Foundation Primary School. Figure 2.12 shows the annual average PM_{2.5} concentrations since 2016. The results indicate that PM_{2.5} meets the Limit Value of 25 µg/m³ at these two locations. However, concentrations are above the WHO Guideline, which is set at 10 µg/m³.

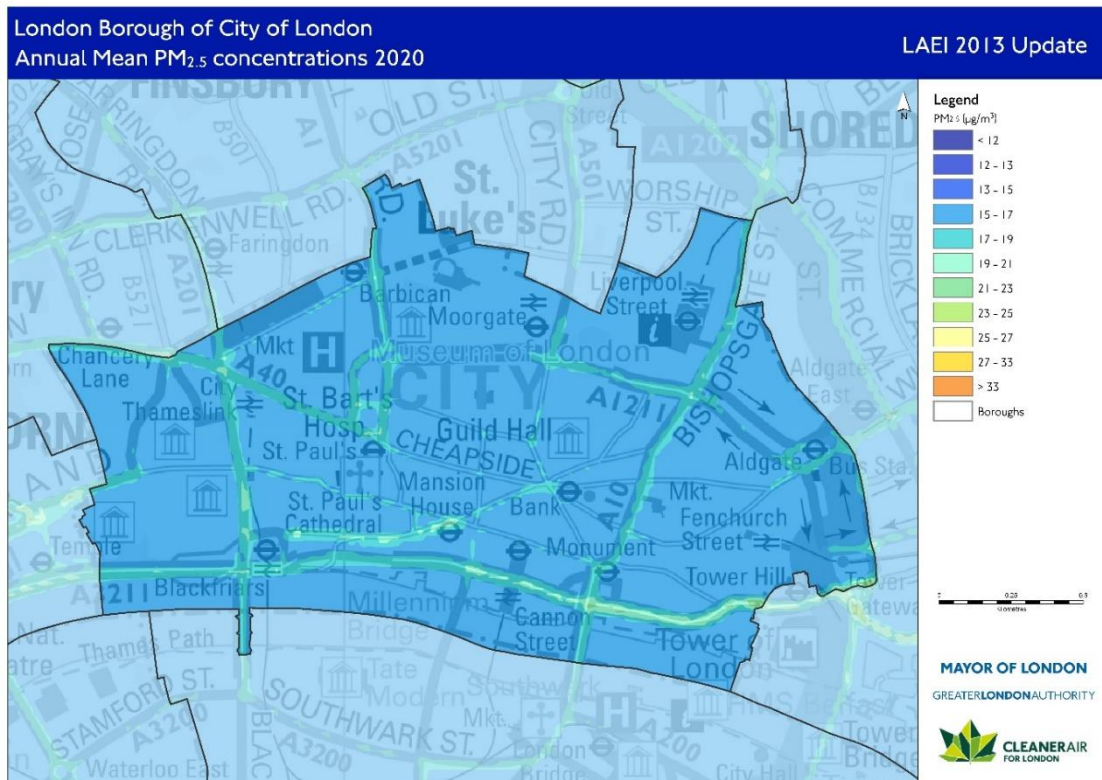
Figure 2.12: Annual Average PM_{2.5}, 2016 to 2018



Note: Data for 2018 is unratiified

Modelled concentrations of annual average PM_{2.5} reveal that levels at all locations across the City of London in 2020 will be below the annual average Limit Value of 25µg/m³. The whole of the City of London is likely to breach the WHO Guideline of 10µg/m³. There is very little that can be done by the City Corporation in isolation that will have a significant impact on concentrations of this pollutant.

Figure 2.13 Modelled concentrations of annual average PM_{2.5}, forecast for 2020



One of the aims of this strategy is to ensure that air quality in over 90% of the Square Mile meets the health-based Limit Values and World Health Organisation Guidelines for nitrogen dioxide by the start of 2025. The remaining areas are likely to be at very busy road junctions and in some heavily trafficked streets with narrow carriage ways and tall buildings that act to trap air pollutants. An assessment of air quality policies and interventions will be undertaken annually to ensure that this will be met.

An additional strategy aim is to take coordinated action to achieve the WHO Guidelines for PM₁₀ and PM_{2.5} in the shortest possible time. This recognises that the City Corporation cannot achieve this in isolation. Once the 2019 LAEI has been published, an assessment will be undertaken to determine when this is likely to be.

Air Quality Monitoring

We will:

Ensure that adequate and appropriate monitoring is undertaken across the City of London to fulfil statutory obligations and make good quality data available to the public.

Use air quality data to generate pollution alerts and messages using a range of media such as the free CityAir Smart Phone App.

Publish an annual report of air quality data on the City Corporation web site.

Continue to make live data from continuous air quality monitors available to the public on the London Air Quality Network web site.

Support the testing of new air quality sensors to establish their degree of accuracy.

Undertake an annual assessment of air quality to ensure levels of nitrogen dioxide in 90% of the Square Mile meet health-based Limit Values and WHO Guidelines by 2025.

3. Leading by Example

Commitment: The City Corporation will seek opportunities to influence air quality policy across London and lead by example to improve local air quality and reduce exposure to air pollution

Improving air quality is a political priority for the City Corporation, for which there is very strong Member interest and support. The Port Heath and Environmental Services Committee oversees the development and implementation of air quality policy, and the Chairman and Deputy Chairman have a keen interest in the issue.

Public Health responsibilities were returned to local authorities in April 2013. This led to the creation of Health and Wellbeing Boards (HWB). The City Corporation HWB supports measures for improving local air quality. The City's Joint Strategic Needs Assessment recognises the significance of air quality. Air quality has been identified by the City Corporation as a Corporate Risk. Management of this risk is overseen by the Audit and Risk Management Committee. Reports are presented to this Committee detailing how the risk is being mitigated.

City Corporation Responsible Business Strategy

The City Corporation's Responsible Business Strategy 2018 is set within the framework of the Corporate Plan. It details how responsible business practices will be put in place across the organisation. One of the main policy areas in the plan is to improve air quality. Box 1 details the specific air quality actions. Many of these actions are referenced elsewhere in this document.

- **Improve local air quality in the Square Mile and reduce exposure to air pollution by continuing to develop and deliver the City of London Air Quality Strategy.**
- **Significantly increase the number of clean vehicles in our fleet and continue to trial new technology.**
- **Encourage and facilitate the uptake of clean alternative vehicles throughout our supply chain.**
- **Increase the number of electric-vehicle charging points across our sites.**
- **Reduce emissions of air pollutants from our building stock.**
- **Provide leadership for air quality policy and action across London.**
- **Encourage businesses to become air quality champions and support our work for cleaner air.**
- **Support research and development into measures to improve air quality with London Universities.**
- **Act as a facilitator for collaborative action on air pollution in London.**

Box 1

City Corporation Fleet

The City Corporation has been reducing emissions from its own fleet for several years. This has been achieved by improved management, a reduction in size of the fleet and the purchase of newer, cleaner vehicles. Since January 2016, a policy has been in place that diesel vehicles cannot be purchased or leased if there are low or zero emission options available. The City Corporation owns or leases 133 vehicles and is in the process of reducing this to 118. These comprise of cars, vans, minibus, tippers, sweepers, pick-up trucks, gully tankers and a range of vehicles associated with open spaces. Most of these vehicles do not operate in the Square Mile. The City Corporation regularly trials new electric vehicle technology such as an all-electric refuse collection vehicle. Eight new electric vehicles were trialled in 2018.

The City Corporation is working towards replacing its vehicles used in the Square Mile with electric or hybrid to comply with the Mayor of London's ultra-low emission zone. A fuel hierarchy is in place for new vehicles:

- a) Full electric
- b) Plug-in hybrid
- c) Petrol hybrid (regenerative braking)
- d) Petrol
- e) (Euro 6/ VI) Diesel

100% of the electricity used by the City Corporation is from renewable sources so electricity used to charge Corporate vehicles isn't contributing to air pollution outside the City of London boundary.

City Corporation Responsible Procurement Strategy

The City Corporation Responsible Procurement Strategy requires that, for large contracts over £250k, at least 10% of the qualitative contract evaluation criteria must address responsible procurement. Large contracts include a 'no vehicle engine idling' policy. Contracts that require the use of vehicles are required to put additional measures in place to help reduce air pollution.

There is a flexible approach with the following menu of options:

- a) Targets for the reduction of NOx and PM10 over the life of the contract
- b) Develop a plan for reducing the air quality impact on days of 'high' and 'very high' air pollution
- c) Develop a logistics approach that avoids deliveries during peak congestion and pedestrian footfall times
- d) Regular green driver training
- e) Retrofit and trial a new technology
- f) Trial a zero-emission vehicle with the support of the City of London Corporation

- | |
|---|
| g) Another innovative action to support the Air Quality Strategy that would reasonably deem to be an equivalent level of ambition |
|---|

In April 2019, the City Corporation will start a new waste collection, street cleansing and ancillary services contract. This new contract will deliver the first low and zero emission fleet in the UK which also consists of the UK's first fully electric fleet of dustcarts.

City Bridge Trust

The City Bridge Trust is the funding arm of Bridge House Estates. It was established to make use of funds surplus to bridge requirements and provides grants towards charitable activity benefitting Greater London. The City of London Corporation is the sole trustee of the Bridge House Estates.

The City Bridge Trust has awarded a grant to Client Earth, a non-profit environmental law organisation, to engage with businesses to tackle the effects of air pollution & encourage a behavioural change towards greener ways of doing business. The Trust also funds a programme of Eco-Audits for voluntary sector organisations. This reviews their energy use, waste and travel patterns, with the aim of making them more sustainable, lower their carbon footprint, and save money by reducing energy bills.

Proposal for New Regulatory Powers

Whilst there is a great deal of action underway to reduce emissions from road traffic there is a lack of effective controls to deal with emissions from combustion plant (boilers, generators, non-road mobile machinery and combined heat and power plant). Close monitoring has revealed significant local impact on levels of air pollution from some combustion plant. The City Corporation has identified a need for a practical, local authority focused piece of legislation to deal with emissions from combustion plant and is working with London Councils to develop a Private Members Bill to tackle this source of pollution.

Leading by Example

We will:

Continue to place air quality as an important political priority and support the outcomes of the City Corporate Plan and local and London-wide action

Provide information on reducing emissions from buildings for City Corporation facilities managers and investment property managers

Reduce emissions of air pollutants from buildings owned by the City Corporation

Review the provision of electric vehicle charging across City Corporation sites including residential estates

Ensure that, subject to operational requirements, 100% of vehicles owned or leased by the City Corporation are electric or hybrid by 2025

Continue to trial low and zero emission technology

Continue to encourage zero emission vehicles through the supply chain

Require electric or hybrid vehicles as a default for the Corporate taxi contract, together with annual emission reduction targets

Require zero emission and electric or hybrid vehicles as a default for courier contracts, together with annual emission reduction targets

Continue to ensure that all relevant Corporate strategies and policies reflect the importance of improving local air quality and reducing exposure

Work with London Councils and other stakeholders to develop proposals for legislation to help improve air quality across London

4. Collaborating with Others

Commitment: The City Corporation will work with a wide range of external organisations on air quality policy and action in order to improve air quality in the Square Mile and across London.

As a significant amount of air pollution in the Square Mile is not generated within its boundary, the City Corporation works with a wide range of organisations on actions to improve air quality and raise awareness. This collaborative work is an essential component of air quality management in the City of London.

Mayor of London

The Mayor of London has a duty to develop an Air Quality Strategy in support of the National Air Quality Strategy and to achieve legal limits for air quality across London. The City Corporation, along with other London Boroughs, must have regard to the Mayors Air Quality Strategy when exercising its own responsibilities for London Local Air Quality Management (LLAQM)⁴. The key requirements of LLAQM are:

- Monitor and assess air pollution
- Ensure an Air Quality Management Area is in place for any areas that exceed the air quality objectives and Limit Values
- Ensure that a current and relevant Action Plan is in place. This should be updated at least every five years
- Publish annual monitoring and action plan update reports

Low Emission Neighbourhood



The City Corporation works very closely with the Greater London Authority and Transport for London. The Mayor of London awarded the City Corporation £1 million over 3 years, from 2016 - 2019 to pilot a range of measures as part of a Low Emission Neighbourhood programme. A range of activities and projects took place over three years, ending in March 2019. These are detailed overleaf.

⁴ <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/working-london-boroughs>

- The installation of 30 electric vehicle charging points in Barbican Estate car parks.
- Cargo bike delivery service pilot
- Provision of cargo bikes for use by City Corporation Gardeners
- Engagement with schools, businesses and residents
- Development of business best practice
- Delivery and service case studies
- Best practice document for construction activity
- Idling engine training with St Bart's Ambulance Services
- Greening projects such as Moor Lane and support for the Clean and Green for Seventeen City in Bloom competition
- Air quality grants for businesses
- Air quality monitoring
- Barbican art installation



Funding has also been received from the Mayors Air Quality Fund for a range of projects. This includes rolling out the City Corporation's successful anti vehicle engine idling programme and for research into the impact of using diesel generators for electricity generation at times of peak demand.

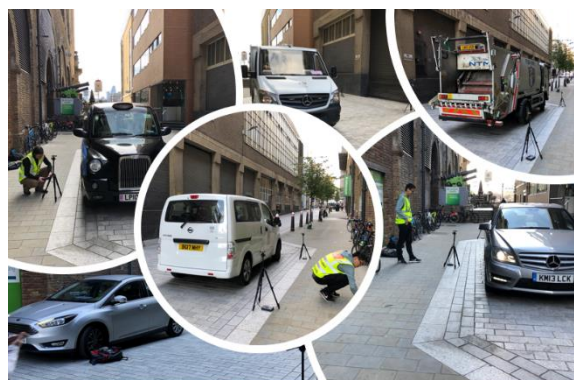
The Mayor of London is delivering a wide range of policies across London to improve air quality. Air quality in the City of London will benefit from all policies but those anticipated to have the greatest impact are cleaning the London bus fleet, cleaning London taxis and the implementation of the ultra-low emission zone (ULEZ). The City of London will be completely within the ULEZ from April 2019. Further details on policies and programmes being implemented by the Mayor of London are in Appendix 6.

London Boroughs and London Councils

The City Corporation works closely with London Boroughs and London Councils. The City Corporation and seven neighbouring authorities form the Central London Air Quality Cluster Group. This group meets regularly at the City Corporation offices to discuss best practice. The City Corporation also provides the chairman for the London Air Quality Steering group which also meets regularly at the City Corporation offices. This group was established to direct and influence strategic air quality policy across London. Members include London Boroughs, the Environment Agency, Greater London Authority, Transport for London and London Councils.

London Universities

The City Corporation has worked very closely with Kings College London (KCL) for many years. The City Corporation commissions KCL to independently check air quality data and make it available to the public on the KCL web site www.londonair.org.uk. The City Corporation has also commissioned KCL to deliver a range of projects including:



- the development of the free smartphone App CityAir;
- undertake real world vehicle emission testing on streets in the City of London;
- assess the impact of washing Beech Street on levels of particle pollution
- independent tests to assess the effectiveness of dealing with idling vehicle engines.

In 2018, City Corporation drivers took part in a study called DEMiST – The Driver Diesel Exposure Mitigation Study. The aim of the study is to quantify the exposure of drivers to diesel exhaust in order to develop cost-effective risk reduction strategies. The City Corporation supports dissertations and research projects. The latest was a study of the impact of messages provided by smartphones during air pollution episodes. This research was published in Environment International, Volume 124, March 2019, and used the City Corporation's CityAir App.

The City Corporation provides the co-chair for the APRIL Committee (Air Pollution Research in London). The City Corporation has also commissioned research to look at the impact of urban form on air pollution in the Square Mile.

Third Sector

The Third Sector is comprised of non-government and non-profit-making organisations. This includes charities, voluntary and community groups. The City Corporation works with a range of third sector organisations on air quality projects including Environmental Protection UK, Global Action Plan, London Sustainability Exchange and Friends of City Gardens. An event to celebrate 120 years of Environmental Protection UK was hosted by the City Corporation in September 2018.

Port of London Authority

The Port of London Authority (PLA) is the governing body for the Port of London. Its responsibility extends over the Tideway of the River Thames. It maintains and

supervises navigation and protects the river's environment. The PLA published an Air Quality Strategy in 2018. The Strategy will be delivered through an Action Plan, covering 2018 to 2022. The 18 proposals for action in the document include carrying out further studies, establishing standards, investigating means to develop and implement green technology, encouraging best practice and further monitoring of river emissions. The City Corporation supported the development of the Strategy and is assisting the PLA in monitoring emissions from the river, detailed as Action 15 of the PLA Air Quality Strategy.

Cross River Partnership

Cross River Partnership (CRP) is a public-private partnership that has been delivering regeneration projects in London since 1994. Its membership includes local authorities, business organisations and other strategic agencies relevant to London. The City Corporation provides the Public Sector Co-chair for CRP and works with the organisation on cross London Borough projects.

Environment Agency

The Environment Agency is public body with responsibilities for the protection and enhancement of the environment. The City Corporation has been working with the Environment Agency to support the implementation of the Medium Combustion Plant Directive (MCPD). The MCPD is a regulatory mechanism for controlling emissions of pollutants from combustion plant between 1 megawatt thermal (MWth) and 50 MWth in size. The emission limits set in the MCP Directive are applied in the United Kingdom from 20 December 2018 for new plant, and from 2025 or 2030 for existing plant, depending on size. It is anticipated that there are many plant in the City of London that meet this criterion. They can be a significant source of emissions of nitrogen oxides (NOx) and small particles, particularly plant fuelled by diesel.

Businesses in the City of London

The City Corporation has been engaging with the City of London business community for over eight years to get their support for improving local air quality and raising staff awareness through the CityAir programme. Regular lunchtime workshops for business representatives are hosted by the City Corporation. Best Practice Guides have been produced with input from City of



London businesses and industry representatives. This includes a Building Engineer Toolkit which provides advice for Facilities Managers on reducing emissions of air

pollutants from buildings. A Low Emission Supply Chain Guide, originally developed in 2012, was improved and updated to incorporate latest best practice in 2018. It provides guidance on reducing the impact on freight transport emissions. There are several Business Air Quality Champions who provide invaluable support and lead the way in action to reduce their impact on local air pollution.

The CityAir model has been extended across London and further businesses are engaged in the Square Mile as the opportunity arises.

Collaborating with Others

We will:

Continue to work closely with the Greater London Authority and Transport for London on policies to improve air quality and ensure that all actions support the aims and objectives of the Mayor's Environment Strategy

Continue to collaborate with London Boroughs and London Councils on action to improve air quality

Support Universities with research into the health impacts of air pollution, to increase understanding of the sources of pollution and the effectiveness of interventions to reduce pollution

Continue to support the Third Sector to deliver air quality improvement projects and raise awareness amongst London's communities

Support the Port of London Air Quality Strategy through air quality monitoring and in taking wider action to reduce emissions from vessels on the river Thames

Continue to support the Cross-River Partnership in its delivery of air quality projects in central London.

Continue to support the Environment Agency with action to improve air quality, including the implementation of the Medium Combustion Plant Directive

Continue to engage with and support the City of London Business Community to become Air Quality Champions and reduce their impact on local air pollution

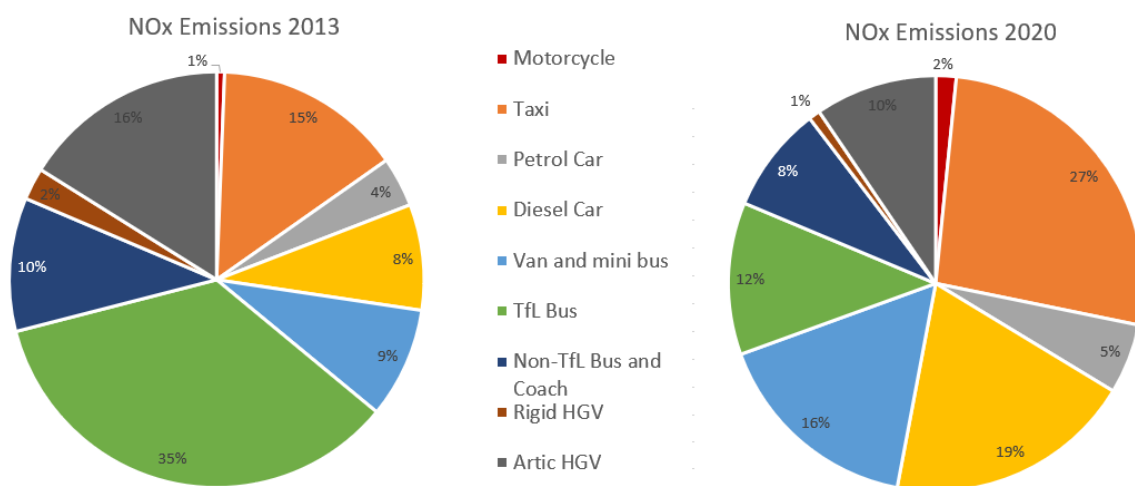
5. Reducing Emissions from Road Transport

Commitment: The City Corporation will implement a range of measures to reduce emissions of air pollutants associated with road traffic in the Square Mile

How people and goods travel to and around the City of London has a significant impact on air quality. The road network in the City of London is used intensively; particularly during the working week as vehicles support the needs of businesses. The Square Mile is located within the Congestion Charge Zone and Ultra-Low Emission Zone. The City of London is very well served by public transport and has 54 bus routes, six mainline railway stations and 12 underground and District Light Railway stations. The number of people who commute into the Square Mile by private car is low.

The London Atmospheric Emissions Inventory suggests that in 2013 road transport accounted for 57% of NO_x; 56% of PM₁₀, and 69% of PM_{2.5} emissions from within the Square Mile. Estimates have been made for 2020 but these were made some time ago and are uncertain, see Appendix 3. Diesel vehicles account for approximately 96% of these emissions, the majority of being buses, taxis and lorries. Figure 5.1 shows the proportion of NO_x emissions for different vehicle types in 2013 together with forecasts for 2020. The main contributor to air pollution from traffic in 2013 was the bus fleet. By 2020 this is expected to change to taxis as the bus fleet becomes progressively cleaner.

Figure 5.1: Proportion of NO_x emissions from vehicles in the City of London in 2013 and 2020



Source GLA LAEI 2013

Figure 5.2 compares the total amount of NOx emitted in tonnes per vehicle type in the City of London in 2013 and compares this to 2020. It clearly shows large reductions in emissions for all vehicles, particularly TfL buses.

Figure 5.2: Change in emissions of NOx from different vehicle types in 2013 and 2020

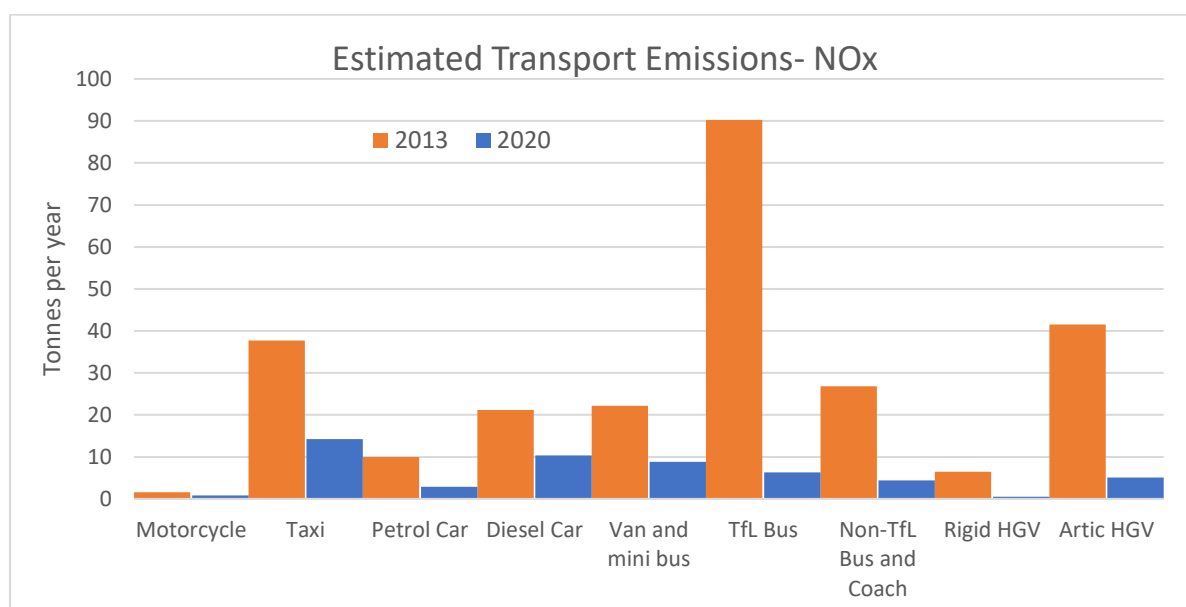
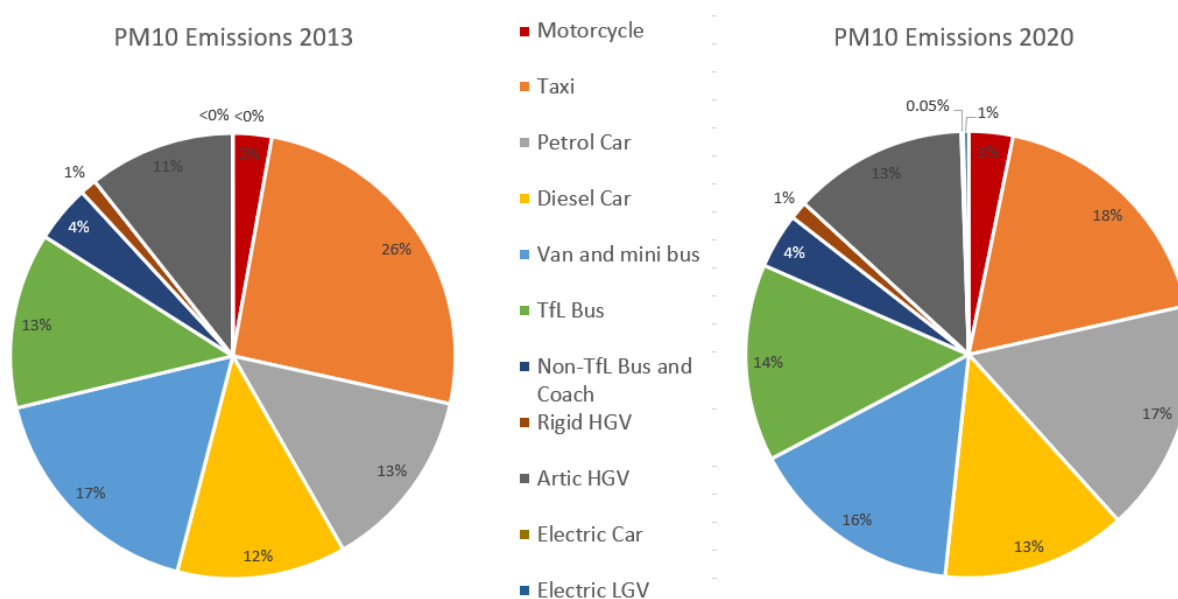


Figure 5.3 shows the relative proportion of PM₁₀ emissions for different vehicle types in 2013 with forecasts for 2020. The most noticeable difference between 2013 and 2020 is anticipated to be a reduction in emissions from taxis as they start to move over to electric. The PM₁₀ attributed to electric vehicles is from tyre and brake wear.

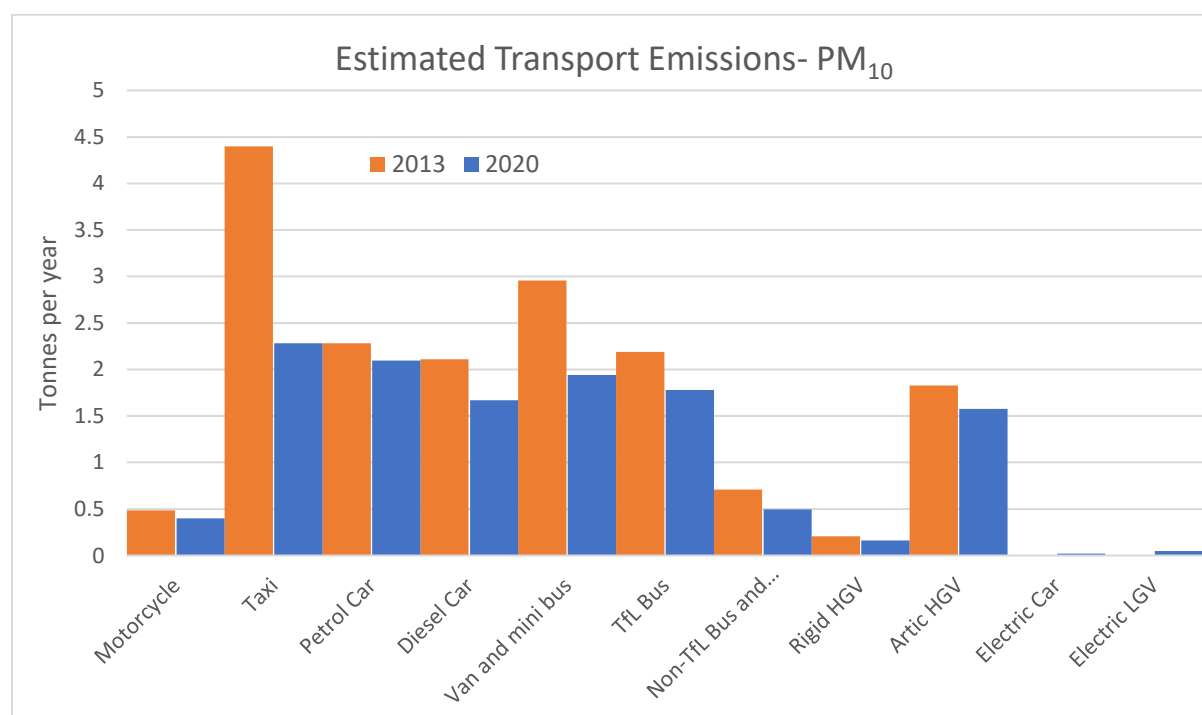
Figure 5.3: Proportion of PM₁₀ emissions from vehicles in the City of London in 2013 and 2020



Source GLA LAEI 2013

Figure 5.4 compares the total amount of PM₁₀ associated with different vehicle types in 2013 and 2020. The difference isn't as great as for NO_x with the notable exception of taxis.

Figure 5.4: Change in emissions of PM₁₀ from different vehicle types in 2013 and 2020



Mayor of London Transport Policies

The Mayor of London is delivering a wide range of policies to reduce air pollution from road transport.

Ultra-Low Emission Zone

The Ultra-Low Emission Zone will be introduced in central London in April 2019. The Square Mile will be completely within the zone. The ULEZ requires diesel vehicles to meet the Euro 6/VI emission standard or pay a daily charge to enter the zone. Petrol vehicles will have to meet the Euro 4 emission standard. The emission requirement will be in place 24 hours a day, seven days a week. From 2021, the Mayor proposes to extend the zone to encompass the North and South Circular boundaries.

Taxis and Private Hire Vehicles

Transport for London (TfL) appoints and regulates Taxi drivers. It is also responsible for setting the emission limits for taxis and Private Hire Vehicles (PHVs). There is a 15-year age limit for London taxis and all new taxis must now be zero emission capable (ZEC). The age limit for PHVs is 10 years. All PHVs licensed for the first time must have a Euro 6 petrol or diesel engine, or a Euro 4 petrol-hybrid engine. New zero emission capable requirements for PHVs will be phased in from 2020.

Further details of the Mayor's emission controls for taxis are included in Appendix 6.

The City Corporation has published a draft Transport Strategy. The overarching aim is to reduce the amount of traffic on the roads in the Square Mile in order to reallocate street space to pedestrians. A reduction in all types of traffic will be required to meet the aim of achieving a 25% reduction in traffic by 2030 and 50% by 2044. The City Corporation will therefore support TfL's efforts to reduce the number of PHVs operating in central London and work with the taxi industry to reduce empty running. This will have a positive effect on local air quality.

Buses

London buses have been a significant source of air pollution in the City of London. The Mayor of London is in the process of cleaning the fleet. He has made a commitment that all single deck buses operating in London will be zero emission by the end of 2020. All new double deck buses are now hybrid, electric or hydrogen. All double deck buses operating in the Square Mile will be at least Euro VI, the latest Euro Standard, by April 2019. Zero emission double deck buses will be gradually introduced to achieve an entirely zero emission fleet by 2037 at the latest.

Transport for London has undertaken a review of its central London bus network. Following a decline in bus use, TFL is examining ways to tackling bus journey times and reliability. The City Corporation through its draft Transport Strategy, will work with TfL to identify opportunities to reduce the number of buses travelling through the

City of London without compromising public transport accessibility. The City Corporation will also request an accelerated roll out of zero emission capable buses on routes through the Square Mile.

City Corporation draft Transport Strategy

The City Corporation, through its draft Transport Strategy, is committed to making streets in the Square Mile great places to walk by prioritising the needs of people on foot.

Traffic management measures will be identified through Area Based Healthy Street Plans. The first three plans will cover Barbican and Smithfield; Bank and Guildhall and the City Cluster and Fenchurch Street.

The draft Transport Strategy, and corresponding Delivery Plan, is fully integrated into this Air Quality Strategy. It contains a wide range of proposals that will lead to better air quality in the City of London. The most significant are:

- Support and champion a central London Zero Emission Zone (ZEZ) within the next Mayoral term. Seek a phased introduction of ZEZ restrictions with the aim of ensuring that 90% of motor vehicles entering the Square Mile are zero emission capable by 2030.
- Introduce local ZEZs covering the Barbican and Golden Lane Estates and City Cluster by 2022

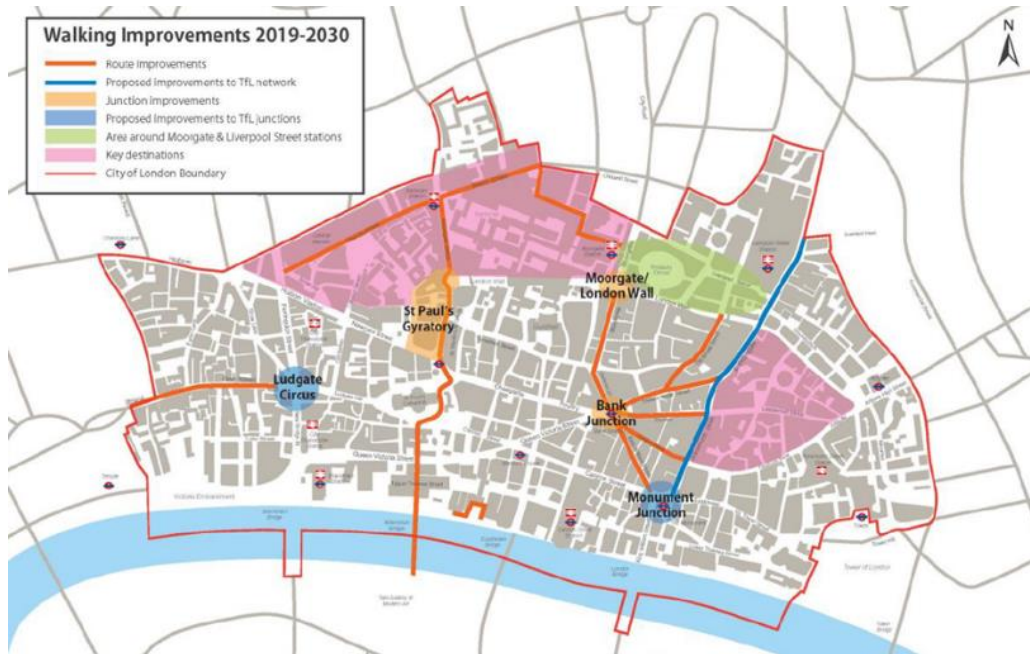
There is also a commitment to:

- Support small businesses to accelerate the transition to zero emission capable vehicles
- Discourage private vehicle use and provide no additional on street parking
- Introduce car free days from 2019

The Transport Strategy contains the following proposals to reduce the exposure of pedestrians to pollution:

- Increase the number of pedestrianised, or pedestrian priority streets
- Widen pavements
- Reduce the amount of time people wait for a green signal to cross the road.
- Complete the riverside walkway and improve the quality of the public realm along the river front.
- Enhance the Barbican High-Walk making it easier to navigate.
- Improve awareness of traffic free walking routes to take people away from areas of poor air quality
- Timed and temporary street closures including a Lunchtime Streets programme
- Support and facilitate street closures by third parties

- Complete the roll out of Legible London maps and directional signs across the Square Mile by 2022



Ultra-Low Emission Vehicle Street

The City Corporation is working towards a pilot of an Ultra-Low Emission Vehicle (ULEV) access restriction. ULEVs are vehicles that emit less than 75g of CO₂/km from the tailpipe and can operate in zero tailpipe emission mode. It is a cleaner standard than that required to meet the Mayor of London Ultra Low Emission Zone. ULEVs include pure electric vehicles, some plug-in hybrids and 'range extended' electric vehicles, such as the new taxi for London.

The trial will enable the City Corporation to assess the suitability of this type of scheme for improving air quality in the Square Mile and provide useful information for the proposed Zero Emission Zones in the City.

Freight

Freight vehicles i.e. those involved in the movement of goods and services, account for around 17% of the traffic in the Square Mile. They tend to be diesel fuelled and so have relatively high emissions of air pollutants.

The City Corporation draft Transport Strategy proposes a range of actions which will assist in reducing emissions of air pollutants associated with freight and will be implemented in conjunction with the City of London Local Plan:

- Reduce the number of freight vehicles in the Square Mile
- Establish a freight consolidation service for the Square Mile
- Support zero emission last mile deliveries
- Identify opportunities to increase the use of the river for freight
- Work with freight operators to ensure their fleets meet Port of London Authority air quality standards
- Explore the use of Blackfriars and Tower Piers and reinstate Swan Lane Pier as points to transfer freight to zero emission last mile delivery
- Require all development in the City of London to consider the use of the river for the movement of construction material and waste

The City of London Freight and Servicing Supplementary Planning Document (SPD), published in February 2018, provides guidance on the interpretation of policies in the City of London Local Plan in relation to freight and servicing movements in the Square Mile.

The SPD sets out potential measures for managing freight through the planning process by minimising trips, matching freight demand to network capacity, and mitigating the impact of essential freight trips.

Cycling

The City Corporation supports and encourages cycling as a mode of transport. Cycling in the City of London increased by 292% between 1999 and 2017. All other forms of transport reduced over the same period.

The City Corporation Transport Strategy and City Local Plan supports and encourages cycling by:

- Increasing the amount of cycle parking in the City of London
- Ensuring new developments contribute to improving the experience of cycling in the City of London
- Promoting and celebrating cycling
- Improving cycle hire provision
- Apply a minimum cycling level of service to all streets

Electric Vehicle Charging Infrastructure

Fifty electric vehicle charge points are currently available in City Corporation public car parks. A further 30 have been installed in Barbican residents' car parks. A rapid

charging hub for taxis is planned for Baynard House car park and a taxi only rapid charge point at Noble Street taxi rest rank.

The City Corporation Transport Strategy details a commitment to install additional publicly accessible rapid electric charge points to support the transition to zero emission and zero emission capable vehicles. This includes exploring the potential for a charging hub with priority access for commercial vehicles. The City's Local Plan requires electric vehicle charging points to be installed within the service areas of new buildings for freight vehicles.

Transport and Public Realm Schemes

The City Corporation has implemented a number of transport and public realm schemes that have been closely monitored for air quality impact, for example Aldgate public realm and changes to Bank Junction.

Work is underway for two major transformation projects in the City of London that will also deliver measurable improvements in local air quality. The first is the Beech Street Transport and Public Realm project and the second is the St. Paul's Gyratory Transformation Project. The initial stage of each project is to assess the feasibility of reducing traffic dominance which will enhance the public realm and improve air quality locally. Air quality improvements will be integrated into both schemes.

Dealing with Idling Vehicles

The City Corporation takes a wide range of action to deal with unnecessary vehicle engine idling. This includes:

- Responding to complaints and engaging directly with drivers with a view to issuing Fixed Penalty Notices or Penalty Charge Notices if appropriate
- Letter drops to businesses regarding delivery drivers
- Distributing information leaflets
- Installing street signs and place signs on lamp posts if appropriate
- Writing directly to coach and taxi companies
- Incorporating no engine idling into the City Corporation Construction and Street Works Code of Practice and enforce around construction sites
- Holding no engine idling action days where staff and volunteers speak to drivers with view to changing behaviour. This model has been rolled out to 25 additional London Boroughs with the support of the Mayor of London.



- Working with businesses, including Cheapside Business Alliance and Bart's Health NHS Trust to support targeted action for no engine idling

Parking Charges

In August 2018, the City Corporation introduced on street parking charges based on vehicle emissions. Older, more polluting vehicles pay a higher charge to park on street in the City of London.

The charge for vehicles which are Zero Emission Capable is £4 per hour. Petrol vehicles that meet Euro 4 emission criteria and diesel vehicles that meet Euro 6/VI are charged £5.20 per hour. Older vehicles are charged £6.80 per hour. The charging framework supports the Mayor of London ULEZ scheme.



Reducing Emissions from Road Transport

We will:

Urge Transport for London to prioritise Zero Emission Capable buses on routes through the City of London

Support the Mayor of London with the effective implementation of the Ultra-Low Emission Zone

Work with the taxi industry to reduce empty running of taxis within the Square Mile

Ensure that Healthy Street Plans have air quality improvement targets and that the air quality impact of major transport and public realm schemes are measured

Introduce a Zero Emission Zone around the Barbican and Golden Lane Estates and City Cluster by 2022

Implement a wide range of action through the City Corporation Transport Strategy to reduce the exposure of pedestrians to transport generated air pollution in the Square Mile

Pilot an ultra-low emission vehicle street

Assess the suitability of rolling out LEN pilot projects at other locations across the Square Mile

Implement a wide range of action, through the City Local Plan and City Corporation Transport Strategy and Freight and Servicing SPD to reduce emissions from freight vehicles in the Square Mile

Implement a range of action through the City Corporation Transport Strategy and City Local Plan to support and encourage cycling

Install additional publicly accessible electric vehicle (EV) rapid charge points by 2025

Through the City Local Plan require the installation of rapid charge points in new developments

Ensure that improving air quality and reducing exposure is an integral part of all major transport and public realm schemes

Continue to take a wide range of action to discourage unnecessary vehicle engine idling in the Square Mile.

Ensure City Corporation parking charges favour low and zero emission vehicles in the City of London

6. Reducing Emissions from Non-Transport Sources

Commitment: The City Corporation will take a range of action to significantly reduce emissions associated with non-transport sources in the Square Mile

Non-transport sources make a significant contribution to air pollution in the City of London. In the past, action has focussed on emissions of pollution from traffic. However, as emissions from vehicles reduce over time, non-road combustion sources are becoming more significant. Combustion plant covers a range of appliances used for heat and energy generation. It includes boilers, Combined Heat and Power Plant (CHP), generators and Non-Road Mobile Machinery (NRMM) used for construction, road repairs, film and street events.

Planning Policy

The Square Mile is in a constant state of redevelopment therefore spatial planning is important for improving air quality in the long term. The City Corporation has been using planning policy for a number of years to reduce the impact of new developments on local air quality.

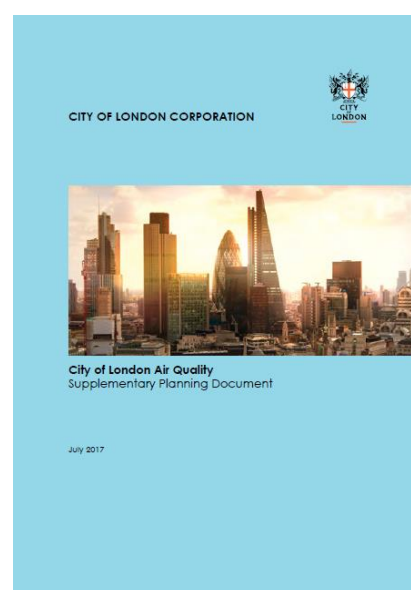
The City Corporation is developing a new Local Plan. It is called the City Plan 2036 and it sets out the organisation's vision, strategy and objectives for planning, together with policies that will guide future decisions on planning applications. Once adopted, the Plan will replace the current City Corporation Local Plan adopted in January 2015.

The draft City Plan supports the City Corporation's drive to improve local air quality. The draft policies and proposals relating to air quality are detailed in Appendix 7.

The City Corporation published its first Air Quality Supplementary Planning Document (SPD) in July 2017. It provides guidance on the interpretation of policies in the City Local Plan. The SPD is available on the City Corporation web site. It details how development activity can reduce its impact on air quality through:

- Building design
- Heating and energy supply
- Reducing dust and air quality impacts during construction

The Air Quality SPD encourages the use of non-combustion technology and recommends emission limits for combustion plant.



Air Quality Assessments and Air Quality Neutral Assessments are used to assess the impact of new development on local air pollution. Air Quality Assessments are required for all major developments, unless it can be demonstrated that emissions from the new development and associated transport will be less than the previous use.

The emerging London Plan⁵ introduces the concept of Air Quality Positive Assessments for the development of large-scale redevelopment areas and those subject to an Environmental Impact Assessment. The draft London Plan also updates the energy hierarchy with Heat Network Priority Areas. This includes the City of London, see Appendix 6 for further information.

Construction and Demolition

At any given time, there are many active demolition, construction and refurbishment sites in the Square Mile. There are also a large number of street works. Refurbishment and new developments are essential for the City of London to maintain itself as a world class business and financial centre. The City Corporation has a Code of Practice for construction and demolition⁶, detailing environmental standards that it expects the industry to work to. The Code is enforced through development management.



Minimising emissions to air is integral to the City Corporation Code of Practice. The guidance, which is available on the City Corporation web site, reflects the best practice guidance issued by the Mayor of London: The Control of Dust and Emissions from Demolition and Construction⁷. The City of London Code of Practice is updated regularly to reflect best practice in the industry and is now in its 9th edition. There are regular checks on all large construction sites to ensure that they adhere to the code.

Non-Road Mobile Machinery (NRMM)

Engines used in NRMM over a certain size are subject to emission controls called Euro Standards. Like with road vehicles, emissions of pollutants from NRMM reduces over time with each Euro Standard. The Mayor of London has introduced a NRMM Low Emission Zone which sets a standard for NRMM used on building sites in the City of London. The standards are Stage IIIA for generators and Stage IIIB for

⁵ Draft New London Plan showing Minor Suggested Changes, 13th August 2018, Mayor of London

⁶ The City of London Code of Practice Deconstruction and Construction Sites Ninth Edition, January 2019

⁷ Mayor of London: The Control of Dust and Emissions from Demolition and Construction, Supplementary Planning Guidance, July 2014

mobile plant (excavators, dumper trucks, hoists etc). The plan is to tighten the standard to Stage IV in 2020.

Diesel-powered equipment used on demolition and construction sites in the City of London is inspected for compliance with the required emission standard. Through its local Code of Construction practice, the City Corporation encourages Stage IV or zero emission equipment, where available. The City Corporation is working towards a requirement for Stage V emissions limit for NRMM by 2025.



Table 6.1: Emission Standards for Non-road Diesel Engines

Net Power kW	NOx g/kWh	PM g/kWh
Stage IIIB		
37–55 kW (50–74 hp) ¹	-	0.025
56–74 kW (75–99 hp)	3.3	0.025
75–129 kW (100–173 hp)	3.3	0.025
130–560 kW (174–750 hp)	2	0.025
Stage IV		
75–129 kW (100–173 hp)	0.4	0.025
130–560 kW (174–750 hp)	0.4	0.025
Stage V		
8–19 kW ²	-	0.4
19–37 kW ¹	-	0.4
37–74 kW (50–99 hp) ¹	-	0.015
75–129 kW (100–173 hp)	0.4	0.015
130–560 kW (174–750 hp)	0.4	0.015

¹ Emissions limits are 4.7 g/kWh for HC+NOx

² Emissions limits are 7.5 g/kWh for HC+NOx

NRMM is also used in road works, to support filming and to provide power for equipment and catering etc. The City Corporation commissioned an assessment of the contribution of NRMM to total emissions of air pollutants in the Square Mile. Estimates are provided in Table 6.2. Due to the volume of street works in the City of London at any given time, this has the potential to be a significant source of emissions. Air quality monitoring in the City of London has shown that street works can have a significant local impact, however, given its transient nature the overall contribution to local levels of air pollution is unknown.

Summary of Emissions (2017) Sector	NOx (kg)	PM (kg)
NRMM (Construction)	38,594	924
NRMM (Events)	528	28
NRMM (Road Works)	Unknown	Unknown
CHP/boilers	87,700	-

Table 6.2

Heat and Energy Plant

Combustion plant including Combined Heat and Power (CHP) plant and generators are a significant source of emissions in the Square Mile. This is an area which traditionally has been poorly controlled. Recent studies^{8,9} commissioned by the Greater London Authority show that CHP has the potential to lead to very high localised levels of nitrogen dioxide. CHP plant in new developments has previously been encouraged through the London Plan. The emerging London Plan is moving the emphasis away from CHP plant unless it supports the delivery of an area wide heat network.

Diesel generators installed in buildings as emergency back-up power sources can be used to meet peak electricity demand and for demand side response. Research commissioned by the City Corporation revealed that this has a potential for significant local air quality impact.¹⁰ The extent to which this is undertaken in the City of London is unclear.

Chimneys

The Clean Air Act 1993 stipulates that a gas boiler of 366.4 kilowatts or more is required to have a chimney height approval from the local authority. The City Corporation approves chimney heights to ensure that fumes from chimneys are not prejudicial to health or a nuisance. The approvals are designed to maximise the dispersion of pollutants. Subject to other constraints, chimneys should terminate a minimum of 2m above the height of the nearest building. Appliances less than 1MW are required to achieve a discharge velocity of 10 m/sec to aid dispersion. Appliances that are 1MW or greater in size, are required to achieve a discharge velocity of 15 m/sec.

Prescribed Processes

The Environmental Permitting Regulations (EPR) deal with emissions of pollutants from industrial processes. The processes are categorised under the regulations as Part A1, Part A2 or Part B processes. Part A1 processes are regulated by the Environment Agency. The City Corporation regulates Part A2 and Part B processes. Three dry cleaners in the Square Mile are currently regulated under this regime.

⁸ Urban air pollution from combined heat and power plants - A measurement-based investigation, Kings College London, April 2018

⁹ Pilot study on the air quality impacts from Combined Heat and Power in London, Report for Greater London Authority, Ricardo Energy and Environment 17/09/2018

¹⁰ Ricardo Energy & Environment (2016) London STOR and Triad Management Study, ED62693

Smoke Control Area

The whole of the Square Mile is a smoke control area which means it is an offence to emit smoke from any premises in the City of London. This has been in place since the City of London (Various Powers) Act 1954 was enacted. In a smoke control area, only fuels that are on the list of authorised fuels or 'smokeless' fuels, can be burnt unless an exempt appliance is used. In the latter case the fuel used must be the one specified for that exempt appliance. Authorised fuels, smokeless fuels and exempt appliances are listed on the Defra Website. There has been a great deal of concern recently over emissions of particulate pollution from domestic wood burning stoves. This is not a major issue for the City of London.

Reducing Emissions from Non-Transport Sources

We will:

Continue to assess all planning applications for air quality impact

Encourage the use of non-combustion technology during construction and in the operation of new developments

Apply stringent emission standards for combustion plant where non-combustion plant is not feasible in new developments

Ensure that where possible chimney stacks terminate above the height of the nearest building

Require all new developments to be air quality neutral as a minimum and developments subject to an Environmental Impact Assessment to be Air Quality Positive in line with the requirements of the emerging London Plan

Update the City Corporation Supplementary Planning Document for Air Quality to reflect new policies and requirements of the City Local Plan and London Plan

Ensure emissions from construction sites are minimised through close management and control

Regularly update the City Corporation best practice guidance on minimising emissions from construction and demolition in order to reflect best practice.

Enforce the Mayor of London NRMM requirements on construction sites as a minimum

Introduce a Stage V emission limit for NRMM on construction sites by 2025 where available

Investigate options for reducing emissions from NRMM used in street works, filming and other events

Examine options for reducing emissions from existing combustion plant in the Square Mile

Improve the understanding of the use of emergency generators in City of London buildings being used for Demand Side Response and Short-Term Operating Reserve

Continue to ensure that emissions from chimneys are dispersed as far as possible using the provisions of the Clean Air Act 1993

Ensure the City Corporation's prescribed processes comply with emission control requirements

Promote and enforce smoke control provisions detailed in the City of London Various Powers Act 1954 and 1973 and the Clean Air Act 1993

7. Public Health and Raising Awareness

Commitment: The City Corporation will continue to raise awareness about air pollution and provide information on how to reduce exposure to pollution

Although air quality is improving in the City of London it remains at a level that has a detrimental impact on health. The City Corporation therefore takes a wide range of action to increase public understanding about air pollution, its causes, effects, and how concentrations vary both spatially and from day to day. Armed with the right information, people can take steps to avoid high levels of air pollution to reduce the impact on their health.

The City of London Joint Health and Wellbeing Strategy (JHWS) has identified improving air quality as a key priority to improve the health and wellbeing of residents and workers.

A Public Health Outcomes Framework (PHOF) has been introduced and consists of a set of indicators compiled by Public Health England. One of these indicators is Air Pollution and this is measured against levels of particles (PM_{2.5}). This size of particle can penetrate deep into the lungs. Nitrogen dioxide is not an indicator in the PHOF, but it does have impacts on health independently of PM_{2.5}. The City of London Health profile for 2017 shows that the City of London has the highest proportion of mortality attributable to particulate air pollution at 7.1%. This is higher than both London as a whole (6.5%) and England (5.1%).¹¹

The City Corporation commissioned a report bringing together the latest papers on the health impacts of air pollution. This report confirms that of all the pollutants, particulate matter has the greatest impact on health. However, particulate matter, nitrogen dioxide and ozone have all been found to be 'certain' causes of death and disease, rather than 'probable' causes as previously understood. The report is available at www.cityoflondon.gov.uk/air. Since this report was produced further studies have been published. More information on the health effects of air pollution is detailed in Appendix 4.

The Department for Community and Children's Services have effective networks for disseminating information about public health. Key channels include: The Business Healthy network; the Libraries Service and other communications channels with residents; the City & Hackney Clinical Commissioning Group; the Neaman Practice (GP) and Healthwatch City of London.

Providing Information

The City Corporation uses a range of methods to inform businesses, workers and residents about air pollution. This includes social media, the City Corporation

¹¹ <https://fingertips.phe.org.uk/profile/public-health-outcomes-framework>
<https://fingertips.phe.org.uk/profile/public-health-outcomes-framework/data#page/4/gid/1000043/pat/6/par/E12000007/ati/102/are/E09000002/iid/30101/age/230/sex/4>

website and providing information at events. An e-newsletter is produced every 2 months.

The City Corporation has an active Twitter account @_CityAir. This helps to raise awareness about air pollution and support campaigns such as anti-vehicle idling and National Clean Air Day.

Overall levels of air pollution in the Square Mile vary from day to day according to weather conditions. Levels of air pollution on each day are either 'low', 'medium', 'high' or 'very high' which reflects banding devised by the government.¹² High levels of air pollution occur in the City of London on a small number of days in any year. Very high levels of air pollution are rare.



The City Corporation's free Smart Phone App 'CityAir' provides advice to users when pollution levels are high or very high. People can sign up as a different user and receive tailored messages to help them avoid high levels of air pollution. The App includes a map of current pollution levels and has a function to guide users along low pollution routes. There have been over 27,000 downloads to date.

The Mayor of London provides information about moderate, high and very high levels of pollution. Alerts are displayed at many public locations across London including 2,500 bus stops, all Tube stations, river piers, and on digital signs along major roads. Information is also sent to schools, hospitals and care homes across London. Alerts and guidance are available via social media, an app and a text alert service providing information and guidance on the alert level. The Mayor has recently appointed a duty forecaster to co-ordinate alerting services.

Working with Residents

In 2013/14 a citizen science project was undertaken where residents in the Barbican and Mansell Street Estates measured air pollution outside their properties over the course of a year. Residents also measured particle pollution as they moved around the City of London streets. This monitoring enabled participants to see how air pollution varies on different routes they take enabling them to take a low pollution route and reduce the amount of pollution they breathe in on a day to day basis. Following the monitoring, residents from the Barbican Estate engaged with local businesses to get their support for action to improve air quality locally.

¹² Defra Update on Implementation of the Daily Air Quality Index Information for Data Providers and Publishers April 2013, Emily Connolly, Gary Fuller, Timothy Baker and Paul Willis

Various engagement events have been held with residents through the Low Emission Neighbourhood programme such as the launch of Electric Vehicle Charging Points at the Barbican Estate.



Other work with residents includes improving local cycle parking facilities, installing green infrastructure, providing information at residents' meetings and supporting the work of Friends of City Gardens, a community group based in the City of London whose aim is to enhance biodiversity; improve access to green spaces and create new gardens in the Square Mile.

National Clean Air Day

National Clean Air Day is held in the June of each year. A range of activities are carried out across the UK to raise awareness of air pollution and inspire behaviour change. National Clean Air Day is supported by the City of London Corporation.



Working with Schools

The City Corporation has worked with Sir John Cass's Foundation Primary School since 2003 to both improve local air quality and work with the school children to raise awareness.

Extensive greening has taken place at the school with green screens on all perimeters, green roofs and movable green screens in the playground. A wide range of activities have taken place with the children such as a garden club, air quality assemblies and air quality focussed lessons and competitions. In 2018 the City Corporation was awarded a National



Air Quality Award for Best Local Authority Initiative for long term collaborative action at the school.



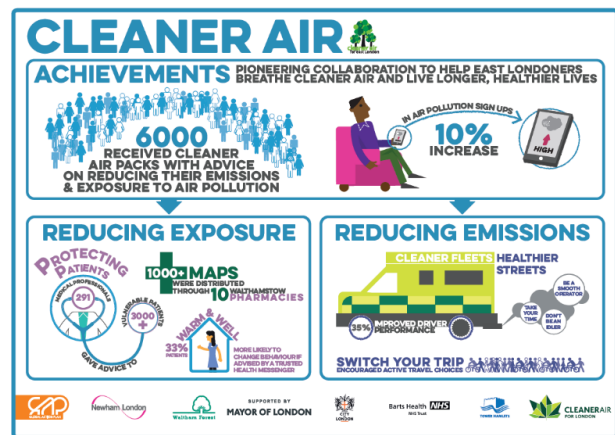
Air quality awareness events have been undertaken with the City of London Girls School in association with the Friends of City Gardens Moor Lane garden project.

The City Corporation is working with St Pauls Cathedral Choir School. This includes supporting extensive air quality monitoring at the school and the provision of information to staff and parents.

Barts Health NHS Trust

Barts Health NHS Trust runs St Bartholomew's Hospital in the City of London. It is London's oldest hospital and is a regional and national centre of excellence for cardiac and cancer care.

The City Corporation worked with Barts Health NHS Trust on a three-year programme from 2013 to 2016. Seven projects were piloted to tackle air pollution and reduce exposure to pollution for Barts Health patients, staff and visitors.



The overall aim of the programme was to: increase the understanding of how to approach air quality as an issue; engage the hospital's health professionals supply chain and wider community and to engage those most at risk of the negative effects of air pollution. The programme was cited as an important example of best practice and cross-sector collaboration in an Air Quality report 'Every Breath We Take' by the Royal College of Physicians and Royal College of Paediatrics and Child Health. The City Corporation has also worked with the Barts Health Trust on idling engine awareness programmes for their drivers.

Working with businesses

Around 510,000 people work in the City of London. Through the CityAir business engagement programme, the City Corporation has been raising awareness of air pollution with workers. This includes supporting events, providing information for internal dissemination and promoting the use of the CityAir smartphone App.



Public Health and Raising Awareness

We will:

Make greater use of Public Health Networks to disseminate information about air quality

Assess options to improve and further develop the free CityAir Smart Phone App

Disseminate information about air quality through various channels such as social media, the City Corporation web site and an e-newsletter

Develop an action plan, in support of the Mayor of London's air pollution forecasting service, to reduce exposure on days of high and very high levels of air pollution

Increase awareness of air pollution amongst the City of London's residential community

Run events in support of National Clean Air Day

Develop focussed plans for improving air quality and reducing the exposure to pollution of children who attend schools in the City of London

Continue to support Barts Health NHS to reduce its own impact on local air pollution and assist vulnerable patients in reducing their exposure to pollution

Continue to engage with businesses to raise awareness of air pollution amongst workers

Appendix 1: Further details on the delivery of actions

Table Key:

Dept. = Department responsible

M&CP = Markets and Consumer Protection

DBE = Department of Built Environment

CHB = Chamberlain's

CCS = Community and Children's Services

CS = City Surveyor's

REM = Remembrancer's

OS = Open Spaces

TC = Town Clerk's

Approximate cost to the organisation per annum:

✓ = <£5,000, ✓✓ = £5,000 - £40,000, ✓✓✓ = >£40,000

Action			Detail	Timeline	Outcome	Dept.	Cost
1	1	Ensure that adequate and appropriate monitoring is undertaken across the City of London to fulfil statutory obligations and make good quality data available to the public.	NO ₂ , PM ₁₀ and PM _{2.5} monitoring will continue using continuous analysers at 4 locations as a minimum. NO ₂ diffusion tube monitoring will take place at 50 locations as a minimum.	Review monitoring requirements at least annually.	To ensure that the City has an effective and appropriate monitoring network with robust data.	M&CP	✓✓
	2	Use air quality data to generate pollution alerts and messages using a range of media such as the free CityAir Smart Phone App.	Monitoring data will be used effectively to generate alerts for the smart phone app and tailored alerts for vulnerable people.	Present to 2024	Better informed public who can make decisions based on receiving pollution alerts	M&CP	✓
	3	Publish an annual report of air quality data on the City Corporation web site.	Annual reports will be produced for compliance with statutory obligations under LLAQM and for demonstrating how air pollution compares to health-based Limit Values and WHO Guidelines. The reports will also demonstrate how pollution has changed over time.	Annually	Check compliance with air quality Limit Values and WHO Guidelines. Check effectiveness of policies to improve air quality.	M&CP	✓
	4	Continue to make live data from continuous air quality monitors available to the public on the London Air Quality Network web site.	KCL will be commissioned to undertake independent checks of air quality data and make the data freely available to the public, consultants and academics as part of a London wide resource.	Ongoing	Local data will form part of a London-wide network of monitoring data and be available for measuring London wide trends and predicting episodes of high air pollution.	M&CP	✓✓
	5	Support the testing of new air quality sensors to establish their degree of accuracy.	Support the testing of one new sensor per year.	2019 - 2024	Reliable air quality data from emerging technology.	M&CP	✓
	6	Undertake an annual assessment of air quality to ensure levels of nitrogen dioxide in 90% of the Square Mile meet health-based Limit Values and WHO Guidelines by 2025	Source funding to undertake annual air quality forecasts to ensure Limit Values and WHO Guidelines will be met by 2025. If it looks like limits won't be met, develop additional action plan for approval.	2020 As required	Air quality in the City of London that meets health-based standards for nitrogen dioxide in at least 90% of the area.	M&CP	✓✓

Action		Detail	Timeline	Outcome	Dept.	Cost
Example Leading City	7	Continue to place air quality as an important political priority and support the outcomes of the City Corporate Plan and local and London-wide action.	Host at least one London wide event per year for relevant air quality organisations. Arrange meetings with relevant policy and research bodies.	Annually Biannually	Encourage collaboration and develop best practice solutions to improve air quality across London.	M&CP ✓✓
	8	Provide information on reducing emissions from buildings for City Corporation facilities managers and investment property managers.	Develop on-line resource Deliver annual lunchtime workshops for at least 80% of Facilities Managers.	2020 Annually	Increased awareness amongst facilities managers on how to support the City Corporation Air Quality Strategy.	M&CP CS ✓
	9	Reduce emissions of air pollutants from buildings owned by the City Corporation.	Undertake energy audits of City Corporation buildings. Reduce emissions of NOx from large buildings by at least 3% per year.	2019 – 2022 Annually	Reduction in emissions from Corporate building stock.	CS ✓✓
	10	Review the provision of electric vehicle charging across City Corporation sites including residential estates.	Assess the requirement for electric vehicle charge points. Make recommendations for the installation and use of charge points to meet residents' requirements. Source funding for additional charging infrastructure.	2019 2019 2020 - 2022	Support for electric and plug in hybrid vehicles.	M&CP DBE C&CS ✓✓
	11	Ensure that, subject to operational requirements, 100% of vehicles owned or leased by the City Corporation are electric or hybrid by 2025.	Use the Responsible Procurement Strategy and Transport Coordination Group to ensure this target is met subject to suitable vehicle availability.	2024	Zero emission City Corporation fleet.	CHB ✓✓✓
	12	Continue to trial low and zero emission technology.	Take all opportunities to trial and evaluate at least one new low and zero emission vehicle per annum.	Ongoing	Ensure that the City Corporation is using the latest zero emission technology.	DBE OS ✓

Action	Detail	Timeline	Outcome	Dept.	Cost
13	Continue to encourage zero emission vehicles through the supply chain.	Apply the menu of options in the Responsible Procurement Strategy to assist in reducing air pollution to major contracts. Review the menu of options biannually.	2019 – 2024 Biannually	Reduced impact on air pollution in London from City Corporation contracts	CHB ✓
14	Require electric or hybrid vehicles as a default for the Corporate taxi contract, together with annual emission reduction targets	When the Corporate taxi contract is renewed, stipulate a requirement for low and zero emission vehicles as default, with emission reduction targets applied.	2020/ 2021	Reduced impact on air pollution in London from City Corporation contracts. Leading by example.	CHB ✓
15	Require zero emission and electric or hybrid vehicles as a default for courier contracts, together with annual emission reduction targets	When the courier contracts are renewed, stipulate a requirement for zero and low emission vehicles as default, with emission reduction targets applied.	2020 - 2024	Reduced impact on air pollution in London from City Corporation contracts. Leading by example.	CHB ✓
16	Continue to ensure that all relevant Corporate strategies and policies reflect the importance of improving local air quality and reducing exposure.	All existing strategies will be assessed for actions to assist in improving air quality and reducing exposure. Further measures will be included in Corporate strategies when they are reviewed.	2020 2019 - 2024	Corporate wide action to improve air quality and reduce exposure. Staff across the organisation with an improved understanding of issues surrounding air quality and how they can support this Air Quality Strategy.	M&CP DBE CHB CS OS ✓
17	Work with London Councils and other stakeholders to develop proposals for legislation to help improve air quality across London.	Agree proposals for a Private Members Bill with London Councils. Coordinate proposals with the Greater London Authority and other bodies. Support the passage of the Bill through the House of Lords.	2019	Improved regulatory powers to improve local air quality.	M&CP REM ✓✓

Collaborating with Others
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Action	Detail	Timeline	Outcome	Dept.	Cost		
18	Continue to work closely with the Greater London Authority and Transport for London on policies to improve air quality and ensure that all actions support the aims and objectives of the Mayor's Environment Strategy.	Ensure actions within this Strategy support the Mayor of London's activities and the requirements of LLAQM.	2019	A strategy and work programme that supports the aims of the Mayor of London.	M&CP	✓✓	
		Undertake air quality improvement projects with the support of the Mayor's Air Quality Fund.	2019 – 2022				Collaboration and the development of cross London policies for improving air quality.
		Support the activities of the Mayor of London Air Quality Department.	Ongoing				
	19	Continue to collaborate with London Boroughs and London Councils on action to improve air quality.	Provide air quality advice to London Councils.	Ongoing	Facilitate and support collaboration. Ensure a strategic approach to air quality policy across London.	M&CP	✓
			Chair four meetings per annum of the London Air Quality Steering Group.	Quarterly			
			Host four meetings per annum of the central London Air Quality Cluster group.	Quarterly			
	20	Support Universities with research into the health impacts of air pollution, to increase understanding of the sources of pollution and the effectiveness of interventions to reduce pollution.	Support research on impact of building form on wind patterns and pollution concentrations.	2019	Improve understanding of how air pollution behaves in a complex urban environment.	M&CP	✓✓
			Support an air quality dissertation through Dissertations for Good. Support other research project as and when required.	2019 – 2024			
Source funding to support London Universities with research for dealing with air pollution in urban areas.			2020 - 2024				

Action		Detail	Timeline	Outcome	Dept.	Cost	
Page 266	21	Continue to support the Third Sector to deliver air quality improvement projects and raise awareness amongst London's communities.	Judge the Sustainable Transport Category of the Sustainable City Awards.	Annually	Facilitate collaboration and the dissemination of air quality knowledge and awareness.	M&CP	✓✓
			Support the work of Environmental Protection UK with events, meeting space and administrative support.	Ongoing			
	22	Support the Port of London Air Quality Strategy through air quality monitoring and in taking wider action to reduce emissions from vessels on the river Thames.	Monitor air pollution along the river.	2019 -2024	Greater understanding of pollution levels along the river.	M&CP	✓✓
			Source funding to support the PLA to pilot measures to reduce emissions from vessels using the river.		Understanding cost effective measures to reduce emissions from vessels on the river.		
	23	Continue to support the Cross-River Partnership in its delivery of air quality projects in central London.	Provide the co-chair for CRP and take part in joint projects.	2019 - 2024	Support collaborative cross borough work to improve air quality.	M&CP DBE	✓
	24	Continue to support the Environment Agency with action to improve air quality, including the implementation of the Medium Combustion Plant Directive.	Source funding to undertake a survey of combustion plant in the City of London.	2019 - 2024	Emissions from combustion plant are minimised.	M&CP	✓✓
			Support the implementation of the Medium Combustion Plant Directive through the provision of information where available and review of permits where required.				
	25	Continue to engage with and support the Business Community to become Air Quality Champions and reduce their impact on local air pollution.	One on one business engagement through the CityAir scheme.	2019-2024	Major businesses in the City of London reduce their impact on local air quality as a result of their business operations.	M&CP	✓✓
			Run at least one Air Quality Business event per year.	Annually			
			Engage with intermediary groups who work with small businesses to raise the profile of air quality.		Smaller businesses in the City of London will have increased awareness of air quality.		

Action		Detail	Timeline	Outcome	Dept.	Cost
		Work with the Cheapside Business Alliance (CBA) to raise the profile of air quality and obtain support for action to reduce emissions associated with the CBA member activities.				

Action			Detail	Timeline	Outcome	Dept.	Cost
Reducing Emissions from Transport	26	Support the Mayor of London with the effective implementation of the Ultra-Low Emission Zone.	Publicise the ULEZ amongst local businesses, City Corporation departments and markets. Ensure City Corporation fleet of vehicles meet the ULEZ criteria.	2019 - 2021 2019	Vehicles that comply with the requirements of the ULEZ delivering air quality improvements across central London.	M&CP	✓
	27	Work with the taxi industry to reduce empty running of taxis within the Square Mile.	Explore what practical action can be taken to reduce empty taxi running.	2019 - 2021	Reduced taxi emissions.	DBE	✓
	28	Urge Transport for London to prioritise Zero Emission Capable buses on routes through the City of London.	Work with TfL on their programme of upgrades to cleaner buses and review of routes.	2019 - 2024	Reduced emissions from the bus fleet in the City of London.	DBE	✓
	29	Ensure that Healthy Street Plans have air quality improvement targets and that the air quality impact of major transport and public realm schemes are measured.	Healthy Streets plans will have air quality KPIs. Road schemes will be assessed for local air quality impact when there are proposed changes.	2019 - 2024	Ensure that road schemes have a positive impact on local air quality.	DBE	✓
	30	Introduce Local Zero Emission Zones by 2022.	Introduce local ZEZs covering the Barbican and Golden Lane and Eastern Cluster.	2022	Reduce emissions from vehicles in the City.	DBE	✓✓✓
	31	Implement a wide range of action through the City Corporation Transport Strategy to reduce the exposure of pedestrians to transport generated air pollution in the Square Mile.	Increase in the number of pedestrianised, or pedestrian priority streets.	2020 onwards	Reduced exposure to air pollution for people who live in, work in and visit the Square Mile.	DBE	✓✓✓
			Widen pavements.	2020 onwards			
Reduce the amount of time people wait for a green signal to cross the road.			2020 onwards				

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Action	Detail	Timeline	Outcome	Dept.	Cost	
	<div>Improve specific walkways such as the riverside walkway and Barbican High-Walk.</div> <div>Improve awareness of traffic free walking routes.</div> <div>Timed and temporary street closures.</div> <div>Lunchtime Streets.</div> <div>Complete Legible London maps and directional signs.</div>	<div>2020 onwards</div> <div>Ongoing</div> <div>Ongoing</div> <div>2019 onwards</div> <div>2019 - 2020</div>				
32	Pilot an ultra-low emission vehicle street.	Pilot ULEV access restriction to inform the development of Zero Emission Zones as part of the City Transport Strategy.	2019 - 2020	Trial the concept of a ULEV street in the City of London to see if it's an effective way to encourage zero end low emission vehicles.	M&CP DBE	✓✓✓
33	Assess the suitability of rolling out LEN pilot projects at other locations across the Square Mile.	<div>Commission a legacy report to establish the most cost-effective interventions.</div> <div>Source funding to roll out cost effective interventions.</div>	<div>2019</div> <div>2020 - 2024</div>	Best practice applied across the City of London.	M&CP	✓✓
34	Implement a wide range of action, through the City Local Plan and the City Corporation Transport Strategy, and Freight and Servicing SPD to reduce emissions from freight vehicles in the Square Mile.	<div>Introducing a freight consolidation service for the City.</div> <div>Delivering two last mile logistics hubs</div> <div>Producing a Servicing Action Plan</div> <div>Identifying opportunities to increase the use of the river for freight including exploring the use of Blackfriars and Tower Piers and a reinstated Swan Lane Pier.</div>	<div>2022</div> <div>2022</div> <div>2020</div> <div>2019 - 2020</div>	Reduce emissions from freight and servicing vehicles.	DBE	✓✓✓

Action		Detail	Timeline	Outcome	Dept.	Cost
		Require all development in the City to consider the use of the river for the movement of construction material and waste	2019			
35	Implement a range of actions through the City Corporation Transport Strategy and City Local Plan to support and encourage cycling.	<p>Increase the amount of cycle parking following a City-wide cycle parking review and publish a Cycle Parking Delivery Plan.</p> <p>Ensure new developments provide secure cycle parking facilities including for non-standard cycles, cargo bikes, hand carts and visitor cycle bays.</p> <p>Promote cycling through improving awareness, support London-wide and national campaigns and explore the potential for an annual City Corporation cycling festival.</p> <p>Work with TFL and cycle providers to improved cycle hire provision.</p> <p>Apply a minimum cycling level of service to all streets initially by reducing motor traffic volumes to below 150 vehicles per hour or Protected cycle lanes that are a minimum of 1.5m wide per direction of travel along a core cycling network.</p>	<p>2022</p> <p>On going</p> <p>2019 onwards</p> <p>Ongoing</p> <p>2019 onwards</p>	Encourage modal shift away from motorised transport	DBE	✓✓✓
36	Install additional publicly accessible electric vehicle (EV) rapid charge points by 2025	Locations to be identified through engagement with the Transport for London Electric Vehicle Infrastructure Taskforce.	2019 - 2024	Support electric vehicle use in the City.	DBE	✓✓✓

Action	Detail	Timeline	Outcome	Dept.	Cost
	Install a rapid charging hub for taxis in Baynard House car park	2019			
	Install a taxi only rapid charge point in Noble Street rest rank	2019			
37	Through the City Local Plan require the installation of rapid charge points in new developments.	Apply the requirements of planning policy and the Freight and Servicing Supplementary Planning Document.	Ongoing	Support the uptake of zero emission freight vehicles.	DBE ✓
38	Ensure that improving air quality and reducing exposure is an integral part of all major transport and public realm schemes.	Air pollution will be modelled and measured as part of all major transport and public realm schemes.	2019-2024	Improved air quality from traffic management schemes in the City of London.	DBE M&CP ✓✓✓
39	Continue to take a wide range of action to discourage unnecessary vehicle engine idling in the Square Mile.	Run at least 3 Cleaner Air Action Days throughout the year. Review options for enforcement. Jointly lead the Pan London Idling Action project. Respond to complaints and erect signs in hot spot areas.	3 times / year 2020 2019-2022 Ongoing	Reduced emissions from unnecessary engine idling in the Square Mile. Coordinated action across London. Raised awareness amongst drivers and support for no engine idling policy.	M&CP DBE ✓✓
40	Ensure City Corporation parking charges favour low and zero emission vehicles in the City of London.	Differential parking charges applied with the lowest level of charges being applied to zero and low emission vehicles such as electric, hydrogen and hybrid.	On going	Parking policies that favour low and zero emission vehicles.	DBE ✓

Action		Detail	Timeline	Outcome	Dept.	Cost	
Reducing Emissions from Non-Transport	41	Continue to assess all planning applications for air quality impact.	Review all planning applications and make recommendations for conditions as required.	Ongoing	New developments that do not have a negative impact on local air quality.	M&CP	✓
			Require air quality assessments for major developments. This includes all fixed plant, boiler and emergency generators, and transportation sources including delivery and servicing.				
	42	Encourage the use of non-combustion technology during construction and in the operation of new developments.	Developers required to identify suitable non-combustion/zero emission technologies such as heat pumps. BREEAM maximum pollution credits for local air quality to be obtained from non-combustion systems where possible.	2019 - 2024	New developments that do not have a negative impact on local air quality. Reduced emissions from buildings.	M&CP DBE	✓
	43	Apply stringent emission standards for combustion plant where non-combustion plant is not feasible in new developments.	Where non-combustion technologies are not feasible and combustion plant is installed the NOx emissions from Combined Heat and Power (CHP) plant will be required to meet the following emission limits: 50mg/Nm3 (and 25mg/Nm3 for turbocharged CHP) at reference O ₂ . All gas boilers will be required to have a NOx rating of <40mgNOx/kWh at 0% O ₂ as a minimum. Options for tightening these limits by 2020 will be kept under review. The use of oil, biomass, biofuels and wood pellets will be discouraged.	2019 - 2024	New developments that do not have a negative impact on local air quality.	M&CP DBE	✓

Action		Detail	Timeline	Outcome	Dept.	Cost
44	Ensure that where possible chimney stacks terminate above the height of the nearest building.	Where combustion plant is installed good dispersion of emissions will be required by ensuring adequate dispersion. Chimneys should terminate a minimum of 2m above roof height where possible Stack discharge velocity should be at least 10 m/sec. Appliances 1MW or greater will be required to achieve a stack discharge velocity of 15 m/sec.	Ongoing	Emissions from chimney stacks have minimal impact on ground level concentrations.	M&CP DBE	✓
45	Require all new developments with to be air quality neutral as a minimum and developments subject to an Environmental Impact Assessment to be Air Quality Positive in line with the requirements of the emerging London Plan.	Evaluate all air quality neutral assessments. Mitigation may be considered but offsetting is not acceptable. Ensure air quality positive assessments are carried out for developments that require an Environmental Impact Assessment.	Ongoing	New developments that do not have a negative impact on local air quality.	M&CP DBE	✓
46	Update the City Corporation Supplementary Planning Document for Air Quality to reflect new policies and requirements of the City Local Plan and London Plan.	Update the Supplementary Planning Document for Air Quality to reflect the latest guidance.	2021	Reduced emissions from new development.	M&CP	✓
47	Ensure emissions from construction sites are minimised through close management and control.	Regularly inspect sites and respond to complaints. Investigate options for powering tower cranes by mains electricity rather than a diesel generator. Encourage the use of electric excavators and diggers.	Ongoing 2020 From 2020	Reduced emissions from construction activities and plant.	M&CP	✓✓

Action			Detail	Timeline	Outcome	Dept.	Cost
Page 274	48	Regularly update the City Corporation best practice guidance on minimising emissions from construction and demolition in order to reflect best practice.	Work with demolition and construction companies to update the best practice guide. Look for further opportunities to reduce emissions with key companies.	Every 2 years	Reduced emissions associated with construction and demolition operations.	M&CP	✓
	49	Enforce the Mayor of London NRMM requirements on construction sites as a minimum.	Carry out an inspection programme. Continue with membership of the London Low Emission Construction Partnership (LLECP)	2019 - 2022	Reduced emissions associated with construction and demolition operations.	M&CP	✓
	50	Introduce a Stage V emission limit for NRMM on construction sites by 2025 where available.	Incorporate this requirement in the City Corporation Code of Practice.	2024	Reduced emissions associated with construction and demolition operations.	M&CP	✓
	51	Investigate options for reducing emissions from NRMM used in street works, filming and other events.	Source funding to undertake a trail of charging facility for street/film events.	2020 - 2022	Reduced emissions associated with street works, filming and other events	M&CP TC	✓
	52	Examine options for reducing emissions from existing combustion plant in the Square Mile.	Source funding for trials. Work with the construction industry and equipment suppliers to support and pilot low and zero emission equipment. Work with business to support trials to reduce emissions from combustion plant in buildings.	2020 - 2024	Reduced emissions from existing combustion plant.	M&CP	✓✓

Action		Detail	Timeline	Outcome	Dept.	Cost
Page 275	53	Improve the understanding of the use of emergency generators in City of London buildings being used for Demand Side Response and Short-Term Operating Reserve.	Source funding to investigate the use of emergency generators in buildings. Work with building owners to investigate alternative means of providing emergency back-up power. Support the Mayor of London to seek reductions in emissions from large scale generators producing power for commercial buildings.	2020 - 2024	Reduced emissions from generators.	M&CP ✓✓
	54	Continue to ensure that emissions from chimneys are dispersed as far as possible using the provisions of the Clean Air Act 1993.	Issue authorisations for Chimney Heights for new appliances.	Ongoing	Ensure reduced impact of emissions on ground level concentrations.	M&CP ✓
	55	Ensure compliance with emission control requirements for the City Corporation's prescribed processes.	Carry out regular risk-based inspections of prescribed processes in the Square Mile.	2019 - 2024	Regulated operations that comply with the requirements of the legislation.	M&CP ✓
	56	Promote and enforce smoke control provisions detailed in the City of London Various Powers Act 1954 and 1973 and the Clean Air Act 1993.	Continue to enforce the smoke control provisions and raise awareness in the City of London.	2019 - 2024	A reduction in the amount of smoke emitted in the Square Mile.	M&CP ✓

9/2/2024 Raising Awareness						
Action	Detail		Timeline	Outcome	Dept.	Cost
57	Make greater use of Public Health Networks to disseminate information about air quality.	Use Public Health Networks to disseminate information and improve awareness of air pollution and its impact on health Promote exposure reduction techniques and greater uptake of exposure reduction apps, such as CityAir phone app especially amongst vulnerable people and groups.	2019 - 2024	Better informed individuals able to take steps to reduce exposure to poor air quality leading to improved public health.	CCS M&CP	✓
58	Assess options to improve and further develop the free CityAir Smart Phone App.	Source funding for improvements to the CityAir Smart Phone App. Work with Kings College London to upgrade the App.	2020	Improved information to enable individuals able to reduce exposure to poor air quality.	M&CP	✓✓
59	Disseminate information about air quality through various channels such as social media, the City Corporation web site and an e-newsletter.	Use and continue to develop a range of communication methods to reach businesses, workers and residents, including social media, digital and website media, newsletters and events. Specifically: <ul style="list-style-type: none">• Daily tweets• Bi monthly e newsletter• At least 2 x hard copy articles per year• Update the City Corporation web pages at least every fortnight• Attend at least 4 events per year to promote air quality	2019 - 2024	Better informed individuals able to take steps to reduce exposure to poor air quality.	M&CP	✓
60	Develop an action plan, in support of the Mayor of London's air pollution forecasting service, to reduce exposure on days of high and very high levels of air pollution.	An action plan focussed on raising awareness on days of high and very high air pollution.	2020	Greater awareness amongst residents, workers and visitors to the City of London leading to a reduction in personal exposure to air pollution.	M&CP	✓

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Action	Detail	Timeline	Outcome	Dept.	Cost	
61	Increase awareness of air pollution amongst the City of London residential community.	Attend events with an information stall. Provide information for newsletters Attend residents' meetings Support residents who wish to measure air pollution where they live.	2019 - 2024	Better informed residents able to take steps to reduce exposure to poor air quality.	M&CP	✓
62	Run events in support of National Clean Air Day.	Run up to 3 events each year on and around National Clean Air Day.	Annually	Better informed individuals able to take steps to reduce exposure to poor air quality.	M&CP	✓
63	Develop plans for improving air quality and reducing the exposure to pollution of children who attend schools in the City of London	An action plan for all City of London schools	2020 - 2021	Reduced impact of air pollution on the health of children in the Square Mile.	M&CP DBE	✓
64	Continue to support Barts Health NHS to reduce its own impact on local air pollution and assist vulnerable patients in reducing their exposure to pollution.	Support hospital events. Liaise with staff to reduce emissions and improve the understanding of air quality.	2019 - 2024	Improved local air quality around the hospital and greater awareness amongst visitors and staff.	M&CP	✓
65	Continue to work with businesses to raise awareness of air pollution amongst workers.	Engage with business through CityAir business engagement programme. Working with Heart of the City and Business Healthy on business engagement.	2019 - 2024	Raised awareness of air pollution amongst workers in the City of London	M&CP	✓✓

Appendix 2: Legal Position

The European Union sets health-based Limit Values for a number of pollutants that are harmful to health and the environment. These Limit Values are legally binding. There are also target values which Member States must take all necessary steps to achieve, not entailing disproportionate costs. The World Health Organisation also sets health-based Guidelines¹³. These are not legally binding. The relevant standards for nitrogen dioxide (NO₂) Particles (PM₁₀ and PM_{2.5}) are shown in table 1.

The European Commission can act against any Member State if the air quality does not meet the European Union Limit Values throughout its territory by a specified date. The UK government is responsible for meeting the EU Limit Values across the UK, with the Mayor of London being responsible for meeting them in London. The City Corporation has a statutory obligation to support this through local action. This obligation is detailed in the Environment Act 1995.

Table A2.1 Summary of EU/UK air quality limits and WHO Guideline values

Pollutant	(UK) Objective /EU Limit Value	Averaging Period	WHO Guideline Values
Nitrogen dioxide - NO ₂	200 µg/m ³ not to be exceeded more than 18 times a year	1-hour mean	200 µg/m ³
	40 µg/m ³	Annual mean	40 µg/m ³
Particles - PM ₁₀	50 µg/m ³ not to be exceeded more than 35 times a year	24-hour mean	50 µg/m ³
	40 µg/m ³	Annual mean	20 µg/m ³
Particles - PM _{2.5}	25 µg/m ³	Annual mean	10 µg/m ³
	Target of 15% reduction in concentration at urban background locations	3-year mean	
		24-hour mean	25 µg/m ³

The Limit Values for nitrogen dioxide are exceeded in large cities across the UK. As a result, in February 2014, the European Commission launched legal proceedings against the UK for its failure to meet the Limit Values. In 2018 further action by the EU followed for failing to respect agreed air quality Limit Values, not taking appropriate measures to keep exceedance periods as short as possible, and for

¹³ Air Quality Guidelines Global Update 2005. Particulate matter, ozone, nitrogen dioxide and sulfur dioxide

disregarding EU vehicle type approval rules¹⁴. The government has produced a number of plans to deal with nitrogen dioxide within this period. The latest Air quality plan was published in 2017¹⁵ and a supplement in October 2018¹⁶. A Clean Air Strategy was also published in January 2019.

The annual average Limit Value for PM₁₀ has been set at 40 µg/m³. This is largely met everywhere across the United Kingdom. However, small particles have health impacts even at very low concentrations. A threshold has not been identified below which no damage to health is observed. Consequently, the World Health Organisation has set a Guideline level for annual average PM₁₀ of 20 µg/m³. The European Union has set the annual average Limit Value for PM_{2.5} (very fine particles) at 25 µg/m³, with the World Health Organisation setting a Guideline level of 10 µg/m³.

The United Kingdom has voted to leave the EU and there are concerns about what will happen to air quality standards and enforcement following Brexit. A House of Commons briefing paper has been produced on Brexit and air quality¹⁷ to consider these issues. The Government has stated it has no plans to change Limit Values and targets for air quality following Brexit and that in relation to air quality, the Government has said that the 'European Union (Withdrawal) Bill [now Act] is designed to ensure that, as far as possible, the same rules and laws will apply on the day after we leave as on the day before'.

Academics, legal professionals and environment campaign groups are concerned that standards could be changed. In response the Government has published an Environmental Principles and Governance Bill proposing the creation of a new statutory independent environmental watchdog.

¹⁴ Air Quality: Commission takes action to protect citizens from air pollution, European Commission Press Release, Brussels, 17 May 2018

¹⁵ UK plan for tackling nitrogen dioxide concentrations Detailed Plan, July 2017, Defra and DfT

¹⁶ Supplement to the UK plan for tackling roadside nitrogen dioxide concentrations, May 2018, Defra and DfT

¹⁷ Brexit and air quality Commons Library Briefing, Number CBP8195 10 October 2018

Appendix: 3 Sources of Air Pollution

Small particles PM₁₀

Particles of varying sizes and sources exist in the air. It is generally considered that small and fine particles are most hazardous to health due to their ability to penetrate deep into the lungs and do the most damage.

Small particles are defined by their size. They are any particles that are under 10 micrometers in diameter which are represented as PM₁₀. Fine particles are 2.5 micrometers or less in diameter and they are generally formed by combustion. They are represented as PM_{2.5} and are the main cause of the harmful effects of particulate matter. Small and fine particles are not visible to the naked eye.

Where do fine particles come from?

Concentrations of PM₁₀ consist of primary particles that are emitted directly into the atmosphere from sources such as fuel combustion, and secondary particles which are formed by chemical reactions in the air. Particle matter can be human-made or occur naturally. Natural particles found in the City of London include sea salt and dust from as far away as the Sahara Desert.

In the UK, the biggest man-made source of PM₁₀ is fuel combustion. Road transport gives rise to primary particles from engine emissions and tyre and brake wear. The Greater London Authority holds a database of all emissions across London. It is called the London Atmospheric Emissions Inventory (LAEI). The 2013 LAEI, released in August 2016, estimates emissions of NO_x, PM₁₀, PM_{2.5} including a range of years and projects emissions from 2008 and 2030¹⁸. The LAEI indicates that approximately 37 % of PM₁₀ generated by road vehicles in the City of London is caused by the general wear of tyres and brakes. Secondary PM₁₀ is created from emissions of ammonia, sulphur dioxide and oxides of nitrogen, as well as from emissions of organic compounds from fuel combustion.

Particles can travel long distances and on any given day it is likely that the following particles are in the air in the City of London:

- Black carbon from fuel combustion, particularly diesel
- Trace metals from e.g. from vehicle brake wear
- Minerals from construction
- Sulphates from industrial fuel burning outside London
- Nitrates from fuel burning, industry and traffic

¹⁸ London Atmospheric Emissions Inventory (LAEI) 2013 Mayor of London

- Sea salt
- Desert dust

Primary particles emitted in the City of London

Figure 1A shows the estimated contributions for each source for selected years between 2008 to 2030. The LAEI indicates that the main source of primary PM₁₀ emitted locally is road transport. This equated to 55% (17.2 tonnes/year) of all emissions in 2013 and 48% (12.4 tonnes/year) of emissions in 2020. There is a large reduction expected in the proportion of emissions arising from road transport between these years.

When comparing vehicle types, taxis are the biggest emitters of PM₁₀ in the City of London.

Figure 1A

London Atmospheric Emissions Inventory

PM₁₀ Emissions - City of London

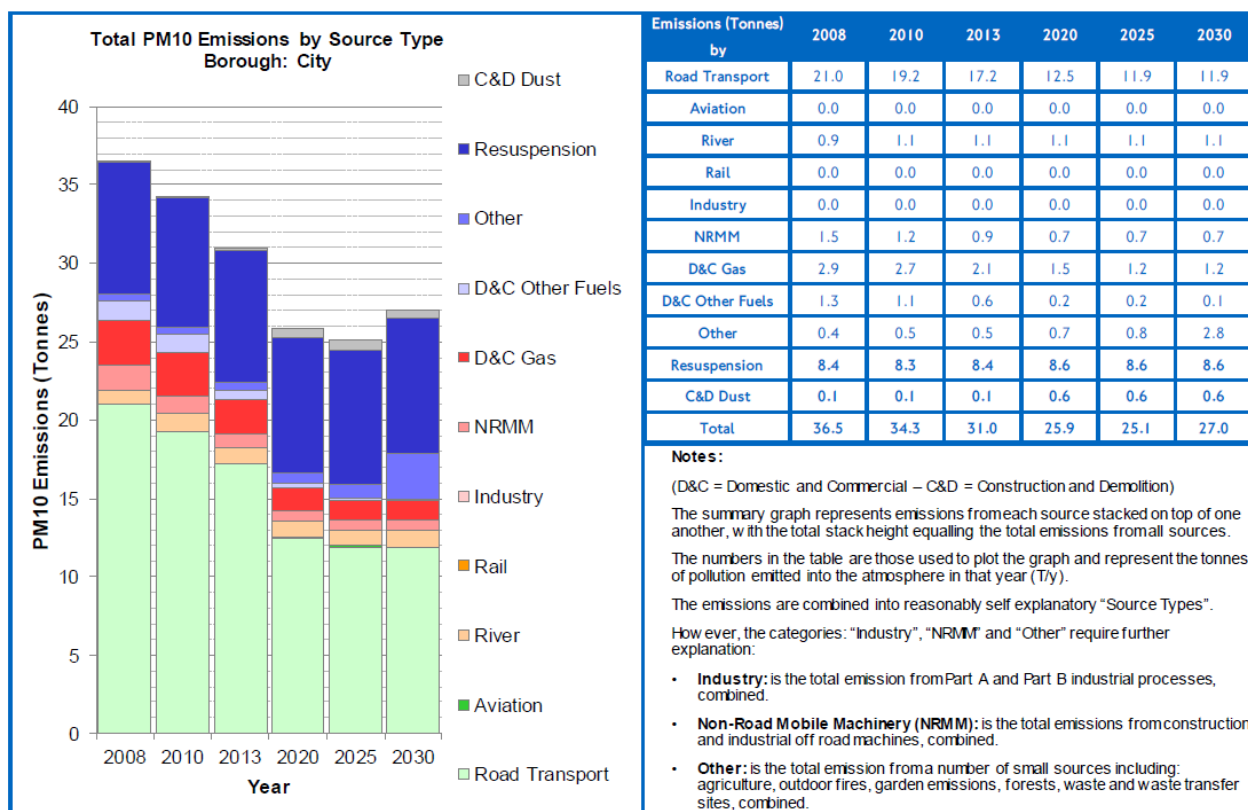
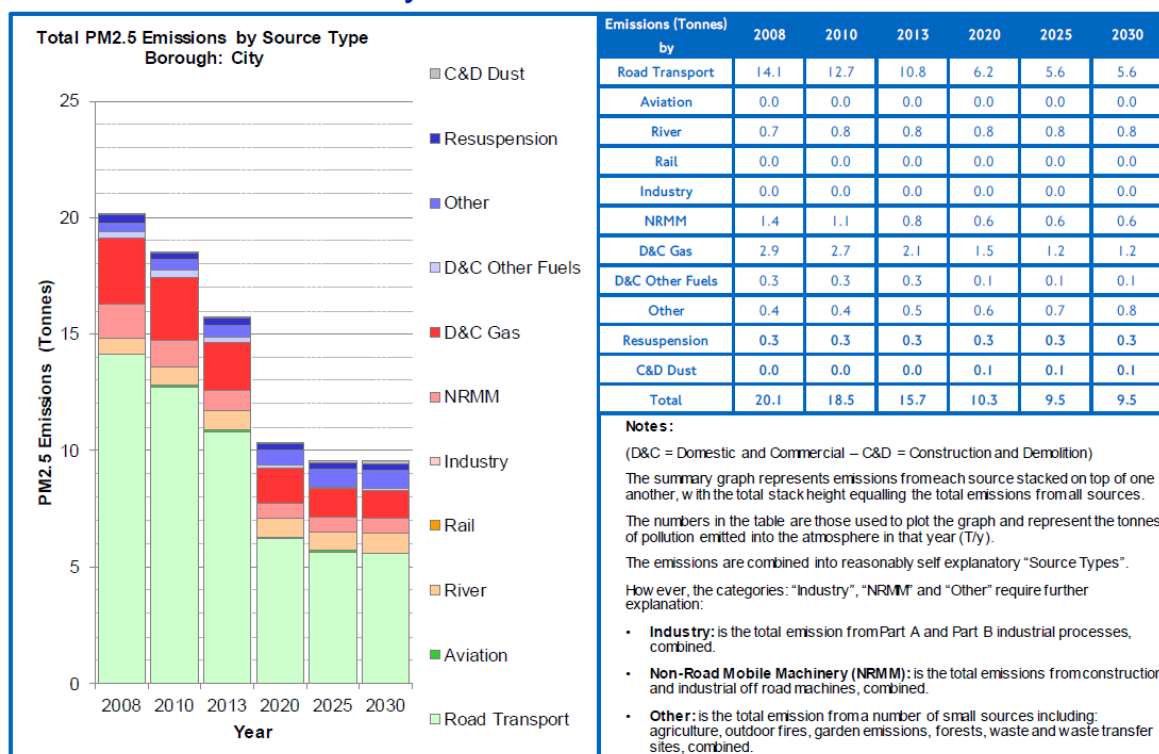


Figure 2A shows the estimated contributions of PM_{2.5}. Road transport makes up the largest single source and again there is a step change expected between 2013 and 2020. However, road transport still remains the biggest source of local emissions.

Figure 2A

London Atmospheric Emissions Inventory

PM2.5 Emissions - City of London



Nitrogen dioxide

Nitrogen dioxide is an irritant gas, which at high concentrations causes inflammation of the airways.

Where does nitrogen dioxide come from?

When nitrogen is released during fuel combustion it combines with oxygen atoms to create nitric oxide (NO). This further combines with oxygen to create nitrogen dioxide (NO₂). Nitric oxide is not considered to be hazardous to health at typical ambient concentrations, but nitrogen dioxide can be. Nitrogen dioxide and nitric oxide are referred to together as oxides of nitrogen (NO_x).

NO_x emitted in the City of London

The 2013 LAEI details the approximate proportion of emissions of NO_x from vehicles and combustion plant in the City of London during 2011. This is shown in Figure A3.

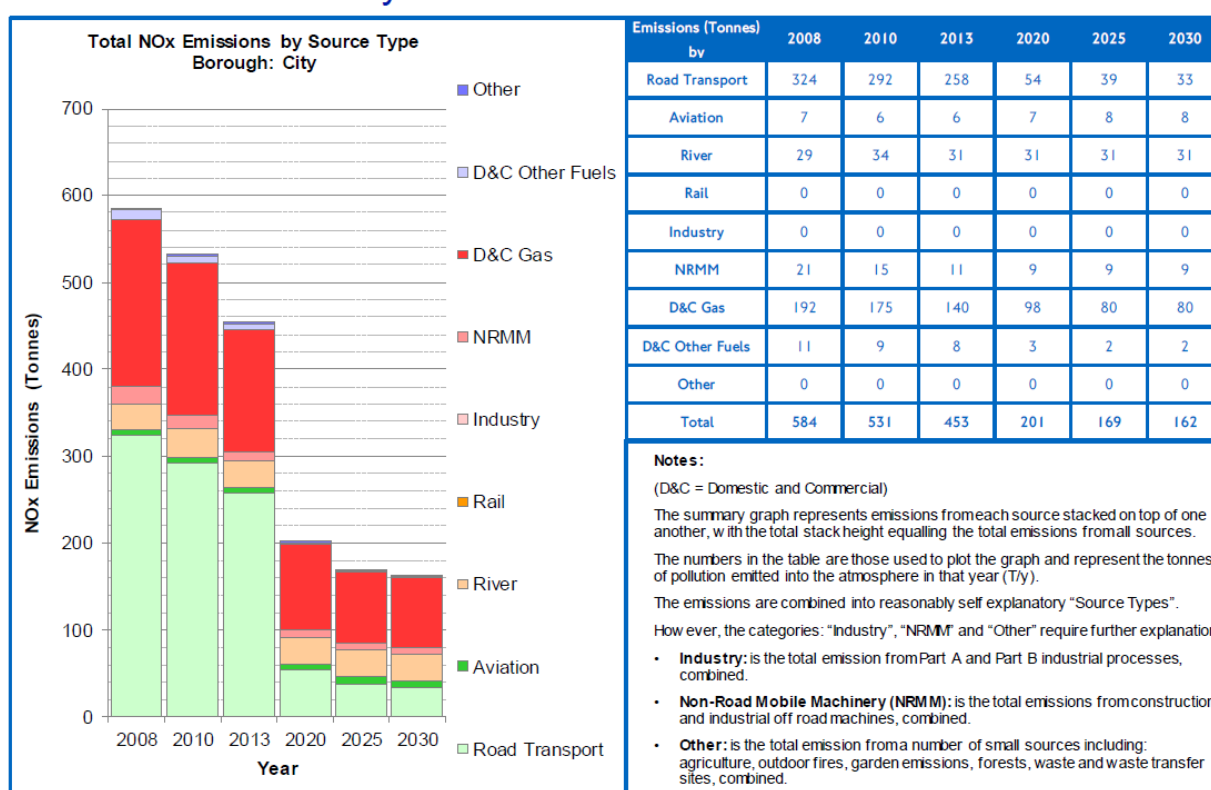
Figure 3A shows the estimated contributions of NOx. In 2013 road transport is the biggest single source of emissions, emitting 258 tonnes of NOx, however this is estimated to reduce to 54 tonnes by 2020. This forecast reduction is based on significant improvements to the emissions from vehicles. It implies a reduction of almost 80% over the 7 years.

Emissions from stationary combustion sources such as Combined Heat and Power and boilers are expected to drop from 148 to 101 tonnes

Figure 3A

London Atmospheric Emissions Inventory

NOx Emissions - City of London



Appendix 4: Health Effects of Air Pollution

Exposure to PM_{2.5} is considered to be a significant cause of disease in London. Public Health England (PHE) published a report in 2014 'Estimating Local Mortality Burdens Associated with Particulate Air Pollution'. The report states that:

'current levels of particulate air pollution have a significant impact on health. Measures to reduce levels of particulate air pollution, or reduce exposure of the population to such pollution, are regarded as an important public health initiative.'

In addition to the above, the World Health Organisation has classified diesel exhaust specifically as a Group 1 carcinogen.

Much research into the health impacts of air pollution has been undertaken. A study 'Understanding the Health Impacts of Air Pollution in London' undertaken by Kings College London was published in July 2015¹⁹. The report, commissioned by TfL and the GLA, estimated the mortality burden of 2010 concentrations of fine particles (PM_{2.5}) in London. The total mortality burden of anthropogenic PM_{2.5} for the year 2010 is estimated to be 52,630 life-years lost, equivalent to 3,537 deaths at typical ages. The total mortality burden of long-term exposure to NO₂ is estimated to be up to 88,113 life-years lost, equivalent to 5,879 deaths at typical ages, combined to create a total figure of up to 9,400 equivalent deaths in 2010. There is assumed to be an overlap in effects of about 30%.

More recently COMEAP in 2018²⁰ published estimates of the annual mortality burden of human-made air pollution across the UK. This study considers the effects of nitrogen dioxide, but these cannot be separated out from the effects of PM_{2.5}. The annual mortality burden has been estimated as an effect equivalent to 28,000 to 36,000 deaths. The range is based on two approaches to take into account the differing views of experts.

The WHO Guidelines for PM are the lowest levels at which total cardiopulmonary and lung cancer mortality have been shown to increase with more than 95% confidence in response to PM_{2.5} in a long-term exposure to fine particulate air pollution study.²¹

¹⁹ Understanding Health Impacts of Air Pollution in London King's College London 15 July 2015

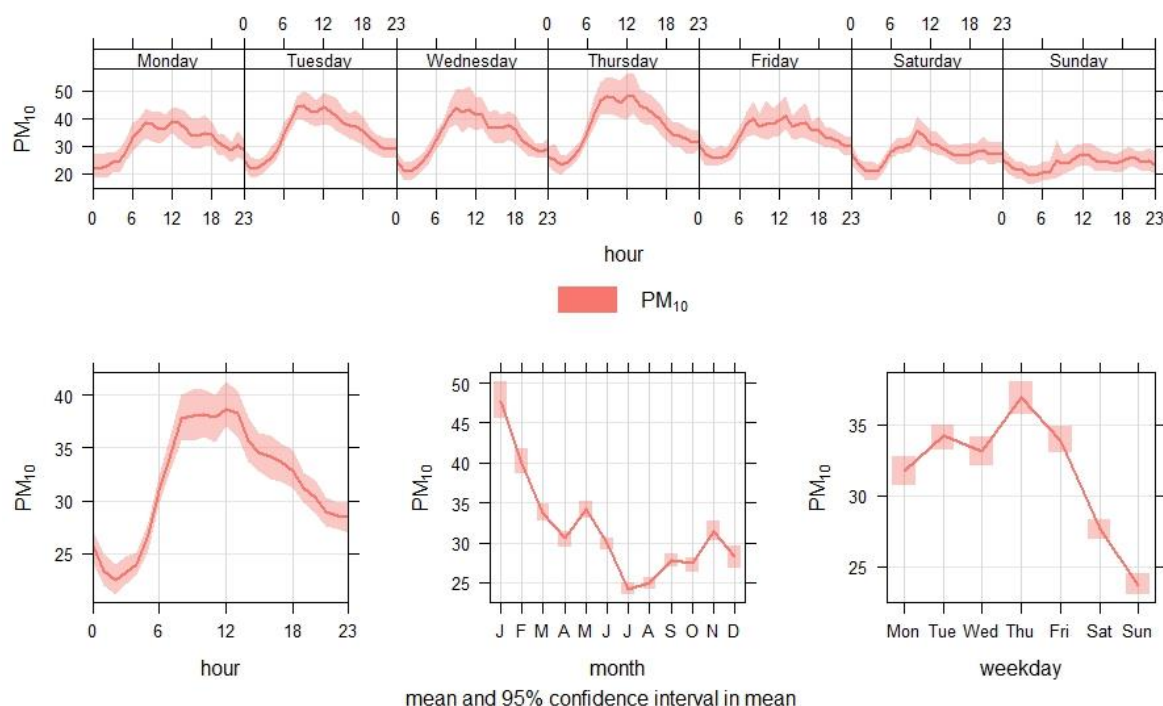
²⁰ Associations of long-term average concentrations of nitrogen dioxide with mortality. A report by the committee on the Medical Effects of Air Pollutants. August 2018

²¹ Evolution of WHO air quality Guidelines, Past Present and Future. World Health Organization 2017

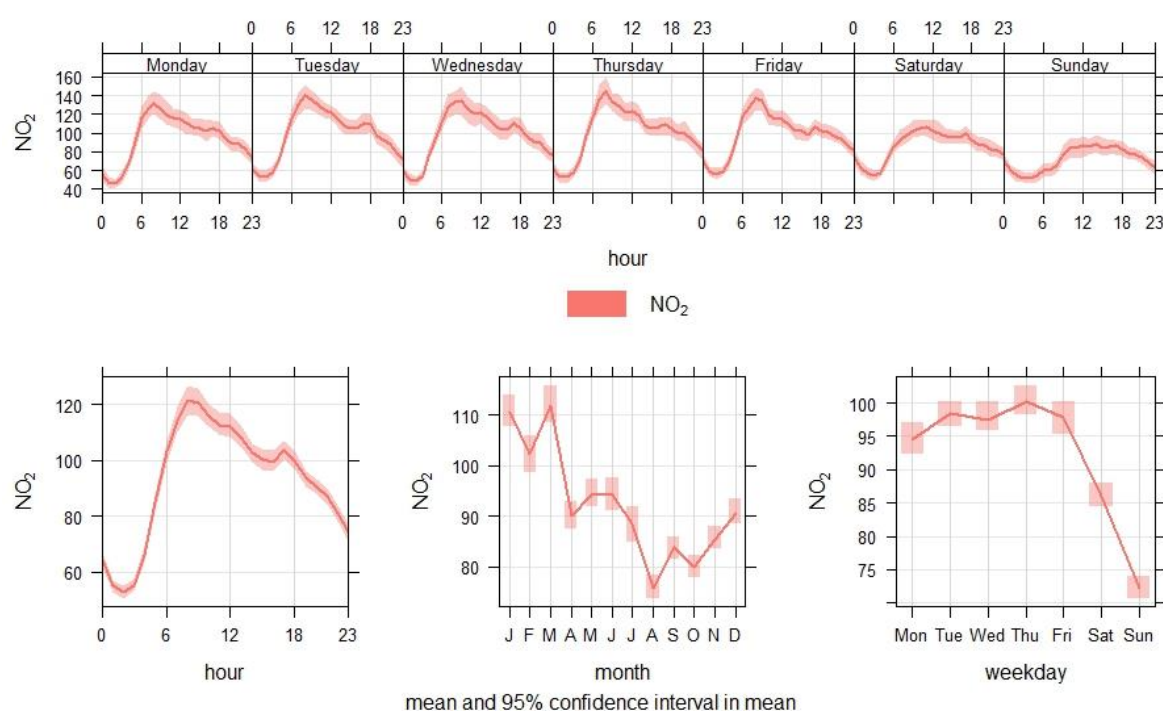
Appendix: 5 Further analysis of monitoring data

Further analysis of monitoring data shows the average diurnal profile during different days of the week. Changes in concentrations are closely related to traffic patterns.

Time Variation of PM₁₀ concentrations at Upper Thames Street 2017



Time Variation of NO₂ concentrations at Upper Thames Street 2017



Appendix 6: Mayor of London Policies

Environment Strategy

As part of his legal obligation to meet air quality Limit Values across London, the Mayor of London published the London Environment Strategy in May 2018. The strategy also covers climate change mitigation and energy, the low carbon economy, waste, green space and transport.

London Plan

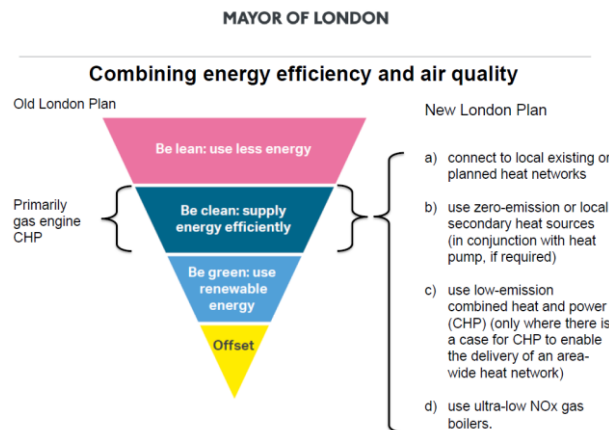
At the time of writing this strategy, emerging policy on air quality is contained in Chapter 9 of the draft London Plan (with minor amendments). This deals with Sustainable Infrastructure:

- Policy SI 1 Improving air quality, part A (1) Development proposals should not lead to further deterioration of existing poor air quality;
- Policy SI 1 Improving air quality, part A (2) requires development proposals to use design solutions to prevent or minimise increased exposure to existing air pollution;
- Policy SI 1 Improving air quality, part A (3) requires masterplans and development briefs for large-scale development proposals subject to an Environmental Impact Assessment should propose methods of achieving an Air Quality Positive approach through the new development and (3a) major development proposals must be at least air quality neutral and be submitted with an Air Quality Assessment.
- Policy SI 1 Improving air quality, part A (4) requires developers to demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance.
- Policy SI 3 Energy infrastructure. Part D (1) requires major development proposals within Heat Network Priority Areas to have a communal low-temperature heating system in line with the following hierarchy; connection to a local existing or planned heat network; use zero emission or local secondary heat sources in conjunction with heat pump; use low-emission combined heat and power (CHP) only where there is a case for CHP to enable the delivery of an area-wide heat network.

In addition, a study on the air quality impacts from Combined Heat and Power in London for the GLA has been undertaken by Ricardo Energy and Environment. The report recommends a complete ban on combustion-based CHP provision for new

development, either in specific geographical areas where air quality is a particular problem, or there are sensitive communities.

The GLA has published an evidence report 'Low Carbon Heat: Heat Pumps in London' which acknowledges that as more up-to-date carbon factors for electricity are applied, heat pumps offer a substantially lower carbon system compared to gas-based systems (e.g. gas boilers and/or gas-fired Combined Heat and Power). This creates co-benefits for both carbon savings and reduced air pollutant emissions as there are no emissions locally.



Transport Strategy

The Mayor of London published a new Transport Strategy in 2018. It set out his plans to transform London's streets, improve public transport and create opportunities for new homes and jobs. The headline target is to 'aim for '80% of all trips in London to be made on foot, by cycle or using public transport by 2041'. Two key elements of the approach include:

Healthy Streets and healthy people: Creating streets and street networks that encourage walking, cycling and public transport use will reduce car dependency and the health problems it creates.

A good public transport experience: Public transport is the most efficient way for people to travel over distances that are too long to walk or cycle, and a shift from private car to public transport could dramatically reduce the number of vehicles on London's streets.

Several action plans will be developed to support the strategy, the first of these is the Walking Action Plan.

Ultra-Low Emission Zone

An Ultra-Low Emission Zone (ULEZ) will be introduced in central London in April 2019. Vehicles travelling in the existing Congestion Charge Zone will be required to

meet new emission standards 24 hours a day, seven days a week, or pay a daily charge. From 2021, the Mayor proposes to extend the zone to encompass the [North and South Circular boundaries](#).

In addition, since January 2018, all new taxis presented for licensing for the first time must be zero emission capable (ZEC). This means having CO2 emissions of no more than 50g/km and a minimum 30-mile zero emission range. Also, all private hire vehicles (PHVs) licensed for the first time must have a Euro 6 petrol or diesel engine, or a Euro 4 petrol-hybrid engine.

In early 2019, TFL will also consult on proposals to reduce taxi emissions further, including a proposal of phased reductions of the taxi age limit for the dirtiest vehicles to 12 years. The 15-year age limit would be strictly mandated in 2019, with a proposed reduction in the age limit each year until a 12-year age limit is reached.

The Mayor of London announced a £23m scrappage scheme for the London's most polluting vans ahead of the introduction of the ULEZ. The scheme will initially help London's micro-businesses, which they define as those with fewer than 10 employees.

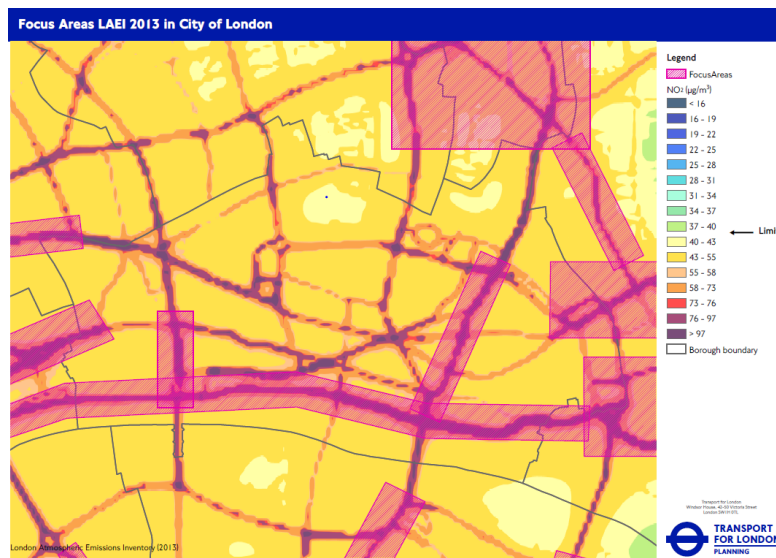
Air Quality Focus Areas

The Mayor of London has identified 'Air Quality Focus Areas' across London. These are areas where the Greater London Authority and Transport for London will focus action to improve air quality, reducing exposure. The Focus areas in the City of London are shown in Figure A6.1

The criteria used by TfL to determine air quality focus areas are available on the Greater London Authority web site²².

²²GLA (2016), London Atmospheric Emissions Inventory (LAEI) 2013 Air Quality Focus Areas - December 2016 update London Data store.

Figure A6.1: Air Quality Focus Areas in the Square Mile



Appendix 7: Air Quality Policies in the Draft City Plan

Policy HIC2: Air Quality

- Developers will be required to effectively manage the impact of their proposals on air quality. Major developments must provide an Air Quality Impact Assessment
- Development that would result in deterioration of the City's nitrogen dioxide or PM10 and PM2.5 pollution levels will be refused
- Developments should be at least Air Quality Neutral. Major developments must maximise credits for the pollution section of the BREEAM assessment relating to on-site emissions of oxides of nitrogen (NOx)
- Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed Air Quality Impact Assessment will be required for combustion based low and zero carbon technologies, and necessary mitigation must be approved by the City Corporation
- Developments that include uses that are more vulnerable to air pollution, such as schools, nurseries, medical facilities and residential development, will be refused if the occupants would be exposed to poor air quality. Developments will need to ensure acceptable air quality through appropriate design, layout, landscaping and technological solutions
- Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts to the fullest extent possible. Impacts from these activities must be addressed within submitted Air Quality Impact Assessments
- Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development to ensure maximum dispersion of pollutants.
- Improving air quality and reducing exposure is also referenced in a number of other policy areas.

Policy HIC8: Play Areas and Facilities

- Play areas and facilities must be inclusive and must not be located in areas of poor air quality due to the negative health impacts on young children.

Strategic Policy S8: Design

- Developments should optimise micro-climatic conditions, address solar glare, day light and sunlight and uncomfortable wind conditions and deliver improvements in air quality

Policy D1: Sustainability Standards

- Mayor development will be required to achieve BREEAM rating of 'excellent' or outstanding obtaining maximum credits for the City's priorities (energy, water, pollution and materials)
- Demonstrate that the London plan carbon emission and air quality requirements have been met on site. In exceptional circumstances where standards cannot be met on site, offsetting will be required to account for the shortfall

Policy D3: Public Realm

- Public realm schemes must have regard to the wellbeing of users in relation to air pollution, noise, temperatures, shading and micro climate

Policy CEW3: New Waste Management Sites

- Proposals for new waste management, handling and transfer will be required to demonstrate that access arrangements, mode of transport and transport routes will minimise the potential for congestion and environmental impacts including local air quality impacts

Strategic Policy S20: Aldgate and Tower

- The Aldgate and Tower key area of change includes requirements to improve air quality around Mansell Street Estate, make improvements to Aldgate Bus Station to improve air quality and identify opportunities to reduce pollution through public realm improvements in the vicinity of Sir John Cass School and Middlesex Street

Strategic Policy S22: Fleet Street

- Residential development will be directed to appropriate sites off principal streets to reinforce the existing residential cluster, ensuring a high quality of residential amenity to reduce exposure to poor air quality

Strategic policy S23: Smithfield and Barbican Key Area of Change

- Improvements will be made to Beech Street to reduce the volume of traffic, improve air quality and increase amenity and vitality

Glossary

AQAP: Air Quality Action Plan

AQMA: Air Quality Management Area

AQS: Air Quality Strategy

BREEAM: Building Research Establishment Environmental Assessment Method

CHP: Combined Heat and Power

COMEAP: Committee on the Medical Effects of Air Pollutants

CRP: Cross River Partnership

Defra: Department for Environment Food & Rural Affairs

EA: Environment Agency

EPR: Environmental Permitting Regulations

EPUK: Environmental Protection UK

EU: European Union

EV: Electric Vehicles

g/kWh: grams per kilowatt hour

HC: Hydrocarbons

HWB: Health and Wellbeing Board

JSNA: Joint Strategic Needs Assessment

KCL: Kings College London

Kg: kilograms

kW: kilowatts

LEN: Low Emissions Neighbourhood

LAEI: London Atmospheric Emissions Inventory

MAQF: Mayor's Air Quality Fund

MCPD: Medium Combustion Plant Directive

µg/m³: microgram of pollutant per cubic metre of air

mg/m³: milligram of pollutant per cubic metre of air

mg/Nm³: milligram of pollutant per cubic metre of air at normal conditions

mg/kWh: milligram of pollutant per kilowatt hour

m/sec: metres per second

mW: Megawatt

NRMM: Non-Road Mobile Machinery

NO₂: Nitrogen dioxide

NO_x: Oxides of nitrogen

PHE: Public Health England

PHOF: Public Health Outcomes Framework

PHV: Private Hire Vehicles

PM₁₀: Particulate matter with a diameter of 10 micrometres

PM_{2.5}: Particulate matter with a diameter of 2.5 micrometres

SPD: Supplementary Planning Document

SPG: Supplementary Planning Guidance

STOR: Short-Term Operating Reserve

TfL: Transport for London

ULEV: Ultra Low Emission Vehicle

ULEZ: Ultra Low Emission Zone

WHO: World Health Organisation

ZEC: Zero Emission Capable

ZEZ: Zero Emission Zone

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Committee Port Health and Environmental Services Committee – For Decision	Date: 5th March 2019
Subject: The Walbrook Wharf offices fronting Upper Thames Street – 3 rd Floor to be declared surplus	Public
Report of: Carolyn Dwyer, Director of The Built Environment	For Decision
Report author: Zahur Khan, Transportation & Public Realm Director.	

Summary

The purpose of this report is to advise the Port Health and Environmental Services committee that DBE vacated the 3rd floor of Walbrook Wharf, Upper Thames Street on 17th December 2018 and to seek Committee authority to declare the 3rd floor surplus to DBE's operational requirements.

Recommendation(s)

Port Health & Environmental Services Committee Members are asked to:

- Declare the 3rd floor offices at Walbrook Wharf, Upper Thames Street surplus to operational requirements.

Main report

Background

1. The Walbrook Wharf Asset Management Plan and Walbrook Wharf Medium Term Strategy objectives are to achieve vacant possession of the Upper Thames Street offices to allow for lettings to third parties for income generation. These objectives are further supported by the Corporate Asset Management Strategy 2017/2018 objectives of reducing operational asset running costs and creating added value revenue opportunities.

2. The 3rd floor forms part of the expected substantial net saving overall given total gross projected income and savings over the term of the proposed letting for all vacated offices.
3. On 1 November 2018, Corporate Asset Sub Committee (CASC) approved the terms of a proposed letting of the 2nd – 5th floors for a lease expiring in March 2027.

Progress to date

4. Whilst options are being progressed for the Corporation staff occupying the 4th and 5th floors to be relocated within Guildhall, the 3rd floor offices were fully vacated by 17th December, with all affected DBE staff relocated to 1st floor of North Wing, Guildhall.
5. A small number of Corporation staff have been located within the retained parts of the depot site to the rear of the Upper Thames Street offices to ensure effective on-going liaison with the cleansing and waste management contractors and delivery of the Walbrook Wharf depot operations.
6. M&CP staff are still occupying the 4th- 5th floors. A further report will be submitted to this Committee in due course to request approval to declare these floors surplus to requirements, allowing the proposed letting arrangements to be completed.

Conclusion

The Walbrook Wharf 3rd floor offices have been vacated and may now be declared surplus to the Port Health and Environmental Services operational requirements.

Appendices

none

Background papers

none

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