



Planning and Transportation Committee

Date: TUESDAY, 18 JULY 2023
Time: 10.30 am
Venue: LIVERY HALL - GUILDHALL

Members:

Deputy Shравan Joshi (Chairman)	Deputy Natasha Maria Cabrera Lloyd-Owen
Deputy Graham Packham (Deputy Chairman)	Alderman Ian David Luder
Deputy Randall Anderson	Antony Manchester
Brendan Barns	Deputy Brian Mooney
Emily Benn	Deputy Alastair Moss
Ian Bishop-Laggett	Alderwoman Jennette Newman
Deputy Michael Cassidy	Deborah Oliver
Deputy Simon Duckworth	Alderwoman Susan Pearson
Mary Durcan	Judith Pleasance
John Edwards	Deputy Henry Pollard
Anthony David Fitzpatrick	Ian Seaton
Deputy John Fletcher	Hugh Selka
Dawn Frampton	Luis Felipe Tilleria
Deputy Marianne Fredericks	Shailendra Kumar Kantilal Umradia
Jaspreet Hodgson	William Upton KC
Amy Horscroft	Alderman Sir David Wootton
Deputy Edward Lord	

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Ian Thomas CBE
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 meetings held on 11 May 2023 and 21 June 2023.

For Decision
(Pages 9 - 28)

4. **WARDMOTE RESOLUTION**

- (a) To consider the following Resolution from the Ward of Aldersgate – 14 March 2023.

“The Aldersgate Wardmote deplors the dangerous use of pavements and walkways by bicycles and scooters and electric versions thereof and urges the Grand Court of Wardmote to take action to prevent such abuse of the pavements and walkways”

- (b) To consider the following Resolutions from the Ward of Candlewick – 20 March 2023.

- (i) “The Ward of Candlewick commented that they were keen to continue working closely and collaboratively with officers at the City Corporation to get the maximum impact for the Ward of Candlewick from a public realm perspective, and to develop and deliver a plan that would work well long term and provide accessible and user-friendly streets across the City.”

- (ii) “With regard to progress of the building development on Abchurch Lane, the Ward of Candlewick asked that this matter be raised with the City Corporation’s officers and an update provided in a future Candlewick Ward Newsletter. In the event that the project was unlikely to be completed in the near future, scope to have the hoardings updated would also be explored with officers from the Planning and Transportation Department.”

For Decision

5. **OUTSTANDING ACTIONS**

Report of the Town Clerk.

For Information
(Pages 29 - 32)

6. **PROPOSED BARBICAN AND GOLDEN LANE NEIGHBOURHOOD FORUM AND AREA**

Report of the Planning and Development Director.

For Decision
(Pages 33 - 94)

7. **BLACKFRIAR'S BRIDGEHEAD CITY WALKWAY VARIATION**

Report of the Executive Director, Environment.

For Decision
(Pages 95 - 104)

8. **CREECHURCH CONSERVATION AREA PROPOSAL**

Report of the Executive Director, Environment.

For Decision
(Pages 105 - 180)

9. **UTILITY INFRASTRUCTURE STRATEGY**

Report of the Executive Director, Environment.

For Decision
(Pages 181 - 210)

10. **CITY OF LONDON LIGHTING SUPPLEMENTARY PLANNING DOCUMENT (SPD)**

Report of the Director of Planning and Development.

For Decision
(Pages 211 - 282)

11. **BIODIVERSITY AND ECOLOGY***

Report of the Director of Planning and Development.

For Information

12. **BUSINESS PLANS 2022/23: PROGRESS REPORT - PERIOD 3 - DECEMBER - MARCH***
Report of the Executive Director, Environment.

For Information

13. **RISK MANAGEMENT UPDATE REPORT***
Report of the Executive Director, Environment.

For Information

14. **CONSERVATION AREA ADVISORY COMMITTEE (CAAC) AND CITY OF LONDON ACCESS GROUP (COLAG)***
Report of the Planning and Development Director.

For Information

15. **DISTRICT SURVEYORS ANNUAL REPORT 2022/23***
Report of the Executive Director, Environment.

For Information

16. **REVENUE OUTTURN 2022/23***
Report of the Chamberlain, the Executive Director, Environment and the City Surveyor.

For Information

17. **PROPERTY SEARCH INCOME AND EXPENDITURE***
Report of the Director of Planning and Development.

For Information

18. **PUBLIC LIFT AND ESCALATOR REPORT***
Report of the City Surveyor.

For Information

19. **WHOLE LIFE-CYCLE CARBON EMISSION DATA MONITORING IN MAJOR PLANNING APPLICATIONS***

Report of the Executive Director, Environment.

For Information

20. **TRANSPORT STRATEGY: 2022/23 ANNUAL REPORT AND DELIVERY PLAN 2023/24 - 2028/29 5-YEAR PLAN***

Report of the Executive Director, Environment.

For Information

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

For Information

- a) To note the minutes of the Planning Applications Sub-Committee meeting on 21 February 2023*
- b) To note the minutes of the Planning Applications Sub-Committee meeting on 20 March 2023*
- c) To note the draft minutes of the Planning Applications Sub-Committee meeting on 27 June 2023* (To Follow)

22. **MINUTES OF THE LOCAL PLANS SUB-COMMITTEE***

For Information

- a) To note the minutes of the Local Plans Sub-Committee meeting on 27 April 2023*
- b) To note the minutes of the Local Plans Sub-Committee meeting on 23 May 2023*
- c) To note the draft public minutes of the Local Plans Sub-Committee meeting on 20 June 2023*

23. **MINUTES OF THE STREETS AND WALKWAYS SUB-COMMITTEE***

For Information

- a) To note the minutes of the Streets and Walkways Sub-Committee on 23 May 2023*
- b) To note the draft minutes of the Streets and Walkways Sub-Committee meeting on 4 July 2023* (To Follow)

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

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

26. **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.

For Decision

Part 2 - Non-public Agenda

27. **DEBT ARREARS - ENVIRONMENT DEPARTMENT (PLANNING AND TRANSPORTATION COMMITTEE)***

Report of the Executive Director, Environment.

For Information

28. **TO NOTE THE DRAFT NON-PUBLIC MINUTES OF THE LOCAL PLANS SUB-COMMITTEE ON 20 JUNE 2023***

For Information

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

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

PLANNING AND TRANSPORTATION COMMITTEE

Thursday, 11 May 2023

Minutes of the meeting of the Planning and Transportation Committee held at the Guildhall EC2 at 10.30 am

Present

Members:

Deputy Shравan Joshi (Chairman)	Alderman Ian David Luder
Deputy Graham Packham (Deputy Chairman)	Antony Manchester
Deputy Randall Anderson	Deputy Alastair Moss
Brendan Barns	Alderwoman Susan Pearson
Deputy Michael Cassidy	Deputy Henry Pollard
Mary Durcan	Ian Seaton
John Edwards	Hugh Selka
Anthony David Fitzpatrick	Luis Felipe Tilleria
Dawn Frampton	Shailendra Kumar Kantilal Umradia
Deputy Marianne Fredericks	William Upton KC
Amy Horscroft	
Deputy Edward Lord	
Deputy Natasha Maria Cabrera Lloyd-Owen	

Officers:

Tim Fletcher	- Town Clerk's Department
Zoe Lewis	- Town Clerk's Department
Gemma Stokley	- Town Clerk's Department
Deborah Cluett	- Comptroller and City Solicitor's Department
Isobel Tucker	- Surveyors and Property Services
Gwyn Richards	- Environment Department
Simon McGinn	- Environment Department
Rob McNicol	- Environment Department
Bruce McVean	- Environment Department
Peter Shadbolt	- Environment Department
Samantha Tharme	- Environment Department
Peter Wilson	- Environment Department

1. APOLOGIES

Apologies for absence were received from Emily Benn, Ian Bishop-Laggett, Deputy John Fletcher, Jaspreet Hodgson, Deputy Brain Mooney, Judith Pleasance and Alderman Sir David Wootton.

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

There were no declarations of interest.

3. **ORDER OF THE COURT OF COMMON COUNCIL***

The Committee received the Order of the Court of Common Council of 27 April 2023 appointing the Committee and setting out its terms of reference for the ensuing year.

RECEIVED.

4. **ELECTION OF CHAIRMAN**

The Committee proceeded to elect a Chairman in accordance with Standing Order No. 29.

Being the only Member expressing a willingness to serve, Deputy Shravan Joshi was re-elected as Chair of the Committee.

RESOLVED – That Deputy Shravan Joshi be elected Chairman in accordance with Standing Order 29 for the year ensuing.

On being elected, the Chairman thanked the Committee for its support.

The Chairman went on to pay tribute to those Members who had now left the Committee – Alderman Alastair King, Alderman Broniek Masojada, Deputy Keith Bottomley, Andy Mayer, Deputy James Thomson, Martha Grekos and Alethea Silk.

The Chair also welcomed new Members of the Committee – Alderwoman Jennette Newman, Deputy Simon Duckworth, Hugh Selka and Dawn Frampton.

5. **ELECTION OF DEPUTY CHAIRMAN**

The Committee proceeded to elect a Deputy Chairman in accordance with Standing Order No. 30.

Being the only Member expressing a willingness to serve, Deputy Graham Packham was duly elected as Deputy Chair of the Committee.

The Chairman thanked the outgoing Deputy Chairman, Deputy Alastair Moss for his contributions to the Committee.

RESOLVED – That Deputy Graham Packham be elected Deputy Chairman in accordance with Standing Order 30 for the year ensuing.

6. **MINUTES**

The Committee considered the public minutes and summary of the Planning and Transportation Committee held on 7 March 2023 and approved them as a correct record.

Matters Arising

In response to a Member's request for an update on the Bank Junction Traffic and Timing Review, an Officer advised that this would be considered by the Streets and Walkways Sub-Committee on 23 May and would then be considered at the next meeting of the Planning and Transportation Committee.

A Member asked about the expected completion date for the Bank Junction works and was advised that the majority of the works would be completed before the Lord Mayor's Show, with the remaining works scheduled for completion in spring 2024.

7. APPOINTMENT OF SUB-COMMITTEES

The Committee considered a report of the Town Clerk concerning the appointment of its Sub-Committees, their composition and terms of reference. The Town Clerk advised that under the new standing orders, the Chairman and Deputy Chairman of a sub-committee would be the Chairman and Deputy Chairman of the appointing committee or their nominees subject to the support of the wider Committee membership.

Streets and Walkways Sub Committee

The Town Clerk announced that with seven Members expressing an interest in standing for the seven available spaces from the Planning and Transportation Committee, a ballot would not be required.

Local Plans Sub-Committee

The Town Clerk announced that with nine Members expressing an interest in standing for the five available spaces from the Planning and Transportation Committee, a ballot would be required.

MOTION – A Motion was put and seconded that for the ensuing year, the Sub-Committee should be expanded to include nine members of the Committee (excluding the Chairman and Deputy Chairman) rather than five Members, to ensure continuity.

The Motion was put and fell with 8 votes for, 13 votes against and 1 abstention.

RESOLVED – That the appointment, composition and terms of reference of the sub-committees for the ensuing year are approved as follows: -

1) Streets and Walkways Sub-Committee

- The Chairman of the Grand Committee
- The Deputy Chairman of the Grand Committee as Chairman

Seven other Members as follows:

- Deputy Randall Anderson
- John Edwards as Deputy Chairman
- Deputy Marianne Fredericks
- Deputy Edward Lord
- Deputy Alastair Moss
- Alderwoman Susan Pearson

- Ian Seaton
- Together with four Members representing the Finance, Police and Open Spaces, City Gardens and West Ham Park and Port Health and Environmental Services Committees.

Terms of Reference

6. The Sub-Committee is responsible for:-

- (a) traffic engineering and management, maintenance of the City's streets, and the agreement of schemes affecting the City's Highways and Walkways (such as street scene enhancement, traffic schemes, pedestrian facilities, special events on the public highway and authorising Traffic Orders) in accordance with the policies and strategies of the Grand Committee;
- (b) all general matters relating to road safety;
- (c) the provision, maintenance and repair of bridges, subways and footbridges, other than the five City river bridges;
- (d) public lighting, including street lighting;
- (e) day-to-day administration of the Grand Committee's car parks
- (f) all matters relating to the Riverside Walkway, except for adjacent open spaces; and
- (g) to be responsible for advising the Grand Committee on:-
 - (i) progress in implementing the Grand Committee's plans, policies and strategies relating to the City's Highways and Walkways; and
 - (ii) the design of and strategy for providing signposts in the City
- (h) Those matters of significance will be referred to the Grand Committee to seek concurrence.

2) Local Plans Sub-Committee

- The Chairman of the Grand Committee as Chairman
- The Deputy Chairman of the Grand Committee as Deputy Chairman

Five other Members as follows:

- Deputy Randall Anderson
- John Edwards
- Deputy Edward Lord
- Deputy Alastair Moss
- Alderwoman Susan Pearson

- Together with two Members representing the Policy and Resources Committee and the Port Health and Environmental Services Committees.

The Committee also approved the Terms of Reference as set out in the report.

Terms of Reference

To provide guidance and make recommendations on changes to the City of London Local Plan to the Grand Committee.

3) Planning Applications Sub-Committee

Terms of Reference

To determine all planning, listed building and advertisement consent applications (including matters relating to planning obligations, conditions and to the principle of stopping up orders under the Town and Country Planning Act 1990 relevant to such determinations) not delegated to officers under the Scheme of Delegation with all other functions within the Terms of Reference of the Planning and Transportation Committee not delegated to officers continuing to be exercised by that Committee or any other Sub-committees to which it delegates functions.

8. OUTSTANDING ACTIONS

The Committee received a report of the Town Clerk setting out its list of Outstanding Actions.

RECEIVED.

9. APPOINTMENTS TO THE CRIME AND DISORDER SCRUTINY COMMITTEE

The Committee considered a report to appoint the Chairman and Deputy Chairman, or their representatives, as Members of the Crime and Disorder Scrutiny Committee.

RESOLVED – That the Committee appoint Deputy Shравan Joshi and Luis Tilleria as Members of the Crime and Disorder Scrutiny Committee.

10. CHARGES FOR PROPERTY SEARCHES

The Committee considered a report of the Planning & Development Director concerning an increase in charges for property searches.

In response to a Member's question, an Officer stated that fees had not changed since 2009, as since then the responsibilities of the service had changed and the size of team had reduced so the fees had been sufficient to cover costs. He stated that the fees were now no longer covering the costs of the team.

In response to Members' questions, the Officer stated that the number of searches being undertaken was relatively consistent and had recovered well since the reduction at the start of the covid pandemic. Also, the fee increases were consistent with the fees of other central London boroughs.

A Member stated that the method for calculating the fees was not included in the report and requested that this be provided with the next report to the Committee. He stated that there was a need to ensure the costs covered the

full costs and this would enable the Committee to consider further potential increases in the future. The Officer outlined the costs that were included in the figures.

RESOLVED – That the Committee

- 1) agree the increase in fees for Property Searches, as set out in Appendix 1 of the Officer report;
- 2) agree that the next report to the Committee include the full cost breakdown.

11. ADOPTION OF STATEMENT OF COMMUNITY INVOLVEMENT AND DEVELOPER ENGAGEMENT GUIDELINES

Members were informed that consultation on the statutory Statement of Community Involvement (SCI) and the non-statutory Developer Engagement Guidance had taken place, and in advance of the formal adoption, developers had been encouraged to meet the requirements in the developer engagement guidance.

An Officer stated that there had been relatively few comments back and most of the comments back were in support of the documents. The development industry, in particular, was very supportive of the principles involved in the guidance and the SCI. Local residents were also supportive. Members were informed that changes had been made to the documents following comments received in the consultation.

The Chairman thanked Officers for their work.

A Member asked for more information on the composition and terms of reference of two of the groups which had made representation - City of London Access Group and the City of London Conservation Area Advisory Committee. An Officer stated an information report would be submitted to the next Committee meeting.

In response to a Member's question, an Officer stated applications with 10 or more objections were submitted to the Planning Applications Sub-Committee and those with fewer were considered under Delegated Authority. The Officer stated that the Scheme of Delegation had been agreed by the Court of Common Council. There was flexibility within this so if Officers or Members considered it appropriate, a particular application could be considered by the Sub-Committee.

A Member commented that the quality and not just the quantity of objections should be considered. Another Member stated that judgements should be made on the weight of each objection, rather than each objection counting as one.

In response to a Member's questions about the Bevis Marks Synagogue, an Officer stated that the nature of objections was considered e.g. whether they were material planning considerations. If issues were raised which Officers considered to be of a wider public interest, this would be discussed with the Chairman and Deputy Chairman to decide whether this should be considered by the Planning Applications Sub-Committee. Members were informed that

Officers had accepted the comment made by the Synagogue on page 64 of the report that reference to “immediate neighbours” be amended to incorporate people who were affected by an application rather than who may be in immediate physical proximity.

RESOLVED – That the Committee

1. Adopts the revised Statement of Community Involvement and Developer Engagement Guidelines.
2. Receives an information report on the composition and terms of references of the City of London Access Group and the City of London Conservation Area Advisory Committee.

12. LOCAL IMPLEMENTATION PLAN FUNDED SCHEMES 2023/24

The Committee received a report covers the provision of Transport for London (TfL) Local Implementation Plan (LIP) funding to the City of London Corporation for the year 2023/24.

RESOLVED – That the Committee

1. Approve the allocations up to the maximum set out in Table 1 (£556k), for the year 2023/24;
2. Delegate authority to the Executive Director Environment, in consultation with the Chairs and Deputy Chairs of the Planning & Transportation Committee and of the Streets & Walkways Sub Committee, to allocate any additional funds which are made available by TfL in 2023/24 financial year;
3. Approve to spend any funds awarded for Principal Road Renewal for the year 2023/24 as outlined on page 129 of the agenda;
4. Delegate authority to the Executive Director Environment to reallocate the TfL grant between the approved LIP schemes should that be necessary during 2023/24 up to a maximum of £150,000.

13. CITY FUND HIGHWAY DECLARATION: 120 FLEET STREET, LONDON, EC4A 2BE

The report sought approval to declare a volume of City Fund owned airspace measuring 433 square feet, situated at 120 Fleet Street to be surplus to highway requirements to allow its disposal in conjunction with the permitted development.

Members were shown photographs and plans.

In response to a Member’s question, an Officer stated that where oversails projected into City Fund owned airspace or land, the use of the airspace could be regularised in return for a premium and costs paid. This was routinely done for oversails.

In response to a Member’s question, the Legal Officer stated that disposal terms were not within the Planning and Transportation’s terms of reference. She advised that the decision for the Committee was whether the airspace was surplus to highway requirements.

In response to a Member's question about the funds generated from the disposal, the Legal Officer stated that it would go into the general City Fund.

The Chairman stated that the Committee should not be influenced by the commercial aspects of the transaction and there would be no benefit to the Planning and Transportation Committee or the Built Environment Department if this was approved.

RESOLVED – That the Committee resolve to declare a volume of City Fund owned airspace totalling 433 sqft (held for highway purposes), situated around 120 Fleet Street, London, EC4A 2BE, to be surplus to highway requirements to enable its disposal upon terms to be approved under the delegated authority of the City Surveyor SUBJECT TO the City Surveyor and the Deputy Director of Transportation and Public Realm first determining the relevant ordnance datum levels to suitably restrict the vertical extent of the leasehold airspace demise and ensure sufficient highway stratum is retained by the City as highway authority.

14. **MIPIM PROPERTY CONFERENCE 2023***

The Committee received a report of the Executive Director of Environment/ City Surveyor concerning the City of London Corporation's activities at the MIPIM property exhibition in March 2023.

A Member stated the importance of looking at performance indicators to assist with planning for the next MIPIM exhibition and requested that when the funding report was presented to the Committee for the next MIPIM Exhibition, that more detail be included about expectations so that the success of attending could be measured.

The Chairman stated that MIPIM had been supported for several years. In recent years this particular event had been undertaken in the context of Opportunity London, a series of events and panels to promote London and key projects. Investments were long-term so it was difficult to provide KPI figures. However over 90% of property investment in the square mile was from international investors. At MIPIM, the Corporation's key policies and strategies were outlined to investors to enable them to decide whether these policies aligned with their own values and whether to invest.

An Officer stated that MIPIM was the biggest international property fair and the City's competitors attended. The Opportunity London Group had agreed that the Corporation had delivered an exemplar programme of events over the two and a half days. 20 meetings had been held with international investors, sovereign wealth funds managers and pension fund managers, promoting key messages. Members were provided with a handout of these key messages. The Officer provided anecdotal examples of potential investment as a result of attending MIPIM. He advised that quantifying the investment that came into the City post attendance, was difficult as this could be short, medium or long term, however the Officer outlined anecdotal examples of potential investment and stated that it would be possible to put KPIs against objectives of attending future MIPIM exhibitions.

In response to a question from a Member, the Chairman stated that the Members attending, had a statutory duty to promote the City and presenting planning policies and strategies to investors was a key function of the role of Planning and Transportation Committee Chairman.

In response to a Member's question, an Officer stated that there was an agreed budget for MIPIM attendance of £40,000 which was ringfenced for this purpose.

RESOLVED – That the Committee note the report.

15. **ENVIRONMENT DEPARTMENT HIGH-LEVEL BUSINESS PLAN 2023/24***

The Committee received a report of the Executive Director, Environment concerning the revised version of the high-level Business Plan which incorporated the changes requested by the Committee in March 2023.

RESOLVED – That the Committee note the revised version of the Environment Department's high-level Business Plan 2023/24.

16. **PUBLIC LIFT AND ESCALATOR REPORT***

The Committee considered a report of the City Surveyor which outlined the availability and performance of publicly accessible lifts and escalators monitored and maintained by City Surveyors.

RESOLVED - That Members note the report.

17. **PUBLIC REPORT OF ACTION TAKEN***

The Committee received a report of the Town Clerk concerning actions taken by the Town Clerk since the last meeting of the Committee, in consultation with the Chairman and Deputy Chairman, in accordance with Standing Order Nos. 41(a) and (b).

RESOLVED – That the report be noted.

18. **TO NOTE THE DRAFT MINUTES OF THE STREETS AND WALKWAYS SUB-COMMITTEE - 7 MARCH 2023***

The Committee received the draft public minutes of the Streets & Walkways Sub Committee meetings on 7 March 2023.

RECEIVED.

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

In response to a question about how hotels, increased residential usage of property and future designs were encouraged when there was a restriction on this type of development and whether there were plans to encourage more mixed usage as well as increasing residential properties within the City, an Officer stated that hotels and residential uses would be considered at the next Local Plans Sub-Committee. He also stated that the Local Plan would be considered by the Planning and Transportation in the Autumn. A Member commented that there were some buildings in the City which were appropriate for residential conversion.

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

Delegated Authority Request

An Officer stated that a Gateway 4 report for the St Paul's gyratory project would be considered by the Streets and Walkways Sub-Committee on 23 May 2023. This report would seek approval to progress the design of one highway layout option and associated public space improvements to public consultation.

Members were informed that, as the project was over £5 million in value, a Gateway 4B report was then required to be submitted to the Court of Common Council for approval. Members were further informed that as the Streets and Walkways Sub-Committee did not have the authority as a sub-committee to refer matters to the Court of Common Council, the Planning and Transportation Committee would need to recommend the Gateway 4b report for approval.

The Officer requested that given the timing of Committee meetings, to maintain the St Paul's Gyratory project's programme and meet the needs of the developer of 81 Newgate Street, the Committee delegate authority to the Town Clerk, in consultation with the Chairman and Deputy Chairman, to consider the decision of the Streets and Walkways Sub Committee and refer it to the Court of Common Council meeting on 22 June 2023, accordingly.

RESOLVED – That the Committee agree the delegated authority request.

SHORTLISTING FOR AWARDS

The Chairman reported that the Planning Division had been shortlisted for six awards in the prestigious Planning Awards and Building London Planning Awards including National Planning Authority of the Year.

Members were informed that the Planning Division had also been shortlisted for their ground-breaking initiatives on:

- Free to visit inclusive public elevated areas in developments (A View for All)
- Carbon options planning advice note
- Suicide prevention planning advice note
- Thermal comfort guidelines

The Chairman wished Officers luck at the awards.

21. **EXCLUSION OF THE PUBLIC**

RESOLVED – 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.

22. **NON-PUBLIC MINUTES**

The Committee considered the non-public minutes of the Planning and Transportation Committee held on 7 March 2023 and approved them as a correct record.

23. REPORT OF NON-PUBLIC ACTIONS TAKEN

The Committee received a report of the Town Clerk concerning actions taken by the Town Clerk since the last meeting of the Committee, in consultation with the Chairman and Deputy Chairman, in accordance with Standing Order Nos. 41(a) and (b).

RESOLVED – That the report be noted.

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

There were no questions raised in the non-public session.

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

There were no additional, urgent items of business for consideration in the non-public session.

The meeting closed at 11.55 am

Chairman

Contact Officer: Zoe Lewis
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PLANNING AND TRANSPORTATION COMMITTEE

Wednesday, 21 June 2023

Minutes of the meeting of the Planning and Transportation Committee held at the Guildhall EC2 at 9.00 am

Present

Members:

Deputy Shravan Joshi (Chairman)	Anthony David Fitzpatrick
Deputy Graham Packham (Deputy Chairman)	Deputy John Fletcher
Deputy Randall Anderson	Alderman Ian David Luder
Brendan Barns	Deborah Oliver
Mary Durcan	Ian Seaton
John Edwards	

Officers:

Zoe Lewis	- Town Clerk's Department
Fleur Francis	- Comptroller and City Solicitor's Department
Gillian Howard	- Environment Department
Ian Hughes	- Environment Department
Bruce McVean	- Environment Department
Gwyn Richards	- Environment Department

1. **APOLOGIES**

Apologies for absence were received from Ian Bishop-Laggett, Dawn Frampton, Deputy Marianne Fredericks, Antony Manchester, Deputy Alastair Moss, Deputy Brian Mooney, Alderwoman Sue Pearson, Judith Pleasance, Deputy Henry Pollard and Shailendra Umrada.

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

There were no declarations of interest.

3. **BANK JUNCTION IMPROVEMENTS (ALL CHANGE AT BANK): TRAFFIC MIX AND TIMING REVIEW UPDATE**

The Committee considered a report of the Executive Director, Environment which updated Members on the progress of the review and set out the findings of the review work to date.

Members were informed of the history of the All Change at Bank Project. They were informed that work was started in 2013 with the Bank on Safety Scheme whereby bus and cycle only restrictions were introduced.

The Officer stated that the project description of All Change at Bank was to improve safety, air quality and pedestrian experience of the area around the Bank junction to reflect the historic and iconic surroundings with the appropriate sense of place. The scheme objectives were to continue to reduce casualties by simplifying the junction, reduce pedestrian crowding levels, improve air quality and improve the perceptions of place.

Bank junction, which is surrounded by Grade 1, 2* and 2 listed buildings, above the third busiest tube station in London had almost 50,000 people entering/exiting the station in the 3 hour morning peak period in 2016. It had a poor safety record and poor air quality with the rate of exposure high due to the high footfall.

Pedestrian counts in 2014-15 showed 18,000 people crossed the Junction in 2014/15 in the morning peak hour, 4,500 people travelled through the junction by bus and cyclists made up 50% of the vehicles that passed through the junction. Cyclists were disproportionately being involved in collisions. In the five years leading up to the end of 2015, there had been 111 casualties at the junction and the approaches to the junction and two of these had been fatalities. The last fatality in 2015 led to the creation of the Bank on Safety scheme which was driven out of a need to improve safety more quickly than the layout of the junction could be improved due to restrictions and constraints under the ground.

Bank on Safety was introduced to improve safety whilst work on the All Change at Bank project was designed. In 2016, it was agreed to progress an experiment to only permit buses and cycles through Bank Junction Monday to Friday 7am-7pm. There was a monitoring strategy agreed with Committee and also with Transport for London as part of the traffic management application. This monitored safety, access for deliveries, air quality and journey times and the experiment met all of the success criteria in these areas. The experiment was made permanent in September 2018.

In the first year of implementation, there was a 27% improvement in casualty statistics and there was also an improvement in casualties in the surrounding area. The general trend in casualty statistics had been downwards at a time when the numbers on the London Underground had been increasing.

Before the pandemic, 123,000 passengers used Bank/Monument station during the morning peak period. 51,000 passengers changed between lines within the station. 72,000 people entered or exited the Bank/Monument station complex.

Members were informed that the new station entrance on Cannon Street opened in February 2023 and the All Change at Bank work was expected to be finished in entirety in spring 2024.

The Officer stated that when the Area Strategy was adopted and the need for change was originally identified, the forecast for employment growth was that by 2026 employment numbers of 428,000 were anticipated. However, this had been exceeded by 2018. The most recent data published in October 2022

stated there were approximately 587,000 workers in the City. This required improved facilities for those travelling by public transport, walking and cycling.

As Bank on Safety drew to a close in 2018, the All Change at Bank project was restarted at the beginning of 2019 and it was agreed at Committee that there should be a move towards restricting traffic on two to three arms of the junction. It was also agreed that an option to extend this further e.g. by full pedestrianisation should not be precluded.

Members were advised that temporary footway extensions were started in January 2020. This extended the available space for people walking by over 50%. The design for All Change at Bank, significantly improved the area for people walking with an increase of the footway of 2335sqm and it was anticipated this would improve safety as lines of sight were improved and there was less expanse of carriageway for pedestrians to scan and cross. There were also fewer turning movements which reduced the risk of collision within the junction.

The plan included providing street trees, greening and seating as part of the scheme. Traffic movements would change in mid-July, when traffic would be able to travel two ways through the junction and this would be the permanent routing for the bus services which had been diverted due to the closure of Queen Victoria Street. Threadneedle Street would be permanently closed and be only for cyclists and pedestrians.

Members were shown CGI images of how the junction would look on completion of the work. It would be a more inclusive and inviting space. The key city transport hub at Bank provided access for people to visit the City for work and leisure purposes.

Members were informed that a review of the traffic and timing mix was part of the approval of making the Bank on Safety scheme permanent. It had been intended to undertake this as part of the design process, but the pandemic gave uncertainty about the future and meant it was not possible to gather satisfactory evidence. It was agreed that the geometry of the junction would not need to change in order to accommodate a change in the mix of traffic. It was also agreed to proceed with the public consultation based on the geometry changes and traffic restrictions that were proposed. It was proposed to retain buses and cycles only as the main restriction through the junction. However, at the time of public consultation, TfL had lost a judicial review to representatives of the taxi trade against their Street Space Programme, specifically at Bishopsgate, and had applied for an appeal so the outcome was awaited as this could influence decision making.

3,500 people responded to the All Change at Bank consultation. Responses were heavily dominated by people who reported their main mode of travel was a taxi or private hire driver or passenger. The views on extending the timings of the restrictions or changing the mix of the traffic were inconclusive as there were polarised views depending on the main mode of travel.

The Officer stated that, in 2021, it was agreed to proceed with the design changes for Bank junction. This was based on the restrictions for Poultry, Cornhill and King William Street/Lombard Street being buses and cycles only Monday to Friday 7am to 7pm. A review was planned for 2025, 12 months after project completion.

A motion to Court of Common Council in April 2022 was passed in April 2022 which stated, "That the Planning & Transportation Committee be requested immediately to begin a review of the nature and timing of the current motor traffic timing restrictions at Bank Junction, to include all options. This review will include full engagement with Transport for London and other relevant stakeholders, data collection, analysis and traffic modelling. The Planning & Transportation Committee should then present its recommendation to this Honourable Court as soon as practicable."

Members were informed that the report being considered at the meeting was the third report written on the traffic and timing mix since the Court motion. It highlighted the findings to date, the difficulties and challenges that had been encountered whilst undertaking the review and set out three options. Members were informed that TfL approval would be required in order to change the traffic order at Bank as Poultry and Cornhill were part of the Strategic Road Network under the Traffic Management Act. This would require the submission of a Traffic Management Approval which was a business case for making a change. This would comply with the Corporation's function as traffic authority and in its duty under Section 122 of the Road Traffic Regulations Act. TfL would then consider the proposal, the benefits and disbenefits and make a decision as to whether the proposed option could be progressed.

The Officer stated that there was no clear transport need for making a change over and above the scheme that was currently being constructed. There might be a case for change based on addressing an equality concern around accessibility for people who relied on taxis. However, conversely this might disbenefit other people with protected characteristics who used the area and travelled by other means. Further data collection and analysis was required. The Officer also stated that there was an issue with forecasting how appealing a route through Bank might be to other vehicles as traffic had not been through there in the last six years and there was therefore no recent data. This impacted on the traffic modelling journey time impacts being forecast. Without TfL approved traffic modelling and subsequent scheme impact report, the Traffic Management Notification (TMAN) would then be rejected/incomplete.

The Officer stated that some of the uncertainty surrounding traffic movements in the area had been quelled. The City's experimental schemes in the area were being made permanent. The final outcome of the TfL decisions on Bishopsgate and London Bridge experimental schemes was not yet known. More people were returning to work after the pandemic with Tube patronage at over 80% of pre-pandemic levels. Bank volumes were now above the pre-pandemic daily averages (with the Elizabeth line operational).

The Officer stated that currently it was difficult to pursue a change to the Traffic Management Order. The evidence to support the case was not currently very strong. The statutory regime put consideration of any traffic implications at the forefront of decision-making.

Members were informed that, to look at equalities in more detail and ascertain the benefits and disbenefits and then proceed with the traffic modelling requirements, approximately £500,000 would need to be spent to get to a point where TfL could make a decision on the TMAN application. A large portion of this spend would be on the required traffic modelling process and audits. This meant that the timescale for possible implementation was now indicatively forecast for 2025 as the traffic modelling approvals would take at least 12 months.

The Officer stated that the three options were set out in paragraph 112 on page 23. She stated that Option A was to continue with a view to consulting on making a permanent change to the type of vehicle included in the restrictions, on a yet to be determined routing as set out in the original methodology for the review. This assumed the traffic modelling issues set out in the report could be overcome. There was a high risk of the money being spent and then not receiving approval. If approval was given there was a risk that traffic modelling or forecasts were incorrect, and more vehicles would come to the area causing congestion. If this was the case, as it was a permanent change to the traffic order, it could not be removed.

Option B was a change in methodology to work towards using an experimental traffic order to introduce a future recommended change and monitor how that worked before a final decision was taken to make it permanent. If this option was approved and did not work, it could be removed and it would give the option of monitoring and consulting with it in place but this would be more expensive.

Option C was to pause further work on the traffic modelling exercise and to focus on identifying and evidencing the need for change and how this could be addressed, and on doing further work to understand the potential latent demand. Subject to the outcome, this would then form the basis of resumed modelling in due course, in advance of public consultation and the taking of a final decision whether to make a permanent or experimental change. This option would enable a strong and robust case to be put forward to TfL. This would limit expenditure in assessing whether or not there was a need for change.

Members were informed that the Officer recommendation to the Streets and Walkways Sub-Committee was Option C and the Sub-Committee had agreed to support this recommendation.

Alderman Hailes made representation to the Committee. He raised concern about hackney carriages not be permitted through Bank Junction as they were used by people with restricted mobility. He also raised concerns expressed by business constituents and retail companies. He stated that a report had been to

the Operational Property and Projects Sub-Committee, which stated that taxi volumes as measured at peak times across the City of London, had declined by 25% from pre-pandemic levels. He was concerned that on Cheapside, taxi volumes between Queen Street and Milk Street were almost zero and on King Street, Queen Street, Gresham Street and Poultry i.e., the displaced areas, they were down by 60%. Alderman Hailes stated that hackney carriages were part of the public transport mix available through the City of London and he stated that they should be treated consistently with other forms of public transport such as buses. He stated that most of the fleet was environmentally friendly, they fulfilled a social purpose as part of the transport mix, business constituents were expressing serious concerns about the consequences of consistently closing down access to the City to hackney carriages and they had an exemplary safety record. Alderman Hailes stated that the Operational Property and Projects Sub-Committee had agreed that an assessment should be undertaken to allow taxis to be exempt from the restriction along Cheapside and subject to the assessment to proceed with an experimental traffic order to test the impacts of allowing taxi access through Cheapside. He advocated for the same approach to be taken at Bank.

A Member stated that taxi access was particularly important for business uses, those who had limited mobility and visitors. He stated its importance in relation to Destination City, one of the prime corporate strategies. He suggested that by allowing taxis within Cheapside, this would give access from the West and passengers could be dropped off close to Bank junction without this undermining the All Change at Bank proposals. He stated that even during restricted hours, southbound traffic from Princes Street was allowed into Cornhill through the junction so passengers approaching from the North could be dropped off in Cornhill which had close links through to Threadneedle Street. The Member further suggested that if the restriction at the far eastern end of Cornhill was removed, taxis would be able to access Cornhill from the East and they could be permitted to turn left and leave via the South. The Member stated that taxis were part of the public transport network and were not private vehicles. He also commented on their good safety record.

The Officer responded by informing Members that a Cheapside bus gate restriction report had recently been to the Streets and Walkways Sub-Committee and the Operational Property and Projects Sub-Committee. The Cheapside bus gate was being retained as it was currently with work being undertaken in relation to an experiment to allow taxi access through the bus gate which would lead to an Experimental Traffic Order, which would be monitored and if successful, would be kept. Although this was not part of the All Change at Bank project it would impact upon it. This was part of the Pedestrian Priority Programme. Having Southbound traffic into Cornhill was part of the design so this allowed access into Cornhill for taxis and other vehicles with a reason to be in Cornhill e.g. picking up or dropping off passengers or deliveries. Allowing taxis to enter Cornhill eastbound could be looked into when moving forward with the review as part of the project. The Officer stated that if King William Street was opened up, this would require vehicles to go through the junction. Also, due to the design, Princes Street was narrow and there were

changes to the way the traffic signals worked as traffic could only go one way at a time at the southern end of Princes Street.

A Member raised concerns about increasing wait times at traffic lights potentially causing more pedestrians to informally cross the junction and the safety impacts of this. The Officer stated that further work would be undertaken on this.

A Member asked for the Officer's view on the possible outcomes of the equalities work. The Officer stated that this would depend on the volumes of additional traffic and the impact that would have on journey times. If bus journey times were increased, that would have an impact on anyone with a protected characteristic using a bus through Bank junction. Equally, if pedestrian wait times at crossing increased, this would mean pedestrians would wait longer to cross and there would also be longer waits for cyclists meaning that pedestrians and cyclists with a protected characteristic would be impacted. More data collection and assessment of the balance was required. The Officer stated that increasing the wait times to 104 seconds would give four fewer opportunities to cross the road each hour. Some of the other options did not require an increase in wait times to mitigate journey time increases so under these options, the current signal timings of 94 seconds could be retained for drivers, cyclists and pedestrians. The maximum time allowed was generally 120 seconds but at this point people could think the signals were broken and proceed without them. Therefore, having a shorter cycle was preferably for safety reasons. The geometry design tried to reduce the risk of collisions but increasing the number of vehicles would increase the risk.

In response to a Member's question about how it was envisaged cyclists and pedestrians would safely share the same space, an Officer stated that the areas for pedestrians and the areas for cyclists were clearly differentiated. The main place pedestrians and cyclists would both use was on Threadneedle Street where the cycle space had kerbs and a raised crossing point.

A number of Members raised concern about the behaviour of some cyclists. An Officer advised that whilst the majority cycled responsibly, work would continue with the City of London Police to improve the behaviour of road users.

A Member stated that as a wheelchair user, he valued the service provided by taxis and did not consider that permitting them access would have a detrimental effect on others with protected characteristics. He asked that he be consulted about the location of dropped kerbs and rush hour choke points which were exacerbated by street furniture and the pavement constricting.

The Chairman reminded the Committee that the options Members were being asked to consider were the process options rather than whether to allow taxis at Bank junction. The Chairman stated that Streets and Walkways Sub-Committee had previously been presented with options of different categories of vehicle types to go to consultation. However, the categories were now no longer being considered as the situation had changed. Members were just being asked to consider the process at this stage. The Chairman asked

Members to focus on the three options in the report and stated that there would be opportunities for further debate on the vehicle types and other matters when this was presented to Committee at a future date.

An Officer outlined the vehicle options and stated that these were still for consideration, however complications in moving forward including costs implications and risks of how successful a scheme might be without the robust evidence required for the traffic management approval. Therefore, Members were being asked to recommend one of the process options to the Court of Common Council.

A Member raised concern about Options A and B as so many variables had changed since the traffic was measured and more modelling would be time consuming and expensive. He stated that it was important to try to understand the softer issues e.g. how many disabled people travelled in taxis, how many disabled people walked or cycled and how long people would wait at a traffic signal without crossing without one. He stated that Option C would enable these types of issues to be assessed.

A Member stated that he had attended two recent meetings with City businesses and a key priority for them was taxi access. He suggested that Option B would enable the methodology to be considered and work take place to look at taxi access.

A Member stated that Option C had the lowest risk of legal challenge, not obtaining approval and would result in lower costs than the other options.

A Member stated that Officers had given their advice on how best to approach gaining TfL approval. This would take time but then it could be possible to look into granting taxis access. He added that there were also problems with getting taxis into the City in the evening when Bank junction was open so restrictions were not the only issue.

A Member stated that he could not see an equalities reason for the inclusion of motorcycles. An Officer stated that the work to determine whether they should be excluded was taking place. Making a decision ahead of this piece of work being concluded would increase the risk of judicial review. Once the work was completed, a recommendation could be made on whether motorcycles should stay in for the next round of assessment.

The Chairman asked about the experimental traffic order in place on Cheapside and Chancery Lane and why there was more risk attached to Bank than on these other schemes. An Officer stated that Bank was a junction and even with simplification, it was still more complex. The Officer also stated that TfL approval was still required for Cheapside.

The Chairman asked how the £500,000 required to complete the work would be funded. An Officer stated that a bid had been submitted to complete the review. This would be considered by the Priorities Board and if agreed, would be submitted to the Resource Allocation Sub-Committee meeting for decision in

September 2023. The funded would be from the On Street Parking Reserve (OSPR).

The Chairman asked for more details on timeframes. An Officer stated that these were set out on pages 81-82 of the Officer report. Option B would be a faster process by a few months as the consultation would take place during the experiment. Option C would be longer as background work was required before proceeding with the modelling.

A Member asked if any discussions had taken place with TfL and an Officer confirmed that they had. TfL had confirmed the process that would need to take place. They would not comment on a proposal until the evidence had been presented to them.

In response to a Member's suggestion that an Experimental Traffic Order be put in place to permit eastbound entry for taxis into Cornhill, an Officer stated that this could be looked at as an option as part of the traffic and timing review. The Officer informed Members that TfL approval would be required as this was part of the Strategic Road Network.

In response to the Chairman's question about the difference in the quality of data between Options B and C, an Officer stated that the quality of data for any of the Options would be relatively similar. The difference was the risk if after collecting data, it was found the case for equalities did not support an application. The risk was greatest where the traffic modelling was undertaken at the same time as the data collection. The Officer stated that Option C would give clarity on the evidence base which could make the process of technical approvals easier.

A Member commented that although Option B would provide real life data, with the difference in timings being relatively insignificant, Option C would be less risky.

A Member commented that unlike Option B, Option C would provide a baseline of Bank on Safety working and then it was possible there could be an Experimental Traffic Order permitting taxis at a later date. He stated that Option C had substantially lower risk.

In response to a Member's question about the processes involved in Options B and C, an Officer stated that a need and a reason for change had to be established and the impacts of the potential change had to be modelled. Option B would establish the need at the same time as the modelling was undertaken. Option C would establish the need and then undertake the modelling. If the work to establish the need showed there was no need, the modelling would not need to be done and the associated spend could be avoided, unlike in Option B when the modelling would have already taken place.

In response to a Chairman's question about the difference in timescales, an Officer stated that there would be an approximate difference of six months between Options B and C being submitted to TfL.

In response to a Member's question, an Officer stated that a consequence of pausing the modelling would be that the majority of work at Bank junction would be complete and traffic would be moving as it would permanently, and therefore observational work could be undertaken.

RESOLVED - That the Committee

1. Note the content of report including the need for a capital bid to secure funds to proceed (paragraphs 129-133 of the Officer report) and the risks (paragraphs 138-147 of the Officer report).
2. Note that the Streets & Walkways Sub Committee preferred Option C (all options are outlined in paragraphs 112-127 of the Officer report) and agree Option C as the Committee's preferred option to recommend to the July meeting of the Court of Common Council.
3. Agree on the basis of recommendation 2 that this report is referred to the Court of Common Council for consideration.

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

A Member raised concern about new entrances to Bank Station being closed during rush hour and advised that TfL had stated this was due to staffing issues. He asked that this be raised with the TfL Commissioner. The Chairman asked Members for their endorsement for him writing to the TfL Commissioner on behalf of the Committee.

RESOLVED – That the Chairman write to the TfL Commissioner on behalf of the Committee.

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

There were no additional, urgent items of business for consideration.

The meeting closed at 10.28 am

Chairman

Contact Officer: Zoe Lewis
zoe.lewis@cityoflondon.gov.uk

PLANNING AND TRANSPORTATION COMMITTEE – OUTSTANDING ACTIONS

Item	Date	Action/ Responsible Officer	Progress Update and Date to be progressed/completed
1	6 March 2020 2 June 2020 23 June 2020 14 July 2020 8 Sept 2020 6 Oct 2020 27 Oct 2020 17 Nov 2020 15 Dec 2020 5 Jan 2021 26 Jan 2021 16 Feb 2021 24 Feb 2021 9 March 2021 30 March 2021 22 April 2021 12 May 2021 8 June 2021 29 June 2021 20 July 2021 7 Sept 2021 21 Sept 2021 26 Oct 2021 16 Nov 2021 14 Dec 2021 11 Jan 2022 1 Feb 2022 22 Feb 2022 26 April 2022 17 May 2022	<p align="center"><u>Daylight/Sunlight – Alternative Guidelines</u></p> <p align="center">Chief Planning Officer and Development Director</p> <p>A Member argued that the Committee should separate out the desire for Member training and the desire for alternative guidelines on daylight/sunlight and requested that a report be brought to Committee setting out how the City of London Corporation might go about creating alternative guidelines, including timescales, if Members were so minded and the legal implications of this.</p>	<p>UPDATE (18 July 2023)</p> <p>Following meetings with industry experts, Officers have gone out to tender to instruct consultants to develop a planning advice note (PAN) on daylight/sunlight matters in the context of the new BRE Guidance and the use of Radiance assessments. The consultants will be appointed in July and it is anticipated that a draft PAN for consultation will be brought to Committee by the end of the year.</p>

	<p>7 June 2022 1 July 2022 19 July 2022 20 Sept 2022 11 Oct 2022 1 Nov 2022 10 Jan 2023 7 March 2023 11 May 2023 18 July 2023</p>		
2	<p>17 Nov 2020 15 Dec 2020 5 Jan 2021 26 Jan 2021 16 Feb 2021 24 Feb 2021 9 March 2021 30 March 2021 22 April 2021 12 May 2021</p>	<p style="text-align: center;"><u>Member Training</u></p> <p style="text-align: center;">Chief Planning Officer and Development Director / Director of the Built Environment</p> <p>A Member questioned whether there would be further training provided on Daylight/Sunlight and other relevant planning matters going forward. She stated that she was aware that other local</p>	<p>UPDATE: (11 May 2023): New Committee Members are provided with training on key aspects. A programme of wider Member training is being implemented in 2023. The first of the recordings (regarding Material Planning Considerations) were sent to members with a Q&A on this topic prior to the 11 May 2023 Planning and Transportation Committee meeting. The next member training material will be sent in advance of committee on 1 October 2023.</p>

	<p>8 June 2021 29 June 2021 20 July 2021 7 Sept 2021 21 Sept 2021 26 Oct 2021 16 Nov 2021 14 Dec 2021 11 Jan 2022 1 Feb 2022 22 Feb 2022 26 April 2022 17 May 2022 7 June 2022 1 July 2022 19 July 2022 20 Sept 2022 11 Oct 2022 1 Nov 2022 10 Jan 2023 7 March 2023 11 May 2023</p>	<p>authorities offered more extensive training and induction for Planning Committee members and also requested that those sitting on the Planning Committee signed dispensations stating that they had received adequate training.</p> <p>The Chair asked that the relevant Chief Officers consider how best to take this forward. He also highlighted that the request from the Town Clerk to all Ward Deputies seeking their nominations on to Ward Committees states that Members of the Planning & Transportation Committee are expected to undertake regular training.</p>	
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<p>3.</p>	<p>11 Jan 2022 1 Feb 2022 22 Feb 2022 26 April 2022 17 May 2022 7 June 2022 1 July 2022 19 July 2022 20 Sept 2022 11 Oct 2022 1 Nov 2022 10 Jan 2023 7 March 2023 11 May 2023</p>	<p style="text-align: center;"><u>Sustainability SPD</u></p> <p style="text-align: center;">Chief Planning Officer and Development Director</p> <p>A Member questioned whether the production of a Sustainability SPD could feature on the list of outstanding actions.</p> <p>The Chief Planning Officer and Development Director stated that he would be liaising with his sustainability officers to provide a more targeted timeline around the production of the Sustainability SPD and agreed to include this information in the list of outstanding actions.</p>	<p>UPDATE (11 May 2023):</p> <p>The Sustainability SPD is being developed and will be brought to the Committee in October 2023, before public consultation.</p>
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Committee(s)	Dated:
Planning and Transportation Committee	18/07/2023
Subject: Proposed Barbican and Golden Lane Neighbourhood Forum and Area	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	3, 4
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Gwyn Richards, Planning & Development Director, Environment Department	For Decision
Report author: Michelle Rowland, Environment Department	

Summary

A group of residents living in the Barbican and Golden Lane estates have come together to propose a neighbourhood forum and neighbourhood area and have submitted an application for formal designation (Appendix 1). Responsibility for considering and designating neighbourhood areas and forums in the City rests with the City of London Corporation. If designated, this would be the first neighbourhood forum and area within the City of London.

The City Corporation undertook public consultation from 9 May to 12 June 2023 to gather public feedback on the proposal (Appendix 2). We received 122 responses to the consultation which were mainly positive and supportive. Two objections were received on the forum and three objections on the area. These objections are not considered to be sufficient to recommend changes to the area or to reject the designation of the forum.

The applications meet the requirements for approval as defined in the Neighbourhood Planning (General) Regulations 2012 and the Town and Country Planning Act 1990 (as amended). This report sets out a recommendation to approve the applications as submitted.

Recommendation(s)

Members are asked to:

- Designate the proposed neighbourhood forum.

- Designate the proposed neighbourhood area.

Main Report

Background

1. Neighbourhood planning was introduced in the Localism Act 2011. It is a tool that gives communities statutory powers to shape their community. Neighbourhood planning allows communities to develop a shared vision for the neighbourhood and shape development and growth of their local area. Neighbourhood planning is not a legal requirement, but a right that communities in England can choose to use.
2. The legislative provisions regarding neighbourhood planning forums and neighbourhood areas are set out within the Town and Country Planning Act 1990 (“the TCPA 1990”) and the Neighbourhood Planning (General) Regulations 2012 (“the 2012 Regulations”).
3. Officers have been engaging with a group of residents living in the Barbican and Golden Lane estates since January 2023 following an initial request to designate a neighbourhood forum and neighbourhood area, providing advice on process and respective roles of the City Corporation and local residents.
4. Neighbourhood planning can be undertaken by three types of organisations, known as qualifying bodies: parish or town councils, neighbourhood forums or community organisations. As the City of London does not contain any town or parish councils, a neighbourhood forum must be designated if a neighbourhood plan is to be produced. Neighbourhood planning is undertaken by a designated neighbourhood forum in a defined neighbourhood area.
5. The application before the Planning and Transportation Committee is for a neighbourhood area and forum. This is the first formal step (of many) towards the possible creation of a neighbourhood plan. A neighbourhood forum has the ability to create a neighbourhood plan which contains policies for the development and use of land. A neighbourhood plan must go through statutory stages of preparation, including public consultation on draft proposals, a public examination of the plan before an independent planning inspector, and a referendum within the plan area, before it can be adopted. Once adopted, a neighbourhood plan forms part of the development plan and sits alongside the Local Plan prepared by the Local Planning Authority. A neighbourhood plan must conform to the strategic policies of the local plan in force. During the neighbourhood plan process, there are significant opportunities for stakeholders within and outside of the area to influence and comment on the neighbourhood plan, if it were to be brought forward. Once a neighbourhood plan has been adopted, the determination of planning applications should be made in

accordance with the policies in the local plan and the neighbourhood plan and any other material considerations.

6. The local planning authority must take decisions at key stages in the neighbourhood planning process, ie. assessment of the neighbourhood plan area or forum. The local planning authority must fulfil its duties and take decisions as soon as possible, and within statutory time periods where these apply. Although the neighbourhood forum is responsible for drafting the neighbourhood plan, the local planning authority is responsible for organising and funding a public examination into the plan and for a referendum amongst residents in the forum area to ask whether they want to adopt the plan.
7. Once a neighbourhood forum is designated, it becomes a statutory consultee to be consulted on for local plan matters and development management in relation to applications that affect the area. The Local Authority also consult with the forum on how best to spend 15% of the collected Community Infrastructure Levy (CIL) from within the neighbourhood area. If a neighbourhood forum has a neighbourhood plan in place, this rises to 25%.
8. Local authorities must consult for a minimum of 6 weeks on the proposed forum and area. Consultation on the Barbican and Golden Lane forum and area took place from 9 May to 21 June 2023. The forum and area applications were published on the City Corporation's website, on [Commonplace](#) (an engagement platform), displayed on posters in estate offices, physical copies of the application were available at Guildhall North Wing and the City's lending libraries, and mailouts went to all postal addresses in and adjacent to the proposed area.
9. Of all the responses, 93% were from people who responded from within the neighbourhood area. Only 10 of the 122 respondents (seven per cent) were representing an organisation.

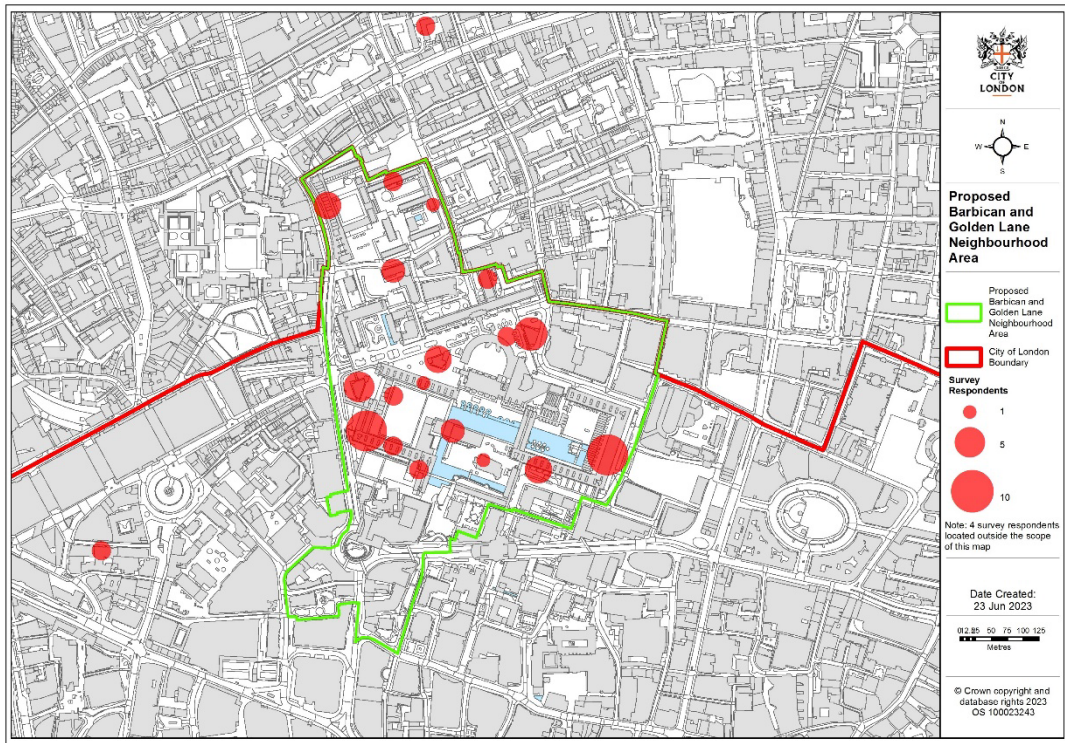


Figure 1 Locations of respondents

10. Applications for a neighbourhood forum and area must be determined within 13 weeks of first being publicised. This date is 8 August 2023.

Proposed Forum

11. A designated neighbourhood forum is an organisation or group tasked with leading the neighbourhood planning process. A group must apply to the local planning authority to be designated as a neighbourhood forum. The forum application must show how they have sought to comply with the conditions for neighbourhood forum designation as set out in section 61F(5) of the TCPA 1990 (as amended). The conditions require that:

- The forum is established for the express purpose of promoting or improving the social, economic and environmental well-being of an area that consists of or includes the neighbourhood area concerned
- Its membership is open to:
 - Individuals who live in the neighbourhood area
 - Individuals who work there
 - Individuals who are elected members of a London borough council whose area falls within the neighbourhood area concerned
- Its membership must include a minimum of 21 individuals who either:
 - Live in the neighbourhood area concerned, or
 - Works there, or

- Is an elected member of a London borough council whose area falls within the neighbourhood area
 - It has a written constitution
12. Section 61F(5) of the TCPA 1990 provides that a local planning authority may designate an organisation or body as a neighbourhood forum if the authority are satisfied that it meets the above conditions. In respect of the current application for designation, the conditions for neighbourhood forum designation have been met and this is demonstrated in the application and submitted constitution.
 13. The City as local planning authority must, in determining under subsection (5) whether to designate an organisation or body as a neighbourhood forum for a neighbourhood area, have regard to the desirability of designating an organisation or body—
 - (i) which has secured (or taken reasonable steps to attempt to secure) that its membership includes at least one individual who lives in the neighbourhood area, one individual who works in the area, and one elected member for the area,
 - (ii) whose membership is drawn from different places in the neighbourhood area concerned and from different sections of the community in that area, and
 - (iii) whose purpose reflects (in general terms) the character of that area.
 14. The proposed Barbican and Golden Lane forum has submitted a constitution based on its incorporation as a Limited Company. The forum became registered under Companies House on 27 June 2023. The proposed neighbourhood forum has submitted a list of 35 individuals, whose homes and workplaces are geographically spread across different parts of the area. The membership also includes elected members for the area. The forum has demonstrated through the objects which are set out in their constitution, that its purpose reflects the character of the area and that the forum has been established for the express purpose of promoting or improving the social, economic and environmental well-being of the neighbourhood area.
 15. If a local authority decides to refuse a designation of a neighbourhood forum, the local authority must publish a statement setting out the decision and reasons for making the decision.
 16. If a designation of the neighbourhood forum is made, no other body may be designated for the neighbourhood area until the designation expires or is withdrawn.
 17. Through consultation on the proposed neighbourhood forum, the majority of comments were in support of the application. 93% of respondents agreed with the neighbourhood forum, 5% disagreed, and some people suggested minor amendments.
 18. The key reasons for support for the forum were that it would:
 - ensure that voices are heard;
 - potentially develop a neighbourhood plan which would address a wide range of planning issues; and,

- bring together the Barbican and Golden Lane areas.
19. The key reasons for objection to the forum were that:
 - it would be undemocratic, due to the way that directors of the forum would be appointed;
 - the Barbican and Golden Lane estates should be separate;
 - the group is not representative;
 - there are many non-residential stakeholders and their voices may not be considered;
 - inadequate consultation process; and,
 - there is a lack of justification for creation of the forum.
 20. In response to these objections, it is noted that the consultation process undertaken follows the legal requirements and accorded with the City Corporation's Statement of Community Involvement. The ability to create a neighbourhood forum, the requirements for doing so, and the position that the forum has within the planning system, are set out in primary legislation and regulation. The Barbican and Golden Lane forum application accords with this national legislation. Having the two areas as a single forum complies with the requirements of the legislation. It is required that membership of the forum is open to individuals who live or work in the neighbourhood area and any elected members for the neighbourhood area.
 21. It is recommended that the Grand Committee approve the neighbourhood forum.
 22. Once designated, Section 61F(8) of the TCPA 1990 states that the forum designation ceases to have effect at the end of the period of 5 years beginning on the day on which the designation is made. A local planning authority may withdraw a designation if they consider that the organisation or body is no longer (a) meeting the conditions by reference to which it was designated; or (b) any other criteria to which the authority were required to have regard to in making the designation, and where an organisation or body's designation is withdrawn, the authority are required to give reasons to the organisation or body.

Proposed Area

23. The neighbourhood forum has proposed an area which covers the Barbican and Golden Lane estates and neighbouring areas. The neighbourhood contains a wide range of uses including residences, businesses (including SMEs and creative enterprises), cultural uses, and green spaces. The entirety of the Barbican and Golden Lane estates are included; other residential buildings include Roman House, Milton Court, London House, and Little Britain. Cultural uses, such as the Barbican Centre and Guildhall School of Music and Drama, are included in the proposed neighbourhood area.
24. To submit an area application, the application must include a map which identifies the area, a statement explaining why this area is considered appropriate to be designated a neighbourhood area and a statement that the organisation is a relevant body (i.e. that they are an organisation or body which

is, or is capable of being designated as a neighbourhood forum, on the assumption that, for this purpose, the specified area is designated as a neighbourhood area).

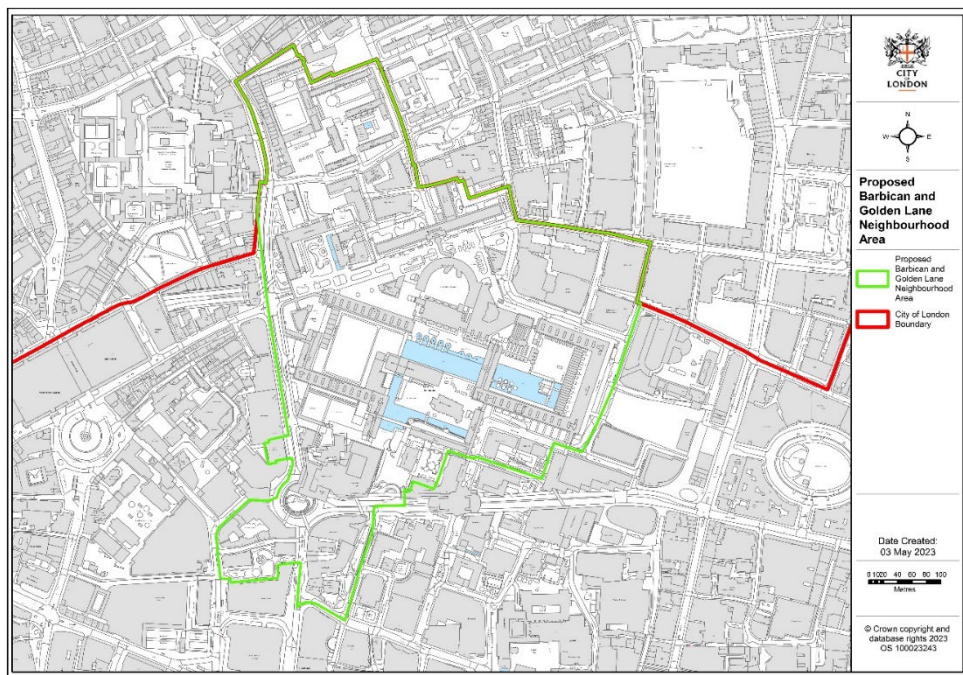


Figure 2 Proposed neighbourhood area

25. The application provides a justification for the boundaries and details the cohesion of the proposed area, including how community-based groups operate together, common physical features defining a natural boundary, the natural setting and relationship to existing planning policies.
26. A local planning authority must designate a neighbourhood area if it receives a valid application and some or all of the specified area has not been designated as a neighbourhood area. If the local authority does not determine a neighbourhood area within 13 weeks of first being publicised, then the area becomes automatically designated. The local authority should take into account the proposed forum's statement explaining why the area they applied for is considered appropriate. A local planning authority can refuse to designate the specific area applied for, if it considers the area is not appropriate. The local authority may, in determining any application, modify the proposed area. If the authority proposes modifications or refuses an application, they must give reasons to the applicant for this.
27. The national Planning Practice Guidance at paragraph 33 provides that the following could be considerations when deciding the boundaries of a neighbourhood area:
 - *village or settlement boundaries, which could reflect areas of planned expansion*
 - *the catchment area for walking to local services such as shops, primary schools, doctors' surgery, parks or other facilities*

- *the area where formal or informal networks of community based groups operate*
- *the physical appearance or characteristics of the neighbourhood, for example buildings that may be of a consistent scale or style*
- *whether the area forms all or part of a coherent estate either for businesses or residents*
- *whether the area is wholly or predominantly a business area*
- *whether infrastructure or physical features define a natural boundary, for example a major road or railway line or waterway*
- *the natural setting or features in an area*
- *size of the population (living and working) in the area*

Electoral ward boundaries can be a useful starting point for discussions on the appropriate size of a neighbourhood area; these have an average population of about 5,500 residents.

28. In response to consultation on the proposed neighbourhood forum, the majority of comments were in support of the application. 77% of respondents agreed with the neighbourhood area as proposed, 10% disagreed, and some people suggested minor amendments.
29. The key reasons for support for the area were that it:
- focuses on an area with important issues to residents such as traffic, environment, and development;
 - recognises geographically tight relationships between the residential and cultural areas;
 - contains Postman's Park and Barbican Wildlife Garden as important local green spaces; and,
 - follows the ward boundaries.
30. The key reasons for objection to the area were that:
- Barts Square and Bartholomew Close were excluded;
 - there is no need for an additional strategy for the area;
 - Barbican and Golden Lane should be considered separately;
 - it emphasises residents over businesses and cultural uses;
 - it should align with the conservation area boundary as proposed by the Golden Lane Residents Association and Barbican Association; and,
 - it would undermine the Development Plan requirements to optimise One Silk Street.
31. In response to these objections, officers consider that the proposed area does identify a functionally coherent neighbourhood, including residential areas, commercial and cultural uses and open spaces that are well related to the area. Area boundaries, in particular along Aldersgate Street, align with established ward boundaries and the City of London boundary. Over 4,100 people live in the proposed area, similar in size to the recommended 5,500 from the Planning Practice Guidance. In relation to concerns from the owners of One Silk Street, the proposal before the Committee is to designate a neighbourhood area and not to consider or approve any proposals which would impact on development within

that area. If the proposed forum take forward the opportunity to develop a neighbourhood plan, this would be required to conform to the City Plan and there will be significant opportunities for stakeholders to influence and comment on plan policies and proposals as they develop, including the opportunity to participate in the formal public examination into these proposals during the consideration of it by an independent planning inspector.

32. Where a local planning authority exercises their powers to designate an area as a neighbourhood area, they must consider whether they should designate the area concerned as a business area. A local authority can only designate an area as a business area if the authority consider that the area is wholly or predominately business in nature. This is not considered to be the case here.
33. Although there are objections regarding the neighbourhood area, officers do not recommend an amendment is made due to the reasons outlined above and recommend that the Planning and Transportation Committee approve the neighbourhood area as proposed.

Corporate & Strategic implications

34. The neighbourhood forum will be required to ensure that any neighbourhood plan is aligned with City Corporation's Local Plan, which itself supports the delivery of key Corporate priorities.

Financial implications

35. Once a neighbourhood forum is designated, the Local Authority must consult with the forum on how best to spend 15% of the collected CIL from within the neighbourhood area. If a neighbourhood forum has a neighbourhood plan in place, this rises to 25%.
36. In 2022/23, the Department for Levelling Up, Housing and Communities made grants available to local authorities to partially address the costs of undertaking neighbourhood planning functions, including £5,000 on designation of a forum, £5,000 on designation of an area, and £20,000 on the submission of a neighbourhood plan for referendum. No confirmation has been provided as to whether these grants will be available for 2023/24 or beyond.

Staff Resource implications

37. It is the responsibility of the City Corporation to provide support, in both materials and staff time, to the neighbourhood forum. Officer time will be required from the City Plan team and by other services as appropriate. Production of the neighbourhood plan, and the work to produce it, falls on the neighbourhood forum.

Legal implications

38. All relevant statutory processes have been complied with during consideration of the neighbourhood forum and area applications. The legal framework is set out in the body of the report.

Equalities implications

39. Regard has been had to the Equality Act 2010 (in particular Section 149) which sets out the public sector equality duty. Officers have considered whether the declaration of the neighbourhood area and neighbourhood forum could have any equality implications and no impacts have been identified. The consultation responses did not give rise to any equality concerns. Membership of a neighbourhood forum is required to be open to individuals who live or work in the neighbourhood area and any elected members for the neighbourhood area.

Risk implications

40. None

Climate implications

41. None.

Security implications

42. There are no direct security implications.

Conclusion

43. The applications for the proposed neighbourhood forum and area meet the requirements for approval as set out in the 2012 Regulations and the TCPA 1990. Public consultation gathered feedback on the applications and on the whole was positive and supportive.

44. Officers recommend that the Grand Committee designate the neighbourhood area as applied for (unaltered) and the Barbican & Golden Lane Neighbourhood Forum as the forum for that area.

Background Papers

- None

Appendices

- Appendix 1: Barbican and Golden Lane neighbourhood forum and area application
- Appendix 2: Barbican and Golden Lane neighbourhood forum and area consultation responses

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BARBICAN – GOLDEN LANE NEIGHBOURHOOD AREA AND FORUM
APPLICATION TO THE CITY OF LONDON CORPORATION



Ms. Juliemma McLoughlin
Executive Director Environment
City of London Corporation
PO Box 270
Guildhall
London EC2P 2EJ

24th April 2023

Dear Ms. McLoughlin,

**APPLICATION TO THE CORPORATION OF THE CITY OF LONDON FOR THE DESIGNATION OF THE
BARBICAN & GOLDEN LANE NEIGHBOURHOOD AREA**

We write in our capacity as the interim Chair and Steering Group of the Barbican and Golden Lane Neighbourhood Forum (BGLNF).

Please treat this as our formal request to designate the Barbican and Golden Lane Neighbourhood Forum and Barbican and Golden Lane Neighbourhood Planning Area.

The attached designation application sets out how the BGLNF meets the statutory requirements for a body qualifying as capable of designation as a neighbourhood forum as set out in section 61F(5) of the Town and Country Planning Act 1990 as applied to Neighbourhood Plans by section 38A of the Planning and Compulsory Purchase Act 2004.

The application also describes the proposed Neighbourhood Planning Area and sets out the reasons why this is an appropriate area for the Neighbourhood Forum and any future Neighbourhood Plan.

The BGLNF already has thirty-five members drawn from across the Forum and Planning Area and our numbers continue to grow. We also enjoy the support of local community groups such as those representing Roman House, Little Britain and London House, together with the Barbican Association and the Golden Lane Residents 'Association.

Given the evidence set out in the Application and its Appendices, we would like to see this application expedited quickly and within the statutory timetable.

Yours sincerely,

Brenda Szlesinger

On behalf of the interim Steering Group,
Barbican and Golden Lane Neighbourhood Forum

APPLICATION TO THE CORPORATION OF THE CITY OF LONDON UNDER SCHEDULE 9 OF THE LOCALISM ACT 2011 FOR THE DESIGNATION OF THE BARBICAN AND GOLDEN LANE NEIGHBOURHOOD FORUM AND NEIGHBOURHOOD AREA

This application, dated 24/04/2023, is made by the Barbican and Golden Lane Neighbourhood Forum, as a qualifying body capable of designation under paragraph 61G of the Localism Act 2011 and Town and Country Planning Act 1990 (as amended).

The application is for designation for both the Barbican and Golden Lane Neighbourhood Forum (BGLNF) and for the boundary of the proposed neighbourhood area for which a neighbourhood plan will be prepared.

This application is submitted in accordance with Section 61c of the 1990 Act (Town and Country Planning Act) and the Neighbourhood Planning (General) Regulations 2012. We note that the significant guiding principle of this legislation is that Neighbourhood Forums are decided on by local people.

The City of London Corporation is asked to publish, consult on and determine this application as soon as possible and within permitted statutory timescales.

1. DESIGNATION OF THE BARBICAN AND GOLDEN LANE FORUM

This part of the designation application seeks approval to the designation of the Barbican and Golden Lane Neighbourhood Forum.

The statutory requirements for a body qualifying as capable of designation as a neighbourhood forum are set out in section 61F(5) of the Town and Country Planning Act 1990 as applied to Neighbourhood Plans by section 38A of the Planning and Compulsory Purchase Act 2004. These require that:

- *the body is established for the express purpose of promoting or improving the social, economic and environmental well-being of an area that consists of or includes the neighbourhood area concerned*
- *its membership is open to those who live or work in the area concerned (whether for businesses carried on there or otherwise) along with elected members of the local authority any of whose area falls within the neighbourhood area concerned*
- *its membership includes a minimum of 21 individuals who fall within the above categories - the body has a written constitution.*

The Barbican and Golden Lane Neighbourhood Forum meets the requirements of the neighbourhood planning legislation. The forum's written constitution clearly states that it has been established for the express purpose of promoting or improving the social, economic or environmental well-being of the designated Neighbourhood Area, whilst it also has membership of more than 21 persons and is open to individuals who live or work in the area or are elected members of the City of London Corporation. Furthermore, the Barbican and Golden Lane Neighbourhood Forum is representative of the Neighbourhood Area. Not only is the membership drawn from different parts of the Area and from different sections of the community, but its membership contains many organisations and 'umbrella' associations who draw upon a wider membership reflective of the neighbourhood. The purpose of the Neighbourhood Forum – to produce a neighbourhood plan that encourages development to be in keeping with the distinctive and historic nature of Barbican and Golden Lane – reflects the character of the area.

1. Objectives of the Forum

The objective of the Forum is to preserve, protect and enhance the distinctive nature and character of the area and to improve the economic, social and environmental well-being and

quality of life of those living and working in it, through the development and implementation of a Neighbourhood Plan, recognising that the area proposed for the Forum contains the whole of the Listed Barbican Estate and Golden Lane Estate, the Barbican and Golden Lane conservation area¹.

The Neighbourhood Plan will be in accordance with the requirements of the Localism Act 2011 and in general conformity with the strategic policies of the most recently adopted City of London Corporation Local Plan following examination by the Planning Inspectorate. As a collective body, the Barbican and Golden Lane Neighbourhood Forum (as and when designated) will respond to consultations on updated versions of the City of London Local Plan and all other relevant planning documents, masterplans and local planning issues.

2. Membership of the Forum

Membership of the Forum has been built up initially as a result of individuals coming together to respond to consultations run by the City of London Corporation in relation to local planning issues and developments. Current membership of the Forum is set out in Appendix A.

This membership represents residents and businesses from across the proposed Neighbourhood Area. The Forum anticipates a growing representative membership. Public information meetings will be held to explain the designation process and the aims of the Forum, with an invitation to all local residents and business to play their part in this initiative.

A website will be launched to provide public information on the Forum and its activities, to encourage local participation and to further its communications with local residents and businesses.

Local ward Councillors, our ward Alderwoman and Alderman and a number of prospective councillors have been consulted and support this application. Ward Councillors and Alderwomen and Aldermen now and in the future will be warmly invited to participate in the Forum.

The Forum is also supported by the Barbican Association (BA) and the Golden Lane Estate Residents Association (GLERA). Both are formally recognised by the City of London Corporation as tenants' organisations, and the City consults both on a non-statutory basis on planning and environmental matters. Both have a great deal of experience in local planning issues. Residents' representatives in blocks such as Roman House, London House and Little Britain also support the Forum.

Mindful that the Barbican and Golden Lane neighbourhood is a residential and cultural area which is also home to SMEs and cultural and creative enterprises which are crucial to the supply chain of other large and small businesses in the City, the Neighbourhood Forum actively seeks to represent all interested parties alike.

The Forum is also supported by and includes in its membership, Father Jack Noble of St. Giles' Cripplegate.

3. Constitution and Steering Group

The proposed constitution of the Forum forms part of this application and is attached at Appendix B.

¹ <https://www.cityoflondon.gov.uk/assets/Services-Environment/planning-local-plan-adopted-2015.pdf> and [Local Plan \(adopted 2015\) Policies Map B revised Sept. 2020 PDF \(4MB\)](#)

The Steering Group of the Forum (the Directors of the Forum Limited Company) will be elected at its formal inaugural meeting. The interim Steering Group is:

Adam Weiner
Brenda Szlesinger
Jan Marc Petroszka
Liz Hirst
Liz Woodside-King CC
Matthew Rees
Mark Szlesinger
Peter Jenkinson
Shelagh Wright
Tim Godsmark

2. DESIGNATION OF NEIGHBOURHOOD PLANNING AREA – STATEMENT EXPLAINING WHY THE PROPOSED NEIGHBOURHOOD AREA IS AN APPROPRIATE AREA

This part of the application seeks approval for the designation of the Barbican and Golden Lane Neighbourhood Planning Area (BGLNPA) in compliance with the Neighbourhood Planning (General) Regulations 2012 (as amended) and the Localism Act (2011) and is the statement explaining why the proposed neighbourhood area is an appropriate area.

This application is made after consultation with the City of London's local plan team, which has offered relevant advice during the process and about the planning ambitions of the community. We are grateful to the City for its positive and constructive attitude towards this dialogue.

A defining principle of the Neighbourhood Planning legislation is that it allows constituents living in an area to participate in the planning process *on their terms*. The legislation was specifically designed to enable local inhabitants to define the boundaries of a neighbourhood area themselves where there is no Parish Council operating. Parliament was clear in its intentions about this. As the Minister, Greg Clark, said in the House of Commons at the time *"This is an historic Bill, not just for the measures it contains but for what it represents. It is about striking out in a different direction. Power should be held at the lowest possible level²"*.

This application notes the Planning Policy Guidance (PPG) on area designation, which says that the following could be considerations when deciding the boundaries of a neighbourhood area:

- *village or settlement boundaries, which could reflect areas of planned expansion*
- *the catchment area for walking to local services such as shops, primary schools, doctors' surgery, parks or other facilities*
- *the area where formal or informal networks of community-based groups operate*
- *the physical appearance or characteristics of the neighbourhood, for example buildings that may be of a consistent scale or style*
- *whether the area forms all or part of a coherent estate either for businesses or residents*
- *whether the area is wholly or predominantly a business area*
- *whether infrastructure or physical features define a natural boundary, for example a major road or railway line or waterway*
- *the natural setting or features in an area*
- *size of the population (living and working) in the area*

Electoral ward boundaries can be a useful starting point for discussions on the appropriate size of a neighbourhood area; these have an average population of about 5,500 residents³.

Statement of Area cohesion

The communities and businesses being covered by this area all self-define themselves to be part of the Barbican and Golden Lane geographic area and there is a strong and vibrant community attachment. An active civic movement exists, through which the associations supporting this application have for many years worked together to contribute to the everyday life and

² Hansard 7th November 2011 -

<https://publications.parliament.uk/pa/cm201011/cmhansrd/cm111107/debtext/111107-0002.htm#11110718000003>

³ Neighbourhood Planning PPG (as revised in Sept 2020) Paragraph: 033 Reference ID: 41-033-20140306 -

<https://www.gov.uk/guidance/neighbourhood-planning--2#the-role-of-the-local-planning-authority-in-neighbourhood-planning>

wellbeing of the area. This existing community network includes groups based in Roman House, Barbican, Golden Lane, London House, Little Britain, the Heron, and Tudor Court, for example.

The Barbican and Golden Lane Neighbourhood Planning Area has been carefully assessed through community engagement, considering the social and spatial components of this neighbourhood and considering how it relates to the City of London's wards and the operational definition of planning policy areas locally by the City, the Mayor, government and other relevant bodies.

Geographic area

The geographic area lies wholly within the City of London. A map showing the boundary of the proposed Barbican and Golden Lane Neighbourhood Area is attached at Appendix C. The Area is bounded by Postman's Park/London Wall to the South, Baltic St. West to the North, Aldersgate Street to the West, and Moor Lane to the East. It contains the City of London wards of Aldersgate and Cripplegate (almost entirely residential), the residential part of the ward of Coleman Street, and the northern tip of Bassishaw ward containing Roman House, which has been converted from offices to residential.

The component parts of the Barbican and Golden Lane Neighbourhood Planning Area are:

- a) The whole of the Golden Lane Estate, including the adjoining Jewin Welsh Presbyterian Church, neighbouring housing such as the Denizen, Tudor Rose Court, Bridgewater House and shops and small businesses etc.
- b) The whole of the Barbican Estate, including the original residential blocks as well as the refurbished Frobisher Crescent and Blake House, various offices and other uses on/in the estate, the Museum of London/Bastion House, Barbican Arts Centre, Guildhall School of Music and Drama, City of London School for Girls, St Giles Cripplegate – along with the adjoining, often interlocking, homes and other buildings such as Monkwell Square, Ironmongers' Hall, Cripplegate Institute, 45 Beech St, Barber-Surgeon's Hall, the Shipwrights Company etc.
- c) The Silk Street area immediately adjoining the Barbican, including the residential Heron tower, Milton House, Britannic House West, the entire area of the Brewery Conservation Area and Milton Gate which adjoins the Heron within the Coleman St ward boundary.
- d) The Roman House area immediately adjoining the Barbican, including Roman House, Salters' Hall and Garden, London Wall Place garden at ground level, and Bassishaw Highwalk at podium level – but excluding the office developments of London Wall Place 1 & 2.
- e) The Little Britain area immediately adjoining the Barbican, including the residential grouping of London House, Little Britain and the churches of St. Botolph's Aldersgate, and St Anne and St Agnes together with Postman's Park.

Size of the population

As at 31st March 2022, the City of London estimated that it contained 8,161 residential units. Of these, the Barbican has 2,140 units and Golden Lane 766 units. The Barbican and Golden Lane Neighbourhood Forum's own analysis estimated using the ONS nomis system, is that 4,194 people or 49% of the City's total population live within the Barbican and Golden Lane Neighbourhood Forum Area. As the figure of 5,500 residents is outlined in the Planning Policy Guidance as the "starting point for discussions on the appropriate size of a neighbourhood area", the Neighbourhood Forum has discussed this with the local planning authority. Including all the residential blocks in the Neighbourhood Area is considered to be vital, as leaving them out would also leave them without another viable Neighbourhood Forum to join, given the low volume of housing elsewhere in the City. Cultural, commercial and educational uses within the Neighbourhood also contribute to making it a distinct and recognisable district.

Neighbours all fall into the same catchments

The Barbican and Golden Lane Neighbourhood Forum Area is a cohesive, predominantly residential, community clustered within and around the listed Barbican and Golden Lane Estates. It is a closely packed, tightly defined part of the City of London. Constituents all fall into the same catchments for services such as schools, healthcare, places of worship, sports, youth services and so forth. Local transport issues are the same for all Neighbourhood constituents. And local people in the whole Neighbourhood meet and mix in community hubs such as the Golden Lane Community Centre, the Barbican Library, as well as in the pubs, bars, cafes and restaurants along Beech Street, Aldersgate St and Wood St/Fore St.

Predominantly a residential area where formal or informal networks of community-based groups operate together

Formal and informal networks already exist between the Barbican Association, the Golden Lane Estate Residents' Association and residents in other blocks within the Area. Roman House, the residential block adjacent to the Barbican, for example, has long-standing links with residents in other blocks; frequently cooperating with Willoughby House Group and the BA. London House, the entrance of which is on Aldersgate Street, is cut off from the rest of its ward, Farringdon Within, by the office block of 200 Aldersgate Street. As a result, London House residents already collaborate with Barbican residents on matters of mutual interest. Similarly, Little Britain's residents' representatives feel part of the wider Barbican area and community as they naturally gravitate towards neighbours and fellow voters who live in this part of the City and share their experiences and concerns. Community bonds, for example between carers locally, were strengthened during the pandemic and continue to develop in the Area. Residents from all parts of the proposed Neighbourhood report that they feel part of the wider community in the Barbican and Golden Lane Area.

The extent to which physical features define a natural boundary

Some parts of the Area and its boundary are defined with regard to the physical built and natural environment locally, for example;

- The Highwalk – is a major physical feature of the Barbican Estate and is therefore within the boundary for the Area, including the redeveloped section above London Wall Place garden.
- The Museum of London and the Rotunda – although these fall outside the City of London's designated Conservation Area boundary, they are included in the Neighbourhood Area because of their physical connection to and integration with the Barbican Estate, forming a natural and very visible boundary at the junction of London Wall and Aldersgate Street.
- Postman's Park – this long-standing garden, much used as an east-west walking route by all local neighbours, and valued by the residents of Little Britain as an adjacent amenity, forms another obvious and visible element of the boundary.
- Aldersgate Street – although this is a busy through route, and therefore is used as the boundary in the main, the position of London House is considered as an exception and is included within the boundary for two reasons; it would otherwise be isolated without a Neighbourhood to represent it, and because it faces the Barbican its residents already have a strong network and shared experiences with the Barbican and Golden Lane Neighbourhood.
- The northern edge of the Neighbourhood, surrounding Golden Lane - is defined by the City of London boundary. COLPAI school and Prior Weston are therefore excluded as they are in Islington. The Forum will liaise with these and other significant uses on the edge of the Area boundary.
- Beech Street – not only is this an obvious feature, it is also a key element of the Neighbourhood's infrastructure. As the Beech St tunnel is an integral part of the Barbican Estate, routing traffic under and through the Estate, the continuation of Beech St/Chiswell St

to the east of the mouth of the tunnel is crucial to pedestrian/vehicle movement and access in the Neighbourhood. The road is a significant east/west route and a major feature of the Neighbourhood. This allows the whole of the Brewery Conservation area to be included, and with it the bars, restaurants and gathering points which are important to the Neighbourhood. During discussion, the local planning authority asked for the block known as Milton Gate to be excluded from the boundary – it has been left in on the basis that the peculiarities of the City/Islington border would leave it without the possibility of joining a Neighbourhood if it were to be excluded.

- Moor Lane – is the eastern boundary, running from the junction with Beech St/Chiswell. Again, it has been chosen both as a natural boundary and an important piece of infrastructure. This north/south route is used by many local residents and workers alike.

The natural setting or features in an area

The importance of the Area’s modern architectural heritage, its gardens and green infrastructure, as well as its historical significance is reflected in the adoption of a boundary for the Neighbourhood Forum which encompasses all the nationally-listed heritage assets and the Conservation Areas of Brewery, and Golden Lane and the Barbican. The Forum recognises the significance of nationally-designated heritage assets which all fall within the Barbican and Golden Lane Neighbourhood Forum Area:

Listed Buildings - Grade I

Church of St Giles Cripplegate

Listed Buildings - Grade II*

Crescent House

Listed Buildings - Grade II

Barbican Estate

Dorothy Annan Murals, Speed Highwalk

Great Arthur House

Cuthbert Harrowing House

Cullum Welch House

Bowater House

Golden Lane Community Centre

Bayer House

Stanley Cohen House

Basterfield House

Golden Lane Leisure Centre

Hatfield House

Sir Ralph Perrin Centre

Designated Landscapes

Barbican Estate (grade II*)

Golden Lane Estate (grade II)

Scheduled Ancient Monuments

London Wall: section of Roman and medieval wall and bastions, West and North of Monkwell Square.

The Barbican is also one of four City parks and gardens that are included on Historic England’s Register of Parks and Gardens of special interest. The Barbican and Golden Lane Neighbourhood Planning Area encompasses all these assets in recognition that they are important to the identity of the Neighbourhood. The Forum recognises that conserving and developing these assets requires partnership working with government, Historic England, and other stakeholders – as well as with the City of London through the Mayor’s Plan for London 2021, the adopted Local Plan (2015) and the paused Draft City Plan 2036 and its replacement.

The Area contains significant elements of green infrastructure, providing a focus for the neighbourhood as well as direct economic benefits to the productivity of workers and the well-being of residents and workers alike. As well as the contribution of the nationally-registered Barbican garden, the Area also has Postman’s Park (a Site of Local Importance for Nature Conservation) and the Barbican Wildlife Garden (a Site of Borough Importance for Nature Conservation) as well as many local opportunities to expand this green infrastructure further still.

The Neighbourhood Forum Area also contains the current Museum of London, the Guildhall School of Music and Drama and the Barbican Centre – a cultural quarter recognised in the

London Plan 2021 as one of the capital's strategic cultural areas⁴ and integral to the neighbourhood, both by being joined physically and by being a key feature of life in the area for residents, workers and visitors. Cultural businesses are encouraged to join the Neighbourhood Forum, which has a category of membership to ensure a balance between business and residential representation. The Forum notes that the London Plan sees the Barbican neighbourhood as a special area within the Central Activities Zone (CAZ) which is rich in cultural activity and where there is a rich mix of strategic functions and local uses. As this strategic plan for London says, this is a place where achieving a suitable sustainable balance is important *“The quality and character of the CAZ’s predominantly residential neighbourhoods should be conserved and enhanced. This should ensure a variety of housing suitable to the needs of diverse communities, including affordable housing, whilst ensuring that development does not compromise strategic CAZ functions. Boroughs should also consider social infrastructure demands generated by residents, workers and visitors in the CAZ when undertaking social infrastructure need assessments” (2.4.19)*⁵.

Educational facilities include the City of London Girls School and the Guildhall School of Music and Drama; nursery schools in Bridgewater Square and in the Barbican Estate; Richard Cloudesley School and Golden Lane School; and the lending Library in the Barbican residential estate – all help to cement the ties which bind this neighbourhood together.

Places of worship include the listed St Giles Cripplegate, St-Botolph-without-Aldersgate (now used by the Free Church of Scotland), St Anne and St Agnes (now the home of Voces 8), the Jewin Welsh Chapel (developed as part of the Golden Lane Estate in 1960 to replace a chapel in the Barbican, which itself replaced the original chapel established in 1774, the first of 30 Welsh chapels in London). Although there is no chapel on the site, the Area also contains the place where John Wesley had his “Aldersgate conversion” in 1738 leading to the founding of the major world faith of Methodism. The oldest Jewish cemetery in the UK was located in what is now Thomas More Gardens in the Barbican and its presence is marked by a formal ceremony every year. All are significant features of the Area, acknowledged to bind the neighbourhood together in culture, history and worship.

Relationship to the City of London’s existing Planning Policy

The City of London’s Local Plan (both current and draft) defines the area as one of strategic importance with regard to planning, which is a further reason for designation. In the current Local Plan⁶ it is defined as a “Key City Place” (North of the City) and in the latest draft Local Plan⁷ it is defined as a “Key Area of Change” (Barbican and Smithfield). The Barbican and Golden Lane Neighbourhood Forum Area is entirely within both these areas of strategic planning importance, as defined by the local planning authority, indicating the area’s long-standing status as a recognisable, distinct Neighbourhood – a status that is likely to continue for many years to come. The Barbican and Golden Lane Forum also welcomes the City’s intentions as set out in the 2036 Draft Plan (7.1.2) for Key Areas of Change to “provide a strategic context for the development of projects and funding bids by a range of City Corporation departments and external partners”

⁴ The Mayor of London’s London Plan 2021, https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

⁵ The Mayor of London’s London Plan 2021, CAZ policies such as 2.4.19, page 79 https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

⁶ City of London Local Plan 2015 (Adopted) <https://www.cityoflondon.gov.uk/assets/Services-Environment/planning-local-plan-adopted-2015.pdf>

⁷ Proposed Submission Draft City Plan 2036 - <https://www.cityoflondon.gov.uk/services/planning/planning-policy/local-plan-review-draft-city-plan-2040>

The City's current Plan expected that approximately 60 - 70% of new residential development in the City would take place in the Area, and the Draft Plan to replace it (although now paused) still expects more housing development in this Area than in others in the City. As a result, the Barbican and Golden Lane Neighbourhood Forum anticipates that this Area will remain predominantly residential for the foreseeable future.

Although the Area scores above average on many quality-of-life indices, it is worth noting that according to the Living Environment Deprivation Indicators (which measure the quality of the local Environment both 'indoors 'ie quality of housing and 'outdoors ') Golden Lane is within the 20% most deprived small area zones (LSOAs) in England, while Barbican West and Barbican East are within the 40% most deprived in England⁸

In this Area residential, business, heritage and cultural interests come together within a highly populated footprint. Population density will increase with further residential development, and with is a need to consider supportive social and educational facilities. The purpose of this application is to bring a neighbourhood dimension to local planning in this area, given its crowded nature and the impact of development on the economic, social and environmental well-being of existing residents and businesses.

FIGURE 8: THE NORTH OF THE CITY



Key City Place

The City of London's current (2015) Local Plan showing the Core Strategic Policy CS5: The North of the City. The North of the City is identified as containing "a mix of areas and uses, including the strategic cultural quarter centred on the Barbican, and residential areas at the Barbican and Golden Lane, each with its own distinctive character"⁹.

⁸ City of London – Indices of Deprivation (2019) - <https://www.cityoflondon.gov.uk/assets/Services-Environment/planning-emp-and-pop-stats-indices-of-deprivation-2019.pdf>

⁹ The City of London Adopted Local Plan 2015, Policy CS5, p65

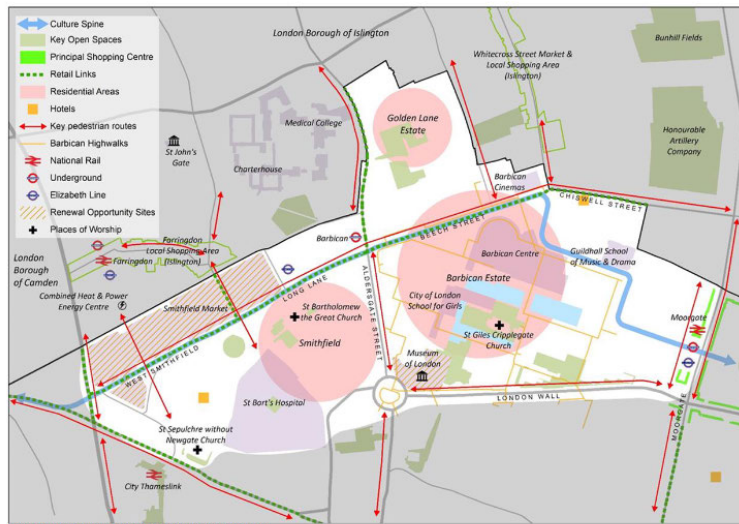


Figure 35: Smithfield and Barbican Key Area of Change

Key Area of Change

The City of London's (2036) Draft Plan showing the Strategic Policy S23: Smithfield and Barbican. Although the Proposed Submission Draft City Plan 2036 is currently paused, it is worth noting that it identifies Smithfield and Barbican as one of the seven Key Areas of Change "set to incur significant change and growth during the plan period".

Contact details

The main contact for the Barbican and Golden Lane Neighbourhood Forum is Brenda Szlesinger

BARBICAN AND GOLDEN LANE NEIGHBOURHOOD FORUM MEMBERSHIP

Please find below the current list of the thirty-five verified members of the Barbican and Golden Lane Neighbourhood Forum as at 24/04/2023.

Adam Weiner
Alan Lam
Alpesh Lad
Averil Baldwin
Barnaby Spurrier
Bev Bytheway
Brenda Szlesinger
Cathy Ross
Alderman Christopher Makin
Claire Carolin
Dimitri Varsamis
Fred Rodgers
Father Jack Noble
Jan Marc Petroschka
Jane Smith
Jill Meager
Kate Willoughby
Kenjiro Kirton
Leah Borremeo
Liz Hirst
Liz Woodside-King CC
Mark Szlesinger
Matthew Rees
Mina Lad
Naresh Sonpar CC
Paul Lincoln
Peter Jenkinson
Sarah Gillinson
Shelagh Wright
Sue Cox
Alderwoman Sue Pearson
Suwei Jiang
Tim Godsmark
Viraj Patel
Yanki Lee

BARBICAN AND GOLDEN LANE NEIGHBOURHOOD FORUM PROPOSED CONSTITUTION

THE COMPANIES ACT 2006 PRIVATE COMPANY LIMITED BY GUARANTEE

DRAFT ARTICLES OF ASSOCIATION OF THE BARBICAN AND GOLDEN LANE NEIGHBOURHOOD FORUM LIMITED (the "Forum")

INTRODUCTION

1. Interpretation

1.1 In these Articles, unless the context otherwise requires:

Act: the Companies Act 2006;

Annual General Meeting: the meeting of the Members which first occurs after each anniversary of the incorporation of the Forum;

Articles: the Forum's Articles of Association for the time being in force;

Bankruptcy: includes individual insolvency proceedings in a jurisdiction other than England and Wales or Northern Ireland which have an effect similar to that of bankruptcy;

Barbican and Golden Lane the area edged blue in the plan attached to these Articles

Neighbourhood Area: in the Annex;

Business Day: any day (other than a Saturday, Sunday or public holiday in the United Kingdom) on which clearing banks in the City of London are generally open for business;

Business Member: the meaning given in Article 16.1(a);

Business Director: a Business Member who is a Director;

Community Group Director: a Community Group Member who is a Director;

Community Group Member: the meaning given in Article 16.1(c);

Conflict: a situation in which a Director has or can have, a direct or indirect interest that conflicts or possibly may conflict, with the interests of the Forum;

Constitution: the meaning given in Article 8.1(b);

Director: means a director of the Forum, and includes any person occupying the position of director, by whatever name called;

Document: includes, unless otherwise specified, any document sent or supplied in electronic form;

Electronic Form: the meaning given in section 1168 of the Act 2006;

Eligible Director: a Director who would be entitled to vote on the matter at a meeting of the Steering Group (but excluding in relation to the authorisation of a Conflict pursuant to Article 13, any Director whose vote is not to be counted in respect of the particular matter);

Meeting Chairman: the Chair of a particular meeting of the Members in accordance with Article 8 (being the Chair or, in their absence, the Vice Chair or, in their absence, the Secretary);

Member: a member of the Forum;

Membership Categories: the purpose of the Membership Categories is to ensure that the Steering Group is composed of a balance of Resident, Business and Community Group Directors. Hence, the Forum offers three Categories of Membership, each of which carries identical rights – Business, Resident and Community Group, and all Members are required to declare which Category they belong to and may select only one Category;

Mission Statement: the mission statement of the Forum as adopted on incorporation and as amended by the Members by special resolution from time to time;

Neighbourhood Plan: a Neighbourhood Development Plan for the Barbican and Golden Lane Area in accordance with the Planning and Compulsory Purchase Act 2004, being a Plan which sets out policies in relation to the development and use of land in the whole or any part of the Barbican and Golden Lane Neighbourhood Area;

Ordinary Resolution: has the meaning given in section 282 of the Act;

Participate: in relation to a Steering Group meeting, has the meaning given in Article 9;

Proxy Notice: the meaning given in Article 29;

Resident Member: the meaning given in Article 16.1(b);

Resident Director: a Resident Member who is a Director;

Special Resolution: the meaning given in section 283 of the Act;

Steering Group: means the Directors collectively;

Subsidiary: the meaning given in section 1159 of the Companies Act 2006; and

Writing: means the representation or reproduction of words, symbols or other information in a visible form by any method or combination of methods, whether sent or supplied in electronic form or otherwise.

1.2 Unless the context otherwise requires, other words or expressions contained in these Articles bear the same meaning as in the Act as in force on the date when these Articles become binding on the Forum.

1.3 Headings in these Articles are used for convenience only and shall not affect the construction or interpretation of these Articles.

1.4 A reference in these Articles to an "Article" is a reference to the relevant article of these Articles unless expressly provided otherwise.

1.5 Unless expressly provided otherwise, a reference to a statute, statutory provision or subordinate legislation is a reference to it as it is in force from time to time, taking account of:

- (a) any subordinate legislation from time to time made under it; and
- (b) any amendment or re-enactment and includes any statute, statutory provision or subordinate legislation which it amends or re-enacts.

1.6 Any phrase introduced by the terms "including", "include", "in particular" or any similar expression shall be construed as illustrative and shall not limit the sense of the words preceding those terms.

1.7 The model articles for private companies limited by guarantee contained in Schedule 2 of the Companies (Model Articles) Regulations 2008 (SI 2008/3229) shall not apply to the Forum.

2. Liability of Members

The liability of each Member is limited to £1, being the amount that each Member undertakes to contribute to the assets of the Forum in the event of its being wound up while they are a Member or within one year after they cease to be a Member, for:

- (a) payment of the Forum's debts and liabilities contracted before they cease to be a Member;
- (b) payment of the costs, charges and expenses of the winding up; and
- (c) adjustment of the rights of the contributories among themselves.

3. Objects

3.1 The objects of the Forum shall be unlimited, but the Forum is primarily established for the public benefit for the following purposes:

- (a) to produce a Neighbourhood Plan for the promotion and improvement of the social, economic and environmental wellbeing of the Barbican and Golden Lane Neighbourhood Area, its residents and businesses;

- (b) to ensure that any development in the Barbican and Golden Lane Neighbourhood Area is appropriate to the distinctive and historic character of the Barbican and Golden Lane Neighbourhood Area;
- (c) to promote high standards of town planning and architecture in the Barbican and Golden Lane Neighbourhood Area; and
- (d) to develop, maintain and implement a Neighbourhood Plan in general conformity with the relevant statutory development plans for the Barbican and Golden Lane Neighbourhood Area, and in support of the Plan objectives, to propose projects that can be funded using the Neighbourhood Community Infrastructure Levy,

in accordance with the Mission Statement.

4. Powers

In pursuance of the objects set out in Article 3, the Forum has the power to:

- (a) buy, lease or otherwise acquire and deal with any property real or personal and any rights or privileges of any kind over or in respect of any property real or personal and to improve, manage, develop, construct, repair, sell, lease, mortgage, charge, surrender or dispose of or otherwise deal with all or any part of such property and any and all rights of the Forum;
- (b) borrow and raise money in such manner as the Steering Group shall think fit and secure the repayment of any money borrowed, raised or owing by mortgage, charge, lien or other security on the Forum's property and assets;
- (c) invest and deal with the funds of the Forum not immediately required for its operations in or upon such investments, securities or property as may be thought fit;
- (d) lobby, advertise, publish, educate, examine, research and survey in respect of all matters of law, regulation, economics, accounting, governance, politics and/or other issues and to hold meetings, events and other procedures and co-operate with or assist any other body or organisation in each case in such way or by such means as may, in the opinion of the Steering Group, affect or advance the principal object in any way;
- (e) pay all or any expenses incurred in connection with the promotion, formation and incorporation of the Forum and to contract with any person, firm or company to pay the same;
- (f) enter into contracts to provide services to or on behalf of other bodies;
- (g) provide and assist in the provision of money, materials or other help;
- (h) open and operate bank accounts and other facilities for banking and draw, accept, endorse, issue or execute promissory notes, bills of exchange, cheques and other instruments; and
- (i) do all such other lawful things as are incidental or conducive to the pursuit or to the attainment of any of the object set out in Article 3.

DIRECTORS

5. Directors 'general authority

Subject to the Articles, the Steering Group is responsible for the management of the Forum's business, for which purpose they may exercise all the powers of the Forum.

6. The Steering Group

- 6.1 The board of Directors of the Forum shall be known as the "Steering Group" and shall manage the Forum.
- 6.2 There shall at all times be a minimum of ten and a maximum of fifteen Directors of the Forum, including the Chair, all of whom shall volunteer.
- 6.3 There shall at all times be five Resident Directors, five Business Directors, and up to five Community Group Directors elected by the membership with the intent of creating a balance of opinions that when combined, result in a single voice for the Barbican and Golden Lane Neighbourhood Area.

- 6.4 The Steering Group shall elect its own officers from among the Directors, including the Chair, Vice Chair, Treasurer and Secretary.
- 6.5 The position of Chair is open to Directors of all Membership Categories – Business, Resident and Community and when a new Chair is selected, they will be, when possible, from a different Membership Category to the outgoing Chair, but there is no obligation to rotate the Chair between the different Membership Categories in a prescribed format.
- 6.6 The position of Chair and Vice Chair shall be, when possible, held by Directors from differing Membership Categories.
- 6.7 The Chair shall usually hold office for approximately two years and a maximum of four years.
- 6.8 At the end of each Chair's period in office, the retiring Chair may normally remain a Director and sit on the Steering Group unless required to seek re-election under Article 6.10.
- 6.9 If vacancies among the Resident Directors, the Business Directors or the Community Group Directors occur the Steering Group may appoint new Directors (each a "**New Director**"). The appointment of any New Directors must be endorsed at the next following Annual General Meeting by ordinary resolution.
- 6.10 It is the intent of the Forum that on the occasion of every Annual General Meeting a minimum of one Director in each Membership Category shall be endorsed (in accordance with Article 6.9), elected or re-elected. To facilitate this, and unless vacancies exist as a result of Article 6.15, the Resident Director, the Business Director and the Community Group Director who have each served the longest on the Steering Group will put themselves forward for re-election.
- 6.11 When a Steering Group directorship vacancy arises under article 6.16 during the year and has not already been filled by the Steering Group, then that directorship will be open for election at the AGM and no other director from the same category will be expected to stand down or be re-elected. The maximum term for a Steering Group member without re-election should be one additional year beyond their normal date for re-election, unless the Steering Group vote in majority to keep a director in place, so as to avoid the loss of two directors from the same category in the same year and thus to provide continuity in the Group).
- 6.12 At each Annual General Meeting, any Member (an "**Applicant**") shall be entitled to stand for election to the Steering Group provided that they have submitted a prior written application to the Secretary, in such format as the Steering Group may prescribe from time to time, which must be received by the Secretary no less than 10 clear Business Days prior to the relevant Annual General Meeting. An Applicant must state in their application whether they intend to stand as a Business Director, Resident Director or Community Group Director and the Steering Group must be satisfied that they have met the relevant qualifying Membership category criteria.
- 6.13 At the relevant Annual General Meeting, any Applicants and any Directors wishing to put themselves forward for re-election to the Steering Group in accordance with article 6.10 shall be voted upon by the Forum. Following the taking of such a vote, the prospective new Business Director, the prospective new Resident Director and the prospective new Community Director each receiving the highest number of votes shall be elected to the Steering Group.
- 6.14 In the event that the election of any New Director is not endorsed by the Forum at an Annual General Meeting, replacement director(s) shall be nominated by the Steering Group for approval by the Forum by ordinary resolution.
- 6.15 If any steering group member is absent for three consecutive steering group meetings, then the member will be deemed to have forfeited their position on the steering group unless they have provided a valid reason for non-attendance that is accepted by a majority vote of the steering group members at the first steering group meeting following the third meeting absence
- 6.16 A person ceases to be a Director as soon as:

- (a) they retire at an Annual General Meeting;
- (b) that person ceases to be a Director by virtue of any provision of the Companies Act 2006 or is prohibited from being a director by law;
- (c) a bankruptcy order is made against that person;
- (d) a composition is made with that person's creditors generally in satisfaction of that person's debts;
- (e) a registered medical practitioner who is treating that person gives a written opinion to the Forum stating that that person has become physically or mentally incapable of acting as a director and may remain so for more than three months; or
- (f) notification is received by the Forum from the Director that the Director is resigning from office, and such resignation has taken effect in accordance with its terms.
- (g) they fail to comply with Article 16.1
- (h) Their position on the steering group is forfeited in line with Article 6.15

7. Representation of the Forum and Delegation by Steering Group

- 7.1 No Director (other than the Chair) may externally represent the Forum (including communicating with statutory bodies or the media) or attend meetings on behalf of the Forum, without the prior written approval of the Chair.
- 7.2 The Steering Group may delegate powers on specific matters to such committees or persons as might be deemed appropriate, including administrative support from a third party.
- 7.3 If the Steering Group so specifies, any such delegation may authorise further delegation of the Steering Group's powers by any person to whom they are delegated.
- 7.4 The Steering Group may revoke any delegation in whole or part, or alter its terms and conditions.
- 7.5 Committees to which the Steering Group delegates any of its powers must follow procedures which are based as far as they are applicable on those provisions of the Articles which govern the taking of decisions by the Steering Group.
- 7.6 The Steering Group may make rules of procedure for all or any committees, which prevail over rules derived from the Articles if they are not consistent with them.

8. Chair, Vice Chair, Secretary and Treasurer

- 8.1 The Chair of the Steering Group shall:
 - (a) chair meetings of the Steering Group and the Members;
 - (b) interpret these Articles, the Mission Statement and any other rules governing the Forum from time to time (together, the "**Constitution**") and the Chair's interpretation of the Constitution may only be overruled by four or more members of the Steering Group; and
 - (c) act as joint signatory on the Forum's bank account alongside the Vice Chair, the Secretary and/or the Treasurer.
- 8.2 The Vice Chair shall:
 - (a) chair meetings of the Steering Group and the Members if the Chair is absent;
 - (b) act alongside the Chair on behalf of the Forum and represent it externally when the Chair is unavailable;
 - (c) assume the Chair's responsibilities if the Chair resigns until such time as a new Chair can be appointed;
 - (d) assist the Chair with interpreting the Constitution; and
 - (e) act as joint signatory on the Forum's bank account alongside the Chair, the Secretary and/or the Treasurer.
- 8.3 The Secretary shall:
 - (a) be responsible for organising meetings of the Steering Group and the Members, maintaining the minutes and making them available to Members within 15 Business Days of a meeting;

- (b) chair meetings of the Steering Group and the Members if the Chair and Vice Chair are absent; and
- (c) act as joint signatory on the Forum's bank account alongside the Chair, the Vice Chair and/or the Treasurer.

8.4 The Treasurer shall:

- (a) be responsible for maintaining the accounts of the Forum;
- (b) be responsible for presenting an annual budget for each following financial year to the Forum at the time of each meeting of the Members;
- (c) submit a detailed summary of the accounts at every Steering Group meeting; and
- (d) act as a joint signatory on the Forum's bank account alongside the Chair, the Vice Chair and/or the Secretary.

9. Meetings of the Steering Group

- 9.1 The Steering Group shall meet as often as is necessary, but no less than quarterly, to develop the Neighbourhood Plan and for any other purposes that the Steering Group shall determine.
- 9.2 Directors participate in a Steering Group meeting, or part of a Steering Group meeting, when:
- (a) the meeting has been called and takes place in accordance with the Articles, and
 - (b) they can each communicate to the others any information or opinions they have on any particular item of the business of the meeting.
- 9.3 In determining whether Directors are participating in a Steering Group meeting, it is irrelevant where any Director is or how they communicate with each other.
- 9.4 If all the Directors participating in a meeting are not in the same place, they may decide that the meeting is to be treated as taking place wherever any of them is.
- 9.5 Subject to the Articles, the Steering Group may make any rule which they think fit about how they take decisions, and about how such rules are to be recorded or communicated to the Steering Group.
- 9.6 The Steering Group may permit other persons who are not Directors to attend and speak (but not vote) at meetings of the Steering Group.

10. Calling a Steering Group Meeting

- 10.1 The Chair may call a Steering Group meeting by giving not less than 10 clear Business Days' notice of the meeting (or such lesser notice as all the Directors may agree) to the Directors or by authorising the Secretary to give such notice.
- 10.2 Notice of any Steering Group meeting must indicate:
- (a) an agenda;
 - (b) its proposed date and time;
 - (c) where it is to take place; and
 - (d) if it is anticipated that Directors participating in the meeting will not be in the same place, how it is proposed that they should communicate with each other during the meeting.
- 10.3 Notice of a Steering Group meeting shall be given to each Director in writing or by electronic form.

11. Quorum for Steering Group Meetings

- 11.1 At a Steering Group meeting, unless a quorum is participating, no proposal is to be voted on, except a proposal to call another meeting.
- 11.2 Subject to Article 11.4, the quorum for the transaction of business at a Steering Group meeting is any three Directors plus the Chair, of whom at least one shall be a Resident Director and at least one shall be a Business Director .
- 11.3 If a quorum is not present within 30 minutes of the time specified for the relevant meeting in the notice of the meeting, then the meeting shall be adjourned for five Business Days at the same time and place.

11.4 For the purposes of any meeting (or part of a meeting) held pursuant to Article 13 to authorise a Conflict, if there is only one Eligible Director in office other than the Interested Director(s) (defined in Article 13.1), the quorum for such meeting (or part of a meeting) shall be one Eligible Director.

11.5 If the total number of Directors in office for the time being is less than the quorum required, the Steering Group must not take any decision other than a decision:

(a) to appoint further Directors; or

(b) to call a general meeting so as to enable the Members to appoint further Directors.

12. Voting at Steering Group meetings

12.1 All decisions made at any meeting of the Steering Group shall be made by simple majority.

13. Directors' Conflicts of Interest

13.1 The Directors may, in accordance with the requirements set out in this Article, authorise any Conflict proposed to them by any Director which would, if not authorised, involve a Director (an "**Interested Director**") breaching their duty under section 175 of the Act to avoid conflicts of interest.

13.2 Any authorisation under this Article 13 shall be effective only if:

(a) the matter in question shall have been proposed by any Director for consideration in the same way that any other matter may be proposed to the Steering Group under the provisions of these Articles or in such other manner as the Steering Group may determine;

(b) any requirement as to the quorum for consideration of the relevant matter is met without counting the Interested Director; and

(c) the matter was agreed to without the Interested Director voting or would have been agreed to if the Interested Director's vote had not been counted.

13.3 Any authorisation of a Conflict under this Article 13 may (whether at the time of giving the authorisation or subsequently):

(a) extend to any actual or potential conflict of interest which may reasonably be expected to arise out of the matter or situation so authorised;

(b) provide that the Interested Director be excluded from the receipt of documents and information and the participation in discussions (whether at meetings of the Steering Group or otherwise) related to the Conflict;

(c) provide that the Interested Director shall or shall not be an Eligible Director in respect of any future decision of the Steering Group in relation to any resolution related to the Conflict;

(d) impose upon the Interested Director such other terms for the purposes of dealing with the Conflict as the Steering Group think fit;

(e) provide that, where the Interested Director obtains, or has obtained (through their involvement in the Conflict and otherwise than through their position as a Director) information that is confidential to a third party, they shall not be obliged to disclose that information to the Forum, or to use it in relation to the Forum's affairs where to do so would amount to a breach of that confidence; and

(f) permit the Interested Director to absent themselves from the discussion of matters relating to the Conflict at any meeting of the Steering Group and be excused from reviewing papers prepared by, or for, the Steering Group to the extent they relate to such matters.

13.4 Where the Steering Group authorises a Conflict, the Interested Director shall be obliged to conduct himself in accordance with any terms and conditions imposed by the Steering Group in relation to the Conflict.

13.5 The Directors may revoke or vary such authorisation at any time, but this shall not affect anything done by the Interested Director prior to such revocation or variation in accordance with the terms of such authorisation.

- 13.6 A Director is not required, by reason of being a Director (or because of the fiduciary relationship established by reason of being a Director), to account to the Forum for any remuneration, profit or other benefit which they derive from or in connection with a relationship involving a Conflict which has been authorised by the Steering Group in accordance with these Articles or by the Forum in general meeting (subject in each case to any terms, limits or conditions attaching to that authorisation) and no contract shall be liable to be avoided on such grounds.
- 13.7 Subject to sections 177(5) and 177(6) and sections 182(5) and 182(6) of the Act, and provided they have declared the nature and extent of their interest in accordance with the requirements of the Act, a Director who is in any way, whether directly or indirectly, interested in an existing or proposed transaction or arrangement with the Forum:
- (a) may be a party to, or otherwise interested in, any transaction or arrangement with the Forum or in which the Forum is otherwise (directly or indirectly) interested;
 - (b) shall be an Eligible Director for the purposes of any proposed decision of the Steering Group (or committee of Directors) in respect of such existing or proposed transaction or arrangement in which they are interested;
 - (c) shall be entitled to vote at a meeting of Directors (or of a committee of the Directors) or participate in any unanimous decision, in respect of such existing or proposed transaction or arrangement in which they are interested;
 - (d) may act by themselves or their firm in a professional capacity for the Forum (otherwise than as auditor) and they or their firm shall be entitled to remuneration for professional services as if they were not a Director;
 - (e) may be a Director or other officer of, or employed by, or a party to a transaction or arrangement with, or otherwise interested in, any body corporate in which the Forum is otherwise (directly or indirectly) interested; and
 - (f) shall not, save as they may otherwise agree, be accountable to the Forum for any benefit which they (or a person connected with them (as defined in section 252 of the Act)) derives from any such transaction or arrangement or from any such office or employment or from any interest in any such body corporate and no such transaction or arrangement shall be liable to be avoided on the grounds of any such interest or benefit nor shall the receipt of any such remuneration or other benefit constitute a breach of their duty under section 176 of the Act.

14. Records of Decisions to be Kept

Where decisions of the Steering Group are taken by electronic means, such decisions shall be recorded by the Secretary in permanent form, so that they may be read with the naked eye.

15. Deadlock Resolution

- 15.1 If at a properly convened meeting of the Steering Group there is no quorum at the meeting and no quorum at the meeting when it is reconvened following an adjournment pursuant to Article 11.3 (a "**Deadlock**"), the Chair shall, within 10 Business Days following the date of the adjourned meeting, convene a general meeting of the Forum to resolve the matter giving rise to the Deadlock.
- 15.2 If a Deadlock cannot be resolved at the general meeting called for the purpose of resolving it, the Forum shall be wound up.

MEMBERSHIP

16. Application for Membership

- 16.1 Membership of the Forum shall be open to:
- (a) individuals who demonstrably work in the Barbican and Golden Lane Neighbourhood Area, ("**Business Members**")
 - (b) individuals who demonstrably live in the Barbican and Golden Lane Neighbourhood Area ("**Resident Members**");

- (c) representatives of any organisation (whether incorporated or not) which demonstrably operates for the benefit of the Barbican and Golden Lane Neighbourhood Area community as a whole, including operations such as (*inter alia*) places of worship, libraries, health facilities, public buildings, open space facilities, education facilities together with not-for-profit representative groups which exist to promote or monitor community assets or functions ("**Community Group Members**"); and
- (d) individuals who are elected members of those Wards in the City of London that lie within the Barbican and Golden Lane Neighbourhood Area,

in each case who support the purpose of the Forum and complete a membership form.

16.2 No person shall become a Member unless they have completed an application for membership in the form prescribed by the Steering Group from time to time. The Steering Group shall be entitled to request that any prospective Member provides such information as the Steering Group in its absolute discretion requests in order to satisfy itself that the prospective Member fulfils the criteria for membership of the Forum set out in Article 16.1.

16.3 An acknowledgment shall be sent to each successful applicant confirming their membership of the Forum and the details of each successful applicant shall be entered into the Register of Members by the Secretary.

16.4 The Secretary shall maintain a complete and up to date Register of Members.

17. Termination of Membership

17.1 A Member may withdraw from membership of the Forum by giving 10 Business Days 'notice to the Forum in writing.

17.2 Membership of the Forum is not transferable.

17.3 A person's membership terminates when that person dies or ceases to exist.

17.4 A person's membership automatically terminates without notice should their circumstances change such that they no longer comply with the requirements of Article 16.1

17.5 The Steering Group may terminate the membership of any Member without their consent by giving them written notice if, in the reasonable opinion of the Steering Group:

- (a) They are guilty of conduct which had or is likely to have a serious adverse effect on the Forum or bring the Forum or any or all of the Members and Directors into disrepute; or
- (b) They have acted or has threatened to act in a manner which is contrary to the interests of the Forum as a whole; or
- (c) They have failed to observe the terms of the Constitution.

Following such termination, the Member shall be removed from the Register of Members by the Secretary.

17.6 The Steering Group must give a Member the opportunity to be heard in writing or in person as to why their membership should not be terminated. The Steering Group must consider any representations made by the Member and inform the Member of their decision following such consideration. There shall be no right to appeal from a decision of the Steering Group to terminate the membership of a Member.

DECISION MAKING BY MEMBERS

MEETINGS OF MEMBERS

18. General meetings of the Members shall be held at least twice in each calendar year, including one Annual General Meeting

18.1 A general meeting of the Members may be called by:

- (a) the Chair;
- (b) the Secretary at the request of the Chair; or
- (c) collectively by 5% or more of the Members.

18.2 At least 21 clear Business Days 'notification must be given to Members for a meeting to be held and such notice must indicate:

- (a) the proposed date and time of the Meeting;
- (b) where it is to take place; and
- (c) the agenda for the Meeting (the "**Agenda**").

19. Members of the Form must declare any conflict of interest before partaking in any discussion, and potentially voting, on any matter. By majority vote of the Steering Group, an individual may be asked not to participate in such a discussion or vote.

19.1 Subject to any other provision of these Articles or the Act, the Meeting Chairman shall have a wide discretion as to the conduct of any meeting including, without limitation:

- (a) matters proposed to be voted upon that were not included in the Agenda;
- (b) the conduct of discussions and voting;
- (c) attendance of non-members; and
- (d) exclusion of any Member or non-member from any meeting.

20. Attendance and speaking at general meetings

20.1 A person is able to exercise the right to speak at a general meeting when that person is in a position to communicate to all those attending the meeting, during the meeting, any information or opinions which that person has on the business of the meeting.

20.2 A person is able to exercise the right to vote at a general meeting when:

- (a) that person is able to vote, during the meeting, on resolutions put to the vote at the meeting; and
- (b) that person's vote can be taken into account in determining whether or not such resolutions are passed at the same time as the votes of all the other persons attending the meeting.

20.3 The Steering Group may make whatever arrangements they consider appropriate to enable those attending a general meeting to exercise their rights to speak or vote at it.

21. Quorum for general meetings

21.1 No business is to be transacted at a general meeting if the persons attending it do not constitute a quorum.

22. At least eight Members must be present at the start of the meeting for it to be declared quorate.

23. Votes of Members

23.1 All Members shall be entitled to attend general meetings, to propose motions for discussion in accordance with Article 23.2 and subject to Article 23.3, to vote.

23.2 Any Member wishing to propose a motion at a general meeting must first submit the proposed motion to the Secretary no less than 10 clear Business Days prior to the date of the relevant general meeting, for approval by the Steering Group. Subject to the Act, the Steering Group may decide, in its absolute discretion, whether to include any such proposed motion in the Agenda for the meeting.

23.3 Subject to the Act, at any general meeting every Member who is present in person (or by proxy) shall have one vote, provided they have been, on the occasion of the vote, a Member for at least 22 clear Business Days

23.4 The Members may:

- (a) receive and comment on any report from the Steering Group;
- (b) approve the annual report and accounts, where relevant, in accordance with the Act;
- (c) approve amendments to the Constitution by special resolution;
- (d) approve draft Neighbourhood Plans; and
- (e) approve any motions proposed by Members pursuant to Article 23.2.

24. Attendance and speaking by Directors and non-members

24.1 Directors may attend and speak at general meetings.

24.2 The Meeting Chairman may permit other persons who are not Members of the Forum to attend and speak at a general meeting, including observers from interested stakeholder groups, statutory bodies and other appropriate organisations or bodies, none of whom will be entitled to vote unless they are Members.

25. Adjournment

25.1 If the persons attending a general meeting within half an hour of the time at which the meeting was due to start do not constitute a quorum, or if during a meeting a quorum ceases to be present, the Meeting Chairman must adjourn it.

25.2 The Meeting Chairman may adjourn a general meeting at which a quorum is present if:

- (a) the meeting consents to an adjournment, or
- (b) it appears to the Meeting Chairman that an adjournment is necessary to protect the safety of any person attending the meeting or ensure that the business of the meeting is conducted in an orderly manner.

25.3 The Meeting Chairman must adjourn a general meeting if directed to do so by the meeting by ordinary resolution.

25.4 When adjourning a general meeting, the Meeting Chairman must:

- (a) either specify the time and place to which it is adjourned or state that it is to continue at a time and place to be fixed by the Steering Group, and
- (b) have regard to any directions as to the time and place of any adjournment which have been given by the meeting.

25.5 If the continuation of an adjourned meeting is to take place more than ten clear Business Days after it was adjourned, the Forum must give at least five clear Business Days' notice of it (that is, excluding the day of the adjourned meeting and the day on which the notice is given):

- (a) to the same persons to whom notice of the Forum's general meetings is required to be given, and
- (b) containing the same information which such notice is required to contain.

25.6 No business may be transacted at an adjourned general meeting which could not properly have been transacted at the meeting if the adjournment had not taken place.

26. VOTING AT GENERAL MEETINGS

27. Voting: general

Subject to the requirement of Article 23.3, any resolution put to the vote of a general meeting shall be decided on a show of hands, other than the election of a Director which shall be decided by a secret ballot.

28. Errors and disputes

28.1 No objection may be raised to the qualification of any person voting at a general meeting except at the meeting or adjourned meeting at which the vote objected to is tendered, and every vote not disallowed at the meeting is valid.

28.2 Any such objection must be referred to the Meeting Chairman whose decision is final.

29. Proxies

29.1 Proxies may only validly be appointed by a notice in writing (a "proxy notice") which:

- (a) states the name and address of the Member appointing the proxy;
- (b) identifies the person appointed to be that Member's proxy and the general meeting in relation to which that person is appointed;
- (c) is signed by or on behalf of the Member appointing the proxy, or is authenticated in such manner as the Steering Group may determine; and
- (d) is delivered to the Forum in accordance with the Articles not less than 48 hours before the time appointed for holding the meeting or adjourned meeting at which the right to vote is to be exercised and in accordance with any instructions contained in the notice of the general meeting (or adjourned meeting) to which they relate,

and a proxy notice which is not delivered in such manner shall be invalid, unless the Steering Group, in their discretion, accept the notice at any time before the meeting.

29.2 The Forum may require proxy notices to be delivered in a particular form, and may specify different forms for different purposes.

29.3 Proxy notices may specify how the proxy appointed under them is to vote (or that the proxy is to abstain from voting) on one or more resolutions.

29.4 Unless a proxy notice indicates otherwise, it must be treated as:

- (a) allowing the person appointed under it as a proxy discretion as to how to vote on any ancillary or procedural resolutions put to the meeting, and
- (b) appointing that person as a proxy in relation to any adjournment of the general meeting to which it relates as well as the meeting itself.

30. Delivery of proxy notices

30.1 A person who is entitled to attend, speak or vote at a general meeting remains so entitled in respect of that meeting or any adjournment of it, even though a valid proxy notice has been delivered to the Forum by or on behalf of that person.

30.2 An appointment under a proxy notice may be revoked by delivering to the Forum a notice in writing given by or on behalf of the person by whom or on whose behalf the proxy notice was given.

30.3 A notice revoking a proxy appointment only takes effect if it is delivered before the start of the meeting or adjourned meeting to which it relates.

30.4 If a proxy notice is not executed by the person appointing the proxy, it must be accompanied by written evidence of the authority of the person who executed it to execute it on the appointor's behalf.

31. Amendments to resolutions

31.1 An ordinary resolution to be proposed at a general meeting may be amended by ordinary resolution if:

- (a) notice of the proposed amendment is given to the Forum in writing by a person entitled to vote at the general meeting at which it is to be proposed not less than 48 hours before the meeting is to take place (or such later time as the Meeting Chairman may determine), and
- (b) the proposed amendment does not, in the reasonable opinion of the Meeting Chairman, materially alter the scope of the resolution.

31.2 A special resolution to be proposed at a general meeting may be amended by ordinary resolution, if:

- (a) the Meeting Chairman proposes the amendment at the general meeting at which the resolution is to be proposed, and
- (b) the amendment does not go beyond what is necessary to correct a grammatical or other non-substantive error in the resolution.

31.3 If the Meeting Chairman, acting in good faith, wrongly decides that an amendment to a resolution is out of order, the Meeting Chairman's error does not invalidate the vote on that resolution.

ADMINISTRATIVE ARRANGEMENTS

32. Means of Communication to be Used

32.1 All correspondence between the Forum and the Members shall be by electronic form.

32.2 Any notice, document or other information shall be deemed served on or delivered to the intended recipient if properly addressed and sent or supplied by electronic form, one hour after the document or information was sent or supplied.

32.3 For the purposes of these Articles, no account shall be taken of any part of a day that is not a Business Day.

32.4 In proving that any notice, document or other information was properly addressed, it shall suffice to show that the notice, document or other information was addressed to an address permitted for the purpose by the Act.

33. Rules

The Steering Group may establish rules governing matters relating to Company administration that are required from time to time for the effective operation of the Forum (for example, the provisions relating to classes of Members, membership fees and subscriptions and the admission criteria for Members). If there is a conflict between the terms of these Articles and any rules established under this Article, the terms of these Articles shall prevail.

34. Bank Account

Cheques and other financial transactions of the Forum shall require the signature of any two of the Chair, the Vice Chair, the Secretary and the Treasurer.

35. Indemnity and Insurance

35.1 Subject to Article 35.2, but without prejudice to any indemnity to which a relevant officer is otherwise entitled:

- (a) each relevant officer shall be indemnified out of the Forum's assets against all costs, charges, losses, expenses and liabilities incurred by them as a relevant officer in the actual or purported execution and/or discharge of their duties, or in relation to them including (in each case) any liability incurred by them in defending any civil or criminal proceedings, in which judgment is given in their favour or in which they are acquitted or the proceedings are otherwise disposed of without any finding or admission of any material breach of duty on their part or in connection with any application in which the court grants them, in their capacity as a relevant officer, relief from liability for negligence, default, breach of duty or breach of trust in relation to the Forum's (or any associated company's) affairs; and
- (b) the Forum may provide any relevant officer with funds to meet expenditure incurred or to be incurred by them in connection with any proceedings or application referred to in Article 35.1 (a) and otherwise may take any action to enable any such relevant officer to avoid incurring such expenditure.

35.2 This Article does not authorise any indemnity to the extent that such indemnity would be prohibited or rendered void by any provision of the Companies Acts or by any other provision of law and any such indemnity is limited accordingly.

35.3 The Steering Group may decide to purchase and maintain insurance, at the expense of the Forum, for the benefit of any relevant officer in respect of any relevant loss.

35.4 In this Article:

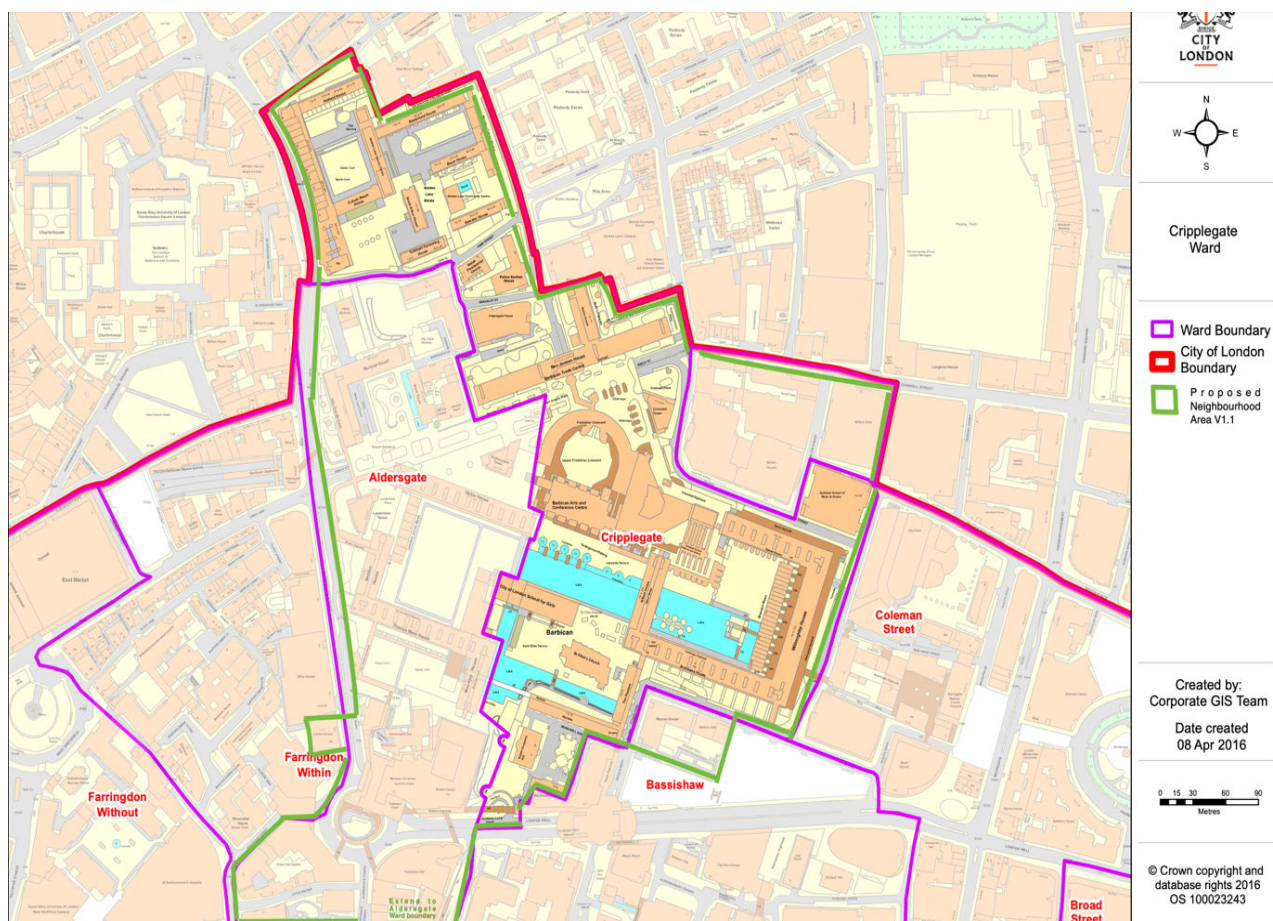
- (a) companies are associated if one is a subsidiary of the other or both are subsidiaries of the same body corporate; and
- (b) a "relevant loss" means any loss or liability which has been or may be incurred by a relevant officer in connection with that relevant officer's duties or powers in relation to the Forum, any associated company or any pension fund or employees' share scheme of the Forum or associated company; and
- (c) a "relevant officer" means any Director or other officer of the Forum but excluding in each case any person engaged by the Forum (or associated company) as auditor (whether or not they are also a Director or other officer), to the extent they act in their capacity as auditor)

36. Winding Up

On the winding-up or dissolution of the Forum, any assets or property that remains available to be distributed or paid to the Members shall be paid or distributed to local community-based organisations, as agreed by the majority of the Members at the time of winding-up or dissolution.

ANNEX
The Barbican and Golden Lane Neighbourhood Area

BARBICAN AND GOLDEN LANE NEIGHBOURHOOD FORUM AREA



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Barbican and Golden Lane Forum and Area Commonplace Comments

Part 2 of 2

date	We want your views on the proposed neighbourhood forum.	We want your views on the proposed neighbourhood area.
2023-05-22T14:06:56.992Z	I support this initiative and applaud those who have got the application to this stage. There is obviously a lot more to be done, and one area that I believe needs further clarification is the criteria for Business and Community Group Members.	-
2023-05-22T12:05:53.806Z	Support the creation of a neighbourhood forum. In the execution of the view that creation of appropriate and balanced governance structures are critical to ensure voices are heard in an unbiased and balanced manner and this should be a key focus for the next stage.	One important comment on the boundary. I propose that the boundary in Moor Lane run to the pavement rather than down the middle of the road. This is because Moor Lane is a quiet cycle lane, is about to be greened as part of neighbourhood greening and wellbeing and hence there is a strong argument to include the road and pavement in the boundary.
2023-05-22T08:43:55.181Z	-	[REDACTED]
2023-05-22T08:32:36.046Z	I welcome this initiative	-
2023-05-21T17:40:28.027Z	I fully support the proposal for a Neighbourhood Forum.	I support the proposed area.
2023-05-21T11:41:03.264Z	I agree with the proposal which is long overdue	I agree with this proposal extending as marked on the map but within the City of London boundaries.
2023-05-21T07:30:20.724Z	It is a great development for the area. Completely support.	The proposed neighbourhood area looks appropriate. I'm glad that residents in blocks neighbouring the Barbican and Golden lane estates are included as they are part of our community. Completely support.
2023-05-21T02:44:38.526Z	This is a brilliant idea. It's high time the residents of the City of London had some recognition and this will help.	It seems entirely sensible. All those within this area share the same interest in maintaining and improving quality of life.

<p>2023-05-20T06:22:20.359Z</p>	<p>This is an excellent idea and long overdue . The Barbican and Golden Lane estates were originally conceived as an oasis in the heart of the city to encourage people to come back and move where they work . In the last 38 years during which weâ€™ve lived here weâ€™ve seen the interests and needs of such residents increasingly ignored by the City planners in every area. We donâ€™t have a coherent and a constructive voice to promote the benefits of having a vibrant residential community in the heart of the City and this will help to provide this</p>	<p>Itâ€™s a great idea to develop a coherent and long term plan for residential areas in the heart of the business community which balances the needs and interests of both communities and provides a useful touchstone for those making planning applications from both. Relations between residents and the City have become quite toxic over the last few years and it is time to engage in constructive debate and create a helpful set of principles to facilitate further consultation and decisionmaking on critical issues such as traffic management, environmental matters and of course development .</p>
<p>2023-05-19T18:24:48.649Z</p>	<p>I support the formation of the Neighbourhood Forum. The constitution document is, however, vague (to the point of silence) as to how its activities will be financed. Presumably the instigators know that a grant for neighbourhood planning expenses is available from Locality. For example, no membership fee is proposed (probably rightly). I wonder whether the option was considered of forming a civil parish within the City, with universal suffrage and elected parish councillors rather than directors, and with the civil parish area forming the neighbourhood plan area, and with a council tax precept financing the parish council (including a paid parish clerk).</p>	<p>1. The City's draft plan also sees residential development at 'Smithfield'; it might be a good idea to include the rest of the Farringdon Within ward (Barts Square etc) in the neighbourhood area, as this is hard by the Barbican and includes Barbican tube station. In particular, buildings/developments on the west side of Aldersgate St have a huge impact on the Barbican environment, and so it would be beneficial to have neighbourhood plan policies that covered that location.</p> <p>2. Similarly the eastern end of the Barbican is heavily affected by buildings/development on the eastern side of Moor Lane and in the vicinity of London Wall Place. I would like to see the neighbourhood plan area extended south to London Wall (where it doesn't currently reach there), and east to Moorfields or even Moorgate. After all, the Culture Mile trail extends east to Moorgate Station, which is also the premier transport interchange for the Barbican.</p>

2023-05-19T17:53:44.385Z	A good idea if this can give more voice to residents in the City.	<p>As a Barbican resident I think the area should be expanded to include Barts Square and Bartholomew Close as residents there will also be affected by significant changes that are on the horizon.</p> <p>With the opening of the London Museum in West Smithfield and the development of the meat market once it moves, the 'culture mile' corridor from the new museum to the Elizabeth Line station entrance in Long Lane and to the Barbican needs to be considered as a whole. It appears that not much thought has been given to movement of people and traffic across this area.</p>
2023-05-19T17:29:38.876Z	It looks well conceived and likely to be very helpful.	This area makes a huge amount of sense given the location of residential buildings and community assets such as churches and open spaces.
2023-05-19T16:39:50.497Z	I am supportive of the forum because it builds on existing good community organisations representing individual local buildings.	I support the proposed area because it reads logically as a neighbourhood. It includes buildings and blocks that have a genuine community and feeling of being a mutually shared place.
2023-05-19T15:48:24.837Z	Neighbourhood Plans are effective at putting the voices of communities into planning law and community initiatives - so I support this.	The area makes sense - it will always seem somewhat arbitrary - but it is centres on the Barbican.
2023-05-19T10:05:19.794Z	It is my view that this is an excellent idea. The proposed area is coherent, has a wide range of planning needs and will benefit from a well-coordinated approach.	The proposed neighbourhood area is logical and relevant to the needs of this community.
2023-05-18T14:37:51.316Z	Its a good idea	Looks about right
2023-05-18T06:44:06.581Z	A good idea if it includes both positive and negative requests	To increase the amount if local neighbourhood facilities. Lots of empty shops that could provide services for community. Farmers food market on a weekend - not just supermarket stuff.
2023-05-17T18:36:13.230Z	Opposed. No need for it. Barbican and Golden Lane have their own separate associations.	No need for it. Barbican and Golden Lane should be considered separately.
2023-05-17T09:33:51.328Z	I support the formation of a Neighbourhood Forum. As a resident I support any initiative which promotes collaboration between the residential and working population of the City of London and the Planning authorities.	The neighbourhood area looks exactly right. I support the inclusion of the green spaces in the area, including Postman's park and the Barbican Wildlife Garden.

2023-05-16T18:43:46.025Z	Yes, this is an excellent idea.	-
2023-05-15T19:55:51.272Z	<p>The creation of a Neighbourhood Forum is important to collate and represent the views of the people living in the Barbican and Golden Lane Estates along with adjoining buildings.</p> <p>The residential area is very special because of its location - but that also leads to particular pressures being put upon it when the needs of residents are up against corporate interests.</p> <p>Without these residential areas the City of London would lose an important part of its character and ability the culture and visitors which enrich it. So it is important that the needs of the residents can be represented coherently and appropriately in local development and planning matters.</p>	I agree with the proposed neighbourhood area
2023-05-15T18:47:45.415Z	<p>It is high-time the community took advantage of the legislation to afford it a statutory voice in the future of their neighbourhood.</p> <p>More information on the emerging forum can be found on their recently launched website- https://bglneighbours.wordpress.com</p>	The proposed area follows the City of London wards of Cripplegate and Aldersgate with a few residential blocks added. These wards are predominantly residential and have a thriving local community.
2023-05-15T12:50:58.108Z	I am a Barbican resident and support establishment of a neighbourhood forum.	I am a Barbican resident and support establishment of a neighbourhood area encompassing the Barbican and Golden Lane Estates.
2023-05-15T10:39:09.310Z	Why not?	To whom would its members be accountable? How would they be elected/appointed? What would they do?
2023-05-14T16:16:37.380Z	I enthusiastically support the creation of the Neighbourhood Forum for this amazing place in which to both live and work and believe that the forum will do much to bring diverse people and institutions together to co-create a positive and imaginative shared future that benefits us all.	-

<p>2023-05-14T12:10:49.594Z</p>	<p>I support this. Sounds like a great idea and surprising we don't have one already in line with other London boroughs & counties. It makes you wonder under legislation what else we don't have here that we have a right to. I hope this forum has more weight and does not become yet another exclusive working group. How quickly can this be up and running?</p>	<p>Can the Forum be renamed? eg North City Neighbourhood Forum. There are residential areas which are not part of either estate in the green area eg bridgewater house, Denizen, Tudor rose court. Naming a Forum to be inclusive of all residents is key to the inclusion of voices to feel they are allowed to participate. Or if the area is marked by Cripplegate & Aldersgate Ward to be named as such, eg Cripplegate & Aldersgate neighbourhood forum.</p> <p>Can the green boundary be extended to the west to include the developments in Barts square?</p> <p>How will it be clear to public this is different to the existing NHS Neighbourhood forums, of eg City & Shoreditch Park Neighbourhood forum. https://cityandhackneyneighbourhoods.org.uk/</p>
<p>2023-05-14T11:52:54.740Z</p>	<p>I strongly support the setting up of the Forum, for the proposed Neighbourhood area. It will provide a strong vehicle for the voices of those who live and work in the area and provide a forum for proactive engagement in local planning (rather than simply reactive)</p>	<p>The area makes sense as a discrete coherent neighbourhood within the City's wider "key area of change" Barbican and Smithfield outlined in the emerging Local Plan. It will help keep the neighbourhood's distinctiveness as a residential and cultural area within the City. It recognises the biggest cluster of residences within the City.</p> <p>Can't see any point in extending it to Islington, which is a much more residential borough anyway and doesn't have the same geographically tight relationship between residences and cultural establishments</p>
<p>2023-05-14T10:35:53.340Z</p>	<p>It is a really good idea and has clear benefits for the local area.</p>	<p>The boundary includes all of the main residential areas in close proximity to the Barbican and Golden Lane Estates - an excellent inclusive approach. It is best not to include those areas that lie within Islington as liaising across 2 local authorities would be complicated and very difficult.</p>

2023-05-14T10:30:14.355Z	I strongly support this proposal, The area fo the forum has a rich and diverse body of stakeholders who are interested in working collaboratively to enhance all aspects of the area. I would personally feel more involved once this exists	This area already has some cohesion and thus stands as an area but with strong links to the rest of the City and surrounding areas. As an ex planner I have engaged where I felt I could add value but this would enhance that ability
2023-05-14T08:22:26.368Z	This is an excellent proposal that stands to support change towards a strong future residential element so fundamental to a great historical city such that the City of London is. Particularly at the time of great change that is upon us: not only the catastrophic impact of global warming and the collapse of non-human species, but the advent of artificial intelligence that will largely eliminate jobs in financial services, universities, and other intellectual-based service roles where humans simply cannot compete (as calculators were to doing arithmetic, AI is to doing intellectual work). At this time we need to shift to people focussed representation that guides us as to how this great city will look and function for residents in the future.	
2023-05-13T20:18:01.261Z	I think it is a good idea	Seems fine

2023-05-13T19:04:18.745Z	<p>Hello, first I have some questions:</p> <ol style="list-style-type: none"> 1. Who decided to launch this project? 2. Who chose the people to approach to become the first members? 3. Who appointed or chose the steering group members? <p>And who are all these two sets of people as I only know two individuals from among them.</p> <ol style="list-style-type: none"> 3. What activities for this forum do these two groups propose to take up, who will decide which ones to accept and carry out, and which ones to reject, and who will carry out the accepted ones? 4. What role(s) do the rest of us have in this picture? <p>This long, detailed text says almost nothing about "what change do we want to bring about" and "what improvements do we want to implement", and "who will be in charge of implementing them and "who will carry them out", and "how will they be funded and managed". With these answers, I would hope to be able to form an opinion.</p>	My questions above need to be answered first, sorry.
2023-05-13T16:19:13.071Z	I think is a great idea and fully support it's establishment as soon as possible	-
2023-05-13T15:21:51.419Z	I think it's a great idea and about time the City had a neighbourhood forum within its boundaries	This makes sense. It is our neighbourhood and contains the majority of the City's residential population, a lot of SMEs, community groups and others. It covers Cripplegate and Aldersgate wards.
2023-05-13T15:16:05.252Z	Yes definitely. It is important that Barbican and Golden Lane residents can present their views.	Excellent idea - fully supportive
2023-05-13T15:11:21.864Z	-	An interesting idea, but if it is to include the life of those who live around here, should it look to include all the new flats behind Barts, to the south of Long Lane

2023-05-13T10:50:29.206Z	<p>compared to the large numbers who reside in the area, they are not representative of the vast majority who live in the area. The mention of somebody in Little Britain also perhaps explains the strange shape of the proposed area, extending south-west to include Little Britain and also many business premises. Also the area to the north-east covers building.</p> <p>There are already enough groups representing residents in these areas, and even those existing ones are in a minority. I lived for 10 years in the Barbican so I know the area well, and now reside in another residential property in the City of London, which also has a resident's committee consisting of a small percentage of the residents, most who are unaware of it's existence.</p> <p>Better would be the City Of London to judge planning application properly and take note of umpteen resident complaints and facts. One example being 150 Aldersgate where a report wrongly stated there would be no loss of natural light if the balconies/fire escapes were ignored. No more automatic rubber-stamping of all new developments, particularly office, and high-end residential.</p>	-
2023-05-12T16:47:28.128Z	It sounds like a very good idea.	Combining the areas of Barbican and Golden Lane makes sense.
2023-05-12T14:34:45.874Z	The proposed area contains a large proportion of non-residential spaces such as schools, offices, arts, and businesses. It is not clear that this in an appropriate forum in which to address the needs of these stakeholders as well as residents.	-
2023-05-11T18:31:08.292Z	This is a sound proposal that will give a stronger voice to the local community.	-

2023-05-10T14:33:09.474Z	I think this is a good idea coming just as we move to the new era of recycling, renovating, retrofitting and conserving nature in our neighbourhoods. I would only say I think that the park just east of and next to Golden Lane and the primary school both have an important function for this neighbourhood that should somehow get reflected even if outside the area. Could the head teacher add comments for example? And people comment on how they use the little park - it is a useful cut through route for example.	See the comment above re the Plan content being used to also reflect on things of local importance just outside the area.
2023-05-10T12:59:26.091Z	I support the proposed forum.	This is the wrong area to achieve the stated purposes. London Wall is the natural Southern boundary. The legislation specifically provides for neighbourhood areas to span local authority boundaries. The Northern boundary should include Prior Weston school, Cherry Tree Walk and adjacent offices.
2023-05-10T07:11:01.490Z	The Worshipful Company of Plaisterers Hall falls within this proposed area. We would wish to understand the implications of being within this area as they pertain to running a busy Hall that is rented out. We would also wish to understand the reason for the SW boundary goes south of London Wall.	-

2023-05-09T18:35:10.973Z	<p>I generally support the proposal, which will go a small way to mitigating the democratic deficit for residents of the City of London, which is overwhelmingly governed by representatives with a large business mandate. I am aware that the SMEs and residents in this neighbourhood have more in common with each other than either have with the large and multinational businesses that predominate in the rest of the City.</p> <p>The Neighbourhood Forum is timely as the proposals for the Culture Mile BID have set an aspiration to increase by a step change the visitor footfall in the area. Whilst the regeneration dividend of Culture Mile is potentially of great value to residents and local businesses, there is also a risk that establishing a national visitor destination on our doorstep will have dis-benefits for residents and certain categories of small business if it not carefully planned and managed. A forum anchored in the neighbourhood could be an important balance in policy and implementation of the Culture Mile, to avoid conflicts that have arisen elsewhere with central London destinations with high residential populations (e.g. Covent Garden, Shoreditch, Fitzrovia).</p>	<p>I am not clear why the residential pockets around St Bartholemew the Great church have been excluded whilst those in Little Britain have been included. Other excluded pockets of primarily residential property (most with SME uses on the ground floor) are along Aldersgate Street and Long Lane. I consider these should be included too to engage both residents and SMEs. These areas as also a part of the setting for the large scale cityscapes of the Barbican and Golden Lane estates. These areas (and those already included) have more in common with each other than either have with the rest of the Square Mile.</p>
2023-05-09T17:53:32.424Z	I	-
2023-05-09T15:25:08.163Z	-	In general the boundary seems sensible, though it seems odd that Alban Gate is not included
2023-05-09T15:11:03.463Z	-	Why are only some properties, across roads from the estates, included in the proposed area?
2023-05-09T09:22:30.698Z	The proposal is sound and reflects the commitment of local residents to shaping their neighborhood as real place.	-
2023-05-09T09:17:32.512Z	It sounds cohesive, relevant, and ticking all the bureaucratic boxes. A good way to foreground residents voices.	It appears to incorporate all the relevant sub-communities.

2023-05-09T09:11:19.382Z	-	I am in support of any effort to empower residents to influence their material environment. My Quaker Meeting is located nearby and we find the gross high-rise intrusions of buildings in the City and in our area of Islington (City Road & Old Street roundabout) ominously threatening, odious.
2023-05-29T16:15:17.019Z	This seems a sensible way of allowing local views to be heard from the residents and small businesses in an important and vibrant area. The current arrangements have until this proposal appeared to discount and undervalue such views.	The area is closely linked and includes a significant proportion of the residential accommodation in the City of London
2023-05-29T00:56:18.966Z	Great idea. Democratic input from people living/working within the neighbourhood makes complete sense.	It seems to be inclusive enough
2023-05-28T21:28:17.947Z	The area residents should have a voice. I support this idea	Yes
2023-05-28T16:45:57.187Z	I	-
2023-05-28T15:56:49.915Z	As a local councillor for Aldersgate, I support the application. I am not clear whether the Forum would input to the City Police Barbican Cluster liaison, but would encourage that - if relevant.	-
2023-05-28T14:16:49.826Z	I am very supportive of the proposal in order to have a say in planning decisions and greater influence on CIL funding outcomes. In 2022 Shakespeare Tower House Group applied for CIL funding to support its efforts of refurbishing its lobby, which is part of the historic fabric of the Barbican. Sadly it was rejected which is doubly disappointing considering that the CIL pot was heavily underutilised and was often used for less deserving initiatives. With the Barbican Podium Works, Beech Street Zero Emission Zone and Barbican Renewal Projects all underway, it is crucial that local residents can better voice their concerns and participate in the planning and decision making process.	Consideration could be given to include neighbouring areas all the way to Farringdon/Smithfield (e.g. Barts Square) to improve the collective bargaining power.
2023-05-28T09:21:23.829Z	It's a great idea and I completely support setting up this forum. The community is very strong here and we would value representation and a voice	-

2023-05-27T16:38:27.035Z	What is the purpose and/or benefit(s) of this further body?	-
2023-05-27T10:40:36.564Z	I fully support this application. I am a resident living in Stanley Cohen House, with links with friends in the Barbican Estate and Cloth Fair as well as my immediate neighbours here on the Golden Lane Estate	-
2023-05-27T07:59:52.275Z	I fully support the proposed neighbourhood forum as a way for the residents and workers in this area to have more of a voice in the vision for our area and how CIL money is spent in our neighbourhood.	I agree with the proposed area which aligns with City of London boundaries and takes in both major residential complexes.
2023-05-27T07:58:16.729Z	I strongly support this proposal which will have significant benefits for the people living in the area.	The area appears relevant and proportionate.
2023-05-26T12:27:11.006Z	I think this is an excellent initiative for a cohesive community to have a statutory voice in the future of their neighbourhoods. Residents' associations don't have this and it is long overdue. Neighbourhood forums have been around since 2011/12. The fact that the City is a one of 8 neighbourhood deserts speaks volumes. This has my full support.	I think this is an excellent initiative for a cohesive community to have a statutory voice in the future of their neighbourhoods. Residents' associations don't have this and it is long overdue. Neighbourhood forums have been around since 2011/12. The fact that the City is a one of 8 neighbourhood deserts speaks volumes. This has my full support.
2023-05-25T13:07:55.032Z	I support the application in relation to both the creation of a neighbourhood area and forum.	I support the application in relation to both the creation of a neighbourhood area and forum.
2023-05-25T13:02:51.336Z	This is a good idea. The Corporation needs to listen to its residents.	Exclude the offices to the South East of the London Wall roundabout.
2023-05-25T08:38:13.494Z	I fully support the proposed Neighbourhood Forum.	The boundary strikes a good balance between commercial/office and residential development.
2023-05-25T08:14:46.728Z	I fully support the proposed forum. We need to find a way to strengthen our local community and give it a more active voice that the City of London will listen to in all areas of activity, regulation, development and expenditure that affect our lives.	This is a vibrant local area with a wonderfully diverse mix of residents and to recognise it as a neighbourhood area will only strengthen the community. Bringing together Golden Lane and the Barbican in this way is eminently sensible and I hope will be the beginning of a process that local residents feel invested in and will contribute to.
2023-05-25T07:46:41.505Z	I am in favour of this.	I agree with the proposal.

2023-05-25T07:43:39.483Z	-	All residential of course except for the area of office blocks south east of Museum of London?
2023-05-23T13:35:58.042Z	try it for a period, say 2 years, and then assess its value objectively.	a good concept
2023-05-22T18:03:37.122Z	I am in favour	I agree with one caveat. The boundary along Moor Lane should include both the road and the pavement along the East side. The move toward greater greening of the neighbourhood should be encouraged; extending the boundary to include the pavement would allow the neighbourhood to fully embrace this objective.
2023-05-22T16:44:24.935Z	Seems a good idea for an area where the corporation tends not to take the interests of residents as seriously as those of businesses	Seems logical given the focus of residential development in this area
2023-05-22T14:06:56.992Z	I support this initiative and applaud those who have got the application to this stage. There is obviously a lot more to be done, and one area that I believe needs further clarification is the criteria for Business and Community Group Members.	-
2023-05-22T08:43:55.181Z	Support the creation of a neighbourhood	One important comment on the boundary.
2023-05-22T08:32:36.046Z	-	*****
2023-05-21T17:40:28.027Z	I welcome this initiative	-
2023-05-21T11:41:03.264Z	I fully support the proposal for a Neighbourhood Forum.	I support the proposed area.
2023-05-21T07:30:20.724Z	I agree with the proposal which is long overdue	I agree with this proposal extending as marked on the map but within the City of London boundaries.
2023-05-21T02:44:38.526Z	It is a great development for the area. Completely support.	The proposed neighbourhood area looks appropriate. I'm glad that residents in blocks neighbouring the Barbican and Golden lane estates are included as they are part of our community. Completely support.
2023-05-21T02:44:38.526Z	This is a brilliant idea. It's high time the residents of the City of London had some recognition and this will help.	It seems entirely sensible. All those within this area share the same interest in maintaining and improving quality of life.

<p>2023-05-20T06:22:20.359Z</p>	<p>This is an excellent idea and long overdue . The Barbican and Golden Lane estates were originally conceived as an oasis in the heart of the city to encourage people to come back and move where they work . In the last 38 years during which weâ€™ve lived here weâ€™ve seen the interests and needs of such residents increasingly ignored by the City planners in every area. We donâ€™t have a coherent and a constructive voice to promote the benefits of having a vibrant residential community in the heart of the City and this will help to provide this</p>	<p>Itâ€™s a great idea to develop a coherent and long term plan for residential areas in the heart of the business community which balances the needs and interests of both communities and provides a useful touchstone for those making planning applications from both. Relations between residents and the City have become quite toxic over the last few years and it is time to engage in constructive debate and create a helpful set of principles to facilitate further consultation and decisionmaking on critical issues such as traffic management, environmental matters and of course development .</p>
<p>2023-05-19T18:24:48.649Z</p>	<p>I support the formation of the Neighbourhood Forum. The constitution document is, however, vague (to the point of silence) as to how its activities will be financed. Presumably the instigators know that a grant for neighbourhood planning expenses is available from Locality. For example, no membership fee is proposed (probably rightly). I wonder whether the option was considered of forming a civil parish within the City, with universal suffrage and elected parish councillors rather than directors, and with the civil parish area forming the neighbourhood plan area, and with a council tax precept financing the parish council (including a paid parish clerk).</p>	<ol style="list-style-type: none"> 1. The City's draft plan also sees residential development at 'Smithfield'; it might be a good idea to include the rest of the Farringdon Within ward (Barts Square etc) in the neighbourhood area, as this is hard by the Barbican and includes Barbican tube station. In particular, buildings/developments on the west side of Aldersgate St have a huge impact on the Barbican environment, and so it would be beneficial to have neighbourhood plan policies that covered that location. 2. Similarly the eastern end of the Barbican is heavily affected by buildings/development on the eastern side of Moor Lane and in the vicinity of London Wall Place. I would like to see the neighbourhood plan area extended south to London Wall (where it doesn't currently reach there), and east to Moorfields or even Moorgate. After all, the Culture Mile trail extends east to Moorgate Station, which is also the premier transport interchange for the Barbican.

2023-05-19T17:53:44.385Z	A good idea if this can give more voice to residents in the City.	<p>As a Barbican resident I think the area should be expanded to include Barts Square and Bartholomew Close as residents there will also be affected by significant changes that are on the horizon.</p> <p>With the opening of the London Museum in West Smithfield and the development of the meat market once it moves, the 'culture mile' corridor from the new museum to the Elizabeth Line station entrance in Long Lane and to the Barbican needs to be considered as a whole. It appears that not much thought has been given to movement of people and traffic across this area.</p>
2023-05-19T17:29:38.876Z	It looks well conceived and likely to be very helpful.	This area makes a huge amount of sense given the location of residential buildings and community assets such as churches and open spaces.
2023-05-19T16:39:50.497Z	I am supportive of the forum because it builds on existing good community organisations representing individual local buildings.	I support the proposed area because it reads logically as a neighbourhood. It includes buildings and blocks that have a genuine community and feeling of being a mutually shared place.
2023-05-19T15:48:24.837Z	Neighbourhood Plans are effective at putting the voices of communities into planning law and community initiatives - so I support this.	The area makes sense - it will always seem somewhat arbitrary - but it is centres on the Barbican.
2023-05-19T10:05:19.794Z	It is my view that this is an excellent idea. The proposed area is coherent, has a wide range of planning needs and will benefit from a well-coordinated approach.	The proposed neighbourhood area is logical and relevant to the needs of this community.
2023-05-18T14:37:51.316Z	Its a good idea	Looks about right
2023-05-18T06:44:06.581Z	A good idea if it includes both positive and negative requests	To increase the amount if local neighbourhood facilities. Lots of empty shops that could provide services for community. Farmers food market on a weekend - not just supermarket stuff.
2023-05-17T18:36:13.230Z	Opposed. No need for it. Barbican and Golden Lane have their own separate associations.	No need for it. Barbican and Golden Lane should be considered separately.
2023-05-17T09:33:51.328Z	I support the formation of a Neighbourhood Forum. As a resident I support any initiative which promotes collaboration between the residential and working population of the City of London and the Planning authorities.	The neighbourhood area looks exactly right. I support the inclusion of the green spaces in the area, including Postman's park and the Barbican Wildlife Garden.

2023-05-16T18:43:46.025Z	Yes, this is an excellent idea.	-
2023-05-15T19:55:51.272Z	<p>The creation of a Neighbourhood Forum is important to collate and represent the views of the people living in the Barbican and Golden Lane Estates along with adjoining buildings.</p> <p>The residential area is very special because of its location - but that also leads to particular pressures being put upon it when the needs of residents are up against corporate interests.</p> <p>Without these residential areas the City of London would lose an important part of its character and ability the culture and visitors which enrich it. So it is important that the needs of the residents can be represented coherently and appropriately in local development and planning matters.</p>	I agree with the proposed neighbourhood area
2023-05-15T18:47:45.415Z	<p>It is high-time the community took advantage of the legislation to afford it a statutory voice in the future of their neighbourhood.</p> <p>More information on the emerging forum can be found on their recently launched website- https://bglneighbours.wordpress.com</p>	The proposed area follows the City of London wards of Cripplegate and Aldersgate with a few residential blocks added. These wards are predominantly residential and have a thriving local community.
2023-05-15T12:50:58.108Z	I am a Barbican resident and support establishment of a neighbourhood forum.	I am a Barbican resident and support establishment of a neighbourhood area encompassing the Barbican and Golden Lane Estates.
2023-05-15T10:39:09.310Z	Why not?	To whom would its members be accountable? How would they be elected/appointed? What would they do?
2023-05-14T16:16:37.380Z	I enthusiastically support the creation of the Neighbourhood Forum for this amazing place in which to both live and work and believe that the forum will do much to bring diverse people and institutions together to co-create a positive and imaginative shared future that benefits us all.	-

<p>2023-05-14T12:10:49.594Z</p>	<p>I support this. Sounds like a great idea and surprising we don't have one already in line with other London boroughs & counties. It makes you wonder under legislation what else we don't have here that we have a right to. I hope this forum has more weight and does not become yet another exclusive working group. How quickly can this be up and running?</p>	<p>Can the Forum be renamed? eg North City Neighbourhood Forum. There are residential areas which are not part of either estate in the green area eg bridgewater house, Denizen, Tudor rose court. Naming a Forum to be inclusive of all residents is key to the inclusion of voices to feel they are allowed to participate. Or if the area is marked by Cripplegate & Aldersgate Ward to be named as such, eg Cripplegate & Aldersgate neighbourhood forum.</p> <p>Can the green boundary be extended to the west to include the developments in Barts square?</p> <p>How will it be clear to public this is different to the existing NHS Neighbourhood forums, of eg City & Shoreditch Park Neighbourhood forum. https://cityandhackneyneighbourhoods.org.uk/</p>
<p>2023-05-14T11:52:54.740Z</p>	<p>I strongly support the setting up of the Forum, for the proposed Neighbourhood area. It will provide a strong vehicle for the voices of those who live and work in the area and provide a forum for proactive engagement in local planning (rather than simply reactive)</p>	<p>The area makes sense as a discrete coherent neighbourhood within the City's wider "key area of change" Barbican and Smithfield outlined in the emerging Local Plan. It will help keep the neighbourhood's distinctiveness as a residential and cultural area within the City. It recognises the biggest cluster of residences within the City.</p> <p>Can't see any point in extending it to Islington, which is a much more residential borough anyway and doesn't have the same geographically tight relationship between residences and cultural establishments</p>
<p>2023-05-14T10:35:53.340Z</p>	<p>It is a really good idea and has clear benefits for the local area.</p>	<p>The boundary includes all of the main residential areas in close proximity to the Barbican and Golden Lane Estates - an excellent inclusive approach. It is best not to include those areas that lie within Islington as liaising across 2 local authorities would be complicated and very difficult.</p>

2023-05-14T10:30:14.355Z	I strongly support this proposal, The area fo the forum has a rich and diverse body of stakeholders who are interested in working collaboratively to enhance all aspects of the area. I would personally feel more involved once this exists	This area already has some cohesion and thus stands as an area but with strong links to the rest of the City and surrounding areas. As an ex planner I have engaged where I felt I could add value but this would enhance that ability
2023-05-14T08:22:26.368Z	This is an excellent proposal that stands to support change towards a strong future residential element so fundamental to a great historical city such that the City of London is. Particularly at the time of great change that is upon us: not only the catastrophic impact of global warming and the collapse of non-human species, but the advent of artificial intelligence that will largely eliminate jobs in financial services, universities, and other intellectual-based service roles where humans simply cannot compete (as calculators were to doing arithmetic, AI is to doing intellectual work). At this time we need to shift to people focussed representation that guides us as to how this great city will look and function for residents in the future.	
2023-05-13T20:18:01.261Z	I think it is a good idea	Seems fine

2023-05-13T19:04:18.745Z	<p>Hello, first I have some questions:</p> <ol style="list-style-type: none"> 1. Who decided to launch this project? 2. Who chose the people to approach to become the first members? 3. Who appointed or chose the steering group members? <p>And who are all these two sets of people as I only know two individuals from among them.</p> <ol style="list-style-type: none"> 3. What activities for this forum do these two groups propose to take up, who will decide which ones to accept and carry out, and which ones to reject, and who will carry out the accepted ones? 4. What role(s) do the rest of us have in this picture? <p>This long, detailed text says almost nothing about "what change do we want to bring about" and "what improvements do we want to implement", and "who will be in charge of implementing them and "who will carry them out", and "how will they be funded and managed". With these answers, I would hope to be able to form an opinion.</p>	My questions above need to be answered first, sorry.
2023-05-13T16:19:13.071Z	I think is a great idea and fully support it's establishment as soon as possible	-
2023-05-13T15:21:51.419Z	I think it's a great idea and about time the City had a neighbourhood forum within its boundaries	This makes sense. It is our neighbourhood and contains the majority of the City's residential population, a lot of SMEs, community groups and others. It covers Cripplegate and Aldersgate wards.
2023-05-13T15:16:05.252Z	Yes definitely. It is important that Barbican and Golden Lane residents can present their views.	Excellent idea - fully supportive
2023-05-13T15:11:21.864Z	-	An interesting idea, but if it is to include the life of those who live around here, should it look to include all the new flats behind Barts, to the south of Long Lane

2023-05-13T10:50:29.206Z	<p>compared to the large numbers who reside in the area, they are not representative of the vast majority who live in the area. The mention of somebody in Little Britain also perhaps explains the strange shape of the proposed area, extending south-west to include Little Britain and also many business premises. Also the area to the north-east covers building.</p> <p>There are already enough groups representing residents in these areas, and even those existing ones are in a minority. I lived for 10 years in the Barbican so I know the area well, and now reside in another residential property in the City of London, which also has a resident's committee consisting of a small percentage of the residents, most who are unaware of it's existence.</p> <p>Better would be the City Of London to judge planning application properly and take note of umpteen resident complaints and facts. One example being 150 Aldersgate where a report wrongly stated there would be no loss of natural light if the balconies/fire escapes were ignored. No more automatic rubber-stamping of all new developments, particularly office, and high-end residential.</p>	-
2023-05-12T16:47:28.128Z	It sounds like a very good idea.	Combining the areas of Barbican and Golden Lane makes sense.
2023-05-12T14:34:45.874Z	The proposed area contains a large proportion of non-residential spaces such as schools, offices, arts, and businesses. It is not clear that this in an appropriate forum in which to address the needs of these stakeholders as well as residents.	-
2023-05-11T18:31:08.292Z	This is a sound proposal that will give a stronger voice to the local community.	-

2023-05-10T14:33:09.474Z	I think this is a good idea coming just as we move to the new era of recycling, renovating, retrofitting and conserving nature in our neighbourhoods. I would only say I think that the park just east of and next to Golden Lane and the primary school both have an important function for this neighbourhood that should somehow get reflected even if outside the area. Could the head teacher add comments for example? And people comment on how they use the little park - it is a useful cut through route for example.	See the comment above re the Plan content being used to also reflect on things of local importance just outside the area.
2023-05-10T12:59:26.091Z	I support the proposed forum.	This is the wrong area to achieve the stated purposes. London Wall is the natural Southern boundary. The legislation specifically provides for neighbourhood areas to span local authority boundaries. The Northern boundary should include Prior Weston school, Cherry Tree Walk and adjacent offices.
2023-05-10T07:11:01.490Z	The Worshipful Company of Plaisterers Hall falls within this proposed area. We would wish to understand the implications of being within this area as they pertain to running a busy Hall that is rented out. We would also wish to understand the reason for the SW boundary goes south of London Wall.	-

2023-05-09T18:35:10.973Z	<p>I generally support the proposal, which will go a small way to mitigating the democratic deficit for residents of the City of London, which is overwhelmingly governed by representatives with a large business mandate. I am aware that the SMEs and residents in this neighbourhood have more in common with each other than either have with the large and multinational businesses that predominate in the rest of the City.</p> <p>The Neighbourhood Forum is timely as the proposals for the Culture Mile BID have set an aspiration to increase by a step change the visitor footfall in the area. Whilst the regeneration dividend of Culture Mile is potentially of great value to residents and local businesses, there is also a risk that establishing a national visitor destination on our doorstep will have dis-benefits for residents and certain categories of small business if it not carefully planned and managed. A forum anchored in the neighbourhood could be an important balance in policy and implementation of the Culture Mile, to avoid conflicts that have arisen elsewhere with central London destinations with high residential populations (e.g. Covent Garden, Shoreditch, Fitzrovia).</p>	<p>I am not clear why the residential pockets around St Bartholemew the Great church have been excluded whilst those in Little Britain have been included. Other excluded pockets of primarily residential property (most with SME uses on the ground floor) are along Aldersgate Street and Long Lane. I consider these should be included too to engage both residents and SMEs. These areas as also a part of the setting for the large scale cityscapes of the Barbican and Golden Lane estates. These areas (and those already included) have more in common with each other than either have with the rest of the Square Mile.</p>
2023-05-09T17:53:32.424Z	I	-
2023-05-09T15:25:08.163Z	-	In general the boundary seems sensible, though it seems odd that Alban Gate is not included
2023-05-09T15:11:03.463Z	-	Why are only some properties, across roads from the estates, included in the proposed area?
2023-05-09T09:22:30.698Z	The proposal is sound and reflects the commitment of local residents to shaping their neighborhood as real place.	-
2023-05-09T09:17:32.512Z	It sounds cohesive, relevant, and ticking all the bureaucratic boxes. A good way to foreground residents voices.	It appears to incorporate all the relevant sub-communities.

2023-05-09T09:11:19.382Z	-	I am in support of any effort to empower residents to influence their material environment. My Quaker Meeting is located nearby and we find the gross high-rise intrusions of buildings in the City and in our area of Islington (City Road & Old Street roundabout) ominously threatening, odious.
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Committee: Planning and Transportation Committee	Date: 18 July 2023
Subject: Blackfriar’s Bridgehead City Walkway Variation	Public
Report of: Executive Director Environment	For decision
<p>Summary</p> <p>The City Corporation has been advised by Bazalgette Tunnel Limited (aka “Tideway”) and Transport for London (“TfL”) that as part of the implementation of the Thames Tideway project it has become necessary to place a new TfL control cabinet on part of the Blackfriar’s Bridgehead City Walkway.</p> <p>To enable this to proceed the area where the control cabinet is proposed to be located would need to be excluded from the City Walkway.</p> <p>The area in question is located away from the main public route and its removal from the City Walkway is not considered to impede public access or amenity.</p> <p>The variation of the city walkway is therefore recommended.</p> <p>Recommendation</p> <p>It is recommended that the Committee:</p> <ol style="list-style-type: none"> 1. Resolves to vary the resolution of the Court of Common Council made on 28 May 1998 by making a resolution in the form appended to this report as Appendix 3A and 3B; and 2. Delegate to the City Operations Director (City Streets and Spaces) authority to insert into the resolution an appropriate date for the coming into force of the variation. 	

Main Report

Background

1. In 1998 the Court of Common Council resolved to declare a new city walkway, being part of the Riverside Walk at Blackfriar’s Bridgehead, and this declaration was made on 28 May 1998. The declaration and area of city walkway are shown in the Resolution and attached city walkway declaration plan (C.W.D.P.3-98) at **Appendix 1**:
2. The Thames Tideway tunnel project is being implemented by Bazalgette Tunnel Limited (aka Tideway) pursuant to powers in the Thames Tideway Tunnel Development Consent Order (the DCO”). The City Corporation has been advised by Tideway and Transport for London (“TfL”) that as part of the

implementation of the project it has become necessary to place a new TfL control cabinet on part of the Blackfriar's Bridgehead City Walkway (see plan of proposed control cabinet location at **Appendix 2**). It is understood that this has arisen because of TfL infrastructure being displaced from its current location due to Thames Tideway works.

3. The erection of the cabinet does not require planning permission because this is permitted by the DCO. However, the DCO does not give powers for the area where the control cabinet is proposed to be relocated to be permanently excluded from city walkway nor for any permanent interference with public access rights on that area of the city walkway. As such, erection of the cabinet on the city walkway would amount to an unauthorised interference with public rights unless the city walkway is varied.

Current Position

4. The area in question is located underneath Blackfriar's Bridge away from the main public route (see **Appendix 2**). Its removal from the city walkway is not considered to impede public access or amenity as it is located away from the pedestrian desire line, adjacent to the boundary wall to the carriageway, and the area is not generally used. There would continue to be sufficient width for pedestrian movement such that public access would not be unduly impeded.
5. This report therefore recommends to your Committee that the city walkway resolution made on 28 May 1998 be varied to exclude from the city walkway the area needed for the control cabinet.

Proposal

6. Appendix 3A to this report sets out a form of resolution to effect the variation of the Blackfriar's Bridgehead city walkway resolution made on 28 May 1998 so as to exclude from the city walkway the area needed for the control cabinet.

Corporate and Strategic Implications

7. There are no Corporate and Strategic Implications.

Legal Implications

8. Wording for the resolution is included in Appendix 3A for Committee's approval. If the resolution is made, notice of the resolution describing the variation must be published in one or more newspapers circulating within the City and displayed for at least 28 days in a prominent position in the walkway. The resolution will take effect from a date to be inserted by the City Operations Director (City Streets and Spaces).

Financial Implications

9. The alteration of the Blackfriar's Bridgehead city walkway is not anticipated to have any financial implications other than the costs of placing in a local newspaper notice of the passing of the resolution altering the city walkway and the costs of the officer time in preparing this report, both of which can be

recovered from Tideway/TfL pursuant to an undertaking provided to the City Corporation. The alteration of the city walkway is not considered to have any legal implications other than those set out within this report. (As a separate matter, the city walkway is vested in the City Corporation and authority regarding disposal of an interest in the area proposed for accommodating the control cabinet to TfL, and regarding disposal terms, will be sought from the relevant Committee or delegated officer. However, that is not relevant to the recommendation of this report).

Conclusion

10. Implementation of the Thames Tideway project necessitates altering the Blackfriar's Bridgehead city walkway so as to exclude from the city walkway the area needed for the relocation of the TfL control cabinet which is being displaced so that Thames Tideway works can be appropriately accommodated. The variation of the city walkway as proposed is not considered to impede public access or amenity. The Committee is therefore recommended to make a resolution varying the original city walkway resolution dated 28 May 1998.

Appendices

- Appendix 1: City walkway declaration of 28 May 1998 and plan C.W.D.P.3-98
- Appendix 2: Plan showing proposed location of TfL control cabinet
- Appendix 3A: Resolution to vary the city walkway declaration
- Appendix 3B: City walkway alteration plan forming an appendix to the resolution to vary the city walkway declaration

RESOLUTION OF THE COURT OF COMMON COUNCIL

28TH MAY 1998

WHEREAS the Mayor and Commonalty and Citizens of the City of London acting by the Common Council (hereinafter called "the Corporation") are authorised by Section 6 of the City of London (Various Powers) Act 1967 (hereinafter called "the Act") BY RESOLUTION TO DECLARE any way or place in the City of London appearing to the Corporation:

- (i) to be laid out or otherwise suitable for a City Walkway within the meaning of Section 5 of the Act;
- (ii) to which access is available directly from a street or another way or place which is a City Walkway; and
- (iii) which is laid out or rendered suitable for a City Walkway in accordance with one of the provisions specified in sub-section (1) of the said Section 6

TO BE A CITY WALKWAY as from such dates as may be specified in such resolution

AND WHEREAS it appears to the Corporation that:

- (i) the way or place specified in the Schedule hereto is laid out or otherwise suitable for a City Walkway within the meaning of Section 5 of the Act; and
- (ii) access to such way or place is available directly from a street or another way or place which is a City Walkway

NOW THEREFORE the Corporation in pursuance of Section 6(1) of the Act by resolution HEREBY DECLARE the way or place described in the Schedule

hereto on and after the Twenty-second day of June One thousand nine hundred and ninety-eight to be a City Walkway

THE SCHEDULE

ALL THAT way or place being the riverside walkway and adjacent paved and planted areas, at ground level between Victoria Embankment and White Lion Hill, more particularly shown shaded on the attached drawing No. CWDP-3-98

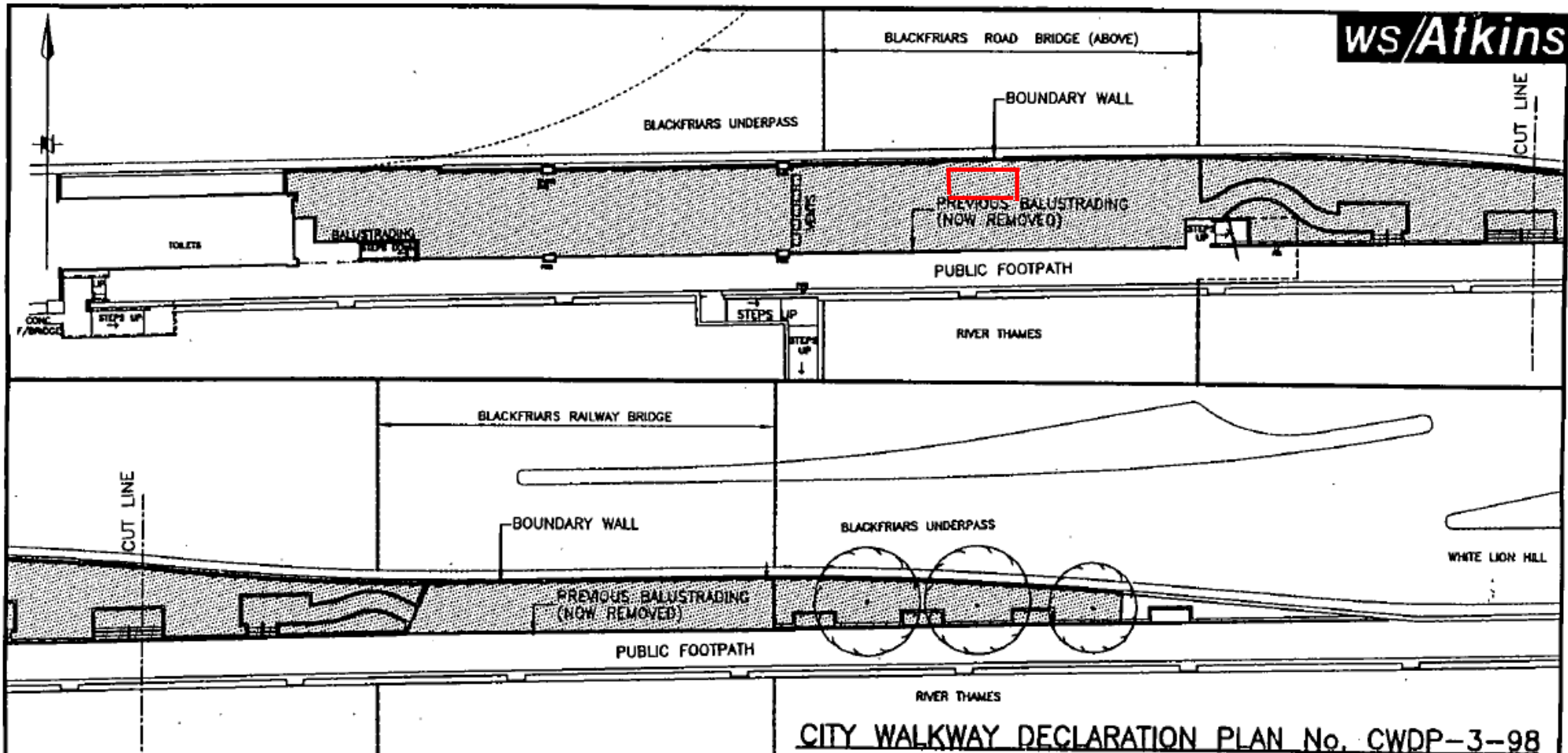
THE COMMON SEAL OF THE MAYOR
AND COMMONALTY AND CITIZENS
OF THE CITY OF LONDON was
hereunto affixed in the
presence of:-



J. CLIFT
ASSISTANT CITY SOLICITOR

Dated the 5th day of June 1998

ws/Atkins



CITY WALKWAY DECLARATION PLAN No. CWDP-3-98

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APPENDIX A

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 City of London Division

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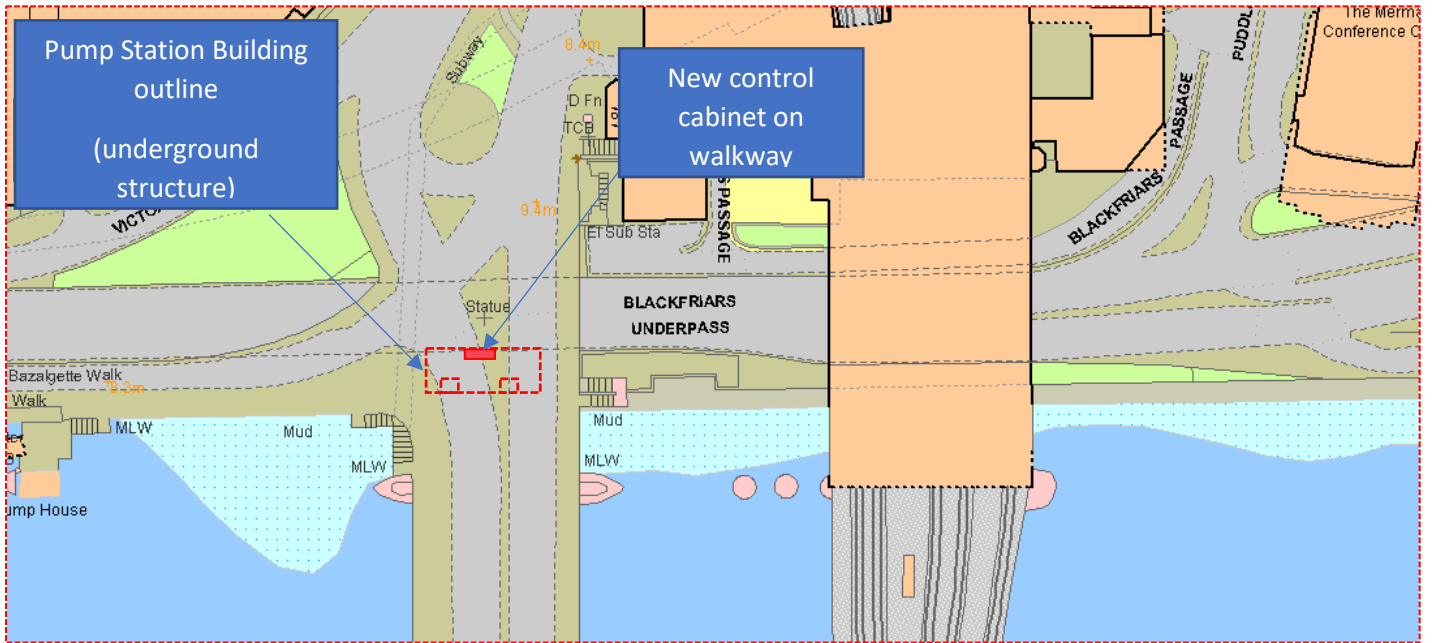
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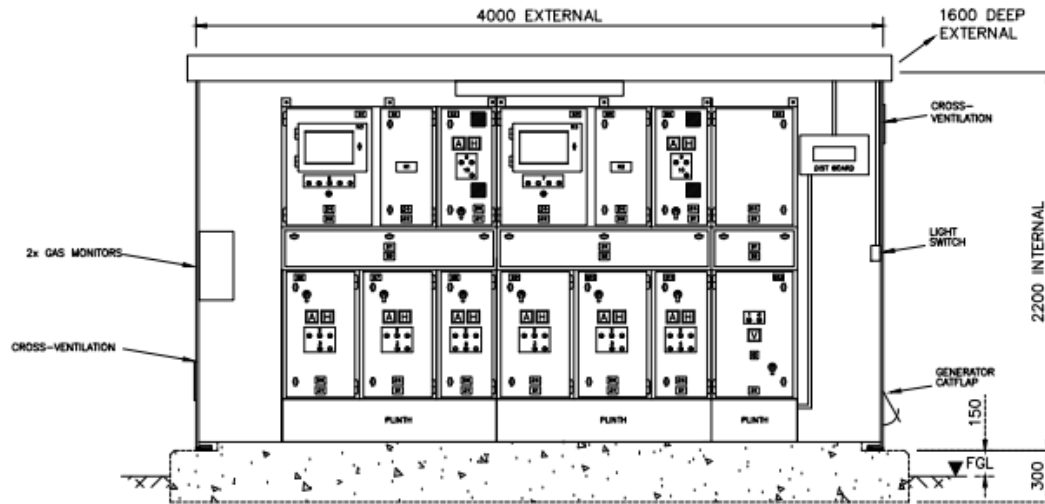
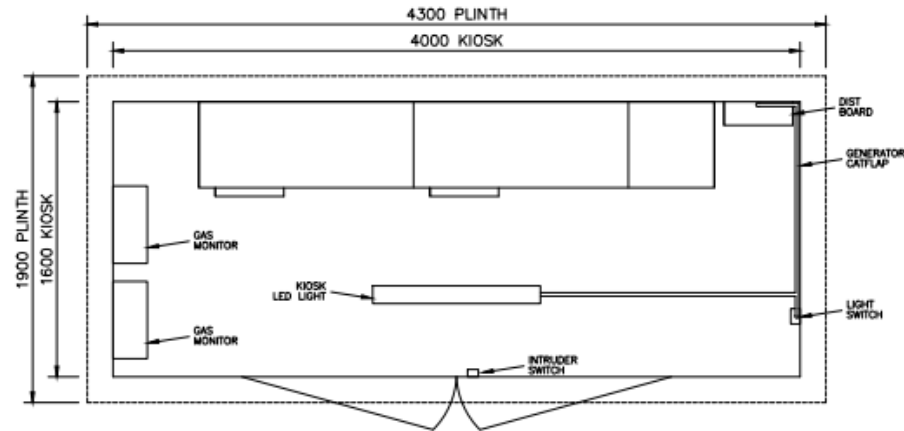
RIVERSIDE WALKWAY IMPROVEMENTS
 BLACKFRIARS BRIDGEHEAD
 CITY WALKWAY DECLARATION

Scale 1:500

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Scheme: Blackfriars Pumping Station Control Cabinet





NOTE:
INTERNAL COLOUR: WHITE
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ISSUE	AMENDMENT	DRAWN BY	APP'D BY	DATE
C	NO CHANGE TO THIS SHEET	GP	GP	18/01/22
B	PANEL LAYOUT AMMENDED TO SUIT SHEET 1	CK	GP	02/12/20
A	THIS KIOSK LAYOUT SHEET ADDED	GP	GP	09/11/20

TITLE:
2 X 2 PUMP 1 SUMP
TFL T0003 CRITICAL SPEC CONTROL PANEL

DRAWN BY	G.P.
APPROVED BY	G.P.
DATE	11/05/20

CLIENT:
COUNTY BUILDING SERVICES

SCHEME:
BLACKFRIARS BRIDGE UNDERPASS, EAST & WEST PUMPING STATION

T-T CONTROLS

WOORE, CW3 9RU. ENGLAND
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PROJECT No.	DRAWING NUMBER.	ISSUE	SHEET 38
L13091	A4/E/9290	C	OF 38

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APPENDIX 3A:

RESOLUTION OF THE PLANNING AND TRANSPORTATION COMMITTEE

(under powers delegated to them by the Court of Common Council on 19 July 2001)

DATED the eleventh of May 2023.

WHEREAS the Mayor and Commonalty and Citizens of the City of London acting by the Planning and Transportation Committee pursuant to the delegation to that Committee specified *above* (hereinafter called “the City”) are authorised by section 6 of the City of London (Various Powers) Act 1967 (as amended) (hereinafter called “the Act”) **BY RESOLUTION TO DECLARE** any way or place in the City of London appearing to the City

- (i) to be laid out or otherwise suitable for a city walkway within the meaning of section 5 of the Act,
- (ii) to which access is available directly from a street or another way or place that is a city walkway, and
- (iii) which is laid out or rendered suitable for a city walkway in accordance with one of the provisions specified in subsection (1) of the said section 6

TO BE A CITY WALKWAY as from such date as may be specified in such resolution

AND WHEREAS the City are further authorised by the said section 6, by resolution, to vary or rescind any resolution declaring a city walkway

AND WHEREAS it appears to the City that the resolution made by the Court of Common Council on 28 May 1998 (hereinafter called “the 1998 Resolution”) should be varied to exclude the areas shown shaded yellow and hatched in black on the drawing attached hereto and numbered [] as “Area of city walkway to be excluded”.

NOW THEREFORE the City in pursuance of section 6(5)(a) of the Act by resolution **HEREBY VARIES** the 1998 Resolution to exclude the way or place described in the Schedule hereto on and after the [to be inserted by the City Operations Director (City Streets and Spaces)] day of [to be inserted by the City Operations Director (City Streets and Spaces)].

SCHEDULE

THE way or place more particularly shown shaded yellow and hatched in black on the **attached** drawing entitled “City Walkway Alteration Plan” and numbered [], as “Areas of city walkway to be excluded,” being [describe location and size in square meters] at Blackfriar’s Bridgehead .

Dated

THE COMMON SEAL OF THE MAYOR
AND COMMONALTY AND CITIZENS
OF THE CITY OF LONDON
was hereunto affixed in the presence of:

Authorised Officer
Guildhall
LONDON
EC2P 2EJ

Agenda Item 8

Committee(s): Planning & Transportation Committee – for decision	Dated: 18/07/23
Subject: Creechurch Conservation Area Proposal	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	2, 4, 7, 10, 11, 12
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Juliemma McLoughlin	For Decision
Report author: Ben Eley, Environment	

Summary

As Local Planning Authority, the City Corporation has a statutory duty to consider, from time to time, the potential for new conservation areas within the City’s boundary. Whilst undertaking an intensive characterisation and heritage significance assessment of the Square Mile to inform the emerging City Plan 2040, and in response to key stakeholders during the consultation on the draft City Plan, a potential new conservation area has been identified in the Creechurch locality, near Aldgate.

The area has been assessed in line with national and local planning policy and Historic England’s guidance on such matters. This assessment identified that the character and appearance of the area has the potential to be designated as a conservation area, due to its special architectural and historic interest. A proposed draft conservation area boundary (Appendix 1) and supporting conservation area proposal (Appendix 2) are now proposed for public consultation.

Recommendation(s)

Members are asked to:

- Consider the assessment;
- Agree that the area has the potential to be designated as a Conservation Area, subject to public consultation;
- Authorise public consultation to be carried out on the proposal for a new ‘Creechurch Conservation Area’.

Main Report

Background

1. The proposed area, located within the wards of Aldgate and Portsoken, is richly historic, comprising a critical mass of characterful, late Victorian/Edwardian warehouses built on the site and echoing the layout of the Holy Trinity Priory, foremost amongst the medieval City's monastic foundations, and studded with three outstanding places of worship: Bevis Marks Synagogue, St Katherine Cree Church and St Botolph Aldgate Church (all listed Grade I).
2. In part, the timing of this assessment has been prompted by a separate proposal for a conservation area in this locality that has been received by representatives of Bevis Marks Synagogue. The proposal prepared on behalf of the Bevis Marks Synagogue is included in Appendix 3.
3. The City's assessment set out in Appendix 2 has arisen from a comprehensive characterisation and heritage significance assessment, of the City as a whole, and of the City Cluster in particular, which will underpin the emerging City Plan 2040 and relevant strategic policies. The characterisation and heritage significance assessment has taken place alongside ongoing consultation with key stakeholders, including the GLA, Historic England (HE) and the Bevis Marks Synagogue.
4. As a Local Planning Authority, the City Corporation has a statutory duty under s69(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to consider whether it should designate conservation areas, which are defined as 'areas of special architectural or historic interest, the character of which it is desirable to preserve or enhance'.
5. S69(2) of the Act states that: 'it shall be the duty of a local planning authority from time to time to review the past exercise of functions under this Section and to determine whether any parts or further parts of their area shall be designated as conservation areas; and if they so determine, they shall designate those parts accordingly'.
6. In the exercise of planning functions, the City Corporation is required to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas and to prepare proposals for their preservation and enhancement. Relevant policy is contained within the City's Local Plan 2015, emerging City Plan 2040, the London Plan 2021 and the National Planning Policy Framework (NPPF).
7. The designation of a conservation area brings certain demolition of unlisted buildings and structures (known as 'relevant demolition') within the area under the control of the local planning authority, in the absence of planning permission for redevelopment. Conservation area designation is unlikely to give rise to unduly onerous requirements for property owners to obtain planning permission. There are some minor permitted development rights which do not apply in conservation areas but (other than in respect of demolition) these are not significant. For example, it would not change permitted development rights in relation to changing windows. The Mayor of London's powers are unchanged whether the development is within or outside a conservation area. The character and appearance of the conservation area is a significant material consideration in

the consideration of planning applications in that area. Some further controls would be exercised over the control of advertisements and there would be greater control over works to trees.

8. There are currently 27 conservation areas in the City, with the most recently designated being the Barbican and Golden Lane Conservation Area in October 2018. The City has previously carried out reviews of conservation areas and their boundaries on a comprehensive basis, with the last such review carried out in 2007, to ensure that conservation area boundaries continue to be clear, precise and meaningful. It is anticipated that the next be undertaken following the adoption of the City Plan 2040.

Current Position

9. The assessment of the character, appearance and heritage significance of the proposed area and its eligibility for designation as a conservation area has been carried out in accordance with the NPPF and Historic England Advice Note 1: Conservation Area Appraisal, Designation and Management (2nd ed, 2019). The assessment and proposal are set out in Appendix 2.
10. The assessment has taken into consideration the alternative proposals tabled by representatives of the Bevis Marks Synagogue.
11. Having assessed the wider area in accordance with national criteria and guidance, it is considered that the proposed area is of sufficiently strong character, appearance and significance to be proposed for designation as a conservation area, subject to public consultation and the final authorisation of Planning and Transportation Committee. The proposed Creechurch Conservation Area boundary for consultation is set out in Appendix 1. The methodology underpinning this recommendation has been peer reviewed by Dr Nigel Barker Mills, an expert in the field of conservation of the historic environment, who has concluded that the methodology of the assessment is sound.

Proposals

12. Subject to Committee support, it is proposed that public consultation be carried out on the proposals for a new 'Creechurch Conservation Area'. The consultation period is proposed to be carried out over late Summer and early Autumn 2023, with the aim of reporting the results back to this Committee before the end of the calendar year.
13. The consultation is proposed to be held for a minimum of eight weeks and would be carried out in accordance with Historic England guidance and the City Corporation's Statement of Community Involvement (2023).

Corporate & Strategic Implications

14. The City Plan 2040 is undergoing review. This decision is separate from the City Plan process.

Financial implications

15. None

Staff resource implications

16. Staff time to support the development of the conservation area proposal will be met through the ongoing work of the Planning & Development Division

Legal implications

17. The legal framework is set out in the body of the report.

Equalities implications

18. An Equalities Impact Assessment would be completed if, following consideration of consultation feedback, it is intended to progress the designation proposal. Any report back to your committee recommending designation would include information regarding the Equalities Impact Assessment to ensure that any relevant impacts are taken into account in deciding whether or not to designate.

Risk implications

19. None

Climate implications

20. A Sustainability Appraisal would be completed if, following consideration of consultation feedback, it is intended to progress the designation proposal. Any report back to your committee recommending designation would include information regarding the Sustainability Appraisal, to ensure that any relevant impacts are taken into account in deciding whether or not to designate.

Security implications

21. None

Conclusion

22. The assessment has concluded that the area at Appendix 1 has the potential to satisfy the criteria for designation as a conservation area, subject to public consultation.

23. It is recommended that public consultation, commencing in late Summer 2023, be carried out in relation to this proposal.

24. The outcome of the public consultation and recommendations will be reported back to Planning and Transportation Committee before the end of the calendar year.

Appendices

- Appendix 1 – Creechurch Conservation Area – Proposed Boundary Map
- Appendix 2 – Creechurch Conservation Area Proposal
- Appendix 3 – Background Papers (A. Prepared on behalf of the Bevis Marks Synagogue: Proposed Bevis Marks/Creechurch Conservation Area; and B. Letter to the City regarding the Proposed Conservation Area)

Ben Eley

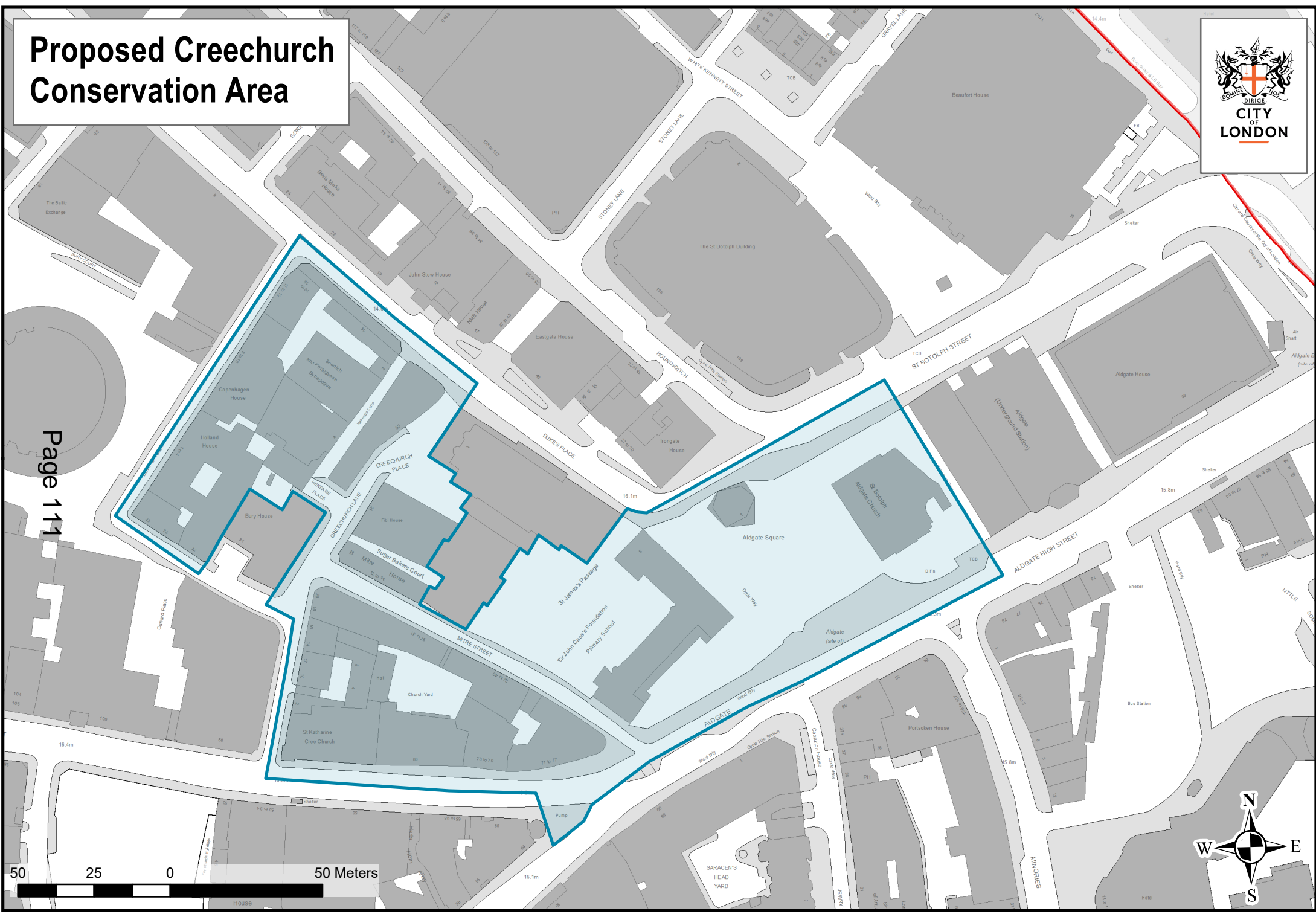
Assistant Director (Design), Environment

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Proposed Creechurch Conservation Area



Page 111

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Appendix 2: Creechurch Conservation Area Proposal

July 2023



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1. Introduction

- 1.1 Background
- 1.2 Policy/Legislative Context

2. The Creechurch Area

- 2.1 Location
- 2.2 Historical development
- 2.3 General character and uses

3. The Assessment

- 3.1 Methodology
- 3.2 Assessment
- 3.3 Eligibility for Conservation Area status

4. Proposed Creechurch Conservation Area

- 4.1 Proposed boundary
- 4.2 Overarching summary of special interest
- 4.3 Architectural/artistic interest
- 4.4 Historic interest
- 4.5 Archaeological interest

5. Conclusion & Next Steps

1. Introduction

1.1. Background

As part of work towards the City Plan 2040, the Planning & Development Division has, since Spring 2022, been undertaking an extensive and systematic characterisation and heritage significance exercise. This is a robust assessment of the character and heritage significance of the City at both a macro strategic and local level, examining everything from the City's role and character in pan-London strategic views to granular assessments of the character and appearance and heritage significance of different Character Areas in the City. This will form part of the evidence base underpinning the City Plan 2040. The potential for a new conservation area in the Creechurch locality was identified as part of this work.

In Spring 2023, the City received a proposal for a new conservation area in the same Creechurch locality from representatives of Bevis Marks Synagogue (Appendix 3). In view of both factors, it was decided to formally assess the potential of the locality for conservation area designation alongside, but separate from, the City Plan 2040 process, and to report the results of the assessment to Planning & Transportation Committee with a view to undertaking public consultation on them.

1.2. Legislative & Policy context

Planning (Listed Buildings and Conservation Areas) Act 1990

S69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 obliges local authorities to determine which parts of their areas are of special architectural or historic interest and to designate them as conservation areas. S69(2) of the Act states that: it shall be the duty of a local planning authority from time to time to review the past exercise of functions under this Section and to determine whether any parts or further parts of their area shall be designated as conservation areas; and if they so determine, they shall designate those parts accordingly'.

Once designated, local authorities are further obliged (s71) to formulate and publish proposals for their preservation and enhancement, to present such proposals for consideration at a public meeting in the area and to have regard to any views expressed at the meeting concerning such proposals.

It is the general duty of all Local Planning Authorities, in the exercise of planning functions, to pay special attention to the desirability of preserving or enhancing the

character or appearance of conservation areas (s72). Relevant policy is contained within the City's Local Plan 2015, emerging City Plan 2040 and the National Planning Policy Framework (NPPF).

The designation of a conservation area brings certain demolition within the area under the control of the Local Planning Authority, in the absence of planning permission for redevelopment. Conservation Area designation is unlikely to unduly onerous requirements for property owners to obtain planning permission. There are some minor permitted development rights which do not apply in conservation areas but (other than in respect of demolition) these are not significant. For example, it would not change permitted development rights in relation to changing windows. The character and appearance of the conservation area is a significant material consideration in any proposals for alteration or redevelopment of sites within the area. It would require that considerable importance and weight be attributed to the desirability of preserving or enhancing the character or appearance of that area.

National Planning Policy Framework and the Planning Practice Guidance

Paragraph 190 of the NPPF mentions that Local Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, taking into account the desirability of sustaining and enhancing the significance of heritage assets.

Paragraph 191 states that "when considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest."

Once a proposed area is designated, paragraphs 206 and 207 are of relevance. Paragraph 206 states that Local Planning Authorities should look for opportunities for new development within conservation areas and within their setting, to enhance or better reveal their significance. Paragraph 207 states that not all elements of a conservation area will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the conservation area should be treated either as substantial harm under paragraph 201 or less than substantial harm under paragraph 202, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the conservation area as a whole.

As set out in the Planning Practice Guidance (PPG), when a conservation area is designated, a conservation area appraisal can be used to help Local Planning Authorities develop a management plan and plan-making bodies to develop appropriate policies for local and neighbourhood plans. A good appraisal will

consider what features make a positive or negative contribution to the significance of the conservation area, thereby identifying opportunities for beneficial change or the need for planning protection. (paragraph 025)

According to paragraph 55 of the PPG, generally the requirement for planning permission for works to unlisted buildings in a conservation area is the same as it is for any building outside a conservation area, although some permitted development rights are more restricted in conservation areas. In addition, planning permission is required for the demolition of certain unlisted buildings in conservation areas (known as 'relevant demolition').

2. The Creechurch Area

2.1. Location

Creechurch is located to the east of the City and comprises (approximately) the area bound by Bevis Marks to the north, Creechurch Lane/Bury Street to the west, Leadenhall Street to the south, and Aldgate to the east. It is located in part in the City Cluster tall buildings area. It is notable, like the Leadenhall Market and St Helen's Conservation Areas, for being in amidst the high-rise modernity of the Cluster and there is a strong defining juxtaposition between the areas historic buildings and the tall modern buildings.

2.2. Historical development

Early History

Roman occupation of the locality is not well understood, but the City wall and Aldgate were constructed by the 3rd century AD. Aldgate, one of the seven City of London's historic gates, and the easternmost gateway through the London Wall leading to Whitechapel and the City of London, stood at the corner of the modern Duke's Place, on the east side of the city, with a busy thoroughfare passing through it.

During the later Roman and Saxon period, the focus of settlement lay to the west of the City and the Strand, with the Creechurch locality being only sporadically occupied.

One of the first Augustinian monastic houses in England, Holy Trinity Priory was founded just inside the City wall near Aldgate in either 1107 or 1108 AD by Queen Matilda, wife of Henry I. From the outset, the Priory seems to have been especially high-status and popular with the elite. Royal patronage led to the construction of a splendid complex. Amidst the mainly timber and brick buildings on surrounding streets, Holy Trinity Priory would have been a distinctive, enriched grouping of stone buildings, with much fine glazing and ornamentation. A medieval pointed stone archway, which was probably part of the southern wall of the chancel of Holy Trinity Priory Church, survives and is embedded in the party wall between nos. 39 and 40, and nos. 72 and 73 Leadenhall Street. The surviving archway is Grade II listed.

Within the precinct of Holy Trinity Priory stood the original building of St Katharine Cree Church which originated as a Priory chapel and later became a parish church.

Immediately west of the Priory complex was another medieval religious establishment, the Abbot of Bury St Edmund's Inn, the boundaries of which now

correspond to Bury Street, Bevis Marks and Heneage Lane. An eclectic mix of historic and modern contextual buildings survive here.

Early Modern – C16 and C17

These two centuries brought considerable upheavals to the locality, disrupting the settled medieval character established over four hundred years.

By the early 16th century, and as can be seen on the map of Holy Trinity Priory c.1520 (Historic Towns Atlas), the Priory had expanded and developed and at its peak occupied the Creechurch locality the land now bounded by Bevis Marks, Leadenhall Street, Bury Street and Aldgate.

During the English Reformation, Holy Trinity Priory was the first monastic house to be dissolved by Henry VIII, in 1532, three years before the general Dissolution. It marked one of the first occasions that a religious complex had been repurposed for the secular world. The buildings and land associated with it were given or sold to prominent courtiers and City merchants over the next thirty years.

These include Thomas Audley, who as Speaker and then as Lord Chancellor was a key figure in the break with Rome. After his death in 1544, the Priory site then became the property of the Duke of Norfolk, another leading courtier, with further adaptation of the Priory buildings into a mansion; Duke's Place is so named for this. The western section of the Priory was given to Sir Thomas Heneage, with today's Heneage Lane marking the separation of the two halves.

Following its subsequent sale to the City Corporation in 1592, the Priory site broke up into smaller and smaller plots, having a profound impact on the character of the area. The Priory buildings and old Tudor mansions fragmenting into smaller houses and industrial premises. No trace of them remains above ground today (but for the vestige of arch preserved in Nos. 71-77), but the layout of the complex is preserved in the street pattern: Mitre Square corresponds to the Priory cloister; Mitre Street, the nave of the Priory church. A Priory chapel became the church of St Katherine Cree, rebuilt in its present form in 1631.

The locality mostly escaped destruction in the Great Fire. The 1676 Ogilby and Morgan map demonstrates the extent of post-medieval change, with the layouts of the Priory and Inn having been largely subsumed by a street pattern that begins to resemble the present, with most of the main streets having been formed: Leadenhall Street, "Beavis Markes", Berry Street and Bevis Lane. St Botolph's is shown on the same location with its churchyard clearly defined, as well as St Katherine Cree and its associated churchyard.

In the early C17 the Jewish community began to return to Britain; semi-formally during the Commonwealth, during which time a house on Creechurch Lane was converted into a Synagogue for semi-public worship. The site of the first resettlement synagogue is marked by a plaque on the Cunard Building which reads -"Spanish &

7

Portuguese Jews' Congregation - The site of first Synagogue after the resettlement 1657 - 1701."

In 1688, many Sephardi (originating from the Iberian Peninsula) Jews from Holland settled in the area growing the community. Consequently, the Sephardi congregation needed a larger space for worship. In response, the Bevis Marks Synagogue was constructed between 1699 and 1701 to the designs of Joseph Avis, a master builder and Quaker who had previously worked with Christopher Wren. It is the oldest synagogue in the country and the only synagogue in Europe that has held regular services continuously for over 300 years. It represents tangible evidence for the historic and on-going relationship that the Jewish community has had with this part of the City.

By the end of the C17 the Ashkenazi (originating from northern and eastern Europe) Jewish community had grown to such an extent that they moved to a new building, The Great Synagogue situated on what is now Duke's Place. The congregation continued to grow in the 18th century and in 1722 and then between 1788 and 1790, larger replacement synagogues were built on the site. The third and final synagogue of 1788-90 was destroyed by German bombs in 1941.

Georgian and Victorian

Growth of the City in the C18 saw the eventual breach of the Roman and medieval City wall; in places the wall and gates were demolished entirely, removing the visual and physical distinction between the ancient sites within the walls and the more recent, fashionable suburbs located without.

The church of St Botolph Without Aldgate was originally attached to the Priory of the Holy Trinity. It was rebuilt just before the Dissolution, but subsequently declared unsafe and demolished in 1739, replaced by the present building.

The GOAD map of 1887 provides a snapshot of the uses in the area, which at this time were mixed, with warehouses jostling for space amongst offices, schools, churches, synagogues, public houses and many more. The map also shows the intricacy and survival of the street pattern which, despite some site amalgamations, remained ancient and medieval in character.

Later phases of the area's development saw the construction of warehouse buildings in the late C19 and C20. Handling commodities such as tea and fruit, these buildings remain and form the heart of the locality's character.

The earliest appearance of the name Mitre Square, which occupies the site of the cloister of Holy Trinity Priory, seems to be in 1830. By 1888, Mitre Square was predominantly lined with four large warehouses, a yard, a commercial building and a few old houses. Mitre Square has undergone total rebuilding since 1888, with the majority of the demolition taking place as late as 1979/80.

Modern – C20 and C21

By the early C20 Creechurch Lane had assumed its present form, and Holland House had been constructed on the east side of Bury Street, introducing a strikingly distinctive faience-led, vertical form of architectural expression to the locality. Otherwise, the area remained markedly traditional in character, with most of the building plot sizes small and recognisably medieval. Of particular note were the tiny plots between Heneage Lane and Creechurch Lane.

The locality escaped significant destruction in the Blitz; only suffering bomb damage towards its easternmost part. The Great Synagogue on Duke's Place was destroyed, together with buildings south of the School, which plots were subsequently swept away in a road widening scheme, giving the School its present, open setting to the south.

Despite avoiding the bombs, the locality could not avoid the trend towards road-widening and site amalgamation that saw the coarsening of the fine grain that had prevailed hitherto. In the 1970s, International House was constructed on a series of amalgamated sites that included the former site of the Great Synagogue; it established an unfortunately large, blocky sense of scale that is perpetuated in its successor, One Creechurch Place. In the same decade, Bevis Marks was widened, resulting in the clearance of small plots either side and the construction of buildings which frame the Synagogue today, including No. 33 Creechurch Lane and Nos. 10-16 Bevis Marks; Copenhagen House on the west side of the Synagogue was built in this decade, too. All these buildings saw the clearance and amalgamation of small, ancient plots, as did the redevelopment in the 1980s of the sites around St Katherine Cree churchyard.

The IRA bombings in 1992 and 1993 transformed the streetscape to the west of the locality along St Mary Axe, destroying the Baltic Exchange and resulting in the very different townscape character of 30 St Mary Axe and its plaza framing the locality to the west. Contrastingly, to the east, Aldgate Square was laid out upon the former Aldgate Gyratory in the early decades of the C21, redressing some of the wrongs wrought by earlier traffic schemes and resulting in a more verdant, open, tranquil and sympathetic setting to the least of the locality.

2.3. General Character and Uses

The Creechurch area is characterised by the fine group of late C19 warehouses at its heart (Creechurch Lane/Mitre Street), which have since been converted to other uses, typically residential/office in the upper floors with the lower floors given over to active uses including pubs and restaurants. The size of these units are typically small and combine to form a sense of granular, traditional character at the heart of

the locality. Residential properties are mainly concentrated to the southern part of Creechurch Lane (including nos. 10 to 20), north of St Katharine Cree, and on Mitre Street (including nos. 27 to 31).

These uses are diversified by the presence of the Aldgate School, with its fine Edwardian building forming a commanding presence to the east of the locality and generating patterns of activity (i.e. processions of schoolchildren; their whoops and cries) that are distinctly different to the office uses surrounding and help to reinforce the sense of Creechurch as somewhat separate from the commercial core of the Cluster, transitioning into the East End.

This sense of escape/retreat is further enhanced by the three places of worship in the area, which give the locality a sense of ancient roots and, in the form of Bevis Marks Synagogue, the presence of a particularly rare and special form of faith. Amidst all this variety and interest, such office uses as exist in the locality are generally understated and located in the more neutral, modern buildings as part of a historic street pattern.

Finally, the locality is rich in open spaces: Mitre Square, Aldgate Square, the churchyards of St Botolph Aldgate and St Katherine Cree, the courtyard of the Synagogue and the playgrounds of the school (though these last two are not publicly accessible). With their planting, historic monuments and street furniture, trees and general sense of respite from the highly urban mood of the Cluster, these spaces offer crucial respite and further bolster the interest and amenity of the locality.

3. The Assessment

3.1. Methodology

The assessment included below has been undertaken to inform the designation process. In assessing the area, the relevant advice note prepared by Historic England, “Conservation Area Appraisal, Designation and Management Historic England Advice Note 1 (Second Ed, 2019)”, was used as guidance.

This Advice Note provides best practice advice on identifying potential conservation areas, assessment of such areas and content of conservation area appraisals, designation and management of proposals in conservation areas.

The Advice Note does not set out an overly prescriptive framework for identifying and designating conservation areas, instead being more advisory in nature. At para 11 it suggests three basic questions to test the eligibility of a place for conservation area designation, which have been addressed in section 3.3, below.

At para 72, the Advice Note gives examples of the circumstances where special character could exist and therefore justify designation as a conservation area, but does not require adherence to, some different traits of special architectural and historic interest which have led to designation. They are reproduced below and renumbered for cross-referencing:

- I. areas with a high number of nationally or locally designated heritage assets and a variety of architectural styles and historic associations;
- II. those linked to a particular individual, industry, custom or pastime with a particular local interest;
- III. where an earlier, historically significant, layout is visible in the modern street pattern;
- IV. where a particular style of architecture or traditional building materials predominate; and
- V. areas designated because of the quality of the public realm or a spatial element, such as a design form or settlement pattern, green spaces which are an essential component of a wider historic area, and historic parks and gardens and other designed landscapes, including those included on the Historic England Register of Parks and Gardens of special historic interest.

Although not a requirement for justifying designation, the Creechurch locality possesses several of these characteristics, which have been identified at section 4.2 below.

A convenient starting-point for the assessment was provided by the boundary as proposed by the Synagogue’s representatives (Appendix 3). The area assessed is

that bounded by Bevis Marks/Duke's Place to the north, Bury Street/Cunard Place to the west, Leadenhall Street/Aldgate High Street to the south and Aldgate to the east.

The assessment below covers each of these streets and buildings and takes the form of street-by-street commentary. Where areas, including spaces, individual buildings, structures and/or streets are not considered to meet the criteria for inclusion in a conservation area, this is explicitly indicated. As per Historic England's Advice Note, boundaries have been defined by physical features where possible.

3.2. Assessment

Creechurch Lane

Creechurch Lane is, with Mitre Street, at the heart of the Creechurch locality. The southernmost part, just off Leadenhall Street formed part of 'Bury Street', the ancient west boundary of Holy Priory; somewhat confusingly, the present-day Bury Street was formed on land to the west of the former Abbot of St Edmundsbury's Inn that neighboured the Priory complex to the west. By 1746 only a small spur was named Creechurch Lane, the remainder of it being called King Street which led to the surviving vestige of the Priory's Broad Court; by 1916 this whole arrangement had been renamed and rationalised into the street's present-day appearance.

The street takes most of its character from the group of late C19 warehouses that survive on the eastern side of the street (**Figure 1**), which are of consistent scale, and adjoin the important church of St Katherine Cree. The difference in brick colour and ornate details of the warehouse buildings adds interest to the continuous building facades. The character of this area is also defined by the narrow street and pavement widths and continuous building line. The slightly curved alignment of the street creates interest in views north and south. Surrounding modern development is evident in the street, with some tall buildings being visible above the historic roofline of the warehouses, including One Creechurch Place.

At the corner of Leadenhall Street and Creechurch Lane is the Guild Church of St Katharine Cree (**Figure 2**), a Grade I listed church of 1631 (the tower has been dated to c.1504). This church predates the Great Fire and the building is a rare example of the early use of classical architectural motifs (internally) alongside the then more traditional perpendicular gothic (externally). The church was consecrated by Archbishop Laud, an influential clergyman under King Charles I. It occupies the site of a parish church established by 1414 within the Priory boundary. It is of outstanding architectural, historic and archaeological significance, and is one of the 'anchor' heritage assets in the locality. It has a strong relationship with those historic buildings enclosing it and can be seen against the dramatic backdrop of the Cluster from most places.



Figure 1: Historic Warehouses, Creechurch Lane

The neighbouring group of warehouses includes Nos. 2-16 Creechurch Lane, a grade II listed tea warehouse building of 1887. The building is five storeys high, of brick, iron and stone and gives a typical flavour of the locality. It incorporates many surviving warehouse features such as external cranes and loading bays which contribute to its special historic and architectural interest and also its townscape value. The complex forms a group with the warehouse buildings immediately to the east and on Mitre Street.

Cree House (Nos. 18-20, unlisted), to the north, is an imposing warehouse building that occupies a prominent corner block with Mitre Street. It dates from 1892, by M. E. Collins, for Phillips & Co fruiterers. It is of five storeys with an additional attic storey with richly carved terracotta panels and keystones illustrating fruits and the other commodities originally stored within.



Figure 2: St Katharine Cree

Further north, Fibi House, at Nos. 22 and 24, a pair of four storeyed tea warehouses of 1895, yellow brick dressed with red, above stone-faced ground floors. The building forms the easternmost end of the warehouse group and shares with the others simple brick and terracotta detailing. The building was converted to offices in the mid-20th century but retains a convincing warehouse exterior.

The little Sugar Bakers' Court, just south of Fibi House, was first laid out c. 1586 by William Kerwin. This is another typical City alley of historic character and appearance. The glazed white brick of the warehouse elevations facing into the court bring some reflective light into the alley. The modern development at One Creechurch Place (outside of the proposed conservation area) now forms a rather abruptly modern and characterless terminus to the eastern end of the alley.

On the western side of Creechurch Lane is No. 33, a modern office building of 5 main storeys. Consent was granted for the building on 27 June 1978 and construction began shortly after. The building, originally known as Arthur Castle House, is clad in a purplish marble with vertically rising brown tinted square windows and infill panels. Although the building is not of any special architectural or historic interest, the footprint of the building reflects the historic street pattern and its height, mass and scale are sympathetic to its context.

Mitre Street

Turning east from Creechurch Lane is Mitre Street. It runs along and perpetuates the alignment of the nave and chancel of the former Priory church and, with Mitre Square, the cloister: two key and fundamental features of the Holy Trinity complex. The western part of the street is lined with additional warehouse buildings, which were formed in the early C19, cutting through courts and yards of the Priory. When visible, tall buildings to the east, including views of 30 St Mary Axe from Mitre Street provide a dynamic backdrop to the historic warehouse buildings (**Figure 3**). Further east, the character is more modern, with the exception of the southern elevation of the Sir John Cass School. Mitre Square contributes to a sense of openness at the eastern part of the street.

Nos. 12-14 Mitre House is a former tea warehouse of 1895 by Weightman and Bullen. The building is of five storeys and relates well to Fibi House across Sugar Baker's Court and has a well-modelled brick elevation to Mitre Street that forms a convincing group with the other 19th century brick frontages. The ground floor incorporates a shopfront punctuated with columns with Classical detailing.

Nos. 27-31 incorporate three different frontages of former warehouses dating from 1891 and 1888. Five storeys high, they are attractively varied in materials, design and detailing and enrich the group of warehouse buildings to the north and east. The northernmost frontage incorporates references to the Priory site in the form of carved mitres.

Mitre Square is the site of the former cloister of Holy Trinity Priory and, in its loosely square form, reflects the preceding claustral shape. It was recently relandscaped in connection with One Creechurch Place. Although the modern landscape treatment has no particular aesthetic pretensions, the layout of the space that marks the historic cloister is of historic interest, and the planting and stone materiality creates a tranquil oasis. To the north and east it is framed by One Creechurch Place, which presents unforgivingly modern elevations which detract from its sense of place: a deficiency redressed to the south by the warm red brick and lively architectural detailing of the School, and the brick wall and traditional iron railings (and extensive greenery) delineating the playgrounds and the south side of St James's Passage, communicating with Duke's Place.



Figure 3: Historic Warehouses on Mitre Street, with 30 St Mary Axe in the background

Nos. 32-40 is a modern stone-faced building of sympathetic scale and modelling, relating well in these traits to the unlisted warehouses adjacent. It constructed in 1991 to designs by Ley, Colbeck and Partners, and incorporates the passageway from Mitre Street into St Katherine Cree churchyard. An open space within the Priory complex, it became a churchyard associated with St Katherine Cree in the medieval period. It ceased to be a churchyard in the 1870s and was converted into a public garden, last relandscaped in the 1960s. The space forms a loose polygon enclosed by the rear of buildings on Leadenhall and Mitre Streets, with a church hall facing to the west. These elevations are of brick or stone and provide an appropriately traditional setting. Unusually, the church is separated from the churchyard. Around the perimeter is York stone paving enclosing a gravelled central area containing chest and table tombs, planting, benches and trees. Just to the east of the entrance is a carved stone gateway, originally placed at the south-east angle of the yard,

dated 1631 that now encloses a fountain. Surrounded by buildings, there is a special sense of enclosure, history and verdancy in this space.

Aldgate

To the west of Leadenhall Street, north of Aldgate is the Grade II* listed Aldgate School (**Figure 5**). The school dates from 1908 and was formerly located in the churchyard of St Botolph Aldgate and on Jewry Street. It now stands within the site of the former Priory complex on the site of the Priory garden; a sense of openness is retained in the playgrounds, formed on the sites of buildings demolished in the 20th century. In the neo-Wren style, constructed of red brick and Portland stone with a green slate roof. Due to its size arrangement, the building is prominent within the locality and is the focus of a number of views from surrounding streets. The main elevation incorporates a central cupola facing east onto the new pedestrian Aldgate Square while secondary frontages facing onto Aldgate High Street and Mitre Street. Its materiality, scale and detailing reflect the warehouse group at the north end of Mitre Street.



Figure 4: St Botolph-Without-Aldgate

East of the school extends Aldgate Square, one of the largest open spaces within the City. The Square was formally opened in 2018 and includes a central lawn area flanked by raised planters which provide informal seating, tree planting on the southern boundary; and a water feature. The cafe on the square, Portsoken Pavilion (named after Portsoken ward), was designed by Make.



Figure 5: Aldgate School

The square sits between Sir John Cass School and the church of St Botolph-Without-Aldgate (Grade I, Figure 4) and its churchyard. The present church building dates from 1744, after the collapse of an early C16 church built by the Priory (itself a rebuilding of an early medieval predecessor). Designed by George Dance the Elder, the present building is of yellow and red brick with partly painted stone dressings, of similar, simple classical architecture as the Synagogue, but of greater ornament, sporting pediments, quoins and Venetian and Gibbsean windows. The church tower and spire rise prominently from the body into open clear sky, and have a landmark quality (indeed, the church is noted as one with a Skyline Presence in the Protected Views SPD). The railings and gates (also Grade I), the yard and associated planting

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and trees make a positive contribution to the townscape. Further interest is added through the presence of historic street furniture outside the church: the Police Call Box (c.1935, grade II listed) and the Metropolitan Drinking Fountain, c.1906.

The whole ensemble of School, Square and Church form a striking and sympathetic townscape group of great character and interest, showing how new public realm can beautifully stitch together existing heritage assets, bestowing a unique sense of place on the site of the Aldgate and the easternmost edge of the Creechurch locality.

Bury Street

Bury Street forms the westernmost edge of the locality, an obvious division between the more historic, granular scale to the east and the much larger and more modern scale of the City Cluster around. It branches west from Creechurch Lane and kinks round to run north to join Bevis Marks; it delineates the boundaries of the Abbot of St Edmundsbury's Inn (hence 'Bury').

Assessed here are the buildings on the north side of the section branching from Creechurch Lane and those lining the east side opposite Gherkin Plaza. No. 31 Bury Street forms the corner building with Creechurch Lane. It was a 1960s extension to Holland House (see below) which obliterated the historic James' Court immediately to the west and extinguished the southernmost section of Heneage Lane, which originally ran all the way from Bevis Marks to Bury Street. Of insipid and bland design, the building cannot lay claim to any architectural or historic interest; nor can it be said to be a good visual neighbour to its surroundings because of the way it crashes into the historic street pattern. Accordingly, the building is not considered to meet the criteria for inclusion in a conservation area.

Nos. 33-34, on the southeast corner of Bury Street, is a four-storey building with a basement and attic storeys built for Messrs Burge, grain dealers in 1912. It is a characterful survival of a small-scale early 20th-century office building, once a common type in the City. It has good quality carved stone detailing and makes an effective contrast with the adjacent Holland House (the original form of which it stymied, and subsequently influenced, because Messrs Burge refused to sell up to that building's developers).

The most prominent building on the street is the grade II* listed Holland House (Nos. 1-4 Bury Street, **Figure 6**), built to designs by H.P. Berlage for a Mueller, a Dutch shipping company. Completed, unusually, in 1916 (enabled by Dutch neutrality in WW1), the building consists of six storeys with additional set back roof storeys. Its Expressionist style, distinctive detailing and materials, making it a striking landmark and singular in its use of grey-green faience materials. It has a very high quality of detailing and execution and is one of the architecturally standout buildings in the locality. It wraps around Renown House onto the southern part of Bury Street, continuing the same style and architecture, with a strong and imposing carved corner feature in polished black marble, with stylised prow of ship.



Figure 6: Holland House, Bury Street

To the south, Nos. 5-10 (Copenhagen House) is an office building, constructed in 1977 by Hildebrandt & Glicker. The building has an imposing presence within the street, due to its width but also its robustness and pink granite façade. The building has an affinity with the offices of similar date on Leadenhall Street and Mitre Street and is cut from similar cloth to No. 33 Creechurch Lane. Like those, the scale, modelling and layout of this building are in sympathy with its more historic neighbours in the locality.

Terminating the east side of Bury Street to the north, Nos. 11-12 Bury Street is the earliest building in this street block after the Synagogue: an early C19 house, of five storeys with a modern two-storey mansard roof extension. The façade to Bury Street is of stock brickwork with stucco dressings; the ground floor has been altered considerably to incorporate a large glazed entrance; to the rear it presents a plainer, beautifully patinated brickwork elevation to the Synagogue courtyard. The building is a rare survivor of its kind in the locality and adds variety and interest to the townscape.

Bevis Marks/Duke's Place

Bevis Marks is a busy, heavily-trafficked street. Assessed here are the buildings running southeast from Goring Street to Aldgate Square: a mixed architectural group, of no prevailing architectural or scalar character, and of variable quality. Such

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character as exists is defined mainly by a mix of tall contemporary buildings and C20 buildings of more modest scale.

The north side of Bevis Marks comprises buildings of variable period, quality, style, and materials. No. 24 is a façade retention scheme by Ivan Starkin which incorporates a simple but characterful 1920s stone frontage with corner turret; the remainder is modern and of no significant architectural or historic interest. Nos. 19-22 are a lower, undistinguished modern range. No. 18 (John Stow House) is a modern building of different scale again, set back further from the street than its neighbours; No. 17 possesses a limited degree of individual interest as a 1935 warehouse by Lewis Solomon, with vaguely Art-Deco stylings and visually prominent bands of alternating Portland stone and metal spandrels. No. 40 Duke's Place, opposite, is of a similar aesthetic but differing scale and block plan. Nos. 32-38 Duke's Place, by Seifert, breaks the building line again and is a generic office block of its kind. Duke's Place terminates with a curio: Irongate House (1973-8 by Fitzroy Robinson), seven storeys of strongly modelled elevations clad in stonework fragments of a meteorite that struck South Africa, of geological and some architectural individual interest.

The north side of Bevis Marks, then, has isolated moments of historic fabric but possesses no consistency in scale, architectural treatment, building line or block plan. Compared with the rest of the Creechurch locality, it possesses a haphazard townscape of little inherent architectural or historic interest, which does not share the characteristics of the more consistent townscape prevailing elsewhere in the locality. As such, the north side of Bevis Marks/Duke's Place is not considered to meet the criteria for inclusion in a conservation area.

On the south side of the street, Nos. 10-16 Bevis Marks, Biiba House, is a 1970s building of dark orange brick, four storeys high with a set-back fifth floor. The building deals with its tricky narrow site (created by 1970s road widening) by introducing a colonnade at ground floor level. It incorporates late 19th century pediment and gated archway associated with Bevis Marks Synagogue (located to the south), of historic and architectural interest. The building is an important frontispiece building to the Synagogue and its courtyard, and is of sympathetic scale, form and materiality.

Located off Bevis Marks, reached through the gated archway in Nos. 10-16, is Bevis Marks Synagogue (1701 by Joseph Avis, **Figure 7**) set within its discreet courtyard. Glimpsed tantalisingly through the elegant ironwork gates of this portal, the Synagogue is an undemonstrative brick building, rectangular in plan, with simple elevations of red brick and modest Portland stone dressings with classical stylings. Above these, a slate roof is set behind a plain parapet above cornice level. The courtyard is surrounded by buildings of various dates but mostly consistent scale and, Valiant House excepted, framing the Synagogue with brickwork elevations with regular window openings. There is an intimate sense of enclosure, seclusion and

quietness upon entering the courtyard that contrasts strongly with the bustle of the main street, despite the presence of tall buildings in the Cluster beyond these self-contained immediate boundaries The Synagogue has strong functional, aesthetic and historic relationships with the adjacent Rabbi's House (2 Heneage Lane) and the Vestry (4 Heneage Lane).



Figure 7: Bevis Marks Synagogue, western elevation

As the oldest Synagogue in the UK, the building is of outstanding architectural and historic interest. It was the first purpose-built Synagogue in the City of London following the readmission of the Jewish community in the C17. It is the oldest Synagogue in Britain still in use for continuous worship; a line of continuity unbroken since it was constructed. As such, it has profound and multifarious associations with generations of Jewish people for whom it figured enormously, particularly in the heady years following its opening. The rich and intricate manner of worship within the Synagogue is partly shared with other Jewish communities and partly unique to Bevis Marks.

The building's discreet, off-street location in an enclosed, private courtyard may or may not have stemmed from a law forbidding the Jewish community from building on a high street, but it symbolises the long and complex history of the Jewish community in the City (and Britain), from formal expulsion in 1290 by Edward I to semi-formal readmittance during the Commonwealth and subsequent resettlement. This is a long, profound and intense narrative, at once apparent in the relationship between the Synagogue, its courtyard, and the main street. Of outstanding architectural and historic significance, the Synagogue is one of the 'anchor' heritage assets in the locality.

After Heneage Lane and the north-east elevation of No. 33 Creechurch Lane (see below and above), the remainder of the south side of Bevis Marks, running into Duke's Place, is occupied by the modern development at One Creechurch Place. This is a very large office building of black metal cladding and glazed panels with an amorphous and uninviting ground floor presence. It has a wholly negative relationship with the Creechurch locality; and harmed the surrounding street pattern, architectural quality and materials to the buildings immediately neighbouring and surrounding, it establishes hard visual and physical barriers between them, save for a link between Creechurch Place and Mitre Square that reorientates a historic connection and creates an unforgiving visual setting for much of the buildings in the locality. As such, One Creechurch Place is not considered to meet the criteria for inclusion in a conservation area.

Heneage Lane

The eastern elevation of the Synagogue faces into Heneage Lane (**Figure 7**), a narrow thoroughfare paved with Yorkstone flags and incorporating traditional iron lamp standards. This is quintessential City alley, defined by a strong sense of enclosure, due to its narrow width and the scale of the buildings on both sides of the lane. The historic character and feel of the lane are further reinforced with the presence of the historic lampposts that make a very positive contribution to the area. The prevailing scale, seclusion and subservience it offers to the Synagogue's east front is an important element of the historic area around the Synagogue.

Just north of the Synagogue building and attached to it is the Rabbi's House, No.2 Heneage Lane, dating from the 19th century (between 1875 and 1916). The part of the building facing onto Heneage Lane is of red brick with red Mansfield stone dressings with Tudor detailing and a plainer stock brick elevation to the Synagogue courtyard. Although of different style to the Synagogue, the patina, texture, colour tones and modesty of the Rabbi's House makes it a sympathetic neighbour.



Figure 8: Heneage Lane

To the south of the Synagogue is the Vestry and Valiant House (no. 4 Heneage Lane). The Vestry dates from the late 19th century and though incorporated into the wider Valiant House development, it continues to serve as a vestry and is visually distinct from its more modern adjunct. The three-storey elevation to Heneage Lane is

of high-quality rubbed and carved red brick, and incorporates beautiful brickwork detailing to the window surrounds and cills at first floor level, which feature fine carved rosettes. The third floor is plainly rendered and the fourth mansard floor is recessed from view. The elevation is of a highly sympathetic scale approximate to that of the Synagogue and its materiality and architectural detailing complement that of the Synagogue and the Rabbi's House, with which it forms an integral group.

The main elevations of the adjoining Valiant House (1978-81 by Peter Black and Partners) incorporate glazed bands and dark brown cladding. Rising to seven storeys, extends above the Synagogue complex with a largely black flank wall of grey cladding rising above them, in views from Heeneage Lane. Its architectural treatment, forms, materials and detailing depart from the modest brickwork elevations of the other buildings facing the Synagogue from within the courtyard or along Heeneage Lane, within the proposed conservation area.

The western part of Heeneage Lane is defined by the 1970s office block at no. 33 Creechurch Lane. As described in more detail above, this building is of no inherent interest, but is of a sympathetic scale, materiality and character, importantly preserving the historic street pattern and secluded, quiet lane character.

Leadenhall Street

Leadenhall Street is one of the City's principal and most well-known streets and has undergone a radical transformation in character in recent years, with many of the tall buildings of the City Cluster having a street presence here. The section here assessed is the north side running east from Cunard Place to the junction with Aldgate. The size of the road, the presence of sizeable and tall buildings and the increased vehicle and pedestrian traffic create a more bustling character and feel that contrasts with the more secluded, granular and historic character of the Creechurch locality.

Cunard House is a modern building (completed c.2000) of no inherent architectural or historic interest, although one of its predecessors on the site was the first Synagogue, converted from a house, following the resettlement. Although of broadly sympathetic scale and materiality to the other buildings in the locality, it is notably higher and relates more in orientation and 'feel' to bigger buildings along Leadenhall Street than the smaller-scale, more granular character of the Creechurch locality. As such it is not considered to meet the criteria for inclusion in a conservation area.

After the important elevation of St Katherine Cree (see above) are a pair of modern buildings which help to define the street block around the churchyard, and which are of broadly sympathetic scale, materials and detailing: No. 80 Leadenhall Street by Hamilton Associates (1990) and No. 78-79, by Ley, Colbeck & Partners (1991). Though modern, these buildings form quieter, more neutral components of the Creechurch locality, and maintain the building line and scale of the street block.



Figure 9: No. 80 Leadenhall Street

The corner plot of Leadenhall Street and Mitre Street, Nos. 71-77, is a prominent corner site and one of the key gateways into the locality from the east. The existing building dates to 1986-7 by Gollins Melvin Ward, of five storeys with two additional floors set-back. The building maintains the scale and building line of the street block, with the curved SE corner of the building forming a point of architectural interest; through windows here can be seen a section (grade II listed) of the Holy Trinity Priory comprising a tall late C14 Gothic window arch relocated here from another site.

Of historic, architectural and townscape interest is also the grade II listed pump at the junction of Leadenhall Street and Fenchurch Street. A 'well' is mentioned here in the C13. The present tapering stone pier with vermiculated blocks looks mid-C18 but with a Victorian pedimented top and brass dog's head spout. Although now surrounded by modern office blocks, the Pump is reminiscent of the earlier history of the area; it is a de-facto memorial to the Aldgate Pump epidemic and signifies the start of the East End, as well as a point from which distances were measured into the counties of Essex and Middlesex.

3.3. Eligibility for Conservation Area Status

Historic England Advice Note 1 proposes, at para 11 (p.5), three questions to define eligibility for conservation area status:

- a) Does the area have sufficient architectural or historic interest for the area to be considered 'special';
- b) Whether this is experienced through its character and appearance;
- c) Whether it is desirable for that character or appearance to be preserved or enhanced, and what problems designation could help solve.

In respect of (a) and (b), the Creechurch locality is found to be richly historic, with a multi-layered sense of place stemming from the ancient delineation of the Roman and medieval City wall and Aldgate and the layout of the Holy Trinity Priory, foremost amongst the medieval City's monastic foundations, both of which have perceptibly influenced the modern street plan. Although upstanding remains of these structures are not now visible in the townscape (with the exception of the Grade II listed archway to the rear of nos. 39 and 40 Mitre Street), the archaeological potential, placenames, forms and spaces (e.g. Aldgate, Mitre Street and Square, Creechurch Place, St Katherine Cree churchyard) they bequeathed convey a strong sense of special historic interest.

Above ground, there is significant architectural interest in the streets and buildings subsequently developed from the early modern period onwards: the two City churches and Bevis Marks Synagogue offer outstanding examples of their types; Holland House strikes a pleasingly eclectic note; the Creechurch/Mitre Street warehouses are a rare and fine group of their kind. The locality is found to possess a varied, characterful and interesting group of historic buildings studded with highly significant historic places of worship and interspersed with more neutral modern buildings that help to create a consistent sense of townscape and distinctive sense of place.

For clarity, the following streets and buildings are considered to depart from these qualities, and for the reasons set out above are not considered eligible for inclusion in the proposed conservation area:

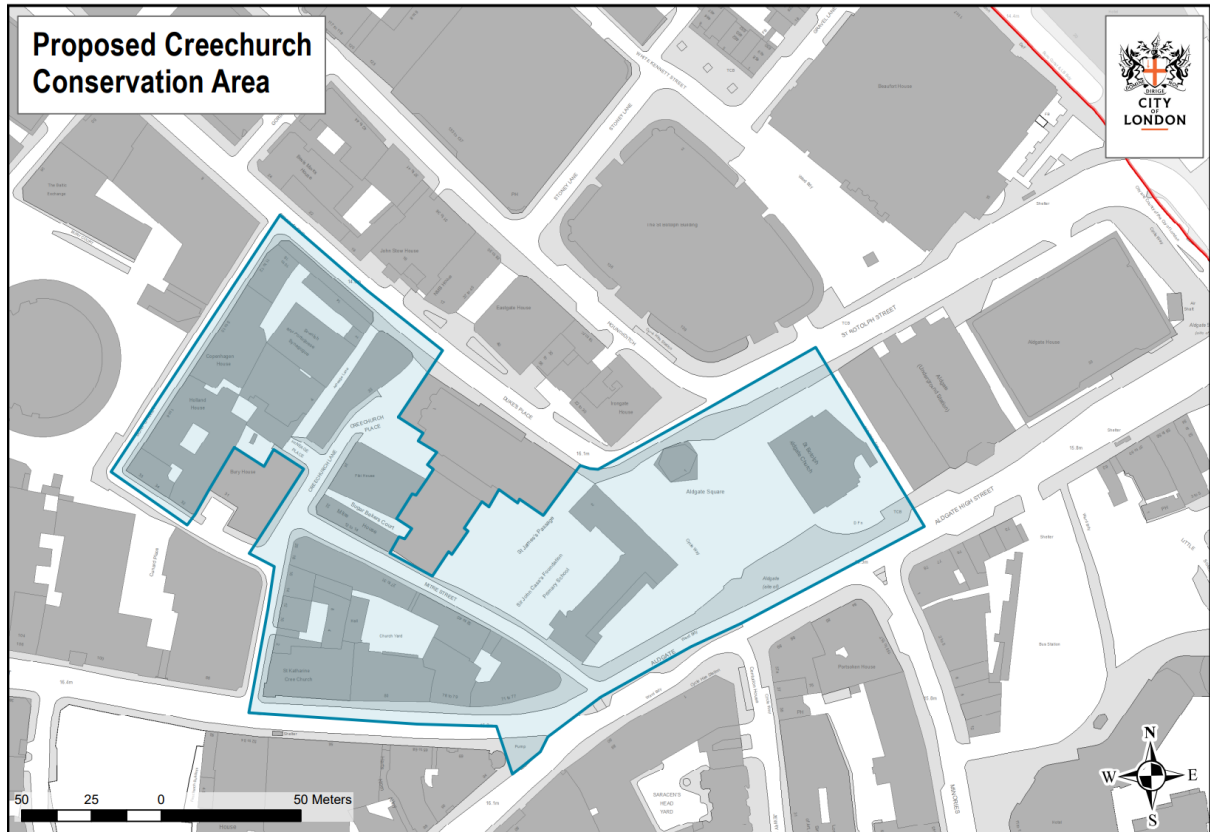
- Bevis Marks/Duke's Place (north side), from Goring Street to Aldgate
- No. 31 Bury Street
- One Creechurch Place
- Cunard House

Otherwise, a conservation area is proposed with the boundaries tightly drawn around the streets and buildings described above. In respect of question (c), it is considered highly desirable to preserve the architectural charisma and sense of history

prevailing in the Creechurch locality; and that conservation area designation would be an appropriate management tool to achieve this overall aim, and for preserving and enhancing the appearance particularly of the unlisted group of late C19 warehouse buildings at the heart of the locality, but also of the cohesiveness of the area's character and appearance as a whole.

4. Proposed Creechurch Conservation Area

4.1. Proposed boundary



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West

The boundary would run along the middle of Creechurch Lane, then kink and follow the footprint of No. 31 Bury Street in order to exclude it from the area, then return along the rear of Holland House to Bury Street, whence it would proceed along that middle of that street west and then north to Bevis Marks.

North

The boundary would run along the middle of Bevis Marks to the building line of One Creechurch Place, whence it would be drawn tightly around the footprint of that building to exclude it from the conservation area, returning along the west side of St James's Passage to the end of Duke's Place, whence it would run east along the middle of St Botolph Street to St Botolph Row.

East

The boundary would run along the middle of St Botolph Row to the middle of Aldgate High Street.

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South

The boundary would run along the middle of Aldgate High Street/Aldgate to the tip of Fenchurch Street, so as to incorporate the Aldgate Pump; it would then kink back up to Leadenhall Street and run along the middle of that street to the centre of Creechurch Lane.

4.2. Overarching summary of special interest

- (i) Strong and visible associations with the Roman and medieval City wall and Holy Trinity Priory, visible in the modern street pattern [HE bullet III]
- (ii) A characterful group of late C19/early C20 warehouses on Creechurch Lane/Mitre Street that are fine examples of their kind and survivors of a type now rare in the City [HE bullets I, IV]
- (iii) Three places of worship of (in a City context) unusually diverse origins and of outstanding architectural and historic interest: Bevis Marks Synagogue (first purpose-built since resettlement and now oldest in UK), St Katherine Cree (a former Priory church) and St Botolph Aldgate (an extramural parish church) [HE bullet I]
- (iv) A proliferation of historic open spaces of diverse scales, functionality and appearance [HE bullet V]
- (v) Strong and continuing associations with the Jewish community following resettlement in the C17 [HE bullet II]

4.3. Architectural/artistic interest

The oldest building in the proposed conservation area is St Katherine Cree (tower of c.1504, church of 1636), an architecturally unusual City church in that it comprises a very early and idiosyncratic marriage of perpendicular Gothic externally and classicism internally; the earlier, diminutive, ragstone-walled tower speaks powerfully of the building's humble status as a parish church and, before that, a small Priory chapel.

Bevis Marks Synagogue (1701) is an excellent example of a simple, non-Anglican, C17 place of worship. The simplicity of its exteriors belies a fascinating complexity of influences. The Queen Anne stylings reflect both the simple vernacular of nonconformist chapels (Joseph Avis was a Quaker) and also the simpler elevations of some of the contemporaneous City churches; architecturally, therefore, it sits somewhere between the churches of the state religion and the buildings of the nonconformist faiths. This reflects the moment of its construction, at the turn of the C17/C18, when the rebuilding campaign of the City churches was well under way and the City was teeming with skilled carpenters and masons, many with links to

Wren and his office. Though simple, the elevations are executed to a very high standard of quality, again reflecting the proliferation of expertise with brick and woodwork at this time.

Some forty years later, the church of St Botolph Aldgate was rebuilt by George Dance the Elder in an amplified version of the simple Classicism employed at the Synagogue. It is a robust composition employing all the usual stylistic devices of the day and has a fine, landmark quality. Collectively, the three places of worship in the proposed conservation area are fascinating illustrations in the shifting tastes as to the suitable architectural clothing of a place of worship. The surviving house at Bury Street (1811) illustrates, albeit later, the way this style was employed on secular buildings of the period.

The group of C19 warehouses are a fine illustration of the kind of small-scale, robust, free-classical mercantile architecture once widespread in the City; they display assured handling of scale and proportion and judicious use of simple classical devices such as rustication, keystones and columns; Cree House, a focal point of the group, goes further with striking terracotta banding and fine carved brickwork and cast terracotta incorporating fruit motifs. The group are executed to a high level of skill. Also, of the C19 are the Vestry and Rabbi's House flanking the Synagogue, modest but well-crafted and executed examples of their kind.

The Aldgate School is another prominent presence within the proposed conservation area. Of a fine, Edwardian neo-Wren style – such that its main east front has the air of a miniature Hampton Court – it is a judiciously designed and proportioned and superbly executed building, of characterful Portland stone and warm red brick, rubbed for details such as keystones and pilasters. It incorporates much characterful ornament such as the little statues of children on the east front and is attractively patinated.

The standout building of the C20 in the proposed conservation area is Holland House. For a sense of its architectural impact, it is best viewed with its neighbour, Renown House. Designed by H.P. Berlage, the building exhibits a tensely vertical main elevation to Bury Street (a response to the original narrowness and exclusively oblique views of that street), with an asymmetrical entrance and simple, vaguely Art Deco detailing; it broke all the architectural rules the City tended to favour at that time, a flavour of which is given by the staid Classicism of Renown House.

Later C20 buildings tend to be of lesser inherent interest, but there is an important consistency in the way they conform to the scale and building lines of the street blocks to which they belong and employ sympathetic materials and simple details. They act as neutral punctuation marks within the proposed conservation area, allowing the historic buildings and spaces to shine.

4.4. Historic interest

There is evident, superlative historic interest in the locality's connection with the Roman and medieval City wall (substantive parts of which and the Aldgate survive below ground as Scheduled Ancient Monuments) and Holy Trinity Priory, one of the foremost monastic foundations of the medieval City, of such importance that medieval English royalty were buried here; it was the earliest to be dissolved in England and therefore of particular interest in this respect; parts of it were sold off to significant courtiers including the Duke of Norfolk.

Of the individual buildings, St Katherine Cree (the oldest surviving above ground) is a nationally-rare type: an early C17 church built during the schisms of Charles I's reign, when few new churches were built; it was consecrated by Archbishop Laud, the controversial Carolean churchman. The church itself stands within the Priory precincts and originated (not this building, but its predecessor) as a Priory chapel.

Bevis Marks Synagogue lends the locality profound associations with the Sephardi Jewish community, who settled here following resettlement in the C17 and have maintained an unbroken presence ever since; the area also has, through the lost presence of the Great Synagogue on Duke's Place, historic associations with the Ashkenazi Jewish community.

The group of C19 warehouses at the heart of the proposed conservation area are a fascinating illustration of how a once-prestigious monastic complex evolved through a period of dissolution and subsequent aristocratic occupation/landlordism to arrive at relatively humble mercantile uses; they illustrate the shifting fortunes of a more peripheral area of the City tucked within the wall and gates, away from the centre, and a once-widespread mercantile warehousing function of the City which is now far less visible.

Through Holland House, the locality has associations with H.P. Berlage, an influential C20 Dutch architect, and the Dutch shipping company Mueller. Other individual associations of note include, but are not limited to, Geoffrey Chaucer (who lived in the Aldgate), the Duke of Norfolk, Archbishop Laud, Samuel Pepys (who visited the preceding Synagogue on Creechurch Lane) and George Dance the Elder.

4.5. Archaeological interest

There is considerable archaeological potential to uncover more of the precincts and remains of Holy Trinity Priory and the Abbot of St Edmundsbury's Inn, as well as burials in the former churchyards. Many of the individual buildings, particularly the

tower of St Katherine Cree and the Synagogue, hold evidential value as to construction methods and design practices of their eras.

5. Conclusion & Next Steps

- A new conservation area is proposed at the Creechurch locality, informed by the detailed assessment set out above;
- The proposed boundary differs from that proposed by the Synagogue in that it would exclude the following buildings:
 - Those on Bevis Marks/Duke's Place (north side), from Goring Street to Aldgate
 - No. 31 Bury Street
 - One Creechurch Place
 - Cunard House;
- Subject to committee support, the next step would be to consult publicly on the proposals, in line with the City's Statement of Community Involvement, to obtain the views of occupiers in the area, consultees including Historic England and the general public on the proposals;
- The results of the consultation and the proposed conservation area boundary would then be reported back to Members for a decision on whether to designate the proposed Creechurch Conservation Area.
- If the Conservation Area is designated, the subsequent step would be to prepare a Character Summary and Management Strategy document to set out the City's proposals for the preservation and enhancement of the area.

Appendix 3: Background Papers

**PROPOSED BEVIS MARKS/CREECHURCH
CONSERVATION AREA**

(INSERT PHOTOGRAPH)

XX May 2022

DRAFT

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1. BACKGROUND AND SUMMARY

- 1.01 The Planning (Listed Buildings and Conservation Areas) Act 1990 Section 69(1) requires local planning authorities, from time to time, to determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and to designate those areas as conservation areas. It is the duty under Section 69(2) of the Act of a local planning authority from time to time to review the past exercise of functions under this section and to determine whether any parts or any further parts of their area should be designated as conservation areas.
- 1.02 This document proposes the designation of a new conservation area in the Bevis Marks/Creechurch Lane area within the part of the City of London. The area proposed for designation contains a number of statutorily listed buildings which are of outstanding and exceptional heritage significance. Three are Grade I listed, and one is Grade II*. There are also several Grade II listed buildings. The area also contains an important collection of non-designated heritage assets for which at present there is no special protection. The area comprises a network of narrow lanes and passages which are an important survivor of the City's historic medieval street pattern. Despite the proximity to the cluster of tall buildings in the eastern part of the City, the area under consideration has a remarkably consistent and harmonious low-rise scale of buildings with similar parapet heights which results in a consistent and uniform townscape fronting the narrow streets. As well as architectural interest the area also has an extraordinarily high historic and archaeological interest, and a deep social and cultural history.
- 1.03 The existing character and appearance of the area, together with the setting of several highly graded statutorily listed buildings, such as the Synagogue in Bevis Marks, has been threatened by two recent planning applications for very tall buildings on sites within the area, namely 33 Creechurch Lane (Ref.18/00305/FULMAJ), awaiting determination, and 31 Bury Street (Ref. 20/00848/FULEIA) which was refused planning permission on 5th October 2021, against officer advice.

- 1.04 It is considered that the designation of a new conservation area, and the adoption of policies for preservation and enhancement, would greatly assist in the protection of the setting of the listed buildings, as well as affording a degree of protection to undesignated heritage assets which front several of the nearby streets.

2. EXISTING CONSERVATION AREAS AND HERITAGE ASSETS NEARBY

- 2.01 There are two existing conservation areas fairly close to, but not abutting, the area under consideration. The Lloyds Avenue Conservation Area, designated in 1981 and modestly extended in 2007, is focussed on the Edwardian street of Lloyds Avenue, between Fenchurch Street and Crutched Friars. St Helen's Place Conservation Area, also designated in 1981, and extended in 1998, is centred on those buildings that define the space of St Helen's Place and those which contribute to the setting of the Parish Church of St Helen's.
- 2.02 Both these small conservation areas have very distinctive characters, with clear and logical boundaries. There is no obvious or logical case for their extension to include any of the area which is being considered in this document for a new Bevis Marks/Creechurch conservation area.
- 2.03 No.38 St Mary Axe is a nearby Grade II listed building, but it is separated from the area under consideration in this report by modern tall buildings on the west side of Bury Street. There is no visual, historic, or functional linkage to the east side of Bury Street or to Bevis Marks, and therefore there is no logical reason to extend the boundaries of the proposed new conservation area to include No.38 St Mary Axe.

3. PROPOSED BOUNDARIES

- 3.01 The proposed boundaries of a new Bevis Marks/Creechurch Conservation Area are shown on Map 1. They are drawn to run down the centreline of roads, with the exception of Cunard Place and the pedestrian passageway through to Leadenhall Street.

4. HERITAGE SIGNIFICANCE

- 4.01 If the area under consideration becomes designated as a conservation area, then the area, as a whole and in part, becomes a designated heritage asset. It is essential, as part of the designation process, that the significance of the heritage asset is carefully assessed so that its special architectural and historic character and appearance is clearly identified.
- 4.02 National Planning Policy Framework Annex 2 states that significance is the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic, or historic. Significance derives not only from its physical presence but also from its setting. These criteria accord broadly with those set out in Historic England's Conservation Principles, namely evidential, historical, aesthetic, and communal. The heritage significance is set out below.

Archaeological

- 4.03 The City of London is the historic centre of London, with a rich history of monuments and archaeological remains surviving from all periods. It is an historic landscape which has shaped and influenced the modern townscape. There has been almost continuous occupation of the City from the initial Roman settlement, with some evidence suggesting earlier occupation. The development of the City is contained within the visible and buried monuments and archaeological remains. The history of settlement has led to the build-up and development of a very complex, and in some areas, deep archaeological sequence. Later building development and basement construction has partly eroded the archaeological evidence, and in some areas remains have been lost with no record or an incomplete record of only part of a site. *(This paragraph derives from the City of London's standard Conservation Area Character Summary documents)*
- 4.04 Archaeological investigations have produced evidence of multi-period defensive and domestic occupation in the area. Most notable are the discoveries of highly significant archaeological remains relating to the City's Roman walls and buildings, and the early medieval Holy Trinity Priory precinct, the former site of which is now bounded by Duke's Place, Aldgate, Leadenhall Street and

Creechurch/Heneage Lane. The source base of the archaeology comprises primary sources including strata, finds, and structures found both above and below-ground. For the post-medieval period this is supported by secondary sources including documentary and map evidence. The development of the former Holy Trinity Priory precinct is now understood in detail through recourse to both primary and secondary sources.

- 4.05 The Roman period archaeological deposits are highly significant for providing evidence of the development of the City's walls in two key phases, specifically the evidence for the original wall and one of its gates, Aldgate, which were constructed in the late 2nd or early 3rd century when the City was first enclosed and the addition of bastions or interval towers to the eastern and north-eastern sections, concentrated in the area of Duke's Place, in the late 4th century. Excavations on Leadenhall Street have also revealed evidence for intense Roman activity featuring successive occupation layers and notably two buildings which had undergone several phases of reconstruction and repair. These are significant for informing our understanding of the layout of the Roman settlement and building typologies and materials.
- 4.06 Evidence for the Saxon period is limited in the City due to the focus of settlement having been outside of the walls about a mile to the west at what is now Aldwych. The discovery of possible Late Saxon period strata and finds including burials which suggest a graveyard in the area is therefore highly significant when taken in the context of current understanding on where settlement activity was focused during that period.
- 4.07 The highly significant archaeological evidence revealed by excavations in the area focused on the former site of the Holy Trinity Priory, Aldgate precinct has contributed to important studies of both London monastic institutions and the effect of the Dissolution on religious precincts. This has previously been described as a neglected subject which has now been substantially informed by the evidence derived from the area. The establishment of the Holy Trinity Priory within the walls is in itself very informative in the understanding of land use in the early medieval period and is also suggestive of its importance. The precinct covered a large area, and its location is suggestive of the availability of space in the eastern part of the City during that period, and when many other religious houses were founded

outside the walls. It is now understood that the area was largely uninhabited until the Priory was founded in 1107-08 and after which and into the early 12th century much of the basic street pattern was developed. As it expanded, the Priory continued to impact the topography of the area with its enclosure of existing lanes including a length of what is now Duke's Place which was enclosed in the 13th century and then reopened after the Dissolution.

- 4.08 Using both primary and secondary sources, it has also been possible to understand the development of the precinct and the wider area in the post-medieval period and its multi-occupation and mixed-use character. Of particular significance, is the evidence for new industries introduced by immigrants, particularly the production of delftware by the Flemish potter Jacob Jansen and others in the former Priory precinct in the late 16th century.
- 4.09 As the City grew in importance as a financial centre from the mid-19th century, its prevailing character changed from that of residential - industrial to commercial with an attendant depopulation as houses were cleared for offices, warehouses, and railway stations. The redevelopment of the area for commercial use resulted in the removal of both above- and below-ground structures and archaeological deposits of medieval and post-medieval date, much of it because of the construction of office buildings and the excavation of basements. Notwithstanding this, there is still evidence of these earlier periods in the historic buildings of the area including the tower of the Guild Church of St Katharine Cree that incorporates elements of the Priory, and the mid-18th century Bevis Marks Synagogue. These buildings contribute directly to the sense of place and provide a tangible source of further understanding of the special archaeological interest of the area.

Historical

- 4.10 The area has special historical interest arising from its associations with notable and important foundations and individuals. Foremost amongst these for representing the most tangible connection between the historic place and people is the Jewish community who have been an enduring presence in the area since their resettlement in England in the mid-17th century.

- 4.11 During the medieval period, the Holy Trinity Priory, Aldgate dominated the area. Founded by King Henry I's Queen, Matilda, it was one of the most important monastic houses and one of the earliest Augustinian houses to be established in England. By the late 12th century / early 13th century, the precinct covered a large area and comprised imposing stone buildings, including a large and architecturally impressive church, the site of which is now bisected by Mitre Street, and a cloister now represented by Mitre Square. The church was the burial place of two of the children of King Stephen in the mid-12th century and of London's first mayor, Henry FitzAilwin. A tangible connection can be made to this important early part of the area's history through the fragments of the Priory precinct that survive in situ above ground. These comprise the lower part of the tower to the Guild Church of St Katharine Cree, the garden of which is the last remaining portion of the medieval churchyard, and a 13th century arch from the Priory church now contained in a nearby office building.
- 4.11 The Holy Trinity Priory was the first monastic house to be dissolved in 1532 and the property was granted to Thomas Audley, soon to be Lord Chancellor, who began to redevelop the precinct. This included converting the chapels around the choir of the monastic church into tenements. Attendant with the change of use to residential was the emergence of the former precinct as an important place for new and innovative industry in the late 16th century. It was home, as was the area generally and as remains today, to a diverse community. At that time, it was a focus for immigrants fleeing religious persecution, amongst which were Jacob Jansen and Jasper Andries, potters originally from Antwerp who had set up a small pottery there by 1571 and are believed to have produced the first tin-glazed or delftware pottery in England.
- 4.12 A key contributor to the special historical interest of the area is the association with the very highly significant historic, established, and most importantly, enduring Jewish community that was concentrated in the City and to the east up until the early 19th century. The area is also of very high significance for the community as it was on Creechurch Lane that the first synagogue was established in England for public worship after the expulsion of the Jews in 1260. Its name "Sha'ar Hashamayim" ("Heaven's Gate") is notable given its location near the Roman Aldgate.

- 4.13 By the end of the 17th century the Ashkenazi (originating from northern and eastern Europe) Jewish community had grown to such an extent that they moved to a new building, The Great Synagogue situated on what is now Duke's Place. The congregation continued to grow in the 18th century and in 1722 and then between 1788 and 1790, larger replacement synagogues were built on the site. The third and final synagogue of 1788-90 was destroyed by German bombs in 1941.
- 4.14 In 1688, many Sephardi (originating from the Iberian Peninsula) Jews from Holland settled in the area growing the community. Consequently, the Sephardi congregation needed a larger space for worship. In response, the Bevis Marks Synagogue was constructed between 1699 and 1701 to the designs of Joseph Avis, a master builder and Quaker who had previously worked with Christopher Wren. It is of exceptional historical interest and notable for remaining little altered and being the oldest synagogue in the country. Importantly, it remains the focus of religious, communal, and educational activities to this day and is the only synagogue in Europe that has held regular services continuously for over 300 years. It represents tangible evidence for the historic and on-going relationship that Jews have had with this part of the City.
- 4.15 A notable, and now one might say, notorious historical figure with an association with the area is Sir John Cass (1661 – 1718) who in 1710 founded a school in the churchyard of St Botolph without Aldgate. Cass held the position of Sheriff in the same year. He represented the City in two Parliaments and was knighted in 1712. The school that he founded is now accommodated in a Grade II* building of 1908 situated opposite the church. Cass was a philanthropist who established a foundation in 1748 to support disadvantaged young people in London. Newly acquired knowledge obtained on behalf of the former Sir John Cass's Foundation, now The Portal Trust, has demonstrated his role in investing and active management of the slave trade. Consequently, his legacy has been re-evaluated resulting in the re-naming of the foundation. Notwithstanding this, the area's association with an influential figure in late 17th century and early 18th century London and one who was, it seems instrumental in the slave trade needs to be acknowledged for furthering our contextual knowledge and understanding of the period and the history of the area.

Architectural

4.16 The area contains a considerable number of buildings of outstanding architectural interest, recognised by statutory listing. However, there is also a concentration of non-listed buildings or structures that are of local architectural interest, including good examples of late 19th century warehouses, inter-war commercial buildings and post-war offices. There are also several quite recent buildings of architectural interest. The close proximity of buildings of different ages and contrasting styles but of similar height and massing gives the area a special and distinctive quality. The quality of each individual building in the area is assessed in the section below, but it is their ensemble that gives the area its very special architectural quality.

Artistic/Cultural

4.17 Although now dominated by offices, the area retains a vibrant and diverse community with religious organisations playing an important welfare role in providing a religious focus and social, and educational activities. These organisations, specifically, the Bevis Marks Synagogue, the Guild Church of St Katharine Cree, and the church of St Botolph Without Aldgate serve a multi-generational and diverse community. They contribute to the wellbeing of their congregants, residents, City workers and visitors to the area who are attracted by the opportunities for religious observance, education, and recreation. Formal education is provided at The Aldgate School run by The Portal Trust (formerly the Sir John Cass's Foundation) which is the only state-funded school in the City and the only primary school. Consequently, there are large numbers of people who over a considerable period, have or had collective memories of their experiences of the area and strong associations with it.

4.18 The Sephardi community at Bevis Marks have a deep and established connection with the area and the synagogue continues to remain the focus of religious and communal life as it has since it opened over 300 years ago. The mission of the Guild Church of St Katharine Cree is to concentrate on those who work in the City in precarious, low paid or 'hidden' occupations. For many years, the church of St Botolph Without Aldgate was synonymous with the work for the homeless caring for hundreds of people a day. Although this work has discontinued, it still plays an important role in the community for hosting weddings and concerts.

4.19 Aldgate Square is the very popular green heart of the area providing respite from the intensity of City life and the dominant built environment. It also hosts temporary site-specific public artwork as part of a new biannual commission, the Sculpture in the City Aldgate Square Commission, that supports emerging artists in the UK. This is an important initiative for community engagement as the site-specific element is influenced through the process of the artists developing their proposals in collaboration with the local community. The artists are directed to consider and respond to the cultural and historical significance of the local area and the collaborative process is important for community to express what is important and meaningful to them.

5. ASSESSMENT OF INDIVIDUAL BUILDINGS

5.01 Map 2 shows the location of existing statutorily listed buildings; other buildings that are suggested to be non-designated heritage assets because of their architectural or historic significance which contribute positively to the character or appearance of the area; buildings which are considered to have no particular architectural or historic interest but whose scale and massing is sympathetic to the character and appearance of the area; and those which are suggested to have a negative or harmful impact on the character or appearance of the area. These are described below:

Aldgate Square and High Street

5.02 St Botolph's Church and attached railings and gate to yard, Grade I listed, 1741-4 by George Dance the elder, and one of the City's fine post-Fire churches, of very high heritage significance architecturally and historically. The elegant tower and spire are an important local landmark. The setting of the church has been greatly improved by the new public realm created at Aldgate Square, designed by Gillespies. The new Aldgate Centre, designed by Edwards Wilson Architects, currently under construction on the east side of the church, facing onto Botolph Row, promises to provide a useful extension to the church and to make a positive contribution to the character and appearance of the area.

- 5.03 Police Call Box, outside St Botolph's church, grade II listed, c.1935, historic street furniture.
- 5.04 Metropolitan Drinking Fountain, outside St Botolph's church, 1906, historic street furniture.
- 5.05 Portsoken Pavilion Café, 2018 by MAKE Architects, part of the newly created public realm which greatly enhances this part of Aldgate. Though very new, it is architecturally interesting and makes a positive contribution to the character of the area.

Bevis Marks

- 5.06 Bevis Marks Sephardi Synagogue Grade I listed, is the world's oldest synagogue in continuous worship, constructed in 1699-1701. It is a heritage asset of international importance and at the highest level of significance in terms of all the criteria of heritage value. Set back from the street, as required at the time of its construction, and accessed through an archway on the street frontage into a small courtyard, its site is constrained by surrounding buildings whose modest scale is critical in terms of preserving the setting of the Synagogue and the quality of the internal space.
- 5.07 Nos. 10-16 Biiba House, south side between Bury Street and Heneage Place, 1970s pale orange brick, divided into six three-window bays, with arcaded ground floor, four storeys with set-back fifth floor, making a neutral contribution to the character and appearance of the area. At first floor it contains the reset 19th century pediment marking the entrance to the Synagogue to the rear, a feature which contributes positively to the area. The scale of the building as a whole is entirely appropriate and contributes to the setting of the Synagogue to the rear.
- 5.08 No. 17 Creechurch House, 1935 warehouse by Lewis Solomon, seven storeys plus two set-back metal spandrels between windows and stone columns, splayed corners to Houndsditch and Bevis Marks, Art Deco detail, including original multi-paned metal Crittall windows, makes a positive contribution architecturally.
- 5.09 No. 18 John Stow House, built originally as an extension to No. 17 in 1962-6 by Theo Birks, eight storeys, H-plan with set-back to allow for road widening, is of no particular architectural interest, but its scale is appropriate.

- 5.10 Nos.19-22 Four storey plus one set back, architecturally undistinguished range with vacant ground floor shops, makes a neutral contribution to the street.
- 5.11 No. 24 Bevis Marks House retains 1920s stone corner turret and frontage to Bevis Marks which contributes positively to the area. The rear, including elevation to Houndsditch and Goring Street is five storeys, 1983 by Ivan Starkin, heavily modelled granite clad facades, of no architectural or historic interest, but appropriate scale, making a neutral contribution.

Bury Street

- 5.12 Nos. 1-4 and 32 Holland House Grade II*, of outstanding heritage significance designed by the Dutch architect H.P.Berlage, built 1914-16, with interiors by Henri van de Velde, in a remarkably idiosyncratic style and with unusual materials. Western frontage five storeys plus one set back, south elevation four storeys with two set back, either side of Nos.33-34.
- 5.13 Nos. 5-10 Long polished granite façade, 1977 by Hildebrandt & Glicker, five stories to parapet, with two raked-back floors. Pale brick rear elevation is important to the setting of the yard of the Synagogue. While of no particular historic or architectural interest its scale is sympathetic to its immediate neighbours, exactly matching the parapet height of Holland House.
- 5.14 No.12 Early 19th century five-bay house, with rusticated ground floor, built after most of Bury Street had been burnt in a fire in 1811. Recently restored with two additional floors set back to be invisible from the street. Consistent parapet height with its neighbours on each side, and its rear brick elevation provides an attractive enclosure to the courtyard of the Bevis Marks Synagogue. It makes a positive contribution to the area and should be considered as an undesignated heritage asset.
- 5.15 No. 31 Extension to Holland House by Gotch & Partners 1967, five storeys plus two set-back floors, architecturally undistinguished but an appropriate scale for its highly significant neighbours.
- 5.16 Nos.33-34 Edwardian commercial building, 1912 by Delissa Joseph for Messrs. Budge, grain dealers. Classical neo-French fin

de siècle style, Portland stone, four storeys plus mansard, forms a fine corner around which wraps Holland House.

Creechurch Lane

- 5.17 Nos. 2-16 Creechurch Buildings, Grade II listed, 1885 former tea warehouse, five storeys, brick, and stucco, by Franklin S. King, comprising frontage and rear blocks including inner courtyard accessed through archway. Well preserved including cranes and iron swing hoists to loading bays. It has high heritage significance both architecturally and historically as evidence of the warehouse activities that once dominated this part of the City. Upper floors converted to residential use.
- 5.18 Nos. 18-20 Cree House, remarkably florid red-brick, and terracotta warehouse, 1891-2 by M.E. Collins for Phillips & Co. fruiterers. Arcaded ground floor with banded voussoirs originally accommodated fruit stalls. Lavish carved terracotta decoration. Surprisingly not statutorily listed but should be considered as a non-designated heritage asset. Historic parish boundary marker plaques survive on street elevation.
- 5.19 Nos. 22-24 Five storey former tea warehouses, 1895, yellow brick with red dressings above, and stone-faced shopfronts. North elevation formerly facing Creechurch Place, or St James Place, is equally good. Makes a positive contribution to the area and should be considered as a non-designated heritage asset.
- 5.20 No.33 Arthur Castle House, five storey office 1978-81 by the Architects' Comprehensive Design Group, occupies a wedge-shaped island block with long elevations to Creechurch Lane and Heneage Lane, and a narrower frontage to Bevis Marks, polished Sardinian granite, bronze panelling, and uniform flush windows. It is of no architectural or historic distinction, but its scale is appropriate for its position.

Duke's Place

- 5.21 One Creechurch Place, 19 storey office tower, completed 2017, by Sheppard Robson Architects, in black metal and glass. T-shaped plan, with new public realm facing Mitre Street. The enormous scale is inappropriate for its surroundings, the colour and materials used are alien to its context, and at ground floor level the building

makes a dismal contribution to the street, the open space, and the public realm. It detracts from the setting of St Botolph's Church when viewed across Aldgate Square and the Aldgate School which it abuts. Overall, it has a negative impact on the area.

- 5.22 No. 30 Irongate House, 1973-8 by Fitzroy Robinson Partnership, seven storeys, recessed ground floor supported on pillars, upper floors vertical windows heavily recessed in polished red South African granite. The black veins of this Parys granite is evidence of ancient meteorite impact, of considerable interest to urban geologists. The building well-proportioned and is an appropriate scale for its prominent position with three street frontages to Duke's Place, Houndsditch, and the new Aldgate Square public space. It makes a positive contribution architecturally.
- 5.23 Nos. 32-38 Duke's House, 1962 by Richard Seifert Architects, eight storey offices, stone-faced with polished mullions, set back on Duke's Place and Houndsditch for road widening. It has little architectural or historic interest, but its scale is appropriate for the area.
- 5.24 No. 40 Greenly House by Levin Solomon, Son & Joseph, 1950, in pre-war classical style, five storeys stone clad, plus mansard with dormers above heavily dentilled cornice. Makes a positive contribution to the area.
- 5.25 Remains of Roman wall, bastions, and city gate of Aldgate. Significant amounts of historic fabric survive in basements, up to 2.5 metres high, and buried below street level, Scheduled Ancient Monument comprising archaeology of very high significance (see Map 3)

Heneage Lane

- 5.26 No. 2 Vestry House for Synagogue, 1880s, red brick, four storeys, asymmetric composition, Arts & Crafts style. Makes a positive contribution to the area. Because of its functional connection it could justifiably be considered to be part of the cartilage of the adjacent statutorily listed synagogue.
- 5.27 No. 4 Annex to Synagogue, 1880s, three storeys, ground and first in red brick, rendered second floor. Makes a positive contribution to the area, and like the Vestry House might be considered part of

the cartilage of the statutorily listed synagogue. Between Nos. 2 and 4 lies the east end elevation of the Bevis Marks Synagogue (see Bevis Marks above)

- 5.28 Valiant House, five storeys plus two set-back floors, offices by Peter Black & Partners 1978-81, with pilotis carrying it over the yard entrance off Heneage Lane. Though of no architectural merit it is an appropriate scale for the street.
- 5.29 East side of Heneage Lane comprises the west elevation of Arthur Castle House (see No.33 Creechurch Lane).

Houndsditch

- 5.30 Nos. 31-36 Northern section and frontage of John Stow House (see No.18 Bevis Marks) eight storeys set back for road widening but projecting ground floor developed in 1980s for the Lion PH.
- 5.31 No.37 Narrow fronted 1930s, three storey plus one set back, modest Art Deco details, makes a minor positive contribution.
- 5.32 Nos. 38-9 Utilitarian 1950s office, five storeys, narrow frontage but strong horizontal windows, slightly set back frontage, of little architectural or historic interest but modest in scale.
- 5.33 Nos. 40-41 Portland stone 1920s commercial building, four storeys plus double mansard, rusticated stone quoins, dentilled cornice at second floor, dormers with copper cladding, makes a positive contribution to the character of the street.

Leadenhall Street

- 5.34 Church of St Katharine Cree, Grade I listed, and the most important church built in London between Inigo Jones and Christopher Wren, nave dating from 1628-31 although the tower is medieval, surmounted by mid 18th century cupola. It is one of the few pre-Fire churches in the City that also escaped serious war damage. With its modest yet distinctive tower and cupola on the corner with Creechurch Lane, and its low frontage to Leadenhall Street, the setting and backdrop of views of St Katharine Cree is particularly important. The delicately exquisite sundial on the Leadenhall Street elevation is a remarkable feature, dating from 1706.

- 5.35 No.76 Swiss Re House, 1986-7 by Gollins Melvin Ward, forms the acute corner with Mitre Street, five storeys with two additional floors set-back, curved flat-iron corner, an appropriate scale for its position. Inside the main entrance foyer and incorporated into the new fabric is a remarkable fragment of the Augustinian Holy Trinity Priory, comprising a tall late 14th century Gothic window arch, This is statutorily listed Grade II, and together with other fragments preserved in the basements is an important part of the area's medieval history and archaeology.
- 5.36 No.78 five storey office building with two set-back roof storeys, 1989-91 by Ley, Colbeck & Partners, stone-clad, highly modelled with post-modernist detailing, and linking behind No.76 with Nos. 32-40 Mitre Street. Its scale is appropriate for the area.
- 5.37 No.80-84 five storey offices with set-back additional floors, 1990, by Hamilton Associates, with well-articulated post-modernist detailing, using high quality materials. It might be considered to have limited architectural or historic interest, but it is an appropriate scale for its location.
- 5.38 No.88 Cunard House six storeys, limestone facing, with recessed 7th floor, 1999 by Fitzroy Robinson, sub-classical style, with inverse curved corner with Creechurch Lane, referencing the magnificent 1930s Art Deco building by Mewes & Davis which previously stood on the site. It incorporates details from the previous building including nautically inspired metalwork to the ground floor and plaque from the old building on the curved corner to Creechurch Lane. The scale reduces to the north to reflect the listed tea warehouse opposite. The north-east corner with Bury Street incorporates a historic City Corporation plaque marking the Site of the First Synagogue 1657 – 1701. Overall, Cunard House makes a positive contribution to the area.

Mitre Street

- 5.39 Nos 27-28, warehouse 1891 by F. Adam Smith, five storeys, with elliptical windows and chamfered vertical columns, very fine example of its period, which makes a very positive contribution to the street, and should be considered as an undesignated heritage asset. Ground floor is now the Trinity Bell PH.

- 5.40 Nos. 29-31 five storey warehouses 1888, with three full height loading bays, similar to Creechurch Lane tea warehouse, but unlisted. Should be considered as an undesignated heritage asset.
- 5.41 Nos.32-40 flat-fronted in stone with inset convex entrance bay, five storeys with set-back roof storeys, 1989-91 by Ley, Colbeck & Partners, part of No.78 Leadenhall Street. Architecturally undistinguished, it nevertheless is the correct scale for the street and makes a neutral contribution.
- 5.42 Churchyard of St Katharine Cree, accessed via a narrow pedestrian way up a flight of steps at the west end of Nos. 32-40, completely enclosed by surrounding buildings, contains a Portland stone door case dated 1631 formerly facing Leadenhall Street east of the church, built by William Avenon, Goldsmith. It is statutorily listed Grade II, and now frames a fountain of 1965 when the churchyard was laid out as a garden by Donald Insall architect. The churchyard contains several chest tombs and sarcophagi which are all of heritage significance.
- 5.43 Nos. 12-14 Five storey warehouses, reconstructed as facsimiles in 1983-5 by Weightman & Bullen, to match the tea warehouses in Creechurch Lane. The rear elevation provides the south side of Sugar Baker's Court. The range admirably complements the historic warehouses opposite and makes a positive contribution to the area.

St James's Passage

- 5.44 Aldgate School, formerly Sir John Cass Foundation Primary School. Statutorily listed Grade II. Built in 1908 by A.W. Cooksy in a 'cheerful Neo-Hampton Court Baroque' style, with main elevation in brick and stone with central cupola, facing east onto the new pedestrian Aldgate Square. Two entrances with figures of charity children relocated from earlier site in Houndsditch. Secondary frontages of L-shaped plan to Aldgate High Street and Mitre Street.
- 5.45 Boundary wall to school, modern dark brick wall plinth surmounted by high railings, copy of traditional design. Contributes positively to the character of the area and the setting of the listed school. The wall to St James's Passage contains an

historic City Corporation plaque ‘Site of Holy Trinity Priory’ and a modern information plaque.

Sugar Baker’s Court

- 5.46 A narrow dead-end court, first laid out in 1586, north side with former shop fronts, part of Nos.22-24 Creechurch Lane. Contributes positively to the historic and architectural character of the area.

6. TOWNSCAPE AND VIEWS

- 6.01 It is clear from the analysis of individual buildings that they compromise a remarkable mixture of different ages, styles and uses. As an ensemble their juxtaposition and group value are also an important consideration, in addition to their individual merits. The network of narrow lanes fronted by buildings of a largely uniform scale, albeit with a variety of architectural styles, creates a harmonious townscape with a particularly strong character.
- 6.02 The group of warehouse buildings in Creechurch Lane and Mitre Street, which are some of the best surviving examples in the City, or the uniform parapet height along the entire length of Bury Street, constitute a special character and appearance that is worthy of preservation.
- 6.03 The majority of 20th century buildings in the area, although of varied architectural merit were also designed to a height, scale and massing that is sympathetic with their neighbours. Generally, parapet heights are five storeys with any additional storeys set back so as not to have any impact on the street. Modern buildings on Houndsditch and Duke’s Place are higher, but mostly a consistent scale of seven or eight storeys.
- 6.04 The new public open space at Aldgate Square has enormously enhanced the area and greatly improved the setting of the Aldgate School and St. Botolph’s Church, creating an open townscape which contrasts with the narrow lanes.

6.05 From within the area, or very close to it, there are important townscape views which contribute very positively to the character and appearance of the area. These are shown on Map 4 and include:

- views of St Katharine Cree from south side of Leadenhall Street
- view down Heneage Lane from Bevis Marks
- view of St Botolph's Aldgate from south side of Aldgate High Street
- view towards Bury Street from plaza south-east of St Mary Axe
- view down Mitre Street from Leadenhall Street
- view from Sugar Baker's Court across Creechurch Lane towards the Gherkin

6.06 The predominantly low scale of the area under consideration is a major factor in the setting of the high-status listed buildings in the area, particularly the three Grade I places of worship. The preservation of the existing scale of this area would help to ensure that their setting continues to be protected and provide a buffer against the cluster of tall buildings to the south and west.

6.07 The area under consideration also lies within a zone where tall buildings potentially affect background views of the Tower of London World Heritage Site, particularly in views from Tower Bridge and the south bank of the river. The modest scale of the vast majority of the existing buildings within the area means that nothing at present impinges on those sensitive views.

7. PUBLIC REALM

7.01 Areas of important public realm are shown on Map 5.

The newly landscaped public realm at Aldgate Square, including St Botolph's churchyard, and the smaller landscaped space fronting Mitre Street/St James's Passage are important recent improvements to the area. The map also shows areas which are in private ownership with occasional or controlled public access, but which nevertheless contribute to the character and appearance of the area.

7.02 The quality of paving is very mixed. There is one stretch of old York stone paving on the north side of Bevis Marks from Nos. 18 – 24. There are larger areas of good quality new sawn York stone paving, such as Heneage Lane with its heritage-style streetlamps, but many stretches of existing pavement comprise poor quality

asphalt or concrete. These include most of Creechurch Lane and Bury Street, the north side of Leadenhall Street, Mitre Street, Sugar Baker Court and parts of Houndsditch.

- 7.03 The 19th century cast-iron City of London cannon bollard at the south-west corner of Bury Street is an important survivor and should be regarded as an undesignated heritage asset.

8. LAND USE

8.01 As well as the physical appearance of the area, its buildings, streets and spaces, land use is also an important factor in identifying the special character of the area. While the majority of the buildings are in commercial office use, there are also three very important places of worship with significant congregations and activities. The Aldgate School brings in children, teachers, and parents from a considerable catchment area. Several of the upper floors of former warehouse buildings in Creechurch Lane and Mitre Street have been converted to residential use. There are also a few ground floor restaurants and bars, several now vacant because of the loss in trade due to the pandemic.

8.02 The area, because of its history and iconic buildings also draw many tourists and visitors, which brings a welcome amount of life to the area particularly at weekends. These varied activities and the footfall they generate contribute to the character of the area.

9. PROPOSALS FOR PRESERVATION AND ENHANCEMENT

9.01 Section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority to formulate and publish proposals for the preservation and enhancement of any parts of their area which are conservation areas. Proposals have to be subject to public consultation to which the local planning authority has to pay due regard.

9.02 Designation of a conservation area is therefore only the first step. A clear understanding of the heritage significance of the conservation area as a whole, as well as individual sites and buildings within it, is necessary for the formulation of proposals and policies which

will enable the local planning authority to preserve and enhance those special qualities.

9.03 In the case of the proposed Bevis Marks/Creechurch Conservation Area it is suggested that the following policies could be appropriate:

- a strong presumption to retain all designated and undesignated heritage assets in the area
- retention of the existing historic street pattern, and restoration of historic building lines where they have been lost
- establish clear guidance for parapet heights fronting the street and for set-back floors for the redevelopment or alteration of all those existing buildings or sites which have a neutral or negative impact on the character or appearance of the area
- identify landmarks whose setting is sensitive to change
- define street views which need to be protected
- proposals to enhance the public realm including paving proposals to enhance public information and visitor experience, including marking the position of the below-ground remains of London Wall and the Aldgate

9.04 In terms of archaeology, it is also suggested that the management strategy incorporates the same requirements and approach as those for other conservation areas, specifically:

- where developments are proposed which involve new groundworks an historic environment assessment, including an assessment of the archaeological potential and impact of the proposals will be required as part of the planning application. Where significant remains survive, consideration will be given to amendments to the proposals to ensure that disturbance to archaeological remains is minimised or reduced.
- the City Corporation will indicate the potential of a site, its relative importance, and the likely impact to a developer at an early stage so that the appropriate assessment and design development can be undertaken. Developers should refer to Planning Advice Note 3: Archaeology in the City of London, and Conservation Areas in the City of London: A General Introduction to their Character for further information. *(These bullet points derive from the City of London's standard Conservation Area Character Summary documents).*

10. CONCLUSION

10.01 It is concluded that the area under consideration possesses a high degree of heritage significance that justifies serious consideration for designation as a conservation area. The ensemble of buildings and the street pattern, together with their historical, archaeological, and social/communal context, comprise an area of special architectural and historic interest whose character and appearance it would be desirable to preserve and enhance. It fully meets the criteria set down by the Planning Act 1990.

Alec Forshaw and Esther Robinson Wild
May 2022

Alec Forshaw was Principal Conservation and Design Officer for the London Borough of Islington, where he worked from 1975 – 2007. He has written widely on historical and architectural matters, including *New City, Contemporary Architecture in the City of London* (2013), *The Barbican, Architecture and Light* (2015), and *Smithfield, Past, Present and Future* (2015). He gave evidence on behalf of SAVE Britain's Heritage in support of the City of London's refusal of planning and listed building consent at the Custom House Public Inquiry in February 2022.

Esther Robinson Wild MA MCifA FSA is a Historic Environment Consultant with extensive experience of working on wide range of projects in all areas of the historic environment including listed buildings, historic buildings and places, conservation areas and archaeology. She is a member of the Board of Directors of the Chartered Institute for Archaeologists (CifA) and a CifA accredited member (MCifA). She has contributed to several conservation themed publications including *Save Britain's Heritage Too good to lose. Historic schools at risk* (2018) and *The Twentieth Century Society's 100 20th Century Gardens and Landscapes* (2020).

ACKNOWLEDGEMENTS

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<https://historicengland.org.uk/listing/the-list>

St Botolph Without Aldgate

<https://www.stbotolphs.org.uk/>

The Guild Church of St Katharine Cree

<https://www.stkatharinecree.org/>

The Portal Trust

<https://portaltrust.org/about-us/resources/sir-john-cass-and-transatlantic-slavery>

The Sephardi Community Bevis Marks

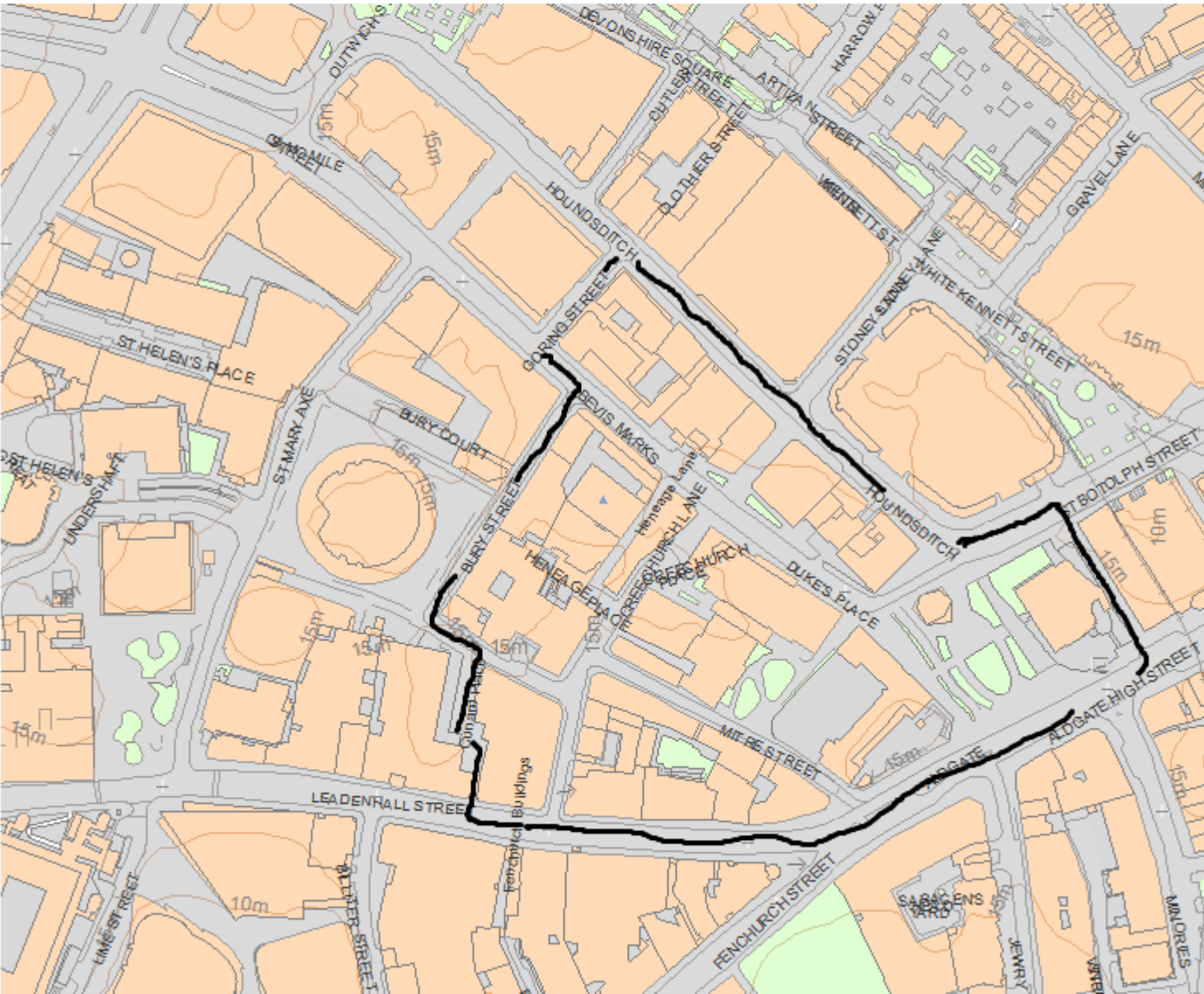
<https://www.sephardi.org.uk/bevis-marks/>

MAPS

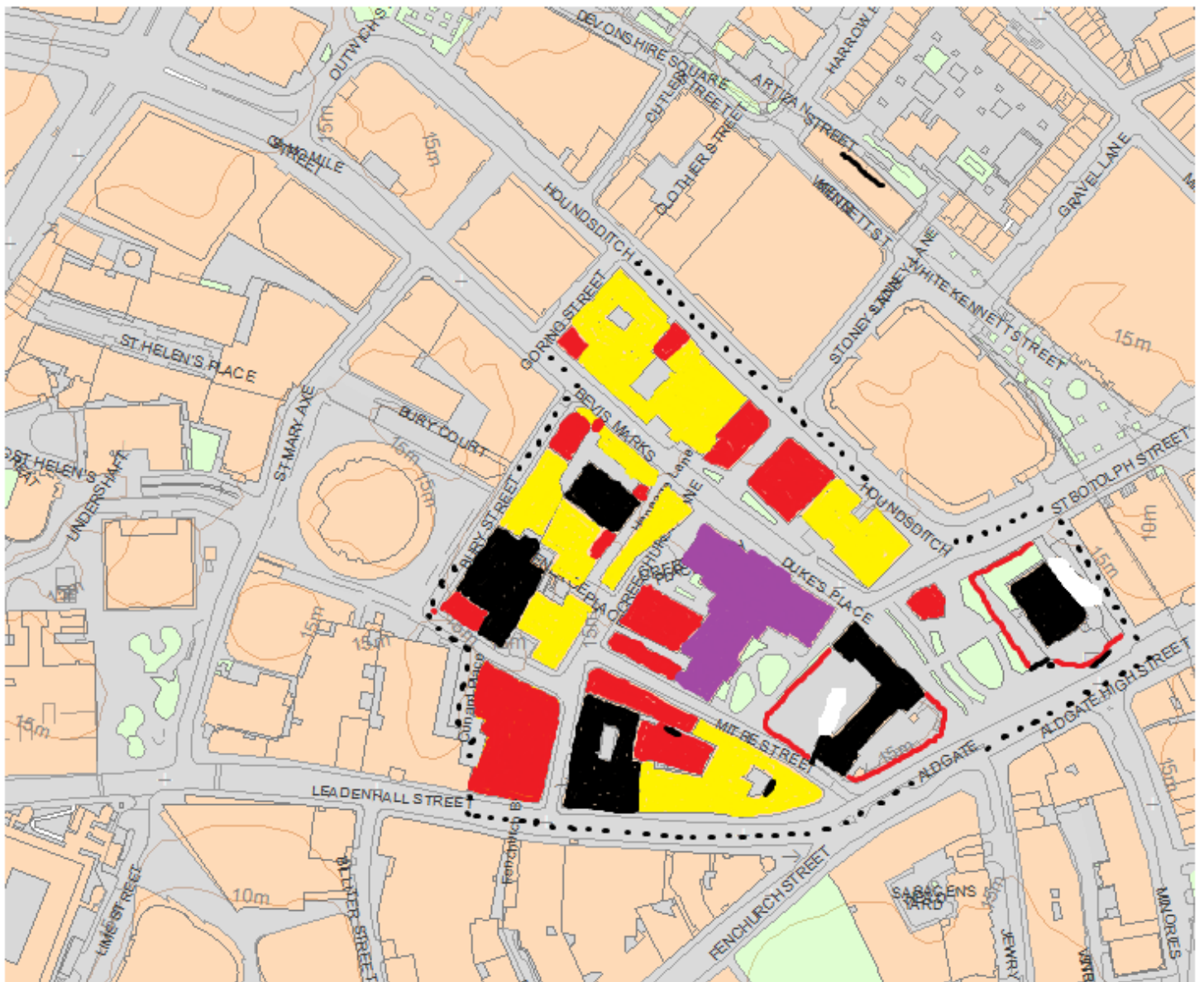
1. Proposed Conservation Area Boundaries
2. Heritage Assets
3. Scheduled Ancient Monument
4. Townscape views
5. Public Realm

MAP 1 PROPOSED BOUNDARIES

BEVIS MARKS / CREECHURCH CONSERVATION AREA



MAP 2 HERITAGE ASSETS



Designated heritage assets



Undesignated heritage assets



Recent buildings of appropriate scale

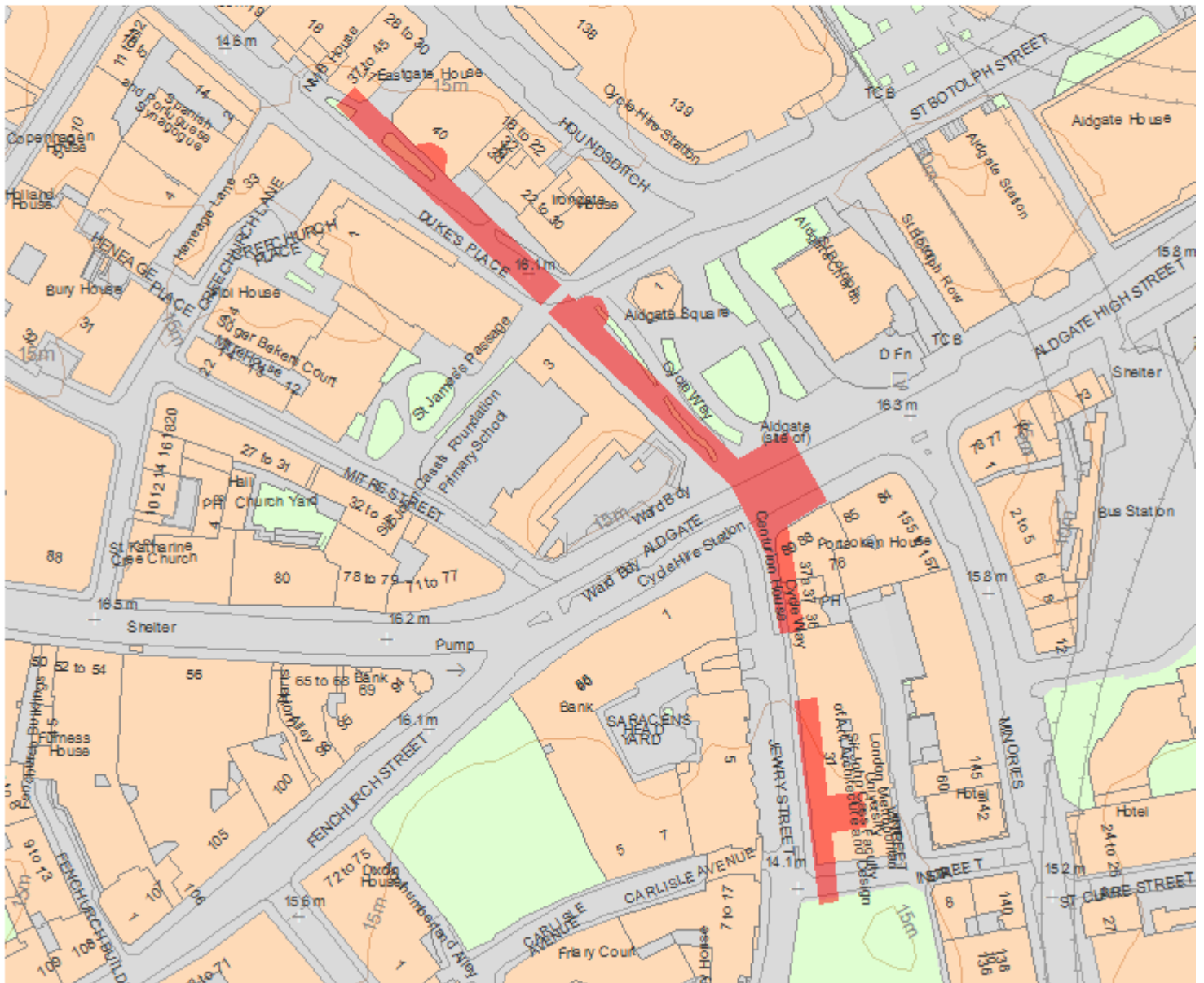


Buildings with negative impact

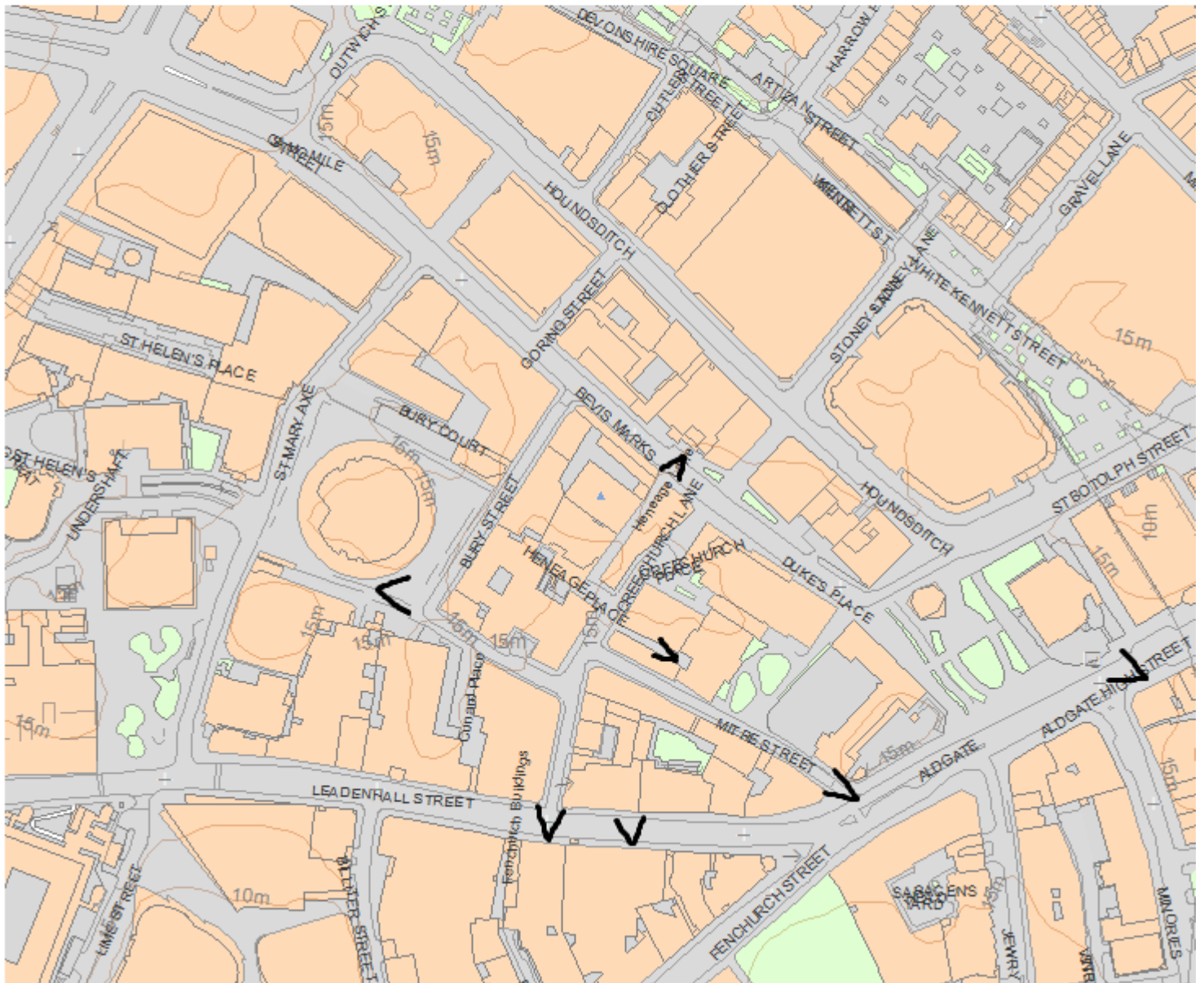


Proposed Conservation Area boundary

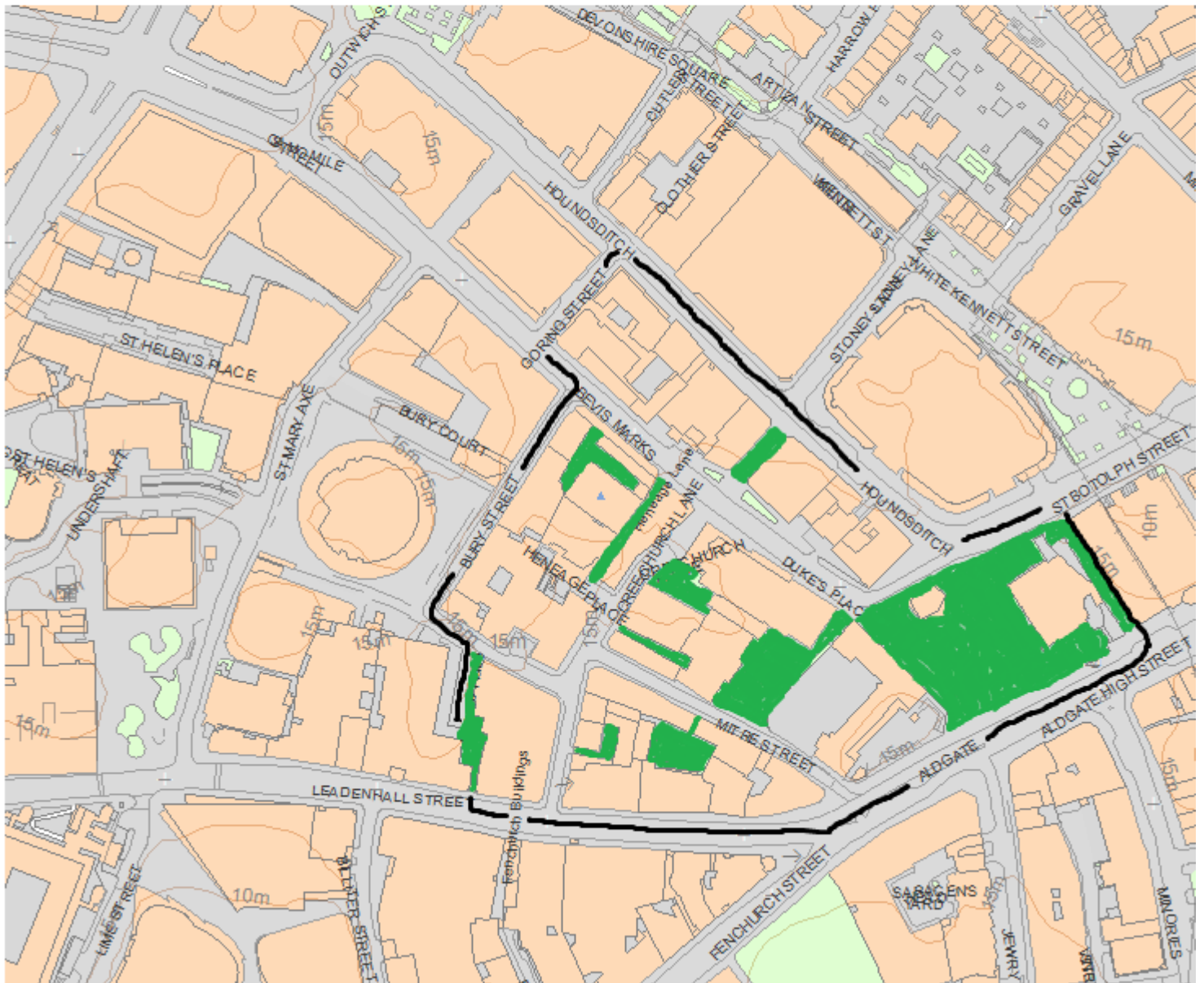
MAP 3 Scheduled Ancient Monument



MAP 4 VIEWS



MAP 5 PUBLIC AND SEMI-PUBLIC REALM



Mr T Nancollas and Mr B Eley
Environment Department
City of London
Guildhall
London
EC2V 7HH

By email: tom.nancollas@cityoflondon.gov.uk and ben.eley@cityoflondon.gov.uk

Dear Tom and Ben,

Proposed Creechurch Conservation Area

Thank you for explaining your work in progress on Friday.

We are of course very supportive in principle of the proposed Conservation Area, which we see as providing a valuable layer of heritage protection to a part of the City which is undoubtedly deserving of it.

Your proposed boundary is more tightly drawn than the one we proposed, which we think is regrettable in general, but about which we will leave others to comment. However, it specifically excludes 31 Bury Street, which we regard as indefensible, and about which you can expect the community associated with the synagogue to have very strong views.

Situation of 31 Bury Street

The building at 31 Bury Street, Bury House, is a relatively modern building that is architecturally undistinguished, but which sits comfortably on its site, respectful in its height, massing and architecture of its very close proximity to the Grade 1 Listed synagogue and its adjacency to the Grade 2* Listed Holland House. It is directly south of the synagogue, including direct views onto the synagogue's eastern facade and windows, and thus any additional height would immediately start to overshadow the synagogue and its courtyard. Furthermore, it abuts the synagogue freehold, currently occupied by Valiant House.



Background

I am sure you will recall what happened in October 2021. Planning permission was refused by the Planning & Transportation Committee for a 49 storey office building (ref. 20/00848/FULEIA). The first reason for refusal was *"The development would adversely affect the setting of the Grade 1 listed Bevis Marks Synagogue and its setting and amenities..."*; the second reason was *"The development would adversely affect the setting of the Tower of London World Heritage Site..."*.

BOTH reasons for refusal were about heritage impact. Clearly, therefore, 31 Bury Street occupies a very sensitive position in heritage terms.

It is public knowledge that the owners of 31 Bury Street are preparing to submit a further planning application. It appears as though this will be for a 43 storey scheme. The difference in impact between this scheme and the refused scheme will be barely discernible.

Change since 2021

Planning policy has not changed formally since October 2021. However, the planning system has not stood still.

In November 2021, the Secretary of State dismissed the Tulip development, which would have occupied a site close to the synagogue, a similar distance from it as 31 Bury Street is. The inspector concluded that the Tulip would, as far as the synagogue is concerned, *"create an overbearing presence from within the curtilage of the heritage asset"*¹

Furthermore, the Corporation has been implementing its Climate Action Strategy (of which it is justifiably proud), and the 2022 progress report emphasises the major contribution to carbon emissions made by commercial buildings and the fact that the City is lagging behind its target for improvement. This has focussed attention even more sharply upon the desirability of avoiding the release of embedded carbon by the demolition of buildings such as 31 Bury Street.

The case for including 31 Bury Street in the proposed Conservation Area

There is a compelling case for including 31 Bury Street, for a number of reasons:

1. 31 Bury Street is very close to the synagogue: it is just a few metres from the building and its courtyard. It is immediately adjacent to Holland House. It is on any objective analysis within the setting of Holland House, and any proposal to increase its height would automatically intrude into the setting of the synagogue, and directly reduce light to several of its windows, including its sensitive eastern and southern facade.

¹ Para 8.61

2. The area is of very high heritage sensitivity, as demonstrated by the 31 Bury Street and Tulip decisions, let alone the existence of Listed buildings of exceptional importance. The precautionary principle should clearly apply. Conservation Area designation does not prevent redevelopment, but it does serve to focus the attention of planning decision-makers on the existence of heritage assets and potential threats to their significance. If the City is serious about taking heritage and cultural considerations seriously, it should start by including 31 Bury Street in the Conservation Area and put the onus on the prospective developers to demonstrate why their proposed building should be found to be acceptable.
3. 31 Bury Street would probably best be regarded as a neutral contributor to the Conservation Area. It is normal practice for neutral and indeed negative contributors to be included in Conservation Areas as long as it is logical to include them in terms of creating a coherent Conservation Area. Indeed, Planning Practice Guidance² says, "*A good appraisal will consider what features make a positive or negative contribution to the significance of the conservation area, thereby identifying opportunities for beneficial change or the need for planning protection*". Likewise, the NPPF³ says that "*Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance*". You are intending that 33 Creechurch should be included within the Conservation Area; it too is a neutral or negative contributor, so the same approach should be applied to 31 Bury Street.⁴ Other Conservation Areas within the City clearly contain neutral/negative contributors.
4. Conservation Areas are areas of special architectural OR historic interest whose character OR appearance it is desirable to preserve OR enhance⁵. It is important not to ascribe undue importance to architectural merit.
5. The threat of inappropriate redevelopment is a legitimate factor to be taken into account in deciding on the boundary of a Conservation Area. Historic England advice⁶ is that, "*Before finalising the boundary it is worth considering whether the immediate setting also requires the additional controls afforded by designation, or whether the setting itself is sufficiently protected by national policies or policies in the Local Plan*". In the present case, the inclusion of the area within the tall buildings cluster, and the City's definition of a tall building being one over 75 metres high, clearly means that Local Plan policies themselves are not strong enough.
6. If 31 Bury Street is not included in the Conservation Area, its exclusion is almost bound to be seized upon by the site owners as an implicit "green light" to

² 025 Reference ID: 18a-025-20190723

³ Para 207

⁴ One Creechurch Place is in a different category; it is a very tall and dominant building which is strongly negative in its heritage impact

⁵ Planning (Listed Buildings and Conservation Areas) Act 1990; s.69.1(a)

⁶ Paragraph 75; Historic England Advice Note 1 (second edition) "Conservation Area Designation, Appraisal and Management". Paragraph 91 acknowledges that neutral or negative features can be expected in most Conservation Areas.

redevelopment with a tower. They will argue that the City has considered the Conservation Area boundary carefully and concluded that 31 Bury Street should not be constrained by heritage considerations. Frankly, it might be better not to have a Conservation Area at all than to hand them the opportunity to make such a point.

Our request

There is yet time to amend the proposed Conservation Area boundary line before the meeting of the Planning & Transportation Committee on 18 July, and before the misguided draft line is put in the public domain. I urge you to take this opportunity and thus avoid provoking a repeat of the sort of widespread outrage that was unleashed by the previous planning application at 31 Bury Street.

I shall of course be very happy to continue to discuss this matter with you at any time.

Yours sincerely,

Shalom Morris
Rabbi, Bevis Marks Synagogue

Agenda Item 9

Committee(s): Planning & Transportation Committee	Dated: 18 July 2023
Subject: Utility Infrastructure Strategy	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	Communities have the facilities they need Support to a thriving economy Digitally & physically well connected
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Executive Director, Environment	For Decision
Report author: Ian Hughes, Environment Department	

Summary

The success and effectiveness of Square Mile of London as a place to live, work and visit fundamentally relies upon the delivery and maintenance of high quality and effective utility services, with the City enjoying the benefits of past improvement, investment and innovation by the utility sector.

The future is expected to be no less challenging, as the City evolves its requirement for digital infrastructure, addresses climate change and ensures network capacities can facilitate the City's plan for substantial growth in office workers and floorspace.

With more renewable energy requirements, a shift to zero emission vehicles and the creation of local energy markets, the future of energy provision will require nothing less than a green revolution to meet these demands, whilst fast & reliable telecommunications have become a basic standard of living in today's modern world.

By working collaboratively and in partnership with all sectors of industry, government and our stakeholders, this strategy seeks to ensure the City's utility infrastructure remains fit for purpose today as well as future proofed for tomorrow.

Recommendation(s)

It is recommended that Members approve for a public consultation exercise to be undertaken on the draft strategy, with the updated final strategy returning to this committee for approval in due course.

Main Report

Background

1. The success of the Square Mile and way in which it supports the needs of its residents, workers and visitors is fundamentally reliant upon the provision of high quality utility services. Such services require the necessary gas, water, electricity and telecommunications infrastructure to be constructed, installed and maintained by the respective statutory utilities, with the City of London Corporation playing a key role in facilitating and supporting their delivery
2. Today's modern City still enjoys the benefits of past investment in utility infrastructure, such as Victorian-era underground utility pipe subways and Bazalgette's 19th Century sewer network, alongside more modern innovations such as the recently installed Wifi and 5G networks and Thames Water's Thames Tideway super-sewer.
3. However, to this point, the City Corporation has lacked an overarching utility infrastructure strategy to help focus attention on the maintenance and development of these services, to help drive the respective utilities forward to meet the needs of the future City and to respond to the emerging challenges of Climate Action and sustainability.
4. In large part, the City itself is not directly responsible for delivering these services but our stakeholders certainly expect the City Corporation to be at the forefront of innovation, working with the utilities to plan for the future and creating the right environment to plan ahead & invest with confidence in order to support the City's long-term priorities.

Current Position

5. The draft Utility Infrastructure Strategy seeks to bring together a raft of current and future activities being planned and delivered by the utility sector in the Square Mile. In terms of City departmental responsibilities, the majority of these aspects lie within the Environment Department to coordinate and manage, with the City Surveyors leading on the interface with Citigen.
6. To this point, informal consultation on the strategy has been undertaken with key contacts within each of the major utilities and their ideas & comments included. The concept of a strategy was also introduced at the Planning & Transportation Away Day at the beginning of this year, and the Town Clerk's Executive Leadership Board has also been briefed.
7. The full strategy can be found at Appendix 1, but for the purposes of this covering report, the strategy is grouped into five themes:

Performance

8. The first section focuses on the performance of the respective utilities in terms of their current operations, particularly their service response standards & communications with City stakeholders and the safety of their highway activities under the umbrella of the Considerate Contractor Streetworks Scheme.

Demand & Connectivity

9. This seeks to promote the initiatives being taken to ensure the City has the requisite amount of connectivity in terms of superfast broadband and public Wifi / 5G coverage. It also explains the key role that underground infrastructure plays in enabling that connectivity, either through the use of pipe subways or the City's support to the Citizen heating & cooling network.

Planning & Innovation

10. In this section, understanding the City's future requirements through the development process is highlighted as a key action, alongside establishing a better understanding of the constraints in meeting that need and promoting the City as a test bed of innovation for utilities to improve their services.

Climate Action

11. Given the City's own commitment towards Climate Action, this is a key area of focus for both the City Corporation and utilities, with the strategy outlining initiatives in terms of the Local Area Energy Plan (being brought forward as a separate but connected policy initiative by Environment's Planning Policy team), future heat zoning regulations and open energy networks for managing peaks & troughs in the energy supply grid. It also considers the need to support green infrastructure for electric vehicle charging in the context of the City's Transport Strategy.

Future Proofing

12. The strategy is intended to promote and intensify the City's active engagement with the utility sector in order to identify and address the Square Mile's longer term challenges. These include the need for more investment to meet the increasing demand for green energy, the transition from methane-based natural gas to zero-carbon hydrogen & biomethane, and the withdrawal by OpenReach of all copper-based voice telephone lines in the next two years.

Options

13. Utility functionality has been delivered to this point by the respective utilities without an overarching City Corporation strategy, but it is thought that developing and adopting such a strategy will not only raise the profile of the utility sector and the role it plays in supporting the Square Mile, but it will also help drive improvement, investment and innovation in what are vital services that underpin the City's current & future prosperity.

Proposals

14. It is proposed that Members of your Committee agree to a public consultation exercise for the draft strategy. The strategy will then be revised accordingly and brought back to your Committee, the Policy & Resource Committee and Court of Common Council for adoption.

Strategic & Risk Implications

15. This strategy will help support the delivery of various key strategic priorities within the City's Corporate Plan (ie contribute to a flourishing society, support a thriving economy and ensuring the City is digitally and physically well connected). It also connects to various important policy initiatives such as Climate Action, the Transport Strategy and the Local Area Energy Plan.
16. In terms of risk, not adopting such a strategy would mean a less coordinated and forward looking approach, leading to less than optimal outcomes in the delivery of these services now and in the future.

Financial Implications

17. It is not anticipated that this draft strategy, in and of itself, will require funding from City Corporation sources. Where investment and expenditure is required (eg maintenance of the pipe subway network, support to Citigen or ground penetration radar surveys), these will be subject to 'business as usual' governance and approval processes for capital and revenue expenditure.

Legal Implications

18. Some aspects of the strategy relate to upcoming primary legislation regarding energy and heat zoning, and as such the City Corporation will monitor and (if necessary) seek to influence such powers as they evolve through the parliamentary process.
19. Utilities themselves already make use of extensive statutory powers to excavate highways to install and maintain their equipment, albeit the City continues to support that activity in its role as Highway Authority and Planning Authority, as well as holding its own statutory powers in relation to requiring utilities to use underground pipe subways where such infrastructure exists.

Climate Implications

20. Aspects of this strategy will directly align with the City's Climate Action commitments to reach net zero across the Square Mile by 2040. This includes the Local Area Energy Plan which aims to improve understanding of the nature, scale, rate and timings of the changes necessary to transition to a net zero energy system.

Equalities, Resource & Security Implications

21. None

Conclusion

22. This strategy intends to better align the utility sector with the future needs of the Square Mile, drawing in key aspects of the City's activities that relate to utility infrastructure. By working collaboratively and in partnership with all sectors of industry, government and our stakeholders, this strategy seeks to ensure the

City's utility infrastructure remains fit for purpose today as well as future proofed for tomorrow.

Appendices

- Appendix 1 – Draft Utility Infrastructure Strategy

Ian Hughes
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Infrastructure Strategy Five Point Plan

Introduction

The City has a history of responding to the challenges of delivering the infrastructure necessary to facilitate the growth of the Square Mile and maintain its relevance at the heart of the UK economy.

The last 150 years has seen vast progress in utility infrastructure, from Bazalgette's sewers and Victorian-era pipe subways, through rebuilding after WWII, the deregulation of the telecommunications sector into today's digital e-enabled environment.

The future will be no less challenging for the utility sector as it must account for the rapidly evolving requirements of digital infrastructure, the need to address climate change and to ensure that capacity is sufficient to facilitate the City's plans for substantial growth in office workers and floorspace.

The City's commitment to Net Zero emissions by 2040, alongside its Innovative Transport Strategy and the high expectations of its residents, workers and visitors set the bar high, making it essential that all parties work together to meet these goals.

With more renewable energy requirements, a shift to zero emission vehicles and the creation of local energy markets, the future of energy provision will require nothing less than a green revolution.

Innovation and change in telecommunications will be no less demanding, with fast, efficient and reliable connectivity a basic standard of living in today's modern world, whilst the City's water and sewer networks provide new opportunities to address the capacity constraints found underground.

By working collaboratively across all sectors of industry, government and in partnership with our stakeholders, this strategy seeks to ensure the City's utility infrastructure remains fit for purpose today and future proofed for tomorrow, enabling it to underpin the City's position as a sustainable, effective environment in which to live, work and visit.





Service Standards, Communications and Engagement

Given the City's various commercial, residential and visitor communities, the requirements for power, water, gas and telecommunications can vary quite markedly.

However, the City gathers information direct from a wide range of stakeholders, including individuals, residential working groups, Business Improvement Districts, developers and wider commercial interests, to enable it to challenge the major utility providers to deliver high quality levels of connectivity, service response standards and communications.

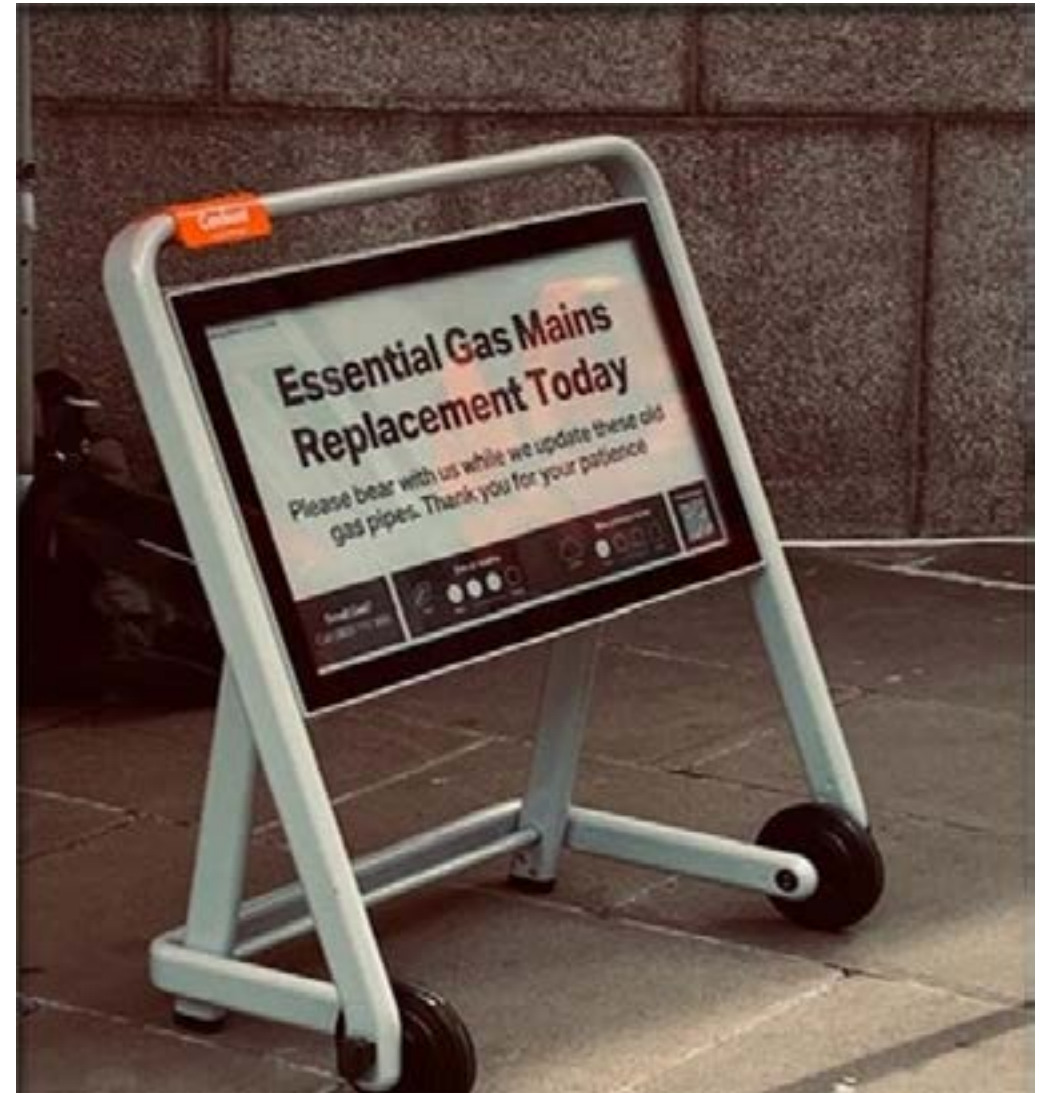
Highly effective working relationships have been established with utilities and their contractors, from senior levels down to operational supervisors who manage works on the ground, enabling City officers to address issues quickly and effectively for the benefit of our stakeholders.

One of the City's key initiatives in this area is the Digital Infrastructure Toolkit, developed with the support of developers, landlords, broadband operators, property managers, government, legal firms and key trade associations.

This national award winning concept sets out a series of tools to make it easier and faster to agree digital connections, including a common standard for wayleave agreements to quicken the process of agreeing consents to cable broadband through buildings.

Alongside close working relationships with the Department for Transport, GLA, TfL and London Councils, officers remain closely involved in shaping industry guidance and driving best practice through JAG (the Joint Authorities Group representing all highway authorities in the UK) and HAUC (Highway Authorities and Utilities Committee).

This includes preparing for new inspection codes of practice for street works before the end of 2023 and the development of Streetmanager, the industry IT tool for permitting and coordinating all utility works.





Considerate Contractor Streetworks Scheme

The Considerate Contractor Streetworks Scheme (CCSS) was pioneered by the City in 1990 and was the first scheme of its kind to be introduced in the UK.

The Scheme aims specifically to tackle the problems associated with street works on our highly congested streets, and its objective remains to encourage and promote the highest of standards for utilities and their contractors working in the Square Mile.

It looks to instil a spirit of pride and excellence in those who work on the highway, create a safer and cleaner environment for everyone who uses our streets and enhance the perception of the street works industry and those who work in it.

The scheme comprises:

- Page 191 A Code of Conduct that aims to reduce work durations, minimise disruption, improve signage, enhance communication and ensure continuous improvement
- Regular inspection and monitoring by City officers
- A formal awards ceremony recognising high performing utilities and their contractors

The scheme remains highly prestigious and drives improvement, creating competition between participants and a mindset to ensure works are safe, well managed and expeditious.

Throughout its long history, the scheme has evolved to include the introduction of an Innovation Award for utilities and the use of sponsorship to make the awards self-funding.

It remains highly effective in encouraging and enabling collaborative working (such as trench sharing) and the coordination of infrastructure works with City projects and highway maintenance, minimising disruption to the public, improving accessibility and driving safety.





Superfast Broadband

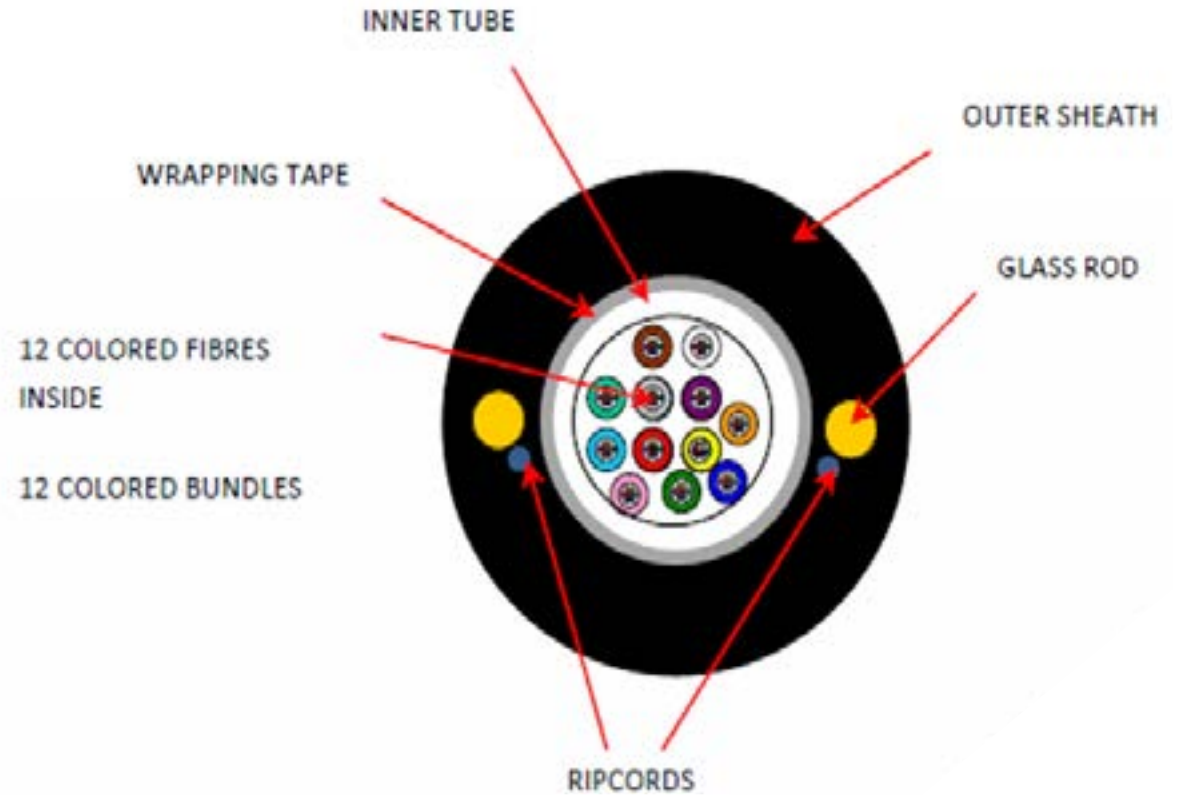
The City's unusual social mix of major financial services and residential properties has historically led to some unique challenges in connecting the City with effective broadband, particularly for our SMEs, residential estates and residential buildings spread across the Square Mile.

With the City's largest commercial enterprises able to procure their own direct requirements from multiple suppliers across diverse routes, the remaining market has typically fallen short of Openreach's business case test for proactively connecting the City to superfast broadband.

Given the status of the Square Mile, this has been consistently raised at a senior level with Openreach and has been addressed through a series of initiatives to enable everyone in the City to have access to an essential part of modern life.

By 2020 90% of the City had superfast broadband enabled by various initiatives including:

- Working with Openreach to improve capacity and their fibre to the premises network
- Facilitating wayleave agreements to bring additional fibre providers to the City's major residential estates
- Identifying and addressing 'not-spot' areas within the Square Mile where network connectivity is not sufficient
- Supporting new fibre providers such as Vorboss to increase network capacity





Wireless Concession

Alongside the steps being taken to address broadband requirements, the City also set itself the challenge of creating a world leading public access Wi-fi network as well as facilitating the requirements of the mobile telecommunications companies to deliver comprehensive and effective 4G (and now 5G) coverage across the Square Mile.

The first step towards this was the installation of free public Wi-Fi infrastructure, delivered in conjunction with partner Cornerstone and their contractor Freshwave. This award-winning connectivity delivered download speeds of up to 100mbps, with installations typically utilising existing street furniture, extended in height to reach the optimum 'broadcast' point.

However, to deliver the requisite 4G/5G connectivity, a solution was needed that avoided the potential for each of the four main mobile network providers deploying their own columns, cabinets and equipment that would otherwise fill the City's congested streets.

The City's innovative concession contract with Cornerstone facilitated the rollout of over 200 4G cells, with Cornerstone and Freshwave promoting, developing and maintaining common user technology at no cost to the City.

Suitable sites are now being trialed that help deliver high capacity, highly reliable 5G mobile networks that the telecommunications sector need to keep the City connected. Full 5G coverage is expected by 2025.





Pipe Subway Capacity

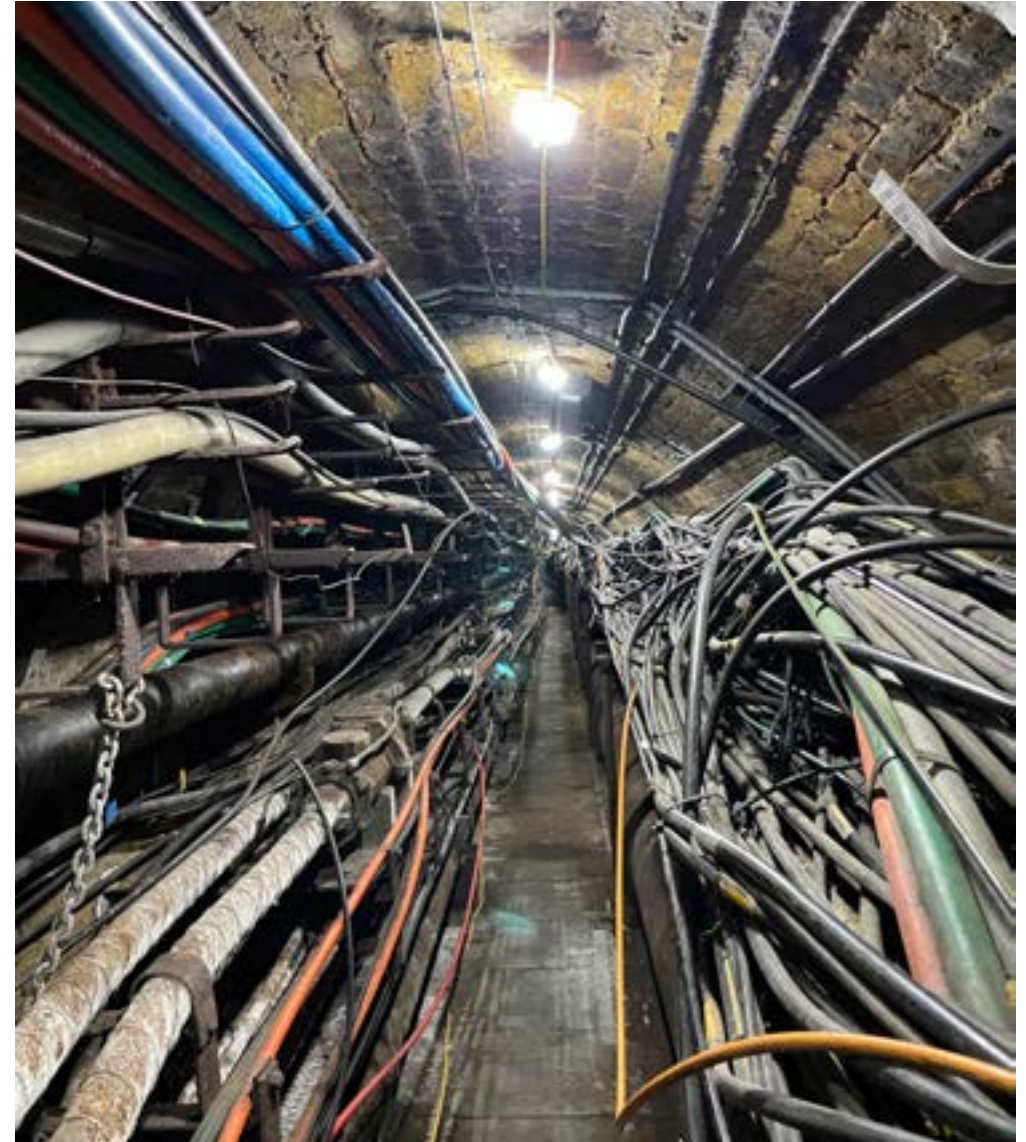
The City has over 6km of pipe subway built underneath its roads, designed and constructed specifically to hold utility infrastructure of all shapes and sizes.

Mostly built by the forward thinking Victorians, utilities are required to use these subways to carry their plant rather than dig up the road, reducing the disruption above ground whilst allowing their equipment to be installed, managed and repaired by physical inspection.

The cost of expanding the network today into new streets can be prohibitively expensive given the disruption required to relocate existing infrastructure, but the City has been able to amend and add to the network in recent times as part of major infrastructure projects such as Thameslink, Crossrail and Tideway.

Safe access to these facilities is managed by the City given their confined space nature, and future initiatives to ensure these unique facilities remain fit for purpose include major structural maintenance work, measures to ensure they are resilient to climate change and smoke sensors to check for safety issues.

Moving forward, the City is seeking to work with the utilities to remove redundant plant, ensuring sufficient space is available to accommodate the City's future requirements.





Citigen

By working with the utility e.on, the City leads the way in low carbon decentralised energy networks by making use of the Citigen decentralised power plant based within the City that produces enough power to heat the equivalent of 11,300 homes.

Hidden behind the Port of London Authority facade at Smithfield, Citigen not only generates power but also heating and cooling, delivered via 10.5km of underground piping to business and residential properties across the Square Mile.

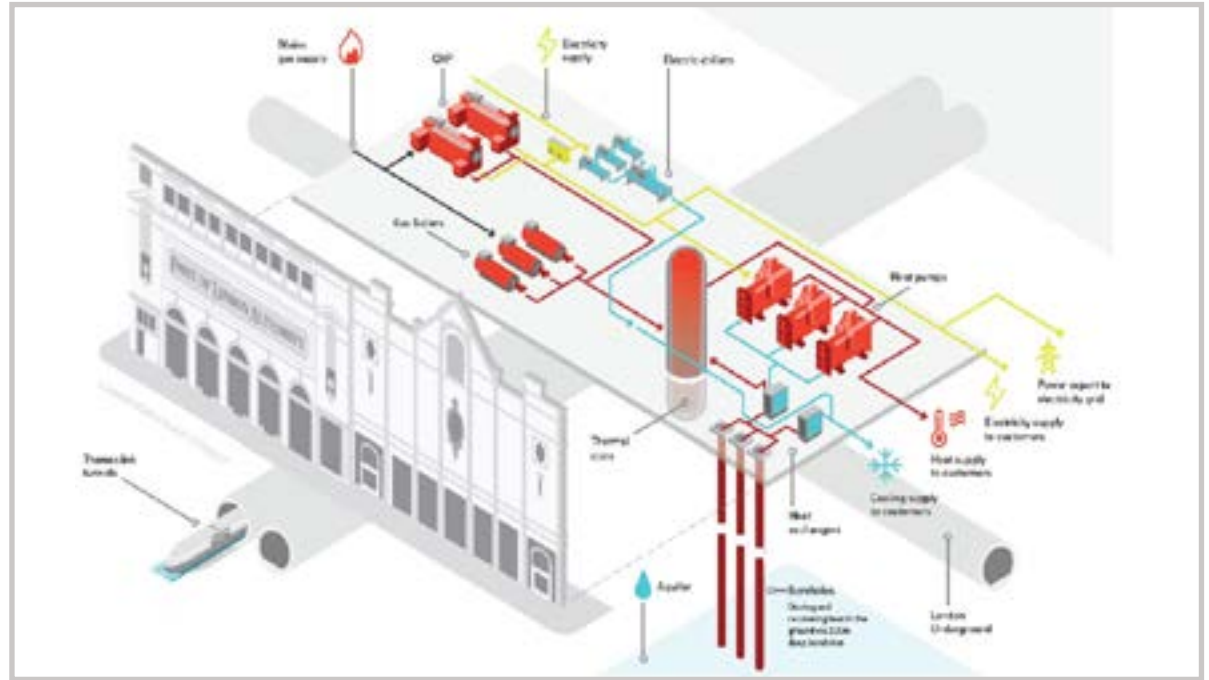
Whilst seeking opportunities to expand its capacity and network, Citigen also makes a significant contribution to the City's environmental goals through its decentralised district heating approach.

Its large thermal store allows the system to hold excess renewable energy before reusing it at peak times, and by drawing on the natural warmth from the London Aquifer 200m below the City, Citigen are now able to commission a new 4MW heat pump that will reduce carbon emissions by 30%.

This infrastructure will allow the City to build on the future decarbonisation of the electricity network as the proportion of renewable energy sources on the grid increases, further reducing heating and cooling associated carbon emissions.

The City's supply agreements with Citigen currently run to 2027, with Citigen obliged to deliver a 20% reduction in carbon during that period.

The challenge for Citigen is to develop and deliver a sustainable and attractive long term energy solution for both its existing and potential new customers within the Square Mile.





Innovation Test Bed

All utilities remain focused on finding ways to improve the resilience of their respective networks, increase the efficiency of their operations, minimise disruption and improve the service to their customers.

The last 10 years has seen major capital investment from both Thames Water and Cadent Gas to upgrade their aging networks using new materials to address what were significant levels of leakage from their pipelines. Thames Water in particular had to address failing pipes which in some places had almost completely eroded away.

We continue to see investment and innovation from all quarters, such as:

- robots to survey and repair pipelines from the inside
- use of the existing sewer network to carry new telecommunications cabling
- vacuum technology to increase the speed of removing materials from excavations
- utility covers that safely vent gas leaks without closing footways
- deployment of denser fibre cables to increase capacity

The degree of innovation is not confined to the commercial sector, with the City itself having just completed its rollout of an innovative street lighting system that enables direct control of individual lighting units in real time via a low frequency mesh network.

Combined with an investment in LED technology and aligned to an industry leading Lighting Strategy, this has resulted in a reduction in energy for street lighting of over 50%.

This mesh network is also capable of carrying other Smart City data, enabling the potential for further development of e-enabled smart technology. As an example, the City is using the same network to generate warnings when lifebelts are removed from the riverside, making the Thames safer by ensuring that those that are removed are quickly replaced.

It is this strategy's ambition for the City to be seen as an effective test bed for new technology, allowing utilities the opportunity to trial new ways of working that make operations quicker, easier and more effective for everyone involved.





Underground Capacity

The space beneath our feet plays host to all number of utility cables, pipes and operating plant, but given these networks have grown over time without a statutory requirement for strategic coordination, successive utilities have installed their own plant wherever space is available.

The first networks to be laid related to sewerage, water and gas, meaning these large pipe networks are typically the deepest underground, with power cables next in line above them. The highest sets of services are usually telecommunications cables which sit just below the surface.

Telecommunications saw a massive expansion in the 1990s and 2000s as a result of government deregulation, meaning the space under most of our footways and roads is now reaching capacity.

That means when new networks are required, significant amounts of time, cost and disruption are incurred just to establish viable routes over, under and around existing networks.

To address this issue, the City is currently working with the GLA and the utility sector to consider how GIS record keeping can help, and for the City in particular, it is proposed to undertake ground penetrating radar surveys to comprehensively map the Square Mile, enabling the City to identify which streets are still available for network expansion.

Meanwhile, the Physical Infrastructure Access scheme enables third party utility companies to rent the Openreach network in order to build their own networks without taking up more space underground, saving time, effort and cost. This is being actively progressed by seven telecom utilities in the City and more are expected to follow, driving competition and improving connectivity





Planning Process

Much of the City's expanding utility need is driven by major development, particularly when it is clustered together and requires a step change in supply that exceeds current capacity.

In the recent past, this has been most noticeable in the Eastern Cluster, where successive large developments have required expansions to the power supply load for that area. Such uplifts are fed from UK Power Network's major City-based substation near Ludgate Hill, the last time being around 10 years ago when many of the City's key streets had to be excavated for new power cables over a two year period.

The City can best address these issues by proactively working with the utility sector and developers to identify specific requirements ahead of time, facilitate advance planning to reduce disruption to the general public, and ensuring long term plans are in place to ensure sufficient capacity is available to meet future demand.

Other initiatives linked to the planning process include a planning condition that major developments must share with the City their utility requirements at an early stage to enable advance discussions around available supplies, customer connections and potential network expansion.

One particular issue can also arise when the needs of a new building occupier only emerge at the very end of the development, significantly adding to the number of connections and utility chambers required, sometimes well after the City's public realm construction works have finished.

To address this, the City promotes a communal entry chamber scheme whereby one utility chamber is constructed to facilitate the requirements of multiple utilities and their respective connections into the new building, allowing last minute supplies to be installed without the need for further major excavations.





Local Area Energy Plan

The City of London has recently developed and adopted a Climate Action Strategy aimed at setting a pathway to net zero, building climate resilience and championing sustainable growth.

The Strategy outlines the City's commitment to reaching net zero carbon emissions within its own operations by 2027, and net zero across the Square Mile and the City Corporation's supply chain by 2040.

To support this Strategy, the City is developing a Local Area Energy Plan for the Square Mile to improve understanding of the nature, scale, rate and timings of the changes necessary to transition to a net zero energy system.

The LAEP process combines robust technical analysis with comprehensive stakeholder engagement to create a route map for delivering decarbonisation as effectively as possible.

It will identify the actions required by local and national government, energy providers, regulators, industry and residents to achieve this, increase local stakeholder awareness in the Square Mile, and inform credible commitments and better buy-in for these changes.

Priority intervention areas include:

- Maximising the energy efficiency of buildings
- Exploring waste heat capture and sharing opportunities
- Prioritising decarbonisation of heat networks
- Rolling out renewable energy systems
- Driving rooftop solar energy

The pathway to an LAEP is currently under development in conjunction with public bodies (GLA, London Councils, Transport for London), key utilities (UKPN, Cadent, e.on), Ofgem and Arup, with a wider stakeholder engagement stage about to commence.





Heat Zoning Regulations

The Government's proposed Energy Security Bill (intended to become law by 2024) seeks to introduce a new regulatory framework for heating, intended to define and designate zones where heat networks can provide the lowest cost low carbon solutions.

As Citigen has shown, local district heating networks can be a cost-effective way of providing reliable, efficient, low carbon heat, even though heat networks themselves do not enjoy the same statutory powers as other forms of utilities such as gas, water and power.

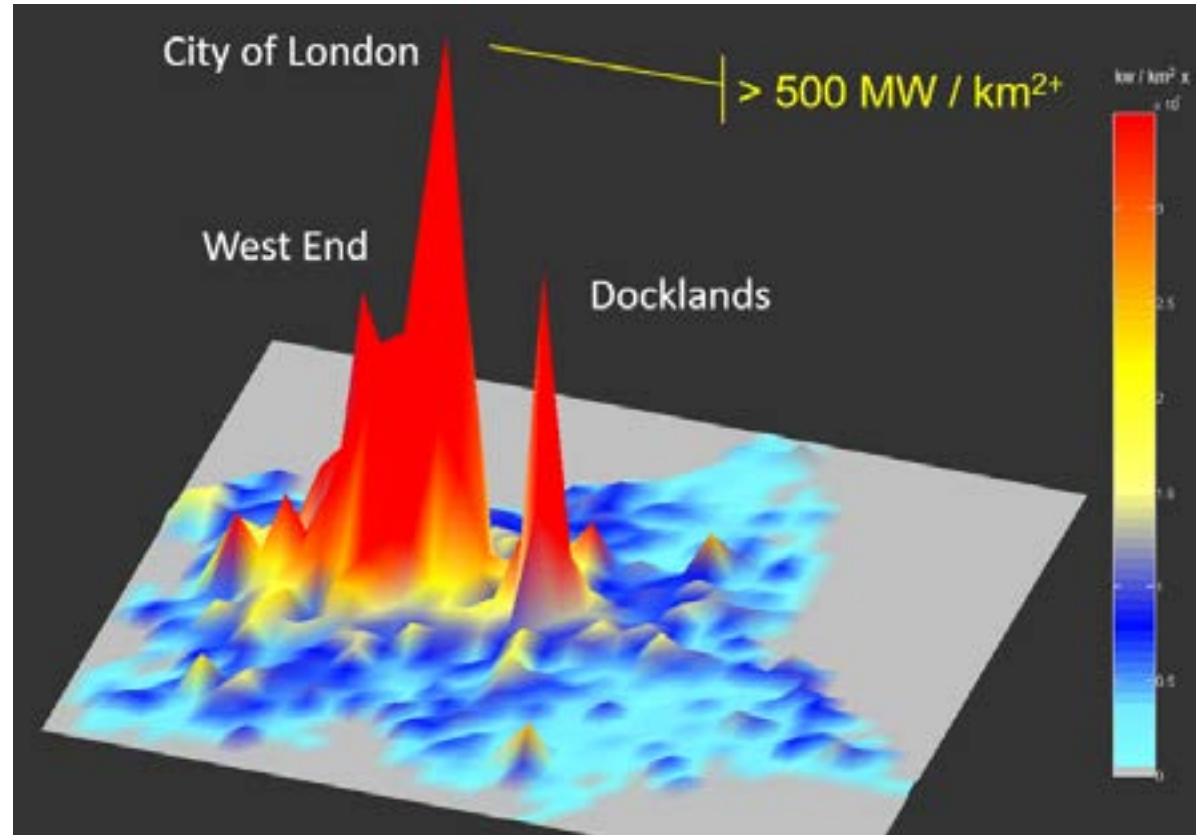
The Bill intends to resolve this by granting heat networks statutory powers, bringing local heat networks under the Ofgem umbrella, regulating prices, promoting technical standards and introducing limits on carbon emissions.

Heat zoning regulations are expected to support the growth and decarbonisation of existing networks such as Citigen and are intended to accelerate the transition towards net zero heat, enabling cities to adopt a common energy strategy.

Local heat networks are particularly suited to locations such as the Square Mile with its building density and available heat sources.

In such areas, the potential for Heat Network Zoning will be considered where certain buildings would be required to connect to such networks as the lowest cost solution for decarbonised heat.

As part of these initiatives, the City may also be able to benefit from the Green Heat Networks Fund, a three year (2022-2025) £288m capital grant fund intended to support (amongst other things) the expansion of existing heat networks.





Open Energy Networks for the Smart Grid

With new smart technologies challenging the traditional way we generate, consume and manage electricity, the Open Networks programme has brought together the nine electricity grid operators in the UK and Ireland to work together to align processes to make connecting these networks as easy as possible and to bring renewable energy resources, including wind and solar panels, to the local electricity grid.

One of their initiatives is the concept of flexible technology that can store energy using periods of low demand, releasing it back to the grid during peak periods. This will become increasingly important in order to address local peaks and troughs of demand given that local supply grids are typically designed to meet average loads.

Working with the industry regulator and the distribution network operators, UK Power Networks are currently facilitating this marketplace by paying flexible energy suppliers (typically at this point large commercial buildings) both an availability fee and a utilisation fee to store energy and push it back into the grid at peak times through their building energy management system.

All the grid providers have committed to offer quicker connections to properties making this commitment, and given the City's demographic, there are clear opportunities where the City and the Energy Networks Association can work together with the City Business Improvement Districts, large commercial properties and residential estates to explore these opportunities.

In the future, it may be possible to consolidate infrastructure installations and harness synergies between developments, enabling both heat and cooling to be provided in a more efficient way to residents and other stakeholders. This will likely drive innovation in terms of energy storage facilities and cooperation between adjacent properties to create a local eco-system for heating and cooling.





Transport Strategy: Electric Vehicle Charging

Under the direction of its innovative Transport Strategy and the need to support the transition to zero emission capable vehicles, the City has recently increased the amount of electric vehicle charging infrastructure available for use in the Square Mile, delivering facilities sufficient to meet the current needs of residents and vehicles serving the City.

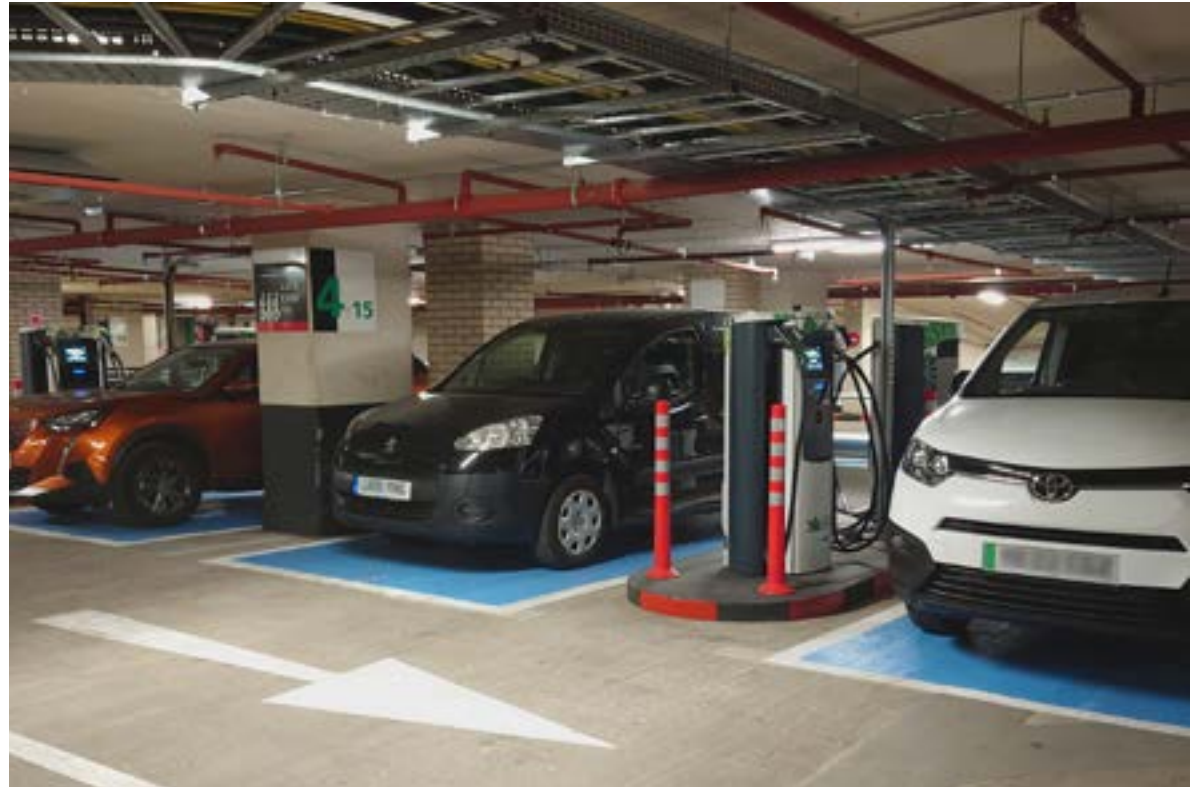
There are publicly accessible electric vehicle charging points in all the City's public car parks, one rapid charging point on-street for taxis and a rapid charging hub in Baynard House car park with six rapid charge points and space for a further four in the future.

This number of facilities needs to balance potential demand with the need to avoid drawing unnecessary traffic into the City just to recharge, potentially adding congestion to our streets, whilst changes in battery and recharging technology will also change these requirements over time.

Alongside this, the City has delivered on its own commitment to zero-emission vehicles by making its Cleansing fleet fully electric, installing the necessary infrastructure at its Walbrook Wharf depot and working with contractor Veolia to transition its fleet of vehicles.

Progress has also been made through the Planning process, whereby new developments with off-street loading can be required to install rapid charge points, whilst we can also encourage the owners, managers and occupiers of existing buildings with loading bays to install rapid charge points.

It's clear that demand for top up charging for vehicles servicing the City, alongside reliable and available recharging facilities for our residents, remains a growing requirement, and as such we are currently working with colleagues in Community and Children's Services to expand recharging facilities in our residential estates, promoting the newly opened recharging hub and looking to increase the number of top up rapid recharging units.





Future Proofing

The City has to continue to work with its stakeholders, the utility sector, government and the industry regulator to ensure its utility infrastructure remains fit for purpose, meeting the needs of today as well as addressing the challenges of the future.

With that in mind, future proofing the City already has some specific early challenges:

- Given deregulation of the supplier market, companies such as UK Power Networks are prevented from investing ahead of need. However, longterm expansions in demand will undoubtedly require an uplift in capacity, needing the City to work with UKPN and others in the electricity sector to consider strategic investment opportunities to grow supply capacity.
- Development activity in the Square Mile continues apace, so it is essential that the City engage with the development community to understand
Despite the complexity and cost of expanding the City's underground pipe subway network, it must look to maximise the opportunities when they arise to connect or lengthen existing parts of this essential infrastructure network.
- In one of the biggest changes in telecommunications history, Openreach intend withdrawing all copper-based voice telephone lines from the UK's network at the end of 2025. This will enable Openreach to focus on maintaining and enhancing its fibre network and consider opportunities from decommissioning but this will impact anyone still using copper based lines.
- Changes are planned to the UK's 284km of gas pipeline network to transition it from methane-based natural gas to zero-carbon hydrogen and biomethane. Cadent has upgraded 92% of the City's low pressure network to distribute natural gas to hydrogen in the future, and other green gas projects expected in due course.
- As part of exploring the potential for hydrogen usage, the Hydrogen Highway project is looking at the landing and distribution of hydrogen to an inland port terminal. This could become a consideration in the long term operational requirements for the City's Walbrook Wharf depot.





Stakeholder Engagement

To consult on this strategy and raise awareness of the issues and challenges it seeks to address, it's intended to undertake a series of engagement sessions and publicity activities, from face to face meetings and public forums to on-line promotion.

The key groups to be engaged with will include:

- Senior level utility representatives
- Business Improvement Districts
- City businesses & SMEs
- Resident groups
- Industry Regulators
- Energy Networks Association
- Greater London Authority
- Transport for London
- Adjacent Local Authorities
- HAUC (Highway Authority and Utilities Committee)
- Members and appropriate City Corporation Committees

To ensure this strategy remains a live document, it is intended the dialogue established through its creation remains in place to drive forward the essential changes it seeks to make.



Performance Actions:

- Ensure effective relationships are maintained within each utility sector and work with stakeholders across the City to bring issues to their attention
- Promote the Digital Infrastructure Toolkit and standard wayleave agreement
- To maintain the commitment embodied by the Considerate Contractor Streetworks Scheme for safe, considerate and cooperative working practices
- Establish performance measure for this strategy

Connectivity Actions:

- Supporting Openreach in achieving their target to deliver fibre broadband to 25 million premises, including both businesses and residents, by end of 2026.
- Highlighting 'not-spot' areas within the Square Mile where there is greater demand for faster fibre connectivity.
- Supporting new fibre providers such as Vorboss to increase network capacity
- Complete the 5G network rollout in conjunction with Cornerstone & Freshwave
- Ensure effective maintenance and resilience for the existing Wi-Fi and 4G networks
 - Capital investment in repairs to Snow Hill and Holborn Viaduct pipe subways
 - Trial smoke sensors to ensure the subways remain safe for both utility plant and workers
- Review opportunities for the removal of redundant plant, making space for new cabling
 - Identify further opportunities to invest in & expand Citigen network
 - Consider opportunities from Govt heat zoning regulations and consider requirements to connect to heat networks

Planning & Innovation Actions:

- Promote the opportunity for the City to be seen as a test bed for new ideas and innovations
- Explore the opportunities provided by the City-wide mesh network to carry smart data
- Undertake ground penetration radar mapping of the City's streets
- Work with the GLA and key utilities to establish the potential to map utility networks as part of the National Underground Asset Register initiative

Climate Actions:

- Work with the City's consultants and key stakeholders to identify the route towards implementing a Local Area Energy Plan for the Square Mile
- Continue to work with e.on to identify opportunities to expand the Citigen network
- Seek to make further progress in decarbonising Citigen's operation
- Work with Govt and Ofgem to review implications & options from heat network zoning and the Green Heat Networks Fund
- Engage with the Energy Networks Association to develop opportunities for flexible energy networks
- Review requirements for on-street and off-street charging points, including within our public car parks and residential estates
- Promote and publicise access to the recharging hub at Baynard House car park
- Work within the Planning process and with the BID engagement team to require & promote the installation of recharging facilities within commercial premises for servicing vehicles

Future Proofing Actions:

- Identify long term energy and telecom requirements and supply constraints for future development
- Consider opportunities for future pipe subway expansion
- Address the impact of the withdrawal off copper-based telecoms
- Assess the challenge represented by the transition of gas networks to hydrogen & biomethane

Route Map

Routemap	
Performance Actions	<ul style="list-style-type: none"> Establish performance measures for this strategy Ensure effective relationships are maintained within each utility sector and work with stakeholders across the City to bring issues to their attention Promote the Digital Infrastructure Toolkit and standard wayleave agreement To maintain the commitment embodied by the Considerate Contractor Streetworks Scheme for safe, considerate and cooperative working practices
Connectivity Actions	<ul style="list-style-type: none"> Supporting Openreach in achieving their target to deliver fibre broadband to 25million premises, including both businesses and residents, by end of 2026 Highlighting 'not-spot' areas within the Square Mile where there is greater demand for faster fibre connectivity Supporting new fibre providers such as Vorboss to increase network capacity Complete the 5G network rollout in conjunction with Cornerstone & Freshwave Ensure effective maintenance and resilience for the existing Wi-Fi and 4G networks Capital investment in repairs to Snow Hill and Holborn Viaduct pipe subways Trial smoke sensors to ensure the subways remain safe for both utility plant and workers Review opportunities for the removal of redundant plant, making space for new cabling Identify further opportunities to invest in & expand Citigen Network Consider opportunities from government heat zoning regulations and consider requirements to connect to heat networks
Planning & Innovation Actions	<ul style="list-style-type: none"> Promote the opportunity for the City to be seen as a test bed for new ideas and innovations Explore the opportunities provided by the City-wide mesh network to carry smart data Undertake ground penetration radar mapping of the City's streets Work with the GLA and key utilities to establish the potential to map utility networks as part of the National Underground Asset Register initiative
Future Proofing Actions	<ul style="list-style-type: none"> Identify long term energy and telecom requirements and supply constraints for future development Consider opportunities for future pip subway expansion Address the impact of the withdrawal off copper-based telecoms Assess the challenge represented by the transition of gas networks to hydrogen & biomethane

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2023

2024

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2026

Routemap

Climate Actions

Work with the City's consultants and key stakeholders to identify the route towards implementing a Local Area Energy Plan for the Square Mile

Continue to work with e.on to identify opportunities to expand the Citigen Network

Seek to make further progress in decarbonising Citigen's operation

Work with the government and Ofgem to review implications and options from heat network zoning and the Green Heat Networks Fund

Engage with the Energy Networks Association to develop opportunities for flexible energy networks

Review requirements for one-street and off-street charging points, including within our public car parks and residential estates

Promote and publicise access to the recharging hub at Baynard House car park

Work within the Planning process and with the BID engagement team to require & promote the installation of recharging facilities within commercial premises for servicing vehicles

2023

2024

2025

2026

Contacts



Ian Hughes – City Operations Director

Ian is the City Operations Director. He has strategic responsibility for all the operational activities on the City's streets, including the key front line services of street cleansing, highway maintenance, domestic waste collection and parking enforcement. Ian also has overarching responsibility for road safety, transportation & public realm schemes, maintaining the Square Mile's trees & green spaces and supporting the City's major on-street events such as the Lord Mayor's Show. He is Deputy Senior Responsible Officer for the Secure City programme with the City Police.



Sye Thevathas – Strategic Infrastructure and Asset Manager

Sye Thevathas is the Strategic Infrastructure & Highways Asset Manager. He is the key contact within the Corporation for all matters relating to network infrastructure, supporting elected Members, City of London departments, City businesses, property owners, developers, utility and fibre broadband providers, to ensure that the Square Mile is provided with world leading utility network infrastructure.



Michelle Ross – Traffic Manager

Michelle leads, manages and directs the three specialist teams responsible for coordination of Street works (permitting), Special Events (on the highway) & Traffic Management (road closures, hoarding licences & major projects)



Darran Gowdy - Streetworks Manager

Darran has over 35 years of experience in engineering, technical services, utility works, highways activities, streetworks permitting and inspections, compliance and highway management, Darran manages the Streetworks Team for the City of London.



Giles Radford – Assistant Director Highways

Giles is the Assistant Director for Highways. He is responsible for managing highway maintenance and construction, street lighting, drainage and the City's pipe subway network. Giles is also responsible for highway licensing, temporary road closures, special events, utility works, the City's 4G infrastructure and the Considerate Contractor Scheme.



Graeme Low – Assistant Director of Energy and Sustainability

Graeme is Assistant Director, Head of Energy and Sustainability for the City Surveyors Department. His team leads on the supply of energy to our buildings including electricity, gas and heat and coolth supplied via Heat Networks such as Citigen. He is responsible for ensuring our buildings energy and operational carbon performance improves to meet the challenge of our Climate Action Targets for 2027.



Mark Donaldson - Senior Energy Engineer

Mark leads the City Corporation's support for the development of heat networks within the Square Mile. This includes working with E.On to support the growth and decarbonisation of the existing Citigen heat network, developing opportunities for new low carbon heat networks in the Square Mile, and preparing the City Corporation for the forthcoming Heat Zoning regulations.



Rob McNicol - Head of Policy and Strategy

Rob is the Assistant Director for policy and strategy in the planning division. His team is responsible for delivering the City Plan, Supplementary Planning Documents and other planning guidance; monitoring and data relating to the Built Environment; and delivering a number of Climate Action Strategy projects that will embed sustainable approaches to development in the Square Mile.

Committee(s)	Dated:
Planning and Transportation – for decision	18 July 2023
Subject: City of London Lighting Supplementary Planning Document (SPD)	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	1, 2, 5,11,12.
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of: Gwyn Richards, Director of Planning and Development	
Report author: Pearl Figueira, Environment Department	

Summary

This report presents a new Lighting Supplementary Planning Document (SPD), which provides guidance for developers on lighting buildings and the spaces between them. It will help developers to meet the requirements of the Development Plan policies that relate to lighting.

This document includes a ‘Considerate Lighting Charter’ which the City Corporation encourage all those involved in lighting the City to commit to, including the owners, occupiers and managers of existing buildings in the City.

Following approval by this committee in November 2022, a public consultation exercise has taken place between December 2022 and February 2023. A large number of responses were received along with significant press coverage, all of which have been considered by officers. Most responses welcomed the Lighting SPD and supported its aims. The SPD has been updated in response to comments received and is now presented to this committee for adoption.

Recommendation

The Planning and Transportation Committee is asked to:

- Approve the adoption of the Lighting SPD attached at Appendix 1.

Main Report

Background

1. In October 2018, the Court of Common Council resolved to adopt the Corporation's Lighting Strategy ('Light + Darkness in the City: A Lighting Vision'), which seeks to improve the quality, efficiency, sustainability and consistency of lighting for the whole City, providing a holistic approach to lighting and helping to ensure a safe, vibrant and pleasant night environment for businesses, residents and visitors. This included a commitment to publish detailed planning guidance as to the use of lighting within the City of London to support and enhance the implementation of policy.
2. The draft Supplementary Planning Document (SPD) provides planning guidance for artificial lighting for existing buildings and details required as part of planning applications from designers, developers, and owners of buildings to help enhance the lit environment after dark. The document has been prepared by lighting consultants Speirs Major Architects with input and oversight from officers across the Corporation.
3. Following approval in November 2022 from Planning and Transportation Committee to undertake a formal public consultation exercise, this took place from December 2022 and February 2023 and included three formal public consultation events, including a night walk around the City.

The Lighting SPD

4. The Lighting SPD has been drafted having been informed by internal and external consultation. It provides planning guidance for developers on lighting buildings and the spaces between them and will help developers to meet the requirements of the Development Plan policies that relate to lighting. It covers the design, delivery, operation, and maintenance of artificial light within the City of London.
5. The document sets out:
 - The details related to lighting that will need to be provided at pre-application stage, planning application submission, and post-permission stage (including information secured through conditions);
 - Guidance on good practice related to lighting, categorised under six 'Lighting Outcomes' of: sustainability and climate change; residential amenity; public realm; architecture, heritage and public art; and safe and inclusive design;

- Technical requirements, which all lighting schemes for new developments are expected to comply with. This includes 'City Environmental Zones' and corresponding curfew times and illuminance levels; and
 - Appendices including the 'Considerate Lighting Charter'.
6. In addition to providing requirements for planning application submissions for new development, these guidelines can also be of use to owners and occupiers of existing buildings and structures in the City (although the Corporation has no powers to impose the adoption of these lighting measures outside of the planning system).
 7. The SPD encourages developers to address lighting impacts at an early stage before their designs are finalised. Using these guidelines, appointing experienced consultants, having a dialogue with officers of the City of London Corporation, undertaking engagement where appropriate, and commissioning early stage studies to assess the lighting impacts will help to meet the City's lighting outcomes.

Considerate Lighting Charter

8. The Considerate Lighting Charter gives an opportunity for building owners, operators and occupiers to make a strong commitment to manage their lighting systems in ways that make a positive contribution to the City. The Charter has been amended following consultation responses.
9. For existing buildings where no new development is proposed, the City Corporation has no legal powers to enforce adherence with the Charter. Building owners, managers and occupiers would, however, incur reputational damage if they were to sign up to the Charter but not adhere to the commitments it contains. The Charter does not change or in any way undermine the City's Environmental Health function, which will continue to investigate complaints of intrusive light and take enforcement action where necessary.
10. The Lighting SPD received significant interest and positive media coverage during the public consultation. At that stage it was considered that a strong media campaign would assist in the promotion of early adoption of the Considerate Lighting Charter, which relates specifically to existing buildings. Following further consideration, and significant and positive market interest in the Charter, it is considered that early adoption by existing building occupiers will likely come forward without the need for a media campaign. Promotion of the Charter will be supported by officers and communications with key

stakeholders, including the Business Improvements Districts, the City Property Association and others.

Summary of public consultation and engagement

11. A comprehensive engagement strategy was undertaken for the public consultation which took place from December 2022 to February 2023, and included residents, workers, consultants and other relevant stakeholders. The consultation included:

- Three events:
 - In-person public consultation event with a Lighting Walking Tour around key parts of the City;
 - A virtual public consultation event;
 - In-person industry professionals event.
- A consultation web page for the SPD;
- Emails to stakeholders and those signed up to the Corporation's planning consultation database;
- A workshop with lighting industry professionals.

12. A total of 68 responses were received and the response was broadly positive; responses have been summarised in the Consultation Statement (Appendix 2). In addition to individual representations from residents, representations were also received from the following resident groups: Barbican Association, Brandon Mews House Group, Gilbert House Group Tenants Association, and the Willoughby House Group at Barbican Estate. In addition, a significant number of technical consultants, lighting designers and businesses responded to the consultation.

13. The feedback from stakeholders has been reviewed by officers and has been used to improve the document and inform the final version. A broad consensus was received from stakeholders that the SPD would help to support a consistent high standard for the lighting of new development.

14. In response to comments, amendments were made to all sections of the document. Most notably, the Technical Requirements section and tables 10, 11 and 12 were amended to be brought more in line with established Institution of Lighting Professionals (ILP) Guidance. In order to protect amenity and to respond to the unique City context, the proposed levels have

been adapted from those included in the ILP guidance and are considered achievable in, and appropriate for, the City's unique context.

15. The public consultation has been undertaken in line with the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Corporate & Strategic Implications

16. Strategic implications: The Lighting SPD is in line with the aims and objectives of the City of London Corporate Plan. This SPD will support the delivery of the Corporate Plan including by ensuring that land-use decisions fully incorporate measures to ensure people are safe and feel safe, people enjoy good health and wellbeing, and our spaces are secure, resilient and well-maintained through the planning system (Corporate Plan, Outcomes 1, 2, 5, 11 and 12).
17. Financial implications: There are no financial implications arising from this report.
18. Resource implication: There are no resource implications arising from this report.
19. Equalities implications: The Lighting SPD will contribute to the delivery of the City Corporation's Public Sector Equality Duty 2010 by improving health and wellbeing outcomes for all people who are protected by existing equalities legislation. The SPD has been subject to an initial screening exercise which concluded a detailed Equality Impact Assessment was not needed as the SPD would not have any negative impacts on those who share a protected characteristic.
20. Climate implications: The Lighting SPD will contribute to the delivery of the Climate Action Strategy.
21. Legal implications: The Lighting SPD has been developed in line with the statutory requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012.
22. Risk implications: There are no additional new risks arising from this report.
23. Security implications: There are no security implications arising from this report.

Conclusion

24. This report presents and updates Members on the draft Lighting SPD including setting out the key principles presented in the SPD and public consultation exercise undertaken between December 2022 – February 2023, and how this has informed the latest version of the SPD. The Lighting SPD has been broadly welcomed during the public consultation and is recommended for approval by Members.

25. If approved by the Planning and Transportation Committee, the SPD will be published and will become a material consideration in the determination of planning applications.

Appendices

- Appendix 1 – Lighting Supplementary Planning Document.
- Appendix 2 – Lighting SPD Consultation Statement.

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City of London Lighting Supplementary Planning Document

Revision: FINAL DRAFT
July 2023



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Executive summary

This Lighting Supplementary Planning Document ('SPD') provides guidance for developers on lighting buildings and the spaces between them. It will help developers to meet the requirements of the Development Plan policies that relate to lighting and supports the aims of the City Corporation's Climate Action Strategy. It covers the design, delivery, operation, and maintenance of artificial light in the public realm within the City of London.

This document also includes the 'Considerate Lighting Charter' which we encourage all those involved in lighting the City to commit to. The Charter sets out simple yet important steps that everyone can take to ensure the:

"... right light, in the right place at the right time, controlled by the right system."*

A commitment of the Corporation's Lighting Strategy (2018), this document builds on the implementation of its policies and principles through the planning system.

This SPD provides detailed guidance on policies within the Local Plan and the Mayor's London Plan and is a consideration in the determination of planning applications.

What is in this SPD?

The guidance asks developers to produce a high-level **Lighting Strategy** early on in the design process. This can then be discussed during pre-application meetings and can shape other aspects of the design.

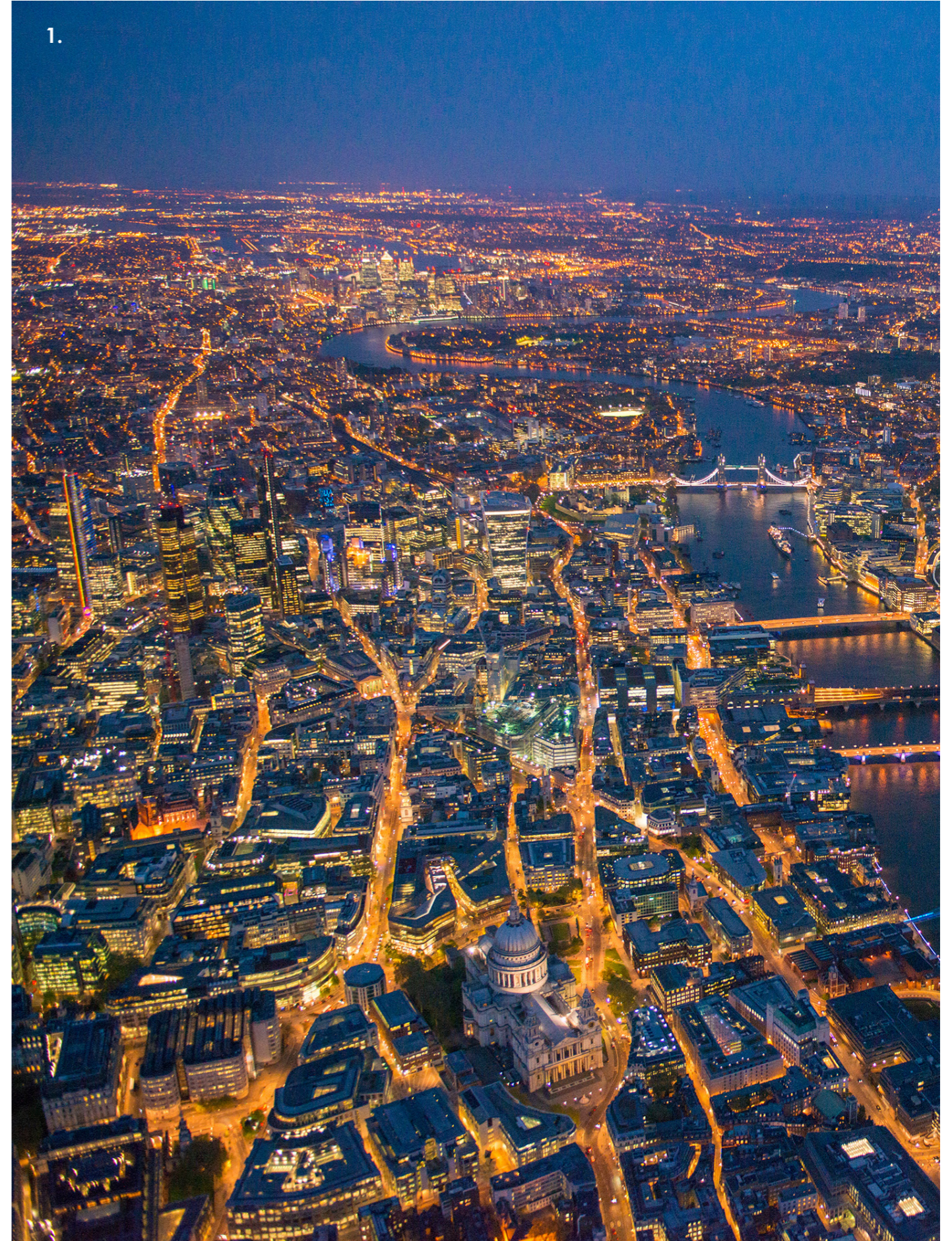
At the application stage, the developer then submits a **Lighting Concept**, with the finer details - including a **Technical Lighting Design** - secured through a condition.

Alongside this new process, the SPD provides guidance and technical requirements, including 'City Environmental Zones' and corresponding curfew times and illuminance levels.

The SPD provides detailed principles that will help to achieve six **Lighting outcomes**:

- Sustainability and climate change;
- Residential amenity;
- Public realm;
- Architecture, heritage and public art;
- Safe and inclusive design;
- Temporary lighting.

Over time, as new developments come forward that follow this guidance, we will transform the approach to lighting in the City; reducing energy consumption, protecting residential amenity and biodiversity, all the while making the City a safer and more attractive place to be for all its communities after dark.

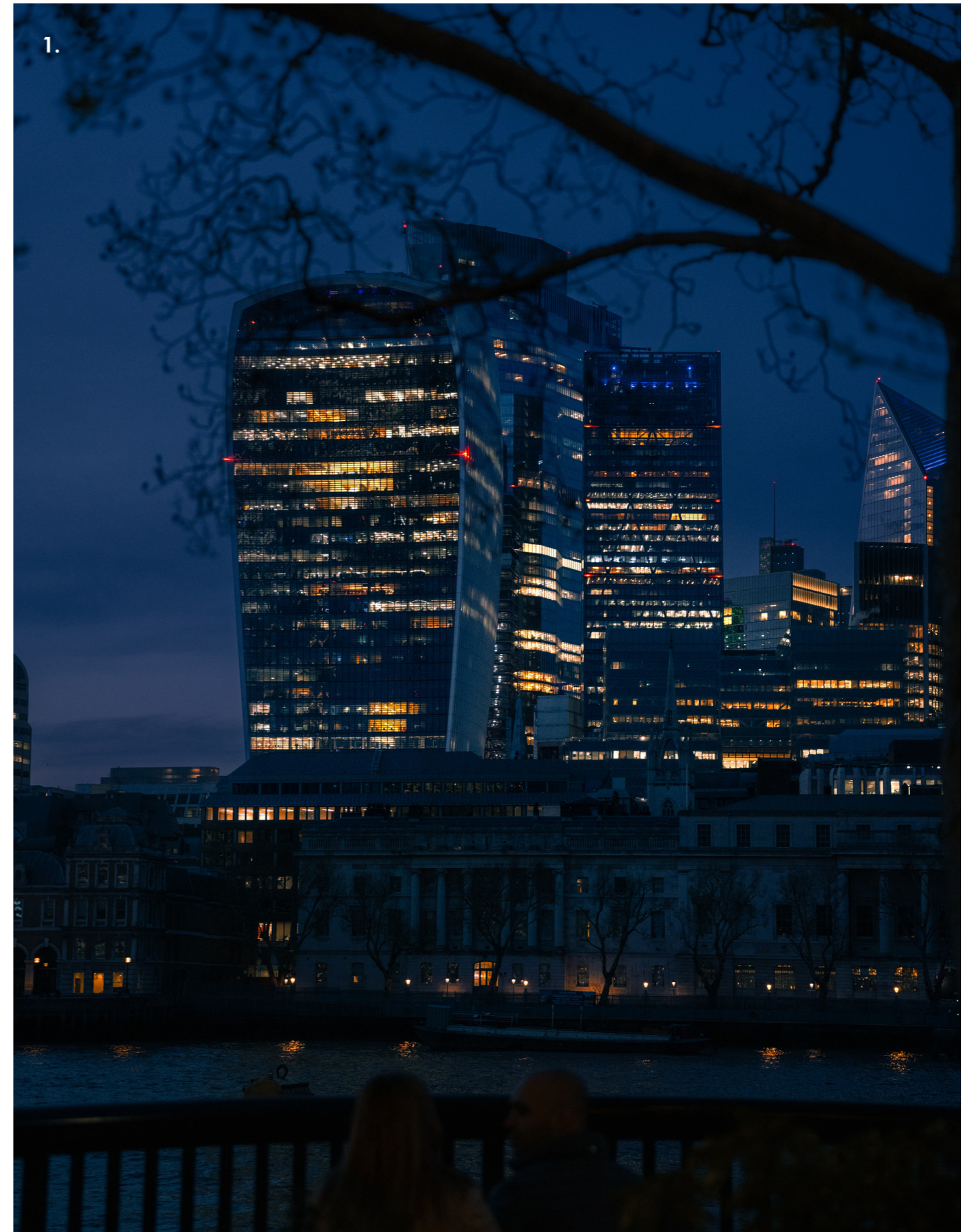


*ILP Guidance Note 01/21 The Reduction of Obtrusive Light

1. Bird's eye view of the City after dark. Photography by Jason Hawkes.

1.0 Introduction

- 1.1 The City of London has become a diverse 24-hour destination – one which seeks to meet the needs of our residents, workers, and visitors by day and, increasingly so, after dark. Given the international dimension of our businesses, many operate around the clock. In addition, our night-time economy is growing in terms of leisure and hospitality. The 'Culture Mile' transformation seeks to cement the position of the City as a major cultural destination both by day and after dark. It is also a 'Destination City' for local, national, and international tourists.
- 1.2 The City of London is also home to a significant residential population. Achieving a vibrant and thriving City at night which is safe and which works for all its communities, will depend on lighting that is not only intelligent, functional, and safe, but also creative, sensitive, innovative, and beautiful.
- 1.3 In addition, Lighting has a place in delivering on our Climate Action Strategy (2020-2027) and reducing energy consumption.
- 1.4 In October 2018, we adopted the most comprehensive, holistic Lighting Strategy in London ('Light + Darkness in the City/ A Lighting Vision for the City of London'). This provides the roadmap to the City of the future which sees lighting contributing to our three overarching aims: A flourishing society, a thriving economy, and shaping outstanding environments. This SPD should be read in conjunction with that document.
- 1.5 The Lighting Strategy made the following recommendations related to planning:
- Promote best practice on lighting around design and environmental considerations;
 - Require lighting strategies to be provided as part of the pre-application process where appropriate;
 - Improve communication between key stakeholders regarding function and aesthetic outcomes;
 - Publish detailed planning guidance as to the use of lighting within the City of London to support and enhance the implementation of policy.
- 1.6 This SPD also builds on our Corporate Strategy and policies in the Development Plan, detailing how we will deliver on the Lighting Strategy through the planning system.
- 1.7 Whether it is a proposal for a new building, the alteration of an existing one, or new or upgraded public realm, these all have an impact on the character of the City after dark. Artificial light can provide positive benefits, not only on how public and private space is used and how safe it feels, but also how attractive it is. It can also have a negative impact, at night and day, such as on the ability of residents to enjoy their homes due to obtrusive light, can cause highway safety and accessibility issues and create environmental damage, including harm to local biodiversity.
- 1.8 The aim of this SPD is to ensure that these opportunities and constraints are identified and addressed. It seeks to consider light as a valuable commodity to be managed in an intelligent, sensitive, and innovative way and provide the guidance needed to ensure that the lighting approach to any development meets specific requirements. It aims to provide support in the preparation of lighting information as part of the pre-application process or for an application submission.
- 1.9 A key aim of the SPD is for City occupiers to consider and discuss lighting at an early stage to ensure issues are understood from the start. This SPD refers to exterior lighting unless otherwise indicated.
- 1.10 Owners, occupiers and managers of existing buildings will be encouraged to adopt the principles set out in this guidance by signing up to the 'Considerate Lighting Charter'. A copy of the Charter is included in Appendix A of this document.
- 1.11 This document covers lighting for new development. Street lighting is supported by the Lighting Strategy (2018) and is considered separately by the Street Lighting Team at: deshighwaysupport@cityoflondon.gov.uk.
- 1.12 This SPD has been prepared in partnership with lighting architects Speirs Major.



1. View of the Eastern cluster after dark. Photography by Marc Kleen.

2.0 Planning process

2.1 This section sets out how lighting should be addressed through the planning process.

2.2 When designing a lighting scheme, applicants should consult the City of London Developer Engagement Guidance (2023) and develop a community engagement strategy ensuring that all stakeholder engagement upholds the values of equality, diversity and inclusion.

2.3 The following is required:

All **major developments** should be accompanied by:

1. A **Lighting Strategy** (see Table 2) outlining the approach to lighting at pre-application stage.
2. At application stage this should be re-submitted together with a more detailed **Lighting Concept** (see Table 3).
3. A full and final **Technical Lighting Design** (see Table 4) shall be reserved for condition.

All applications for lighting schemes, including for the public realm and building facades, should also provide the above information.

All other applications including refurbishment, alteration, extension, new build and illuminated advertisements, should address how lighting has been considered as part of the submission (in line with the SPD).

Pre-planning submission

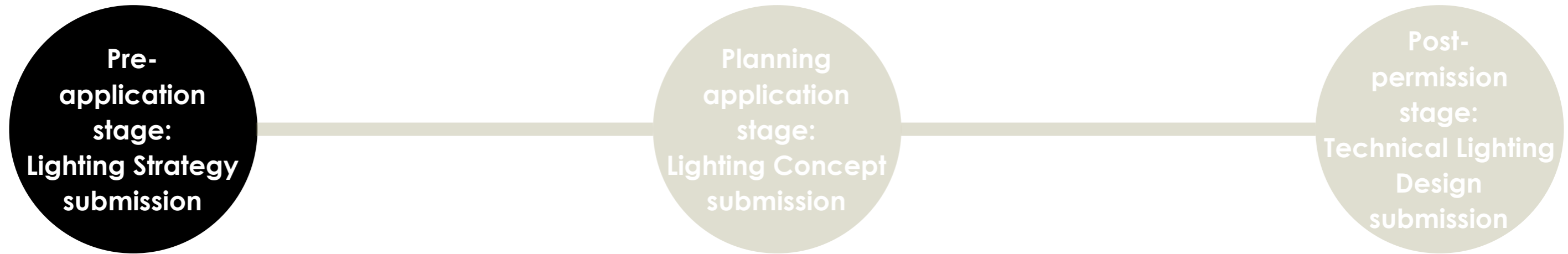
2.4 Appropriate expertise about lighting should be sought from the start. It may be necessary to employ an experienced and suitably qualified professional lighting designer or illumination engineer, usually a corporate member of the International Association of Lighting Designers (IALD), Institution of Lighting Professionals (ILP), Chartered Institute of Building Services Engineers (CIBSE) or other similar independent professional organisation.

2.5 The information as indicated in '**Table 1: Design process for lighting development**' should be submitted at each stage, commensurate to the scale of development, addressing the guidance in this document. This process is broadly based on the Royal Institute of British Architects (RIBA) Plan of Work 2020.

Table 1: Design process for lighting development

RIBA Stage	Actions	Notes
0 – Strategic Definition	No action required.	n/a
1 – Preparation and Briefing	Consider the lit context of and potential impact of the lighting. Develop the lighting brief.	Ensure initial brief to design team and incorporates lighting as a key planning requirement. Consider the early appointment of a lighting design professional.
2 – Concept Design	Submit Lighting Strategy (See Table 2 for requirements)	Consider requirements for safety, security, accessibility, inclusion, character, identity, and legibility after dark. Include the strategy for illuminance levels, colour temperature and scale. Define parameters for reduction of obtrusive light and mitigation of impacts on residential amenity and biodiversity both with respect to the design of the building and its external and internal lighting. Set out sustainable lighting criteria.
3 – Spatial Coordination	Submit Lighting Concept (See Table 3 for requirements)	Build upon the Lighting Strategy, developing and clearly communicating the overall lighting design intent.
4 – Technical Design	Submit Technical Lighting Design (See Table 4 for requirements)	Develop the technical response based on the Lighting Strategy, Lighting Concept and any related conditions and/or reserved matters.
5 – Manufacturing and Construction	Comply with any planning conditions with respect to lighting as required prior to Practical Completion.	Ensure all conditions with respect to both the Technical Lighting Design and construction lighting are met particularly agreed timings in respect of pre-curfew and post-curfew lighting requirements.
6 – Handover	Comply with any planning conditions with respect to lighting prior to Final Completion.	Ensure all conditions with respect to balancing and dimming and/or switching of public realm and building lighting are met particularly agreed timings in respect of pre-curfew and post-curfew lighting requirements.
7 – Use	Comply with any planning conditions with respect to lighting as required following Final Completion and for the life of the development.	Ensure all conditions with respect to balancing and dimming and/or switching of public realm and building lighting are met particularly agreed timings in respect of pre-curfew and post-curfew lighting requirements.

2.0 Planning process



2.6 The following information as indicated in 'Table 2: Lighting Strategy submission requirements' should be submitted as part of the development of a 'Lighting Strategy':

Pre-application Stage

Table 2: Lighting Strategy submission requirements

Requirement	Description	Note
A. Vision	Illustrated and written description of the high-level creative approach for all external lighting and, where relevant, internal lighting.	To have consideration for the City Corporation's Lighting Strategy (2018).
B. Analysis	Assessment of issues including context (including existing light and cumulative impact), character, safety, security, legibility, accessibility, sustainability, and nearby sensitive receptors. Consider the social composition of the area and the different requirements and impacts of lighting on a diverse range of users.	To investigate and communicate key design criteria.
C. Approach	Illustrated and written description of the general lighting approach for all external lighting including street and amenity lighting, illuminated advertising, building and landscape lighting and the illumination of art.	To include night-time sketch visuals.
D. Technical	Strategic diagrams showing proposed average levels of illuminance and distribution requirements, colour temperature, and scale/heights of fixtures.	May be based on classes as per BS5489 or other recognised guidance. Should refer to the City Corporation's Lighting Strategy (2018).
E. Residential amenity	Details of the approach to the reduction of any impact created by the internal lighting related to obtrusive light, such as glare, excessive visual brightness, light spill, and light intrusion, detailing potential mitigation measures.	Important where the development is highly glazed and has the potential to affect sensitive environmental receptors, such as local residences.
F. Environmental impact	Statements regarding proposed energy use, obtrusive light such as sky glow, glare, excessive visual brightness, light spill, and light nuisance and any potential impacts for local biodiversity should be included along with proposed mitigation measures, and a commitment to long term maintenance, management, and the reduction in waste, embodied and operational carbon.	Important where the development is highly glazed and has the potential to affect sensitive environmental receptors, such as intrinsically dark spaces, for example, parks, gardens, churchyards or the River Thames.

2.0 Planning process



2.7 The following information as indicated in 'Table 3: Lighting Concept submission requirements' should be submitted as part of the development of a 'Lighting Concept':

Planning application stage

Table 3: Lighting Concept submission requirements

Requirement	Description	Note
A. Lighting Strategy	Lighting Strategy to meet the requirements outlined in Table 2 .	Where a Lighting Strategy has been previously submitted as part of a pre-application process then the Lighting Strategy should be updated to reflect any changes to the overall design.
B. Lighting Concept	Illustrated and written description of the detailed Lighting Concept for all external lighting including street and amenity lighting, illuminated advertising, building and landscape lighting and the illumination of art. In addition, where relevant, details for internal lighting visible from the public realm and/or which could result in wider impacts to residential amenity and the environment should be included.	Visual material that clearly explains and illustrates the lighting intent including rendered plans, sections, and elevations, digital models (where relevant) and night-time visuals including CGIs. N.B. Preliminary lighting layouts, outline schedules of lighting equipment, control methodology and typical modelling to demonstrated proof of concept are welcomed but not mandatory at this stage.

2.0 Planning process



2.8 The following information as indicated in 'Table 4: Technical lighting design submission requirements' should be submitted as part of the development of a 'Technical Lighting Design':

Post-permission stage
Table 4: Technical lighting design submission requirements

Requirement	Description	Note
A. Lighting layouts	Plans, sections, and elevations as required to indicate the proposed position of all external luminaires.	Luminaires to be referenced to Lighting Equipment Schedule.
B. Lighting equipment schedule	Detailed schedule providing the specification for sources, luminaires and accessories (see Table 6 for details for Technical Requirements).	To include description, type, output, power, mounting, driver, size, weight and all accessories and associated columns/bracketry. May specify final recommended manufacturer.
C. Lighting details	Drawings showing typical details indicating methods of locating/fixing luminaires and associated equipment within the public realm and/or on the building/s .	To show relationship of luminaires to landscape and/or building fabric and should provide drawings at an appropriate scale.
D. Control methodology	Details of approach to the provision of lighting control including dimming and/or switching to include proposed method of control and level of automation together with proposals for management of the system, lighting scenes and their timings.	Should reference the use of timeclocks, PIRs and other similar devices that may trigger on/off or other lighting states.
E. Technical information	Details showing lighting calculations indicating illuminance and/or luminance, distribution, colour temperature and colour rendering criteria for typical areas of public realm and/or building facades. Should clearly demonstrate the impacts to sensitive receptors and mitigation implemented to reduce this. To include details of total installed energy load of all external lighting such as a statement of how energy use has been minimised/ optimised.	As may be reasonably requested to support any evaluation of the lighting proposals, particularly to demonstrate mitigation of obtrusive light such as sky glow, glare, excessive visual brightness, light spill, and light intrusion. Calculations used to determine obtrusive light should be for the installation i.e. when new with no maintenance factor adjustment. Details of assumptions used should be provided.
F. Operation and maintenance information	Details of operational requirements for lighting including details of times at which lighting will be switched on and off and/or dimmed together with anticipated timescales and access methods for the cleaning, repair, upgrading and replacement of all lighting and control systems. To include details of proposed recycling and disposal of lighting equipment at end of life.	As may be reasonably required to demonstrate the duration of any impact of the lighting proposals and to confirm that operation and maintenance has been properly considered as part of the design.

3.0 Lighting guidance

Lighting outcomes

3.1 This section of the SPD provides general guidance and sets out technical requirements for a lighting scheme that forms part of new development. It allows applicants to address City Corporation lighting policy in their planning application. The guidance will be a material consideration when reviewing a lighting scheme submitted as part of a planning application. Schemes that deviate from this guidance and its technical requirements should provide a clear explanation as to the reasons and offer any mitigation as may be required.

3.2 Artificial light is an important aspect of 'place-making' and should be carefully managed to address competing demands to achieve the right outcomes. The planning process within the City of London demands that an appropriate approach is taken to the design, delivery, installation and maintenance of all exterior lighting, and interior lighting visible from within the public realm. This is with the view to ensuring that the lighting makes a positive contribution to the cityscape whilst limiting potential adverse impacts and obtrusive light, particularly in respect of residential amenity and biodiversity.

3.3 **'Table 5: Lighting outcomes'** summarises the key outcomes from any lighting scheme that is submitted as part of a planning application.

3.4 The following pages of this section provide the general principles that apply to lighting development, where relevant. Each principle includes guidelines related to the topics outlined in **'Table 5'**.

Table 5: Lighting outcomes

Topic	Outcomes
A. Sustainability and climate change	<ul style="list-style-type: none"> Minimise embodied energy to help reduce carbon emissions. Minimise operational energy use to help reduce carbon emissions. Employ circularity through design and specification to help reduce material waste. Minimise obtrusive light such as sky glow, glare, excessive visual brightness, light spill and light intrusion that adversely impacts biodiversity, particularly within green spaces and adjacent to or within the river.
B. Residential amenity	<ul style="list-style-type: none"> Avoid obtrusive light that significantly impacts local residents created by permanently installed interior, amenity, architectural, and landscape lighting and illuminated advertising. Avoid obtrusive light that significantly impacts local residents created by temporary construction lighting.
C. Public realm	<ul style="list-style-type: none"> Employ lighting to help create an attractive, legible, inclusive, safe and secure public realm after dark. Employ lighting to help promote mobility, sustainable travel and support wayfinding, and accessibility. Employ lighting to help promote culture and the arts.
D. Architecture, heritage, and public art	<ul style="list-style-type: none"> Employ lighting to enhance and preserve the City of London's architectural heritage and historic places. Employ lighting to enhance new architecture, but only where justified. Employ lighting to enhance public art.
E. Safe and inclusive design	<ul style="list-style-type: none"> Employ lighting to ensure that public places and buildings are accessible for everyone. Employ lighting to help promote inclusion and diversity, and create places where everyone feels safe. Employ lighting to support and promote walking, cycling and the use of public transport.
F. Temporary lighting	<ul style="list-style-type: none"> Consider the opportunity for the inclusion of infrastructure to support temporary lighting for festivals and events. Minimise construction lighting to that required to meet safety and security requirements only.

3.0 Lighting guidance

Topic A: Sustainability and climate change

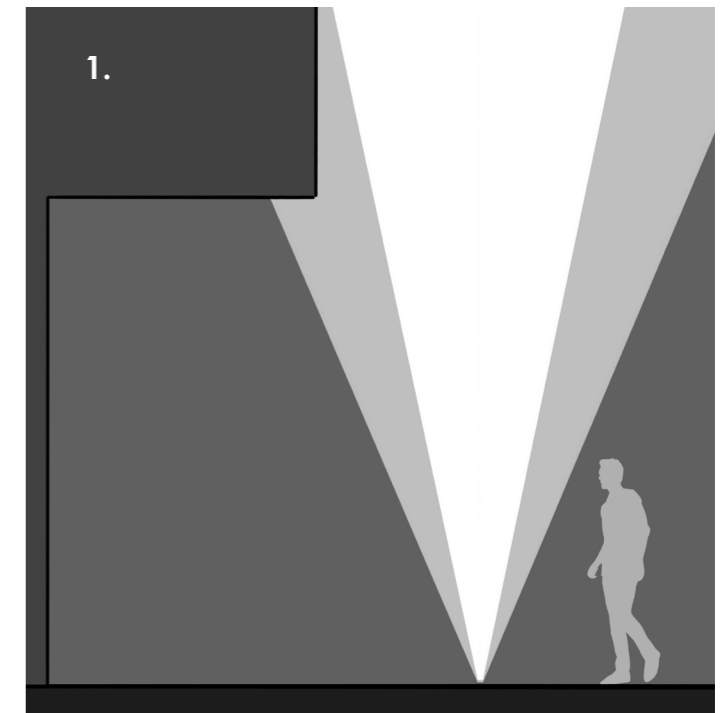
3.5 There are many things to think about when considering the use of artificial light in the City of London, whether it is illuminating an open space or landscaped area or highlighting a building. Even the impact of the interior lighting of a building needs to be considered as it can create unwanted impacts on people and the environment. Lighting schemes should aim to carefully balance the social and economic benefits that lighting brings to a development whilst mitigating the environmental consequences. The following general principles can assist in creating sustainable and responsible lighting solutions that minimise their impact on the planet:

Minimising energy use

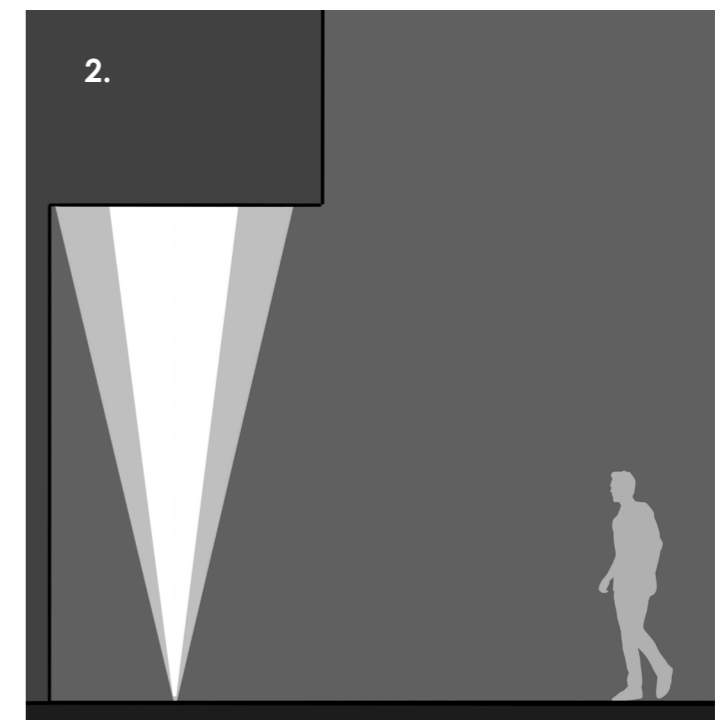
- 3.6 Electric light uses energy. In so doing it can create greenhouse gas emissions and uses valuable resources, contributing to climate change. The following general principles aim to help reduce energy used by lighting schemes:
- a. Artificial light is a precious commodity and should not be taken for granted. It should be used in a way that minimises waste and promotes moderation. Where artificial light is introduced to a development, it should be done so for a reason, with clear justification, whether functional, aesthetic or both.
 - b. Developments should seek to minimise the use of artificial lighting in interior spaces during daylight hours through the provision of natural light as an integral part of the building design. This particularly applies to deep plan office and retail spaces where optimisation of daylight should adhere to best practice.
 - c. Buildings should seek to achieve the maximum number of credits for lighting in the BREEAM Assessment (or similar schemes), using the most energy efficient lighting possible.
 - d. Lighting schemes should be designed to contribute to the well-being of building occupants through measures such as the WELL standard (or similar schemes).
 - e. All developments should ensure all external and internal lighting is automatically turned off when not needed using PIRs and/or timeclocks or other automated control devices to help reduce energy use and waste.
 - f. Any architectural lighting, or lighting without an essential function, should be switched off between the agreed 'lighting curfew' and dawn.
 - g. Lighting schemes should ensure as much of the energy demand as possible is met through on-site renewable or other forms of renewable energy provision.
 - h. Lighting schemes should seek to exploit innovative procurement strategies such as lux-lease arrangements, whereby building owners or tenants lease the luminaires on a pay as you use basis, incentivising efficiency and reducing waste.

Obtrusive light

- 3.7 Obtrusive light is a growing problem in urban centres including the City of London. It includes sky glow, glare, excessive visual brightness, light spill, and light intrusion. Sources of obtrusive light can include street and amenity lighting, security lighting, the exterior and interior lighting of buildings, and illuminated advertising amongst other examples.
- a. The City Corporation's Lighting Strategy (2018) seeks the active reduction of all forms of obtrusive light including sky glow, light spill, glare, excessive visual brightness, and light intrusion.
 - b. All developments within the City of London should take measures to limit all aspects of obtrusive light in accordance with the recommendations of this SPD and best practice.
 - c. All developments should ensure all external and internal lighting is turned off when not in use to help reduce obtrusive light.
 - d. All external lighting schemes should avoid directly uplighting the sky and ensure that any light distributed above the horizontal is directly targeted at the surface to be lit and demonstrate this through the planning application details.
 - e. All exterior fixtures should be fitted with louvres, snoots, cowls or other accessories, where appropriate, that help limit obtrusive light, specifically light spill, glare, and sky glow.
 - f. Given the proximity of London City Airport and road traffic routes, applicants should ensure that lighting schemes do not create glare or other obtrusive light that may impact traffic safety and/or aircraft safety, particularly on take-off or landing, including helicopters. Applicants for tall buildings must also indicate where aviation marker lighting for aircraft including helicopters is required.
 - g. Lighting on or adjacent to the River Thames should consider any impacts to navigation, to ensure that proposed lighting does not cause a hazard for vessels using the river.



1. Schemes should avoid directly uplighting into the sky.



2. Schemes should ensure that any light distributed above the horizontal is directly targeted at the surfaces to be lit without spilling light into the sky.



3.0 Lighting guidance

Biodiversity

3.8 Exposure to artificial light at night (ALAN) has the potential to have a negative impact on a wide range of wildlife, from birds, bats, and fish to plant life, insects and other flora and fauna. The impact of artificial lighting on biodiversity is known to be complex and varies with species. It can either attract or repel certain species, interfering with natural feeding, breeding and migration patterns. Particular importance is given to avoiding the lighting of water habitats in relation to bats and fish and the mitigation of light spill from tall, highly glazed buildings with respect to bird strike and interference with patterns of migration. This SPD makes the following general recommendations:

- a. All developments should ensure natural darkness is retained in green areas / corridors at night. Natural darkness is defined as the general condition at night without the addition of artificial light from any development. Where not practical to do so specific 'dark nights' are encouraged during which time lighting is turned off.
- b. Lighting should encourage, or not discourage, biodiversity including in green areas / corridors such as 'B-lines'.
- c. Lighting levels should generally be kept as low as possible with light focused only where it is needed in green areas / corridors.
- d. The direct illumination and highlighting of green landscape, including the uplighting of trees and other planting, is discouraged other than where it can be justified in terms of helping to create a more legible environment that directly support inclusion and accessibility.
- e. New developments should prevent light spill that would affect biodiversity, including into green areas / corridors, through the detailed design of glazing and by using hoods, cowls, louvres and shields on external lighting.
- f. All lighting next to the River Thames and the riverside should avoid excessive illumination and any spillage into the water which could have detrimental impacts on biodiversity including bird, bat and fish populations and other river species.
- g. All lighting should closely observe and not interfere with established bat corridors.

- h. All lighting near planted areas and hedgerows, should be sensitive to bats, birds, insects and other flora and fauna.
- i. Highly glazed tall buildings should take any necessary mitigation measures including to reduce the risk of bird strike due to external and internal lighting.
- j. All major developments, particularly those located adjacent to green space such as gardens, parks, churchyards or the river are advised to take advice from a specialist environmental consultant and/or ecologist who has local knowledge.
- k. All developments should ensure all external and internal lighting is turned off when not needed to protect biodiversity.
- l. Developments should consult the existing evidence base, including a data search report from Greenspace Information for Greater London CIC (GiGL), which includes information on species and Sites of Importance for Nature Conservation (SINCs).
- m. Developments should consider using lower Correlated Colour Temperature (CCT) for sensitive sites such as churchyards, and by the river in consultation with ecologists. Such requirements should be carefully balanced with any requirements for accessibility, safety and security.
- n. Applicants should actively seek the best possible up-to-date scientific information and advice.



1. Glazed facades without treatment and external lighting with insufficient optical control can cause light trespass into green areas spaces and potentially create bird strike.



2. Strategically located internal illumination, carefully detailed glazing facades and good optical control on for external lighting can help prevent light trespass into green areas spaces and birdstrike.

3.0 Lighting guidance

Topic B: Residential amenity

3.9 Lighting can adversely impact residents' quiet enjoyment of their properties after dark. Consideration should also be given to temporary residents including workers who live in apartments during the week and tourists who stay in hotels and rented accommodation, particularly at the weekend. Light spill through windows, even those fitted with blinds and curtains and the direct view of bright external and internal lighting schemes and light sources can not only cause a nuisance but also contribute to health issues including anxiety and sleep deprivation through the disruption of circadian rhythms. The following general principles should be observed:

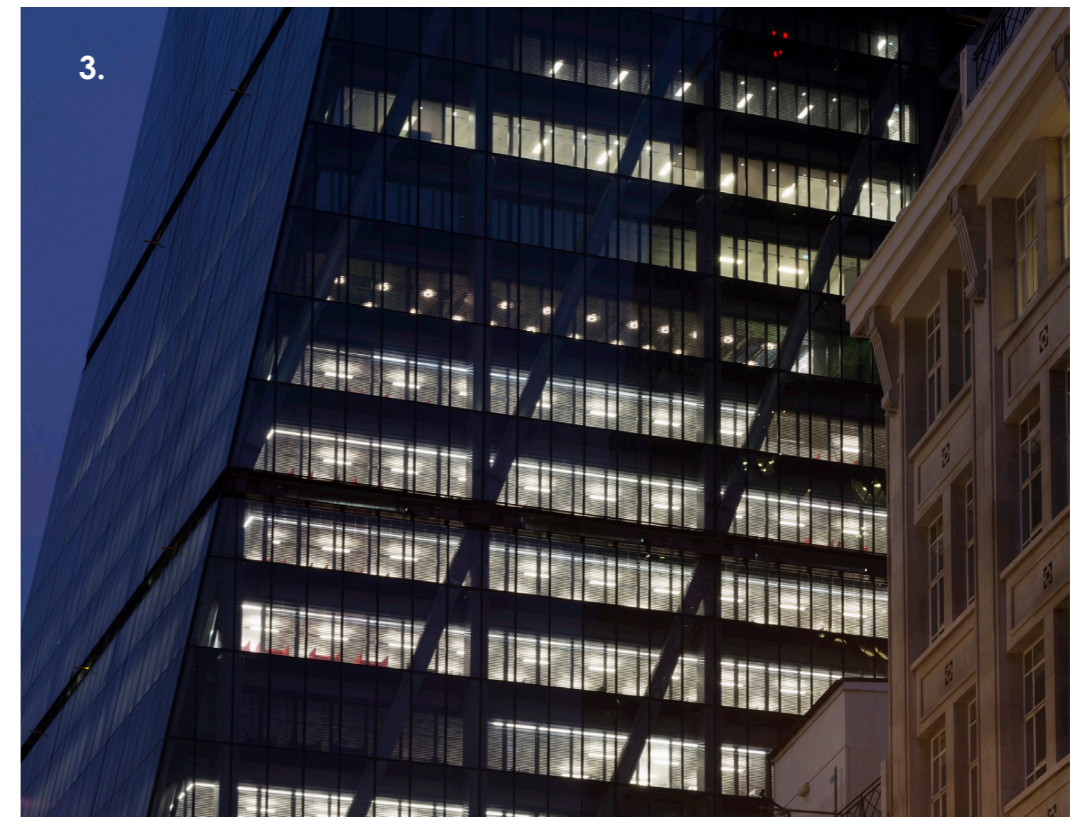
- a. Minimise and mitigate the visual brightness of interior lighting, particularly of highly glazed buildings, when seen from residential properties including the visibility of light fittings and their sources. This includes distant, mid and near views.
- b. Use good optical control and/or baffles to light fixtures to help reduce glare from interior lighting.
- c. Include well-designed presence detection systems to reduce lighting accidentally being left on.
- d. Consider the solid to void ratio of facades, the transmission value of any glazing, and the use of blinds for developments directly impacting residential areas to help reduce light spill and the visibility of interior lighting at night.
- e. Put robust management protocols into place that seek to reduce over-lighting and waste.
- f. Developments should ensure all external lighting is managed in accordance with the Lighting Curfew Times, and all non-essential lighting turned off in line with requirements stated in **Table 9**.



1. Bright internal lighting schemes and highly visible light sources can not only cause a visual nuisance but also contribute to health issues.



2. Blinds, coatings, frit patterns and other facade design techniques can help reduce the visibility of interior lighting at night while occupants can still perform their tasks. All developments should switch off the internal lighting when the building is not occupied.



3. Good optical control and baffles to light fixtures can help reduce glare from interior lighting (example of different approaches and impacts). Photography by James Newton.

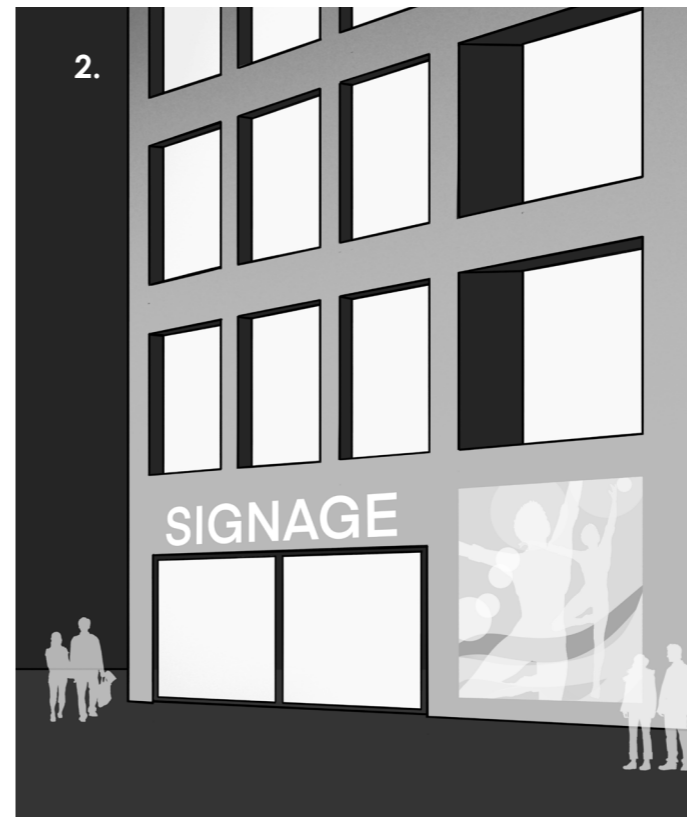
4.0 Lighting guidance

Topic C: Public realm

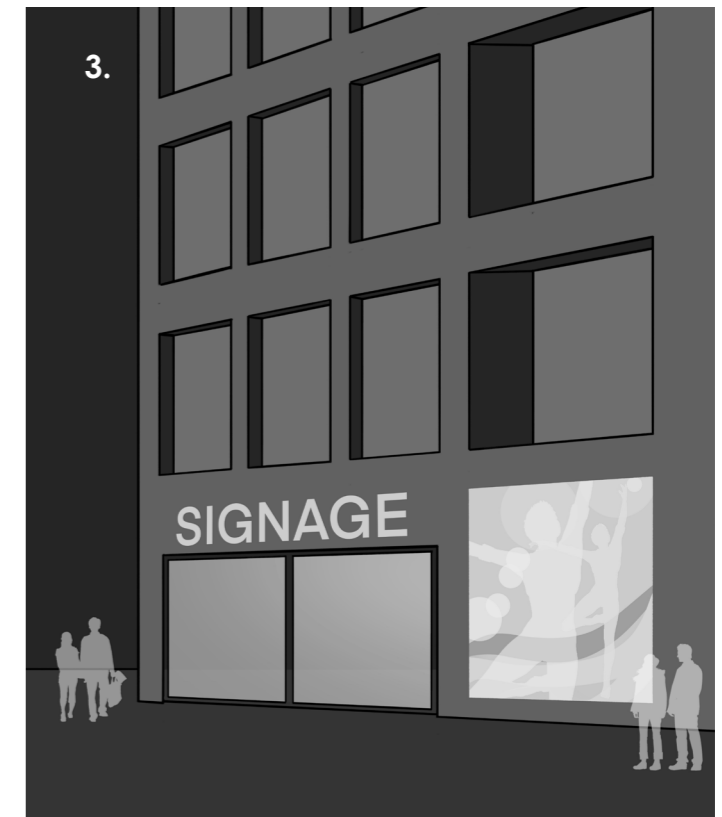
3.10 Lighting directly contributes to the character of the City of London after dark. This can range from the experience of pedestrians at street level to an appreciation of the skyline and key landmarks such as St. Paul's Cathedral when seen from a distance. The lighting of all developments should seek to make a positive contribution to the experience of the public realm after dark by observing the following general principles:

- a. All developments should consider how architectural and public realm lighting can contribute to place-making, character, and ambience to ensure attractive and safe places after dark.
- b. All developments should consider the accommodation of street and amenity lighting from early in the design a process from both a functional and urban design perspective.
- c. Where new developments are providing street or amenity lighting illuminance levels, colour temperature and mounting heights should be in strict accordance with the City Corporation's Lighting Strategy (2018) unless otherwise agreed.
- d. Public realm lighting should seek to create a legible environment that reveals key vertical as well as horizontal surfaces but without recourse to creating obtrusive light or glare.
- e. Small-scale creative lighting has the potential to create welcoming routes and improve sense of place and should be employed where appropriate.
- f. The illumination of all areas of hard and soft landscape should balance the requirements for accessibility, safety and security after dark with any potential impact on residential amenity and biodiversity.

- g. All public realm lighting should have the provision to be dimmed and controlled to help manage and balance visual brightness.
- h. The requirements for lighting to support CCTV should not over-ride aesthetic and environmental considerations.
- i. Key soft landscape features may be highlighted, but only where appropriate to do so.
- j. Schemes should retain natural darkness in green areas / corridors where safe to do so. Natural darkness is defined as the general condition without the addition of artificial light from any development.
- k. Colour rendering and colour appearance should be carefully considered such that materials and their surface textures, where illuminated, are well lit. Well-lit does not necessarily mean brightly lit.
- l. Consideration should be given to the appearance of any exterior lighting equipment and its associated architectural and electrical infrastructure by day.
- m. For illuminated advertising, impact to amenity and public safety should be carefully considered and to achieve this, should be in compliance with 'Table 12'.
- n. Illuminated advertising should be fully dimmable and controllable to help manage visual brightness.
- o. There is a general presumption against the use of non-white spectrum coloured lighting, unless there is a strong justification in the wider public interest.



2. The high brightness of illuminated advertising can negatively impact the public realm experience.



3. Controlled illuminated advertising can enhance the public realm experience.



1. Key landmarks such as St. Paul's Cathedral are part of the character of the City of London skyline after dark. Photography by James Newton

3.0 Lighting guidance

Topic D: Architecture, heritage and art

3.11 The lighting of architecture, including key details and parts of buildings, can make a valuable contribution to the overall experience of the City after dark and directly contribute to its cultural, social and economic life. Whilst the City Corporation encourages the creative and sensitive use of architectural lighting to help enhance its rich heritage not all new developments should necessarily be externally lit. Whilst external lighting that is used to enhance contemporary architecture should therefore generally be minimised, proper consideration should be given to the identity of all developments after dark including the external appearance of the internal lighting. Subject to the agreement of the artist, public art should generally be lit. The following general principles should be observed:

- a. All new developments should consider whether the addition of exterior architectural lighting is desirable. Not all buildings should necessarily have lighting treatments. The inclusion of exterior lighting to buildings that form part of a development should therefore be fully justified as part of any application, particularly in relation to any adjacent heritage, residential or environmentally sensitive site.
- b. The lighting of heritage assets should be undertaken with great care, and be compatible with their conservation and enhancement, but not all heritage assets should be lit, and this will require strong justification and should not detract from the heritage context or its setting.

- c. Where facades are highly glazed to new or refurbished developments, particularly retail frontages and office floor plates, careful consideration should be given to the impact of the interior lighting on the external identity of the development after dark.
- d. Colour rendering and colour appearance of all external and internal lighting should be carefully considered such that materials and their surface textures, if highlighted at all, are well lit. Well-lit does not necessarily mean brightly lit.
- e. In some cases, particularly with tall towers, the impact of the building on the skyline and strategic townscape heritage should also be considered.
- f. Consideration should also be given to the appearance of any exterior lighting equipment by day.
- g. The inclusion of lighting to reveal public art after dark should be carefully considered in terms of brightness, colour and scale such that it provides visual benefit after dark as well as by day subject to the requirements of the artist.
- h. Where 'light art' is employed, the brightness, colour, scale, and glare should be fully dimmable and controllable.



1. Example of good lighting of an internal office floorplates that positively contributes to the building's external identity after dark. Bloomberg European HQ – Lighting design by Tillotson Design and Foster + Partners. Photography by James Newton.



2. Considered illumination of heritage structures makes a valuable contribution to the overall experience of the City after dark. London Wall Place – Lighting design by Studio Fractal. Photography by James Newton.

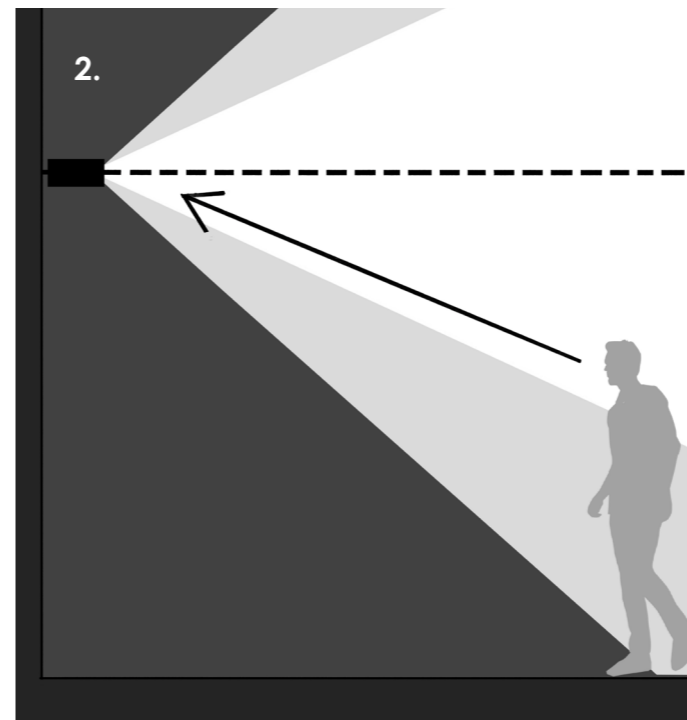
4.0 Lighting guidance

Topic E: Safe and inclusive design

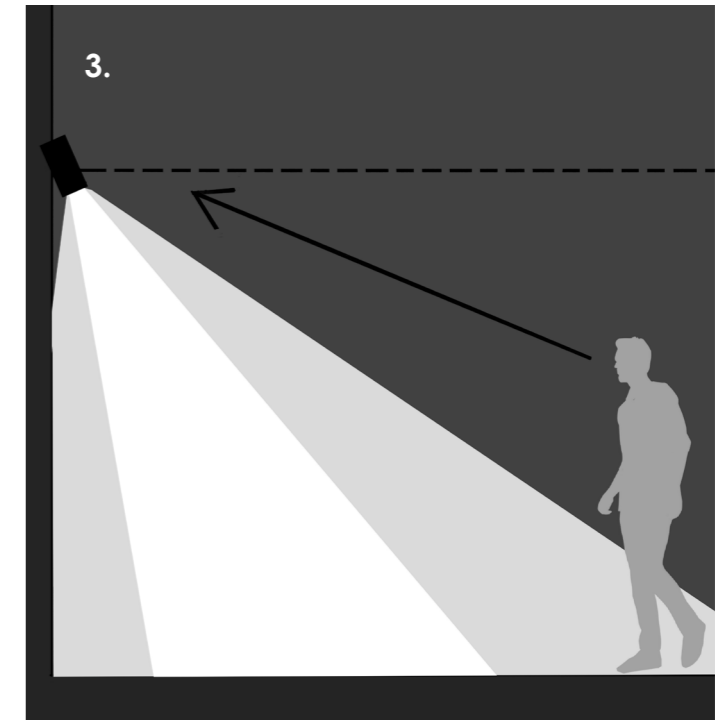
3.12 Lighting should be used to help create safe, inclusive environments for everyone. Lighting can affect the accessibility of the City by creating barriers and lighting design should reinforce the City Corporation's and Mayor's Transport Strategies including the 'Healthy Streets Approach', which seeks to create a public realm that helps improve people's health and their experience of using streets. The following general principles should be observed:

- a. Lighting should be used to create an accessible public realm and public spaces for everyone, particularly after dark. Lighting should be designed to meet the requirements of different people, including those with reduced mobility, visual impairments, people who are neuro-divergent, older people, and children.
- b. Lighting design, especially that which affects the public realm, should be informed by meaningful and constructive engagement, especially through engaging those with expertise and experience in accessibility, equality, diversity and inclusion.
- c. Lighting design should prioritise the creation of safe and attractive spaces and routes for people walking, cycling, motorised travel, wheelchair users, and using public transport including for night workers.
- d. Lighting design should be used to create accessible, inclusive and safe public realm and public spaces, including roof terraces, recognising that softer, warmer, more ambient lighting can help create safer-feeling places than harsh, bright, cooler light. Also, that the lit context, reflections, contrast and pooling of light, glare, flashing light, spectrum and layering can all influence accessibility, inclusion and sense of safety and security.

- e. In designing for safety and security, lighting design should factor in the experience of different groups, including women and girls, LGBTQ+ people, disabled people and those who are likely to experience hate crime on the basis of their race or religion.
- f. Lighting design should employ fuller spectrum white light sources to help improve recognition.
- g. Lighting should be used to celebrate the diversity of the people who live, work and visit the City of London, for example through highlighting public art, commemorative statues, and religious buildings or through temporary, creative lighting installations that celebrate events and festivals for particular communities.
- h. Lighting should be used to enhance the experience of people arriving by public transport including through ambient and creative lighting at a human scale.
- i. New developments should consider how lighting can be provided which encourages vehicles to behave safely, whilst allowing safe passage for pedestrians and cyclists.
- j. Lighting should be designed to reduce the amount of distracting and disorientating light so as to prevent accidents and assist with the prevention and fear of crime, and ensure that lighting works in conjunction with CCTV.



2. Glare caused by luminaires can disorient and distract people, especially people those with visual impairments.



3. The appropriate careful direction of light fixtures can help reduce glare and help people better orient themselves.



1. Ambient and creative lighting on a human scale can encourage people to use public spaces after dark. Photography by James Newton.

3.0 Lighting guidance

Topic F: Temporary lighting

3.13 Whilst this SPD is concerned with the design, detailing, delivery, operation, and maintenance of permanent lighting installations, there are two types of temporary lighting which should be considered as part of the planning process where relevant: festive lighting, and construction lighting.

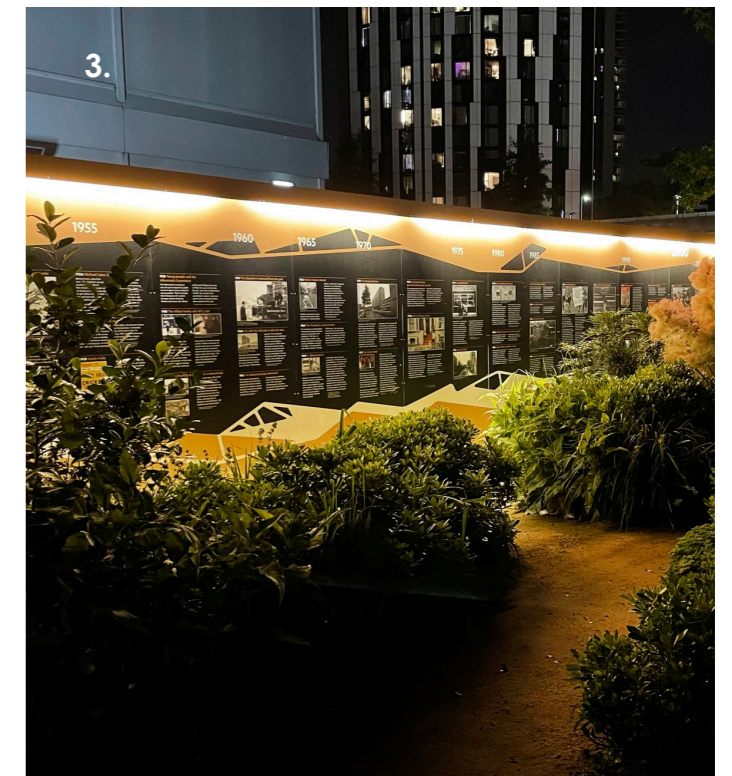
3.14 Temporary festive and event lighting can make a positive contribution to the social, economic, and cultural life of the City. Whilst the installation of permanent dynamic lighting schemes are not encouraged i.e. lighting installations that randomly change colour with no clear design purpose or create a visual distraction or nuisance to local residents, it welcomes the provision of infrastructure for the occasional use of dynamic coloured lighting, projections and other forms of artistic night-time intervention as part of national or local celebrations, public and religious holidays and support for causes.

3.15 Construction lighting can be in place for many years. Whilst this is essential to the safety and security of construction sites, particularly during the winter months, it is recognised it can have a highly detrimental impact on both residential amenity and biodiversity due to the techniques that are often employed such as area floodlighting.

3.16 Lighting equipment for filming or photography does not usually require planning permission. Where it does, the principles set out in this document should be followed, with particular care taken to minimise impact to residential amenity.

3.17 The following general principles should be observed with respect to both of these forms of lighting which may be subject to planning conditions as part of the approval process:

- a. The provision of temporary festive lighting both within the public realm and where mounted on or from the building should be considered early in the design where applicable.
- b. Where temporary festive lighting is to be employed consideration should be given to the provision of supporting electrical and mechanical infrastructure including externally exposed cabling, sockets, cleats, hooks, eyes and other fixings as part of the facade design.
- c. The provision of temporary construction lighting adjacent to or running through a development site, and the illumination of the site itself for safety and security purposes including the lighting of cranes should all be carefully considered as a holistic design.
- d. The temporary lighting of construction sites should be designed to promote accessibility and minimise obtrusive light including sky glow, glare, light spill, visual brightness, turn lights off when not needed, and avoid creating adverse ecological impacts particularly with respect to residential amenity.
- e. Consideration should be given as to how the temporary lighting of construction sites might make a positive contribution to the character and ambience of the local area after dark for the duration of the works.



1. Provision of infrastructure for the occasional and appropriate use of dynamic coloured lighting, projections and other forms of artistic night-time intervention can enhance the public realm after dark.
Photography by James Newton.

2. Temporary construction lighting can cause glare, light spill and light pollution.
Photography by James Newton.



3. Temporary lighting of construction hoarding can make a positive contribution to the character and ambience of the local area and minimise the impact on the ecology.



4.0 Technical requirements

Technical requirements

4.1 This final section sets out the technical requirements with which all lighting schemes within the City of London for new developments are expected to comply. This applies to all unadopted schemes. Where lighting is to be adopted applicants must agree any further design criteria with the City of London. Where deviation occurs from these Technical Requirements applicants should explain their reasons and justify their design decisions including providing mitigation where needed.

4.2 The information as indicated in 'Table 6: Technical lighting requirements' should be submitted as part of the Lighting equipment schedule as indicated in 'Table 4: Technical lighting design submission requirements':

Table 6: Technical lighting requirements

Item	Requirement
Type of source	To be light emitting diode (LED) unless otherwise stated. Where not LED please detail the source and justify its use.
Colour appearance of the source	All exterior light sources, and interior light sources where visible from the public realm, should be in the range of 2300K – 4000K. Where sources are not within this range, or are coloured, please clearly explain the reason.
Colour rendering of the source	All exterior light sources should have a CRI of ≥80 to aid good recognition and to support biodiversity. Where sources are not within this range, such as where sources are being selected to help limit impacts on biodiversity, please clearly explain the reason.
Construction of the luminaire	Details should be provided as to the materials and general construction of the luminaire, its IP and IK rating (where relevant) and its compliance with relevant British Standards, Electrical Regulations and Codes of Practice.
Efficiency of the luminaire	All exterior lighting equipment should achieve efficiencies in line with the requirements of the Building Regulations and/or the requirements of BREEAM, whichever shall be the lowest in terms of lumens per circuit watt. Where equipment does not meet these requirements, please clearly explain the reason.
Optical design and aiming of the luminaire	All exterior luminaires should be directed at the target surface and aimed so as not to create obtrusive light such as sky glow, glare, excessive visual brightness, light spill or light intrusion. Where the risk of obtrusive light exists luminaires should be fitted with louvres, cowls or shields. Where no accessories are fitted, please clearly indicate how the design minimises glare.
Mounting methodology	Please indicate the method by which any lighting equipment is fixed within the public realm or to a building and the means by which it is secured to prevent it falling. Where equipment is at low level and/or can be touched by a member of the public details should be provided as to the measures taken to secure the fitting and prevent injury by sharp edges, heat, or electric shock. Details should also be provided as to any measures taken to counter vandalism.
Dimensions and weight	Please state the overall dimensions and weight of each item of lighting equipment.
Lifetime, upgrading and disposal	Details should be provided as to the anticipated lifetime of all exterior lighting equipment, any warranty period provided by its manufacturer and the method by which it will be upgraded to extend its life and disposed of at end of life. It is recommended that all luminaires have a warranty of not less than 5 years.
Origin of manufacture and support	Details should be provided as to the origin of manufacture of all exterior lighting equipment and the means by which technical support will be provided during its lifetime.

4.0 Technical requirements

Obtrusive light

4.3 One of the primary goals of this SPD is to help reduce the environmental impact created by lighting schemes for new developments to protect both residential amenity and biodiversity, whilst at the same time promoting the creation of rich, diverse and visually interesting public realm experience after dark. To do so it has drawn upon general guidance and best practice. This includes 'Guidance Note 01/21 for the reduction of Obtrusive Light 2021' published by the Institution of Lighting Professionals (ILP), which in itself is based on international guidance on obtrusive light as detailed in 'CIE 150:2017 Guide on the Limitation of the Effects of Obtrusive Light from Outdoor Lighting Installations'.

4.4 Whilst obtrusive light is also referred to as light pollution, for the purposes of this document it includes sky glow, glare, excessive visual brightness, light spill, and light intrusion that can create an adverse impact on both people and biodiversity.

4.5 Four things are required to be considered to help minimise obtrusive light created by a lighting scheme whether that is external to the building or internal but visible from outside: the brightness of the light sources, the optical design and distribution of the luminaires, the positioning and mounting of the luminaires, and how they are controlled.

4.6 Lighting schemes designed as part of new developments should meet the requirements and provide the information set out in 'Table 7: Environmental lighting standards'. Where deviation from such standards occur applicants should explain their reasons and justify their design decisions including providing mitigation where required.

Table 7: Environmental lighting standards

Issue	Requirement
Sky glow	Provide details of any mitigation measures taken as part of the design and management of the exterior and interior lighting to reduce the risk of contributing to sky glow such as aiming fixtures above the horizontal, their optical design, the inclusion of accessories such louvres, snoots and cowls and the use of lighting control.
Glare	Provide details to demonstrate how glare will be controlled including confirmation that the main beam angle of all light fixtures when directed towards an observer is no more than 60° from the vertical. If aiming angles of luminaires exceed this requirement, clearly explain the reasoning and any mitigation measures that may be taken.
Visual brightness	Provide details to demonstrate that the visual brightness of a façade, or illuminated advertising complies with the requirements of this document (see Tables 9-13). If the visual brightness exceeds these clearly explain the reasoning and any mitigation measures that may be taken. The angle of illumination limit depends on the type of lighting considered and the position of the fixtures.
Light spill	Provide details, to demonstrate that light spill from both outdoor and interior lighting as part of development complies with the requirements of this document (see Tables 9-13). If the light spill exceeds these, clearly explain the reasoning and any mitigation measures that may be taken.
Light intrusion	Provide details of any mitigation measures taken as part of the design and management of the exterior and interior lighting to reduce the risk of light intrusion into adjoining or neighbouring properties.
Curfew	Provide details of which luminaires, including those that would be activated by movement, are required to be maintained from dusk to dawn for essential lighting to support safety and security and which luminaires are non-essential and may therefore be switched off at the appointed curfew time (see Table 9).
Energy consumption	State the total energy consumption of the external and internal lighting installation and detail what measures are being taken to minimise energy use.
Waste	Indicate the strategy for the upgrading, recycling and disposal of the light sources, lighting equipment, lighting control system and associated electrical infrastructure.

4.0 Technical requirements

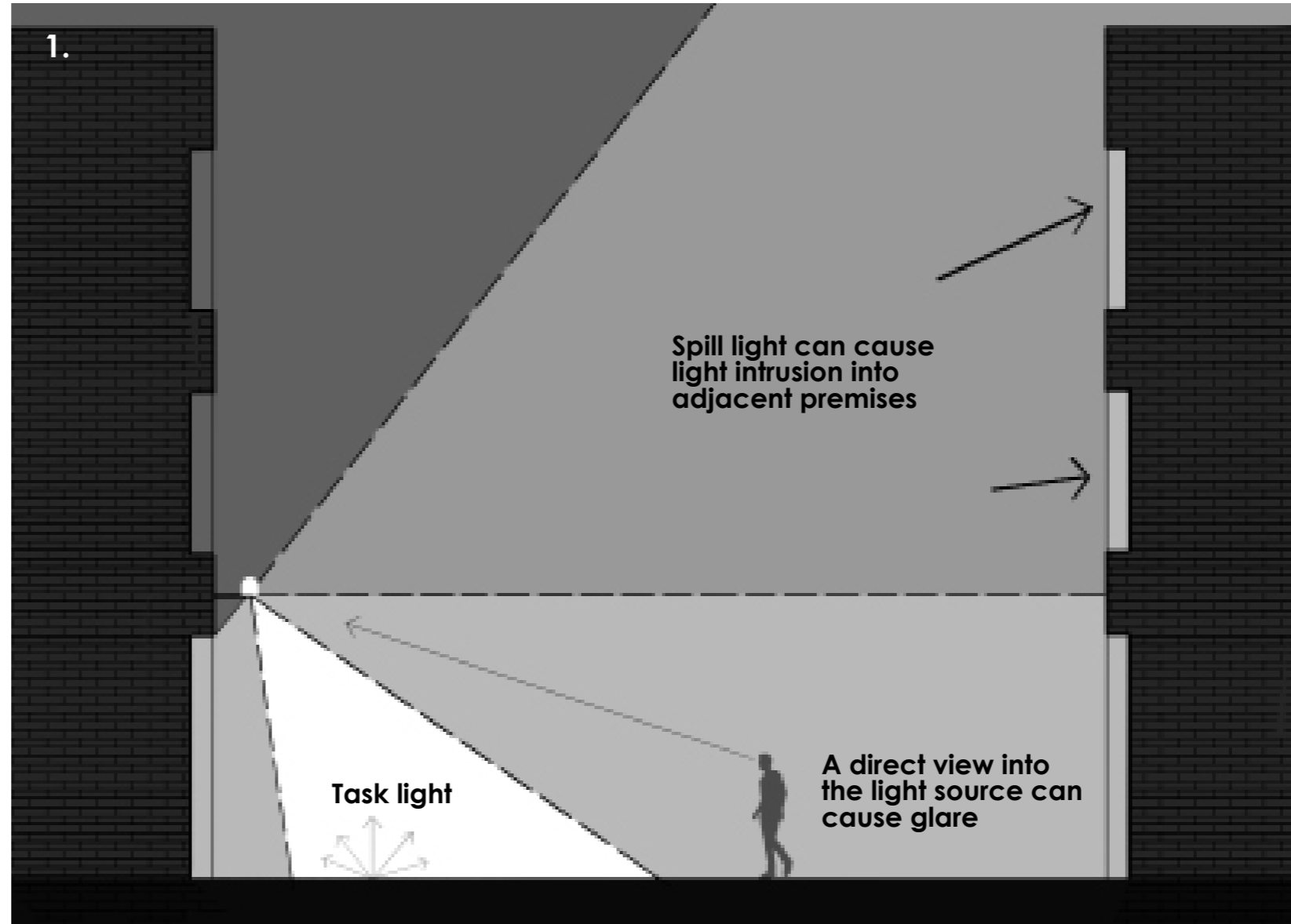
4.7 The diagrams on this page demonstrate potential sources of obtrusive light.

4.8 Alongside the requirements set out in 'Table 7: Environmental lighting standards' the following Tables 8 -13 (summarised below) indicate the general technical standards that lighting should be designed to for all new developments, particularly with respect to light spill and visual brightness:

- **Table 8:** City environmental zones.
- **Table 9:** Lighting curfew times.
- **Table 10:** Maximum permitted values of vertical illuminance on premises.
- **Table 11:** Maximum permitted values of surface luminance on premises.
- **Table 12:** Maximum values for illuminated advertising.
- **Table 13:** Requirements for the operation and maintenance of lighting.

4.9 Evidence of compliance with the requirements in Tables 10-13 should be provided through details submitted by the applicant including outputs from light modelling studies.

4.10 Lighting that directly affects the streetscape should be considered within the specific context and should make a positive contribution to the public realm, which is usually lighting at ground level or below podium level. In some instances, this may result in approaches that exceed the levels set out in 'Table 10', where sensitive receptors such as residences, historic buildings and other special cases are not affected, and when agreed with an officer.



1. Types of obtrusive light.



2. If the visual brightness of illuminated advertising is too high, it contributes to obtrusive light.



3. If the visual brightness is carefully considered and well balanced, the facade and illuminated advertising are more legible.



4.0 Technical requirements

4.11 The City Corporation's Lighting Strategy (2018) describes a variety of different character zones. It is recognised that these different areas of the City are brighter or darker depending on the nature of the activity taking place i.e. commercial office, retail, residential, historic, cultural or mixed use. **'Table 8: City environmental zones'** indicates the classification of different areas of the City. Applicants should establish which zone/s applies to their development through consultation with a City of London officer.

4.12 Where a development lies at the boundary of multiple City environmental zones, the design should comply with the requirements of the lower City zone unless otherwise agreed with an officer. It may also be that different areas of a development are required to meet the requirements of different environmental zones. Where there is a specific risk of light spilling through the windows of a residential property or into a sensitive green space, the applicant may be required to ensure all or part of a development complies with the requirements of a lower environmental zone than might otherwise be generally anticipated for a City zone or character area.

4.13 Having established the relevant City environmental zone/s that applies to the development, the applicant should consult **'Table 9: Lighting curfew times'** which states the times at which all external lighting, except that specifically required for accessibility, safety and crime prevention such as street and essential amenity lighting, should automatically switch off, or dimmed down to pre-agreed levels.

Table 8: City environmental zones*

City zone	Class	Area
E4/1	High	Commercial, retail and transport terminals and other defined high district brightness areas.
E4/2	Medium	Cultural, tourist and heritage and other defined medium district brightness areas.
E4/3	Low	Residential, special heritage, landscaped and other defined low district brightness areas.

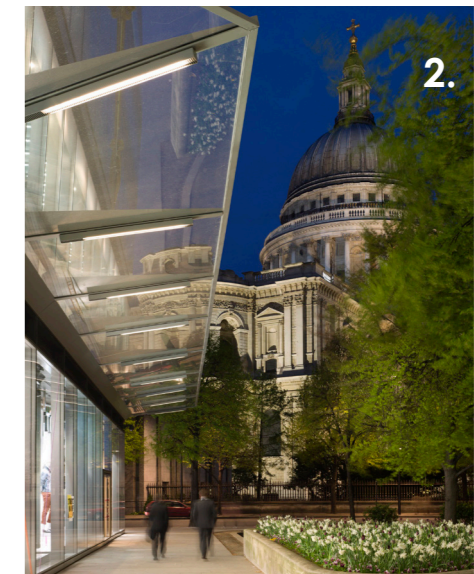
**The 'City Zones' have been derived from the Environmental Zones as recommended by ILP GN01. E4-Urban has been divided into three sub-zones with the view to providing greater flexibility of control for different character areas in the City.*

Table 9: Lighting curfew times

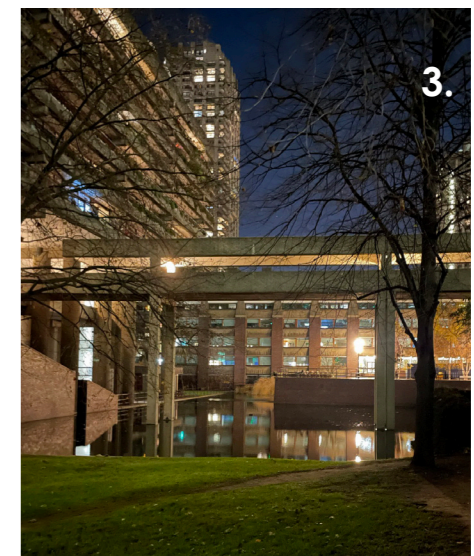
City zone	Class	Pre-curfew	Post-curfew
E4/1	High	Sunset to midnight	Midnight to sunrise
E4/2	Medium	Sunset to 23.00	23.00 to sunrise
E4/3	Low	Sunset to 22.00	22.00 to sunrise



1. Example of City Zone 1.
Photography by James Newton.



2. Example of City Zone 2.
Photography by James Newton.



3. Example of a City Zone 3.

4.0 Technical requirements

Design measures

4.14 Where buildings are highly glazed above ground level, consideration should be given to limiting the visual brightness of light fixtures and ceilings within 1.5m of the inner face of the building facade unless mitigated by measures including:

- the solid to void ratio of the facade itself;
- the use of low transmission glass;
- the provision of internal blinds that deploy reducing the visible brightness of the interior by no less than 50% at the curfew, and 100% post-curfew, unless otherwise agreed with an Officer.

Luminaires within this zone should have a downward distribution only with a cut off no less than 60° or be fitted with a louvre or other form of glare control. Diffusing luminaires, backlit panels or other glowing sources should not be used in this zone unless otherwise justified as part of the design.

Table 10: Maximum permitted values of vertical illuminance on premises

City zone	Class	Pre-curfew	Post-curfew
E4/1	High	20 lux	5 lux
E4/2	Medium	15 lux	3 lux
E4/3	Low	10 lux	2 lux

Note: The maximum stated values may be achieved by the switching off and/or dimming down of internal lighting.

4.15 Having established the City environmental zone/s and lighting curfew times, the external outdoor lighting, and/or the internal lighting visible from the public realm, should be designed to meet the criteria stated in '**Table 10: Maximum permitted values of vertical illuminance on premises**' where premises include all building types. The values have been adapted from ILP Guidance GN01 (2021). This is with view to helping control obtrusive light including light spill.

4.16 The values in **Table 10** apply particularly to nearby dwellings / premises or potential dwellings / premises and specifically windows. The values are the summation of all lighting installations including light spill from the development.

4.17 Where existing illuminance levels exceed those in **Table 10**, any additional illuminance created by the proposal should be minimised to meet target levels to be agreed in consultation with an officer. Where possible the development should contribute to a reduction in obtrusive light.

Table 11: Maximum permitted values of surface luminance on premises

City zone	Class	Pre-curfew	Post-curfew
E4/1	High	15 lux	3 lux
E4/2	Medium	5 lux	1 lux
E4/3	Low	1 lux	0.1 lux

4.18 Having established the environmental zone/s and the lighting curfew times the external lighting of all building facades, particularly architectural lighting, should be designed to meet the requirements of '**Table 11: Maximum permitted values of surface luminance on premises**'. Whilst all external building lighting directed at the facade of a building should be turned off 'post-curfew', area lighting specifically required for accessibility, safety and crime prevention may remain switched on but should be dimmed down to meet lighting values to be agreed in consultation with an officer.

4.0 Technical requirements

Illuminated advertisements

4.19 Having established the City environmental zone/s and the lighting curfew times, illuminated advertising, excluding highway signage, should be designed to meet the criteria stated in 'Table 10: Maximum values of vertical illuminance on premises' and 'Table 12: Maximum values for illuminated advertisements'. This guidance has been adapted from the 'Guidance Note GN01 - The Reduction of Obtrusive Light' and 'Professional Lighting Guide PLG05 – The Brightness of Illuminated Advertisements Including Digital Displays' as published by the Institution of Lighting Professionals (ILP).

4.20 Notwithstanding the provisions of that guidance, all internally illuminated advertising should have the ability to automatically dim their displays and to be turned off to meet the requirements of agreed curfew times to fall within the stated values unless otherwise agreed with officers.

Table 12: Maximum values for illuminated advertisements

City zone	Class	Pre-curfew	Post-curfew (to be turned off or dimmed)
E4/1	High	300 cd/m ²	150 cd/m ²
E4/2	Medium	200 cd/m ²	100 cd/m ²
E4/3	Low	100 cd/m ²	50 cd/m ²

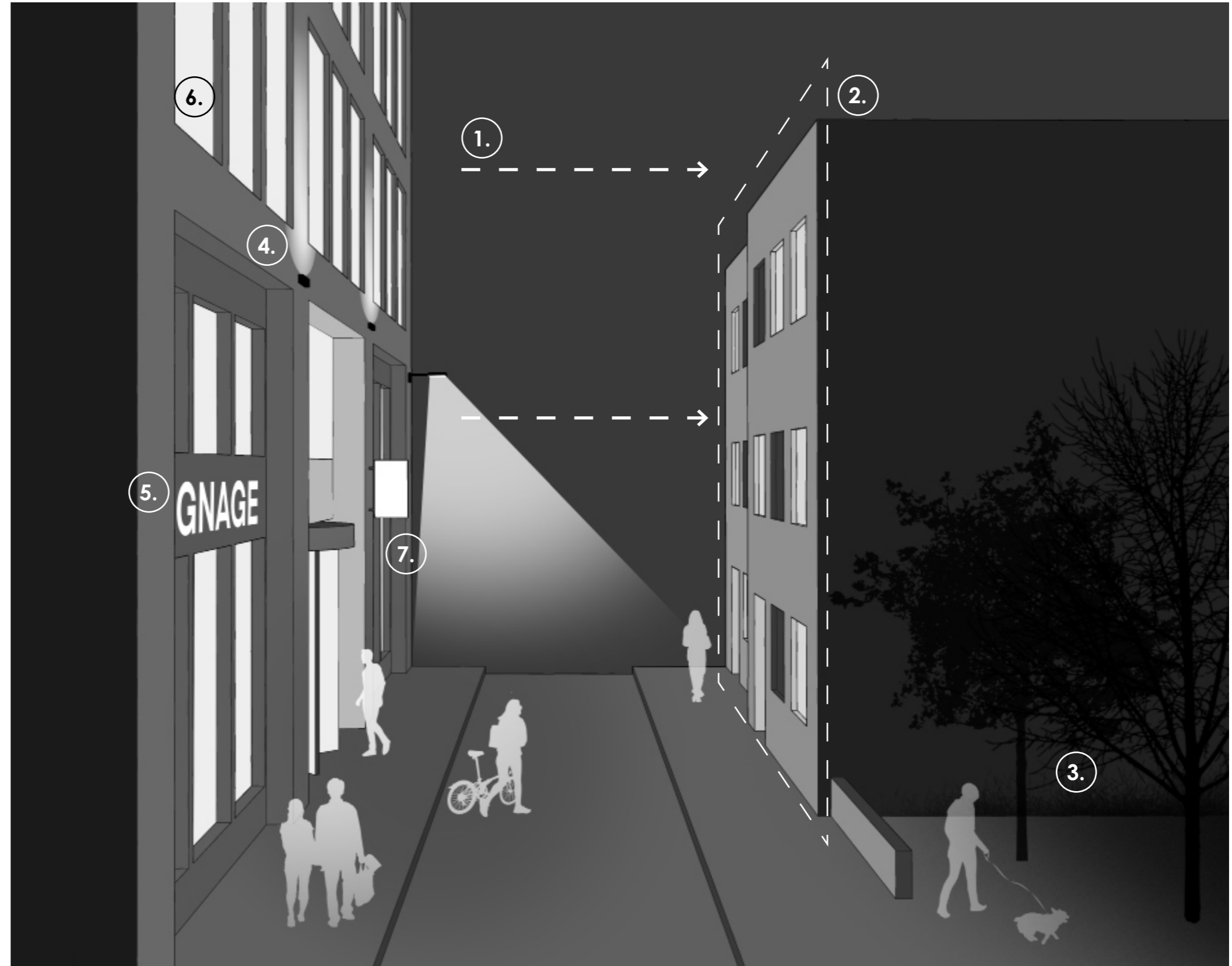


1. The measuring plane is the face of the illuminated advertisement.

4.0 Technical requirements

4.21 The diagram on this page demonstrates how the technical requirements may be applied in practice:

1. The maximum lighting values stated in **Table 10** are the summation of all lighting installations, including light spill from the development.
2. Measuring plane for values on receptor premises.
3. Minimise light spill into adjacent green spaces.
4. The brightness of any permitted facade lighting should not exceed the maximum values stated in **Table 11**.
5. The brightness of any illuminated advertising should not exceed the maximum values stated in **Table 12**.
6. Reduce the visual brightness of all interior lighting above the ground floor/podium when seen from outside by limiting the glare from internal lighting installations through specification and control, particularly to the perimeter zone 1.5m from the inside of the facade.
7. Minimise both direct and indirect spill from new development.



4.0 Technical requirements

Operation and maintenance

4.22 Notwithstanding the quality of the lighting design for any development and its compliance with the general principles and technical requirements of this SPD, the way in which the lighting performs after dark each night will be reliant on the manner in which it is operated and maintained. **'Table 4: Technical lighting design submission requirements'** requires applicants to submit full details of their intended operational and maintenance requirements for the exterior lighting and any interior lighting visible from the public realm. Such details should include the information and details as outlined in **'Table 13 – Requirements for the operation and maintenance of lighting'** as follows:

Table 13: Requirements for the operation and maintenance of lighting

Item	Requirement
Control methodology	General summary of anticipated methodology for the control of all external lighting and all internal lighting visible from the public realm.
Control system	Details of exterior and interior control systems including general type, control protocol, confirmation of degree to which lighting is dimmable and details of operational interfaces that control the timing of the external lighting and internal lighting visible from the public realm including PIRs, photocells, programmable and astronomic timeclocks.
Operational times	Details of operational timings and approximate lighting levels as a percentage of full brightness for all external lighting and internal lighting visible from the public realm to demonstrate compliance with pre-curfew and post-curfew lighting requirements as stated in this guidance including details of different lighting moods or scenes.
Maintenance of lighting equipment	General method statement for the maintenance of all lighting equipment providing the external lighting and internal lighting visible from the public realm including intervals for inspection and cleaning of lighting equipment including details of access requirements and timings.
Replacement of lighting equipment	General statement for the anticipated upgrading and/or replacement of all lighting equipment providing the external lighting and internal lighting visible from the public realm including LED chips, luminaires, accessories and drivers together with details of how such equipment will be recycled or disposed.

Appendices (A - E)

Appendix A: Considerate Lighting Charter City of London Corporation

The City of London Corporation's Considerate Lighting Charter is a set of commitments that will help to ensure that buildings and public spaces in the Square Mile achieve the right light, in the right place, at the right time.

Building owners, managers and occupiers in the Square Mile are encouraged to sign up to this Charter. By doing so, they commit to undertaking the actions of the Charter within a reasonable timeframe.

These actions are the minimum required to comply with the Considerate Lighting Charter. More detailed guidance is available in the City of London Corporation's Lighting Supplementary Planning Document (SPD).

By signing up to the Considerate Lighting Charter, we commit to:

1. Manage lighting well, by:

- 1.1. **Turning lights off when not in use.** Lights in unoccupied interior spaces, particularly commercial spaces, will not be left on unnecessarily. We will ensure external lighting accords with curfew times in the Lighting SPD.
- 1.2. **Installing control systems** such as passive infrared detectors (PIR) as part of a 'smart' lighting system designed in a way that minimises the amount of light used.
- 1.3. **Embedding good lighting management practice** in our facilities management teams and undertaking training for staff on how lighting systems should be operated.

2. Review our lighting system, by:

- 2.1. **Carrying out an initial review** and updating it regularly, with the aim of minimising light spill, reducing energy consumption and carbon use, improving safety and character and ambience, and which considers equality, diversity and inclusion.
- 2.2. **Consulting neighbouring properties,** particularly those who are most affected by our lighting, as part of the review. We will publish information about changes to our internal and external lighting and provide contact details.
- 2.3. **Considering biodiversity,** through identifying the local context and adjusting our lighting system to limit impacts on biodiversity.

3. Minimise the impacts of our lighting, by:

- 3.1. **Reducing glare and light spill for internal and external lighting,** through measures such as installing low-glare downlighting, louvres or blinds, and removing or reducing any internal lighting within 1.5 metres of the building facade.
- 3.2. **Procuring sustainable light fittings** that have the minimum embodied carbon and lowest operational energy, and can be easily repaired, replaced and recycled. We will consider 'lux leasing' and other circular economy approaches.
- 3.3. **Improving the performance of our lighting,** through avoiding cooler colour temperatures after dark; putting limits on the illuminance and brightness of external lights, and internal lighting that is visible from outside our building(s); and making external lighting efficient (in line with Building Regulations and/or BREEAM).



Appendix B: Relevant policy, legislation, standards, and guidance

Policy

- 1.1 There are national and local planning policies and guidance that are relevant to lighting.

National

- 1.2 The National Planning Policy Framework (NPPF) comprises Government planning policy for England. The Planning Practice Guidance (PPG) provides further guidance on the policies in the NPPF. The NPPF states that planning policies and decisions should ensure that development “limits the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation”. The PPG contains further guidance on light pollution. Whilst acknowledging the wider benefits of artificial light, it recognises that it is not always necessary, and has the potential to contribute to ‘light pollution’ and ‘obtrusive light’. For maximum benefit it recognises that “it is important to get the ‘right light, in the right place and for it to be used at the right time’”. The PPG also recognises that since it can be costly and difficult to change lighting installations, getting the design correct at the planning stage is important.

- 1.3 The National Design Guide, updated in January 2021, seeks to ensure new development contains street and building lighting of an appropriate and attractive appearance.

London

- 1.4 The London Plan was adopted in March 2021 and provides planning policy for Greater London. It comprises part of the City of London Development Plan, on which decisions on planning applications are made. Although there is no specific policy on lighting in the London Plan, lighting is referenced throughout the Plan including within the Public Realm policy (D8) which states that lighting should be carefully considered and well-designed in order to minimise intrusive lighting infrastructure and reduce light pollution.

City of London

- 1.5 The City of London Local Plan was adopted in January 2015. It contains a number of relevant policies with respect to lighting, including details on the internal and external illumination of buildings and the contribution that lighting makes to the character and townscape of the City after dark, and seeks to reduce energy use and limit light pollution.
- 1.6 The City of London has prepared a draft plan, the City Plan 2036, which was published for Regulation 19 consultation in early 2021. Work is continuing on the Plan, and it remains a material consideration in the determination of applications alongside the adopted City of London Local Plan 2015 and the London Plan 2021. The Plan contains a dedicated Lighting Policy which draws on the adopted Lighting Strategy.

Legislation

Environmental

- 1.7 There are number of areas of legislation that are relevant to lighting within the City of London. These relate to both environmental law and listed buildings.
- 1.8 Lighting can be controlled under non-planning legislation and so to avoid conflict in the future, it is pertinent to consider the potential for new development to cause statutory nuisance so as to design it out. Section 102 of the Clean Neighbourhoods and Environment Act 2005 and sections 79, 80 and 82 of the Environmental Protection Act 1990 (as amended) extend the statutory nuisance regime to include the statutory nuisances from ‘(fb) artificial light emitted from premises so as to be prejudicial to health or a nuisance’. Exclusions are in place for developments used for transport purposes and other premises where high levels of light are required for safety and security reasons, such as bus stations, railway stations, harbours, and good or public service vehicle centres. At a local level, the ‘City of London Various Powers Act’ gives the City Corporation the power to affix lighting infrastructure to any building which fronts the public highway and City Walkway without prior consent. In practice the City Corporation would discuss with

the landowner any proposed change and when the opportunities arise through development, is willing to discuss how the lighting can be altered to meet the objectives of the Lighting Strategy and this SPD.

Listed Building

- 1.9 There is a separate legislative regime when it comes to the protection of listed buildings, of which there are many in the City. Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990, requires applications for listed building consent for any works, which could include external and internal lighting installation and associated infrastructure, to have special regard for preserving the special architectural or historic interest of the structure/building and its setting.
- 1.10 For example, the following would likely require listed building consent:
- External decorative and/or functional lighting.
 - Illuminated advertising.
 - New internal lighting which would affect the special interest of the listed building.
- 1.11 Any proposal would be assessed to ensure it is appropriate and sensitive to the character and appearance of the building. In some instances, the works might also require planning permission. There is an additional requirement, under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, to have special regard for the listed building and its setting when assessing a lighting scheme which requires planning permission.

Standards and guidance

- 1.12 There are a number of recognised standards and guidance with respect to external lighting in the UK, many of which are produced by independent professional bodies such as the British Standards Institute (BSI), the Chartered Institute of Building Services Engineers (CIBSE), the Institution of Lighting Professionals (ILP), and Historic England. These bodies make general recommendations regarding the quality, quantity, distribution and delivery of light and the many technical considerations associated with the illumination of the built environment. A list of useful standards and guidelines can be found in Appendix B of this document.
- 1.13 Whilst the specific guidance in this document shall take precedence, all lighting installations in the City of London, including during construction, should generally conform to the recommendations of the Institution of Lighting Professionals (ILP) ‘Guidance Notes for the Reduction of Obtrusive Light 2020’ as a minimum good practice requirement.
- 1.14 All lighting schemes should also refer to, and where possible improve upon, best practice including British and European Standards, CIBSE Code for Exterior Lighting and other recognised guidance. Designers are also expected to follow the Mayor of London’s Supplementary Planning Guidance ‘Sustainable Design and Construction’ April 2014.
- 1.15 All lighting equipment used should also meet the highest standards of energy efficiency at the time of installation and provide the most efficient use of light, taking into account lumen output, colour rendering and colour appearance and the purpose of the lighting scheme. Embodied energy, circularity of design and manufacturing, recycling and disposal should all be considered.

Appendix C:

Supporting legislation, standards and guidance

There are numerous recognised standards and guidelines with respect to external lighting the UK. These make general recommendations regarding the quality, quantity, distribution, and delivery of light and the many technical considerations associated with the illumination of the built environment. Whilst too numerous to cite within this document, the following are recommended for further background information in support of this SPD:

- BS8300-1:2018: Section 11 for Lighting;
- BS8300-2:2018: Section 14 for Lighting;
- BS5489-1 2020: Design of road lighting. Lighting of roads and public amenity areas. Code of practice;
- CIBSE/SLL Code for Lighting;
- CIBSE/SLL Lighting Guide LG06/16: The Exterior Environment;
- CIBSE/SLL LGLOL Guide to limiting obtrusive light;
- CIE 115:2010 Lighting of roads for motor and pedestrian traffic;
- BS EN12464-2, 2014: Light and lighting - lighting of work places. Outdoor work places;
- CIE 126:1997 Guidelines for minimising sky glow;
- CIE 136:2000 Guide to the lighting of urban areas;
- CIBSE LG21 Protecting the night-time environment (2021);
- CIE 150:2017 Guide on the limitation of the effects of obtrusive light from outdoor lighting installations;
- ILP GN 01: Guidance note for the reduction of obtrusive light;
- ILP PLG04 Guidance on undertaking environmental lighting impact assessments;
- ILP PLG05 The brightness of illuminated advertisements (05/22);
- ILP PLG06 Guidance on installation and maintenance of seasonal decorations and lighting column attachment;
- Historic England: Streets for All Advice for Highway and Public Realm Works in Historic Places;
- Historic England: External Lighting of Historic Buildings;
- Information from the Bat Conservation Trust on artificial lighting, and Eurobats guidelines for consideration of bats in lighting projects including 'Bats and artificial lighting in the UK - Bats and the Built Environment series' (Guidance note 08/18) by Bat Conservation Trust and ILP;
- City of Toronto bird-friendly guidelines: 2018;
- Civil Aviation Authority CAP1096: Guidance to crane users on aviation lighting and notification;
- Design for the mind - Neurodiversity and the building environment - Guide. PAS 6463:2022. The British Standards Institution.

It should be noted that the above list is not exhaustive. It also relates to good practice guidance not regulation. The advice given by the Institution of Lighting Professionals in relation to their guidance may be seen as applicable to all: "Lighting is a complex subject with both subjective and objective criteria to be considered. The notes are therefore no substitute for professionally assessed and designed lighting, where the various and maybe conflicting visual requirements need to be balanced."

Appendix D: Construction Lighting

Whilst temporary construction lighting for construction sites after dark is essential to maintaining safety and security on construction sites it can also be a blight creating light spill, glare, light intrusion and other unwanted impacts, particularly with respect to local residents and biodiversity. In some cases temporary construction light may stay in place for many years. It also often changes and develops over time, including the re-positioning of lighting associated with hoardings, scaffolding, site access for vehicles and personnel, site accommodation, open working areas, cranes, concrete batching plants and other construction areas. The following guidance is recommended for all construction sites within the City of London with respect to lighting.

Applicants are encouraged to also refer to the 'Environmental good practice on site' produced by from CIRIA.

1.0 Introduction

The following guidelines have been prepared to assist with the design, development, delivery, operation, and maintenance of 'Exterior Site Lighting' within the City of London. They aim to provide 'best practice' guidance to principal contractors, their sub-contractors, and other key stakeholders as to the use of artificial light in the external realm in association with construction sites and their immediate curtilage.

2.0 Background

Lighting plays a key role on construction sites, particularly during the winter months when work may be taking place during the hours of darkness. Lighting is used to provide an inclusive and safe and secure environment for all those that work on, or visit the construction site itself, and for members of the public who are driving, cycling or walking around the perimeter. Whilst the role of such lighting is critical it should be recognised that it also creates several unwanted environmental impacts including:

- Energy use
- Obtrusive light
- Light Pollution
- Waste

This document aims to provide advice as how to improve the balance between the requirement to provide a well-lit working environment and reducing the environmental impact of Exterior Site Lighting to create a sustainable response. This is particularly important as construction sites within the City of London, and their temporary lighting arrangements, will be in place for long periods – often several years. It is therefore important to reduce the impact of such lighting for local residents, biodiversity, and to protect the night sky but without compromise to safety and security.

3.0 Standards

Whilst there are no apparent statutory requirements for Exterior Site Lighting within the UK, it is a requirement of the Health and Safety Executive to safely illuminate construction sites. Guidance is available on the HSE website. This includes links to HSG38 'Lighting at Work'. Whilst this document deals more broadly with health and safety issues around lighting in a range of different workplaces including offices, factories, etc., it also refers to construction sites. It should be noted however, that HSG38 was first published in 1987, and last updated in 1997, since when many changes in lighting technology and the understanding of both the benefits and impacts of artificial lighting on human health and the wider environment have substantively changed. The baseline information from HSE regarding Site Lighting is currently limited to the provision of light but does not include any comment regarding the potential environmental impact or nuisance it can cause. Many other standards exist with respect to the design of exterior lighting which are noted in the appendix to this document. Whilst such guidance refers generally to more permanent schemes, much of the advice can equally apply to temporary conditions, particularly where lighting is to be installed and operated for many years. The most relevant document that provides guidance in respect of light pollution, light spill, over-illumination and other environmental factors with respect to the use of artificial light at night (ALAN) is 'ILP GN 01/20: Guidance note for the reduction of obtrusive light' published by the Institution of Lighting Professionals.

4.0 Principles

The key lighting requirement for all Exterior Site Lighting is providing the right amount of light, of the right type in the right place, and at the right time.

Quantity

Whilst HSE guidance on technology as outlined in HSG38 is outdated, many of its key recommendations remain relevant. The guidance states: "Lighting at work is very important to the health and safety of everyone using the workplace. The quicker and easier it is to see a hazard, the more easily it is avoided. The types of hazard present at work therefore determine the lighting requirements for safe operation." It is therefore essential that the right amount of light for the visual task is determined in each area of the site. This should generally be determined based on carrying out a risk assessment and/or using the CIBSE Code for Exterior Lighting or similar best practice guidance. Whilst the amount of light (illuminance measured in lux) may be expressed as an average across the task plane its uniformity (evenness of the lighting) is critical. Extremes of contrast should be avoided wherever safety is a key consideration. The more uniform the lighting the better the eye can see and therefore the lower the light level can be. This point is important where measures are being taken to minimise the environmental impact of the lighting including the avoidance of over-illumination and over-specification. The less light that is used the less impact is created.

In the absence of any other guidance the following may be used subject to a proper assessment of risk:

Task (rough construction work)	Average Illuminance (lux)	Minimum Illuminance (lux)	Uniformity (UF)
Areas involving the movement of people and vehicles such as lorry parking or circulation areas	30	5	0.2
Areas involving the movement of people, vehicles and/or machinery such as clearance, excavation and soil work	50	20	0.4

Whilst the background level of illumination as stated in this table should be sufficient for many activities, where more detailed tasks are being carried out, or there is a high risk of personal injury, higher levels of illumination may be required. In such cases consideration might be given to the local lighting of such tasks rather than illuminating large areas of the site to a higher level. An alternative may be to raise the level of light across the wider area but only when such tasks are being carried out.

Quality

As important as the quantity of light is its quality. This can be expressed both in terms of colour appearance and colour rendering.

Colour appearance is the colour of the light itself i.e. warm, neutral or cool, which is measured as correlated colour temperature (CCT) expressed in Kelvin (K). Whilst not critical to the visual task consideration might be given to the CCT of any exterior lighting in relationship to the site context. By example, warmer light (2700K-3000K) might be employed in a residential area.

Colour rendering is a measure of the ability of a light source and its spectrum to reveal colours accurately and is measured through a 'colour rendering index' (CRI) expressed in Ra. Ra100 is identical to the spectrum of daylight which reveals colours accurately. The better the quality of light in

terms of its spectral distribution, the higher the CRI and the easier it is to recognise colours. High CRI (>Ra 80) can allow lighting levels to be slightly lowered when compared with sources with a lower CRI.

It should be noted that the prevailing source technology, light emitting diodes (LED) generally have a very high CRI. They render colours better than many of the more traditional sources of light such as fluorescent and metal halide around which many lighting standards were originally determined.

Another important qualitative issue is glare. There are two types: The first is 'disability glare' which is produced directly or by reflection and which impairs the visibility of objects. The second is 'discomfort glare' which causes actual visual discomfort. Glare should be avoided as it can cause a wide variety of problems including for accessibility and inclusivity and hampering people's ability to easily adapt to the dark. With exterior lighting the eye will always adapt to the brightest object in the field of vision which in turn will create problems with the visibility of the surrounding area. Glare can therefore be hazardous in complex and potentially dangerous working environments such as construction sites.

Place

Another critical factor is the manner in which light is distributed to meet the requirements of the visual task within any place. Aside from the distribution of the light having the potential to create issues such as glare it will also impact uniformity and create shadows. By example a focussed light source will create extremely sharp and deep shadow, but the visual brightness of the fitting can be better controlled. An unfocussed or diffused light source will produce a softer flatter light with less harsh shadows but can create more glare.

LEDs themselves are generally bright, glary and highly focussed light sources by their very nature so good optical control is always recommended. This can also greatly enhance the efficiency of the fixture and its source as well as helping to control glare.

Lighting can also be regarded as a 'place-making' tool. Whilst Exterior Site Lighting is less likely to be concerned with character or identity it should be recognised that the overall appearance of a construction site after dark can positively contribute to the brand values and image of the client, the wider development and the construction team, both as responsible 'good neighbours' to local communities and in respect of sustainability and environmental impact.

Duration

One of the easiest ways to save energy and reduce unwanted environmental impacts is to use less light. This can not only be achieved through designing for lower light levels but also by ensuring that lighting is turned off, or at least right dimmed down, when there is no human presence. The duration of any lighting can be controlled by photocells, timeclocks or presence detection. These can either control light fittings either individually or as a network.

Photocells can be used to raise or lower, turn off and turn on light sources related to the availability of daylight i.e. at dusk or dawn.

Timeclocks can provide simple pre-programmed on/off instructions. Astronomic timeclocks are pre-programmed to control lighting in relation to the daily change to sunset and sunrise times.

Presence detection will raise or lower, switch on or off light fittings when triggered by the presence of a person or vehicle.

It is recommended that these various forms of control are used to manage energy and mitigate environmental impacts through regulating the use and amount of light at a different times for different purposes, including dimming lighting down to a security setting or switching it off altogether at an agreed 'curfew' time.

5.0 Environmental Impact

As previously stated, exterior site lighting can directly contribute to environmental impact that can cause harm to people, flora and fauna, and the planet. Such impacts are created in several ways:

Energy Use: Light is a highly visible form of energy use. The less light we use the more we reduce the carbon footprint of any site which in turn reduces the depletion of the earth's natural resources in the form of valuable fossil fuels. Whilst solid state lighting technology such as LED and control systems can help reduce energy use through achieving greater efficiencies energy use can be further reduced and better managed through good design.

Light Pollution: Artificial light is an industrial product that can create pollution. Light pollution not only conceals our view of the stars on a clear night but can also harm local ecologies, particularly bird, bat and insect populations. Light pollution is not only caused by direct upward light but also reflected light from brightly illuminated horizontal or vertical surfaces. Security lighting is recognised as one of the major contributors to light pollution.

Light Intrusion: Light intrusion (also called Light Spill) is a form of light pollution. In the context of this guidance, it refers to light that strays over the site boundary into neighbouring areas. This is known as light trespass. Uncontrolled light spill can cause problems for people and biodiversity. Light spilling through bedroom windows of residences local to a site can create problems with sleep patterns leading to health issues. Light spilling into ecologically sensitive zones can harm both flora and fauna upsetting the natural balance, impacting the migration patterns of birds, attracting insects that change the feeding patterns of predators and causing stress to plants, trees and other flora.

Over-Illumination: The use of higher levels of light than are needed or maintaining illumination when not required, can be referred to as over-illumination. Over-illumination is often created by the over-specification of light sources and lighting equipment. With well-designed lighting 'brightest is not always best' and 'less can often be more'. Whilst access and inclusion, and safety and security is of paramount importance this should not be achieved through the careless use of more light than is required to achieve such objectives.

Waste: As well as wasted energy and wasted light, lighting can also create waste through the redundancy of lighting equipment and supporting electrical infrastructure. This is particularly the case with temporary lighting where fittings are sometimes discarded rather than being re-used or re-purposed. Low cost fixtures often break or LED sources fail prematurely. They are also often unable to be upgraded, repaired or even recycled. Every effort should be made to reduce unnecessary waste and to re-use site lighting. Consideration should be given to the whole-life cost, circularity, embodied energy, ability to be repaired, upgraded and/or recycled for each component within the systems that deliver the Exterior Site Lighting.

Aircraft Safety: The use of warning lights may be required on tall cranes during construction to protect aircraft safety including helicopters. Contractors must check for the need for compliance with such requirements with the relevant authorities. Where such lighting is required it must comply with the relevant statutory aviation and health and safety regulations, codes of practice and guidance.

6.0 Recommendations

Exterior Site Lighting is often designed to spill high levels of light into the environs of a construction site using bright and uncontrolled fittings such as floodlights mounted on hoardings, site offices, gantries, towers and cranes. Such lighting is often over-specified, over-bright, glary and light polluting spilling light well outside the boundary of the site itself.

Whilst 'temporary' in nature Exterior Site Lighting can often be in place for many years creating visual problems for local residents, office workers and members of the public who pass by or through, overlook or otherwise engage with the site.

It is the recommendation of this report that all Exterior Site Lighting is designed, developed, specified, procured, delivered, controlled and maintained to reduce unwanted and unnecessary environmental impacts as far as it is reasonably possible. If carefully and professionally designed, this can

be achieved without compromise to health, inclusivity, accessibility and safety and security.

Beyond the general recommendations already made in this guidance the Exterior Site Lighting to all construction sites within the City of London should adhere to the following specific recommendations:

- The quantity of light used should not exceed the recommendations of the CIBSE Code for Exterior Lighting and/or HSE Guide HSG38. Wherever possible consideration should be given to further reducing light levels, particularly where overlooked by, or in close proximity to residences or areas of ecological importance.
- The correlated colour temperature of the light (CCT) should be no greater than 4000K (neutral white). Where the site is local to residential areas consideration should be given to using 3000K or less (warm white).
- All light sources shall produce white light in the range of 4000K-2700K and the use of coloured lighting should be avoided unless otherwise agreed.
- The colour rendering of all light sources should not be less than Ra80 to aid recognition.
- A 'lighting curfew' time should be agreed after which all exterior lighting is switched off or dimmed down to 10% of its designed level.
- Whilst lighting should be designed to support CCTV arrangements this should not be to the detriment of the local environment. CCTV cameras should be specified or switched to low light level mode post-lighting curfew.
- All light sources should be directed at the ground or onto vertical surfaces such that light does not spill into the sky or beyond the site boundary.
- All light sources should be fixed or tilted such that they light above the horizontal.
- All light sources should be fully or partially shielded to prevent a direct view of the light sources.
- All area floodlights or similar wide-beam luminaires should be fitted with louvres, snoots, shields and/or hoods to help reduce glare, light spill, and light pollution.
- All bulkheads should be shielded such that upward light spill is avoided, particularly where fitted to public hoardings.
- All continuous or discontinuous linear light sources, especially those fixed to hoardings, should be concealed behind shields or pelmets to avoid direct views of the source.

- All illuminated advertising should be controlled such that they do not become a glare source or a visual nuisance.
- Consideration should be given to the use of blinds in windows of all site accommodation where interior lighting levels are in excess of 200 lux and/or unshielded ceiling mounted light sources are visible from outside, particularly where the site is in close proximity to residences or sensitive ecological areas. Consideration should also be given to blocking windows to reduce obtrusive light during construction, especially when near to residential.
- Tower cranes should not be lit other than with specific task lighting for safe access and/or operation.
- All lighting should be fully dimmable or capable of being switched down in increments of 25%.
- All lighting systems and lighting equipment should be controlled by either a centralised or localised system of photocells, timeclocks or presence detectors to allow the lighting to be fully controlled according to an agreed series of times.
- Lighting should be controlled across the site such that three lighting 'scenes' can be created and managed as follows:
 - Early evening: The brightest scene, particularly in the winter months, to support an active site. Lighting levels to different areas and tasks to comply with the recommendations of this report.
 - Late evening: A reduced lighting scene where areas with no activity have the lighting switched off or dimmed down to a security level of 10% of full output.
 - Post-lighting curfew: The lowest lighting scene where all lighting on the site is either switched off or reduced to 10% of full output.
- The addition of electrical infrastructure to support the temporary creative illumination of events and holidays should be considered as part of community outreach.

Appendix E: Glossary

The following is a glossary of terms to help the reader understand some of the more technical terminology used within this document. It is adapted from a full and more detailed glossary published as part of the SLL Lighting Handbook. Further information is also available through many of the standards, codes and guides that are listed in Appendix B.

Adaptation

Adaptation is the ability of the human eye to adjust to various levels of light.

Amenity Lighting

Amenity lighting covers all external area and other public lighting that is not specifically dusk to dawn street lighting e.g. wall mounted bulkheads, bollards, under-bench lighting.

Astronomical time clock

A timing device or software function designed to switch lighting on at dusk and off at dawn in relation to the day of the year at a given geographical location.

Average illuminance

(See illuminance). Illuminance averaged over the specified surface area measured in lux. In practice this can be derived either from the total luminous flux falling on the surface divided by the total area of the surface or, alternatively, from an average of the illuminances at a representative number of points on the surface.

Average luminance

(See luminance). Luminance averaged over the specified surface measured in candela per square meters (cd/m^2). In practice, this may be approximated by an average of the luminance at a representative number of point on the surface.

Brightness

Attribute of a visual perception according to which an area appears to emit (or reflect) more or less light.

Brightness contrast

Subjective assessment of the difference in brightness between two or more surfaces seen simultaneously or successively.

Colour contrast

Subjective assessment of the difference in colour between two or more surfaces seen simultaneously or successively.

Correlated colour temperature (CCT)

The Correlated Colour Temperature of a lamp refers to the chromaticity of the light emitted. CCT is measured in degrees Kelvin (K). The warmer the appearance of the light source, the lower the degrees of Kelvin.

Colour rendering (CRI)

Colour rendering is the ability of a light source to reproduce surface colours as faithfully as possible compared to a reference light source (e.g. daylight). It is identified by the colour rendering index (CRI). The highest colour rendering is $R_a = 100$.

Colour consistency

Colour consistency refers to the average amount of variation in chromaticity among a batch of supposedly identical lamp samples. To limit this variation, the lighting industry uses a colour consistency system based on MacAdam ellipses.

Cowl

Shaped semi-cylindrical device fitted to the front of a luminaire that restricts the view of the light source.

Curfew

Time period during which stricter requirements (for the control of obtrusive light) will apply. Note: it is often a condition of use of lighting applied by a government controlling authority, usually the local government.

Cut-off

Technique used for concealing lamps and surfaces of high luminance from direct view to reduce glare.

Diffused lighting

Lighting in which the light on the working plane or on an object is not incident predominantly from a particular direction.

Direct lighting

Lighting by means of luminaires having a distribution of luminous intensity such that the fraction of the emitted luminous flux directly reaching the working plane, assumed to be of infinite extent, is 90% to 100%.

Directional lighting

Lighting in which the light on a plane or on an object is predominantly from a particular direction.

Disability glare

Glare that impairs the vision of objects without necessarily causing discomfort. Disability glare can be produced directly or by reflection.

Discomfort glare

Glare that causes discomfort without necessarily impairing the vision of objects. Discomfort glare can be produced directly or by reflection.

Driver

Device connected between the supply and one or more LED lamps which serves mainly to limit the current and/or regulate the voltage to the lamp(s) to the required value.

Efficacy

Luminous efficacy of luminaires corresponds to the ratio between the light output (lm) and the input power (W). Luminous efficacy is measured in lm/W .

Emergency lighting

Lighting provided automatically for use when the supply to the normal lighting fails.

Flicker

Impression of unsteadiness of visual sensation induced by a light stimulus whose luminance or spectral distribution fluctuates with time.

Floodlighting

Lighting of a scene or object, usually by projectors, in order to increase considerably its illuminance relative to its surroundings.

General lighting

Substantially uniform lighting of an area without provision for special local requirements.

Glare

Glare is the sensation produced by bright areas within the field of view and may be experienced either as discomfort glare or disability glare. Discomfort glare arises from light sources or luminaires whose luminance is greater than the eye can adapt to. Disability glare impairs the vision of objects without necessarily causing discomfort. See also disability glare and discomfort glare.

Illuminance

Illuminance describes the quantity of light emitted by a light source falling on a surface,

and it is measured in lux.
Illuminance (lx) = luminous flux (lm) / area (m²).

Indirect lighting

Lighting created by reflecting light off a surface.

Ingress Protection (IP) ratings

Numerical index used to define levels of sealing effectiveness of electrical enclosures, including luminaires, against intrusion from foreign bodies (tools, dirt etc) and moisture.

Integral lighting

Lighting system consisting of lamp(s), luminaire(s) and associated mechanical and electrical control devices which forms a permanent part of the built environment.

Intensity

Luminous intensity is the basic photometric value, expressing the capacity of a point light source to provide illumination in a given direction. It mainly serves to establish the distribution of the light given off by a lit surface depending on the direction. The SI unit of luminous intensity is the candela (cd).

IK rating

Numerical index used to define the degrees of protection provided by electrical enclosures (including luminaires) against external mechanical impacts.

Lamp

Light source made in order to produce an optical radiation, usually visible.

LED (light emitting diode)

Solid state device emitting optical radiation (light) when excited by an electric current.

Life of lighting installation

Period after which the installation cannot be

restored to satisfy the required performance because of nonrecoverable deteriorations.

Light Trespass

Light trespass means any light that falls beyond the legal boundaries of the property it is intended to illuminate and refers to light falling where it is not wanted or needed, generally light from one property that shines onto another property or the public right of way.

Local lighting

Lighting for a specific visual task, additional to and controlled separately from the general lighting.

Louvres

Fixed or adjustable blades or baffles on windows to restrict daylight and/or preclude sunlight or to restrict or reflect some portion of the light from the lamp or light source associated with a luminaire.

Luminaire

Another term for a light fitting.

Luminance

Luminance is a measure of the luminous intensity per unit area of light travelling in a given direction measured in candelas per square metre (cd/m²). It describes the amount of light that passes through, is emitted or reflected from a particular area, and falls within a given solid angle. Luminance distribution in the visual field controls the adaptation level of the eyes which affects task visibility and visual comfort. Too high luminances can give rise to glare and too high luminance contrasts can cause fatigue from constant re-adaptation of the eyes.

Luminance meter

Instrument for measuring luminance.

Luminous environment

Lighting considered in relation to its physiological and psychological effects.

Maintained emergency luminaire

Luminaire in which emergency light sources are operating at all times when normal lighting or emergency lighting is required.

Maintained illuminance

Value below which the average illuminance on the specified area should not fall.

Maintained luminance

Value below which the average luminance on the specified area should not (unit: cd·m⁻²).

Maintenance cycle

Repetition of lamp replacement, lamp/luminaire cleaning and room surface cleaning intervals.

Maintenance factor

Ratio of illuminance produced by the lighting installation after a certain period to the illuminance produced by the installation when new.

Obtrusive light

Spill light which because of quantitative, directional or spectral attributes in a given context gives rise to annoyance, discomfort, distraction or reduction in the ability to see essential information.

PIR (passive infrared)

Movement detector used as part of a presence or absence detection system.

Presence detection

The automatic detection of presence in a space in order to switch the luminaires on during space occupancy.

Reflectance

Ratio of the reflected radiant

or luminous flux to the incident flux in the given conditions.

Reflections

See veiling reflections.

Scene setting

A software function or manually via a scene setting switch in order to select the available lighting scenes in a space.

Snoot

Cylindrical device fitted to front of luminaire to restrict the view of the light source.

Sky Glow

Sky Glow is a result of light fixtures that emit a portion of their light directly upward into the sky where light scatters, creating a diffuse glow above a city or town.

Spacing

Distance between the light centres of adjacent luminaires of the installation.

Spacing to height ratio

Ratio of spacing to the height of the geometric centres of the luminaires above the reference plane.

Spill light

Light emitted by a lighting installation which falls outside the boundaries of the area for which the lighting installation is designed.

Uniformity

Uniformity is the ratio between the lowest illuminance level and the average illuminance, measured in an illuminated area. $U_0 = E_{min} / E_{av}$.upward flux ratio.

Veiling reflections

Specular reflections that appear on the object viewed and that partially or wholly obscure the details by reducing contrast.

Visual comfort

Subjective condition of visual wellbeing induced by the visual environment.



City of London Lighting Supplementary Planning Document (SPD) Consultation Statement JULY 2023



INTRODUCTION

1. The City of London Corporation adopted a Lighting Strategy 2018 which included a recommendation to develop planning guidance for lighting. The City Corporation has resolved to develop the Lighting Supplementary Planning Document ('SPD') to further support the National Planning Policy Framework 2021, the London Plan 2021, and the draft City Plan 2040.

EARLY CONSULTATION ON THE LIGHTING SPD

Draft Local Plan consultation

2. The City Corporation is preparing a new Local Plan, the City Plan 2040. The City Corporation consulted on a full draft of City Plan 2036 between 12 November 2018 and 28 February 2019. During the consultation, comments were received for the impact of new development, including for light spill and light pollution. This draft City Plan is at an advanced stage of preparation and will be subject to further ('regulation 19') consultation in early 2024.

City Corporation committee consultation

3. The need for the Lighting SPD and progress in delivering the SPD was considered in public meetings of the City Corporation's Port Health and Environmental Services Committee on 10 October 2022 and the Planning & Transportation Committee on 1 November 2022. At these meetings, elected Members provided support for the need for the provisions in the SPD and the need for effective guidance to address artificial lighting associated with development in the City.
4. The Planning and Transportation Committee approved the draft Lighting SPD for public consultation on 1 November 2022.

CONSULTATION ON DRAFT LIGHTING SUPPLEMENTARY PLANNING DOCUMENT

5. Consultation on the draft Lighting SPD has been undertaken in accordance with the requirements of the City Corporation's Statement of Community Involvement (2023) and the Town and Country Planning (Local Planning) (England) Regulations 2012. Consultation documentation was sent to:
 - adjoining local planning authorities;

- the Mayor of London;
 - City residents and City businesses;
 - those voluntary bodies or business representative bodies that the City Corporation consider appropriate;
 - lighting experts and designers; and
 - other groups and bodies on the City Corporation's City Plan database.
6. Consultation on the draft Lighting Supplementary Planning Document took place from 9 December 2021 until 17 February 2023. Consultation measures included:

Consultation Notification Emails

7. Emails were sent to consultees on the City Plan consultation database, including neighbouring boroughs, the Mayor of London, City businesses, developers and agents, and City residents.
8. The consultation was widely publicised in the press including a front page story in the Financial Times Weekend, and coverage in The Times, The Guardian, Evening Standard, Metro, BBC News, BBC Radio 4, BBC Radio London and over 130 other local, national and international outlets.
9. A total of 68 representations were received on the draft SPD. These representations and the City Corporation's officer responses are summarised and attached at Appendix 1.

Website

10. The draft Lighting SPD was published on the City Corporation's website.

Consultation events

11. Three events took place in total:
- In-person public consultation event with a Lighting Walking Tour around key parts of the City;
 - A virtual public consultation event;
 - In-person industry professionals event.

RESPONSE TO CONSULTATION ON DRAFT LIGHTING SPD

12. The comments received have been summarised in Appendix 1.
13. In addition to individual representations from residents, representations were received from the following resident groups and include responses from:
- Barbican Association;
 - Brandon Mews House Group;
 - Gilbert House Group Tenants Association;
 - Willoughby House Group, Barbican Estate.
14. A significant number of technical consultants and lighting designers responded to the consultation which has been summarised in the 'Lighting designers and technical consultants' section of Appendix 1.
15. An additional workshop was undertaken following the consultation period with lighting experts to further review the Technical Requirements section of the SPD.
16. To summarise, comments can be divided into the general themes below, although not an exhaustive list:
- Technical requirements and assessment of impacts;
 - Residential amenity;
 - Biodiversity;
 - Heritage;
 - Safe and Inclusive design;
 - The Considerate Lighting Charter;
 - Implementing and enforcement of SPD, and other practical implications.
17. Changes were made to the SPD in response to the issues raised. These included significant amendments to: the Planning Process, Lighting Guidance, and the Technical Requirements sections, and to the Considerate Lighting Charter in Appendix 'A'.
18. In response to comments, amendments were made to all sections of the document. Most notably, the Technical Requirements section and tables 10 – 12 were amended to align more closely with established Institution of Lighting Professionals (ILP) Guidance. Specifically, the ILP measures for the light spill on the vertical plane of premises and 'Environmental Zones' have been adapted and included in the SPD. In order to protect amenity and to respond to the unique City context, the proposed levels and zones have been adapted from those included in the ILP guidance and are considered appropriate in the context.

Appendix 1: Summary of consultation comments and City Corporation Officer responses

Representations received from individuals including from City residents have been summarised below:

Summary of response	City of London Corporation Officer response
<p>I. <u>Impact of light pollution</u>: Significant impacts on health and wellbeing, including internal light spill, and impact of colour temperature. Developers must be required to consult residents.</p> <p>II. <u>Planning controls</u>: Enforcement is needed for light pollution; unnecessary lights should be switched off; should control the type of fixtures installed. Planning conditions should require details of reductions and systems to be fully operational before discharge. Westminster Council requires a professional to commission lighting systems.</p> <p>III. <u>Automated blinds</u>: Should be compulsory; to drop where buildings face residential; should be required from 7pm; including for existing buildings.</p> <p>IV. <u>Curfew times</u>: Proposed times are too late; should be 7 - 8pm where buildings face residential; and it depends on time of year. Definition of 'near' to residential needed. There should be no need for non-essential lighting to be turned on at all.</p>	<p>I. The potential impact to health is referenced in paragraph 3.9. Text added at paragraph 2.2 stating applicants should consult the City of London Developer Engagement Guidance (2023) and should develop a Community Engagement Strategy.</p> <p>II. Planning conditions will require details, including for management, to be approved prior to lighting works and development must adhere to approved details. Whilst planning conditions will require details to be submitted for approval, the approval of fixtures will relate to external lighting only. Curfews are proposed for non-essential external lighting. The SPD recommends appropriate expertise is sought from the start and states a qualified professional may be required at paragraph 2.4.</p> <p>III. Blinds are one of a range of measures suggested, which could be automated or manually deployed. Applicants are required to consider sensitive receptors, including residential, when designing relevant development. At condition stage, applicants are required to submit operational details, and detail for the control methodology. The following has been added to 'Table 4': "Should clearly illustrate the impacts to sensitive receptors and mitigation implemented to reduce this."</p> <p>IV. The proposed curfew times reflect the need to balance the mix of uses in the City. The SPD states that the City Environmental Zone should be agreed with an officer, which would include considering nearby sensitive receptors in each case. The light levels set out in the technical requirements – both before and after the curfew times – would minimise the impact of artificial lighting on sensitive receptors. Lighting in the City needs to respond to the mix of uses and non-essential light and essential light should be responsibly used.</p>

- V. Construction lighting: Should have requirement to turn off or reduce construction lighting out of hours and windows should be blocked out during fitout.
- VI. Safety: Must ensure City is safe and accessible particularly for certain roads and alleyways, and with no contrasting areas of darkness. Lights need to be on very late to ensure the safety of those returning from work late.
- VII. Control systems: Issues experienced with systems in existing buildings when not used or working properly, triggered by late workers, security etc. Should be properly maintained.
- VIII. Street lighting: There is waste from City lighting. Motion sensor activated street lighting should be introduced e.g. Podium level at Barbican.
- IX. Social and Artistic lighting: Schemes will help the overall look and feel of the City and light should be encouraged to promote gatherings.
- X. Definitions: clearer definitions needed for "their sources". How are "distant", "mid" and "near" defined?
- XI. Light spill distance: Lighting more than 2 metres from a window will cause light spill especially when viewed from height; issue of glare is just as significant.
- XII. Applicable development: Should apply to all existing developments including retail.

- V. *Text has been added to paragraph 3.17(d): "...turn lights off when not needed...". A comprehensive Appendix 'C' has been provided with guidance for construction lighting, and the following has been added to 'recommendations': "Consideration should also be given to blocking windows to reduce obtrusive light during construction, especially when near to residential."*
- VI. *Safety and accessibility is a key outcome for the SPD including guidance within the 'Safe and inclusive Design' and 'Public Realm' sections. Amended to highlight the impact of pooling of light and contrast in paragraph 3.12 for accessibility, inclusion and for safety and security.*
- VII. *Table 13 sets out requirements for Operation and Maintenance, including for control systems.*
- VIII. *Street lighting has been informed by the Lighting Strategy (2018) and is carefully managed by the Street Lighting Team; clarification has been added in paragraph 1.11. The SPD applies to new development and lighting for safety is not subject to the curfew restrictions as stated in paragraph 4.13. The Barbican lighting is managed by the Barbican Estate.*
- IX. *Paragraph 3.10(f) acknowledges that small-scale creative lighting has the potential to create welcoming routes and improve sense of place and should be employed where appropriate. Paragraph 3.14 welcomes artistic lighting where appropriate including for events.*
- X. *This relates to the connections to light fixtures. In reference to views, this is determined on a site-specific basis considering specific sensitive receptors.*
- XI. *The SPD has reduced this to 1.5 metres and this does ultimately depend on the viewing angle however this measure it aimed at reducing obtrusive light. Guidance is provided for issue of glare, and measures to address this, including in paragraph 3.9(b).*
- XII. *The SPD can only apply to new development that requires planning permission, which may include proposals for retail development (although this may also be permitted development) and proposals for new or altered shopfronts. The Charter applies to existing buildings and is a voluntary commitment.*

<p>XIII. <u>Horizontal measure</u>: Sideways and horizontal light also leads to sprawl. Developers should consider where all light emitted will fall. Direct light that hits other properties and roads should be minimised /screened. Surfaces should be selected so that the glow is minimised if appropriate.</p> <p>XIV. <u>General energy waste</u>: Should apply to waste energy for heating and cooling too.</p> <p>XV. <u>Biodiversity</u>: Should apply not near to green sites and should specify to use lower colour temperature lighting as harmful to wildlife.</p> <p>XVI. <u>Public realm</u>: Low white LED should be used to minimise blue light risks; "invisible" infrared lighting and sensitive cameras could/should be used to minimise the need for excessive visible illumination.</p> <p>XVII. <u>Skyline</u>: Lights should be dimmed not turned off because London is recognisable.</p> <p>XVIII. <u>Glare</u>: State should be avoided as it can affect visibility and make areas more dangerous e.g. traffic.</p> <p>XIX. <u>Appendix B</u>: Provide web links.</p> <p>XX. <u>Corporation boundary</u>: Queried if applies to the land the City Corporation owns outside the City.</p> <p>XXI. <u>Heritage</u>: Query how city heritage assets would be evaluated as to whether would warrant illumination.</p>	<p>XIII. <i>The Technical requirements section has been amended to more closely reflect existing ILP standards and includes illuminance on nearby premises measured on the vertical ('Table 10') and for surface illuminance on premises ('Table 11').</i></p> <p>XIV. <i>The SPD applies to lighting only.</i></p> <p>XV. <i>The following has been added to 'Biodiversity': for 'e' "...that would affect biodiversity..."; and "Developments should consider using lower Correlated Colour Temperature (CCT) for sensitive sites such as churchyards, and by the river in consultation with ecologists. Such requirements must be carefully balanced with any requirements for safety and security."</i></p> <p>XVI. <i>The SPD encourages the careful consideration of luminaires to sensitively light development, where different light sources may be appropriate in different cases. This may include cases for infrared lighting and cameras however the latter is outside the scope of the SPD.</i></p> <p>XVII. <i>The curfews included ('Table 9') apply to external lighting, except that specifically required for accessibility, safety and crime prevention. It is not considered the recognisable skyline will be adversely affected although the SPD strongly encourages non-essential light to be turned off when not in use.</i></p> <p>XVIII. <i>Reference to road safety in relating to obtrusive light has been added to paragraph 3.7(f).</i></p> <p>XIX. <i>Web links are not used as these are external sources.</i></p> <p>XX. <i>The SPD applies to new development on land within the Square Mile only (the 'Local Planning Authority').</i></p> <p>XXI. <i>Paragraph 3.11(b) states: "The lighting of heritage assets should be undertaken with great care, and be compatible with their conservation and enhancement, but not all heritage assets should be lit, and this will require strong justification." This will be considered alongside officers to determine where illumination of heritage assets is appropriate.</i></p>
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XXII. Efficiency: Table 6 calls for 70lm/w. Query whether this is in line with Part L and whether considering efficacy as an average of the whole installation.

XXIII. Light Trespass: Strengthen wording on trespass.

XXIV. Charter: Many PIRs are set to 40 minutes "on" after activation therefore with late workers, lights can be on through the night. Should state only install if will mostly be turned off at night due to less movement, and to set to the minimum setting. Should be funded and promoted to buildings neighbouring residential including the Barbican and Golden Lane estates. Should consider response to non-compliance. Queried when it will be launched, what publicity will be, and how success will be measured. SPD / Charter could set out the route for a member of the public to complain about a lighting nuisance, and what action the Corporation will take to enforce action. Should amend colour temperatures to 4000K or lower.

XXII. 'Table 6' amended to state: "All exterior lighting equipment should achieve efficiencies in line with the requirements of the Building Regulations and/or the requirements of BREEAM, whichever shall be the lowest in terms of lumens per circuit watt."

XXIII. The Glossary definition is considered sufficient.

XXIV. It is considered this is addressed in the amended Charter: "1.2 Installing control systems such as passive infrared detectors (PIR) as part of a 'smart' lighting system designed in a way that minimises the amount of light used; 1.3. Embedding good lighting management practice in our facilities management teams and undertaking training for staff on how lighting systems should be operated"; and states: "Consulting neighbouring properties, particularly those who are most affected by our lighting, as part of the review. We will publish information about changes to our internal and external lighting and provide contact details". A strategy for promotion the Charter will be agreed in due course and how this will be promoted, implemented and funded will be considered. The Charter states cooler colour temperature should be avoided.

Representations submitted by / on behalf of organisations are summarised below:

Summary of comment	City of London Corporation Officer Response
<p>Combined responses from lighting designers and technical consultants</p>	
<p>I. <u>Introduction</u>: Queried whether paragraph 1.7 relates just to night time artificial light, as day time can result in negative impacts.</p> <p>II. <u>Photographs</u>: Unclear which are good/ bad examples.</p> <p>III. <u>Inclusive Design</u>: Reference to regulation or best practice needed. Need more on lighting impacts on neurodiversity. Reference to warmer colour temperatures, especially for visually impaired and neurodiversity. See documents: PAS6463 and BS8300.</p> <p>IV. <u>Planning conditions and enforcement</u>: Should require sign off through planning to ensure installed scheme meets approved design. Officers do not have the resource to ensure they are met post construction, concerns about how will be enforced. One approach is for a condition that the lighting designer be available through the project and has responsibility to sign off the lighting installation upon completion, and any substitutions of equipment have been discussed and found acceptable and that the installation has been commissioned and operates as intended.</p> <p>V. <u>Implementing guidance</u>: Often tall towers have different lighting designers working on them, queried how could calculate from all lighting designs of a building. Following completion, queried how occupiers of floors would undertake calculation e.g. if an occupier of two floors refurbishes, including the lighting.</p>	<p>I. <i>The SPD applies to all artificial light and aims to address obtrusive light issues, although primarily relates to the lit environment at night. Added text in paragraph 1.7 to clarify.</i></p> <p>II. <i>Clarification added to page 12.</i></p> <p>III. <i>The following has been added to Appendix 'C': British Standards for Lighting (BS8300-1:2018; BS8300-2:2018), and Design for the mind - Neurodiversity and the building environment - Guide. PAS 6463:2022, The British Standards Institution. Reference to warmer light included in paragraph 3.12(c).</i></p> <p>IV. <i>Additional sign off post-installation may be specifically required in some cases in sensitive contexts however is not currently proposed for all development as the potential impacts and any mitigation measures will be addressed earlier in the planning process. Developments will be required to adhere to approved details, and enforcement action will be taken if deemed appropriate.</i></p> <p>V. <i>The SPD proposes a range of measures, including building design itself, to help address issues of obtrusive light. Developers would be expected to coordinate, as with other planning conditions, to ensure details are provided and requirements met. In addition, if approved, the developer would be required to adhere to the approved details and would be required to submit changes if needed.</i></p>

- VI. Consultation: Undertake surveys of residents, workers and stakeholders to create an evidence base of perceptions of the existing lighting provision. Follow up studies with the community to assess the effectiveness of the design intervention and could be commissioned under Section 106 agreements.
- VII. Baseline: How does SPD address existing lighting.
- VIII. Table 1: Should include strategies for sustainability, ecology, circularity etc. and include budget costs. Stated this complex as RIBA stage 4 is not always a complete stage depending on the form of contract as a stage 4i may not be suitable detail to discharge a detailed planning condition.
- IX. Table 3: Comments on technical modelling.
- X. Table 4: Should add that any calculation used to determine obtrusive light and other such factors has to be for the installation under 'worse conditions' i.e. when it is new so no maintenance factor adjustment.
- XI. Table 5: Use of the word minimise is wrong, it accepts that it will occur, consider the use of "Mitigate the effects of ..."
- XII. Table 6 for Lifetime, upgrading and disposal: Should this be 'and' instead of 'and/or'. Upgrading is already a legal requirement. EPD / LCA and CIBSE TM65 are becoming common place in lighting and this details not just origin of product but Embodied Carbon through life cycle carbon stages A-D. A lighting specific version of TM65 is due to be released that gives every manufacturer the ability to self-declare the CO2e impacts of their products. This will become common practice to start using this information in specification criteria, the SPD does not mention. This section could also include comment on labelling of components for ease of replacement.
- XIII. Table 6: It is known there are bats etc., in the City, and statement should be included that light sources <CRI 80 should be considered.

- VI. *Text added at paragraph 2.2 advising applicants to consult the City of London Developer Engagement Guidance (2023) including developing a Community Engagement Strategy. Follow up studies is not considered necessary at this stage and the applicants are expected to follow the detailed guidance in the SPD regarding assessment of existing context and identifying sensitive receptors. Existing buildings can sign up to the Charter to ensure these continue to consider impact of light, including on surrounding sensitive receptors.*
- VII. *Added "including existing light" into 'Table 2'.*
- VIII. *It is considered that this goes beyond the scope of the SPD, and the applicant is expected to consider these issues as part of the wider application. The point is noted regarding the complexity however the SPD broadly follows the RIBA Plan of Work.*
- IX. *This has been replaced with 'lighting strategy' and 'lighting concept' to reflect the detail required at this stage.*
- X. *Table 4(e) has been amended to include following: "Calculations used to determine obtrusive light should be for the installation i.e. when new with no maintenance factor adjustment."*
- XI. *Regarding obtrusive light, this has been amended to state "avoid obtrusive light..."*
- XII. *Amended to 'and' in Table 6. Circular economy and sustainability are considered throughout the SPD, and wider sustainability impacts would be considered as part of the wider application.*
- XIII. *'Table 6' states exterior light sources should have a CRI of ≥80 to aid good recognition; this has been amended to include biodiversity. In addition, the following has been added at paragraph 3.8(m): "Developments should consider using lower Correlated Colour Temperature (CCT) for sensitive sites such as churchyards, and by the river in consultation with ecologists. Such requirements should be carefully balanced with any requirements for safety and security."*

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| <p>XIV. <u>Table 7:</u> The angle of illumination limit depends on the type of lighting considered and the position of the fixtures. If these are below a bench perhaps the 45° is less important. Street and amenity should be excluded from light spill. For sky glow, this should include a requirement to provide calculations and demonstrate impacts. Equally if lighting designs should only be carried out by qualified / experienced people, calculations are common practice. The reference to "snoots and louvres" has been around for too long. For visual brightness, this should include individual luminaires too.</p> | <p>XIV. Angle has been amended to 60 degrees to balance the requirements of related ILP guidance and the City-specific context. The SPD looks for information to be provided to clarify the light spill over and above the baseline conditions created by statutory lighting. Calculation for sky glow is not required as the proposed requirements are considered sufficient to help to address obtrusive light. For luminaires, this information is required as part of 'Table 4'.</p> |
| <p>XV. <u>Table 13:</u> For replacement of lighting equipment, a maintenance programme over a specified life of the installation (e.g. 25 years) should be planned out. i.e. what gets replaced first and how.</p> | <p>XV. Reference to replacement is included in tables 4 and 13, and although a detailed plan is expected to be undertaken by the applicant, the full details are outside of the scope of the SPD.</p> |
| <p>XVI. <u>Technical requirements (light spill) and District Brightness Zones:</u> Concerns raised for the proposed measuring, targets and tables including to measure at 2m from the facade and clarification needed for these proposed measures and impacts including on safety. Should use the ILP guidance. Concerns levels in DBZs would be too onerous. A developer should be able to propose 'alternative target values' for the illuminance or luminance levels to be achieved around a proposal based on the situation and specific needs of each site with planning officer feedback on these. When taller buildings consider the background against which they are viewed, this can vary depending upon viewpoint, they may from one aspect be viewed with other offices as the background but also from with the natural dark sky as the background, an aspect that ILP GN01 and PLG05 both consider when determining the permitted lighting performance of illumination at higher levels.</p> | <p>XVI. The tables have been amended to be more closely aligned with levels with the 'Professional Lighting Guide GN01 – The reduction of obtrusive light' and the 'Professional Lighting Guide PLG05 – The Brightness of Illuminated Advertisements Including Digital Displays' as published by the Institution of Lighting Professionals (ILP). In order to protect amenity, and to respond to the unique City context, the levels proposed have been adapted from the levels included in the ILP guidance and are considered achievable in the context. District Brightness Zones (DBZs), now amended to 'City Environmental Zones' which have been adapted from the ILP Guidance and tailored to the City context. Confirmation of these are at the discretion of officers as per paragraph 4.11. The requirement for consultation including identifying nearby sensitive uses is included in paragraph 2.2 and 'Table 2'. The consideration of cumulative impacts has been added to 'Table 2'.</p> |
| <p>XVII. <u>Safe and inclusive design section:</u> 'g' needs clarification and media screens should be added to this as can be distracting.</p> | <p>XVII. The principal aim is to ensure applicants consider the lit context for those travelling by public transport. This section is considered to cover a range of lighting.</p> |
| <p>XVIII. <u>Temporary lighting section:</u> Reference the embodied carbon impact of temporary lighting and potential for re-use.</p> | <p>XVIII. Paragraph 1.15 of Appendix 'B' states "Embodied energy, circularity of design and manufacturing, recycling and disposal should all be considered."</p> |

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| <p>XIX. <u>Advertisements</u>: Queried if differentiation between large and small screens/signs, and whether illuminance from the illuminated media have to comply with other requirements. Clarification needed for why differs from recently adopted ILP guidance 05, which factors in the lit area of the signage and includes design requirements to prevent upward light etc. Research indicates that it is about the area of the display / sign as well as its height above ground level and Table 12 does not reflect this. The highest value in the table is 15 lx, given that the building is permitted to have a sign of 500 cdm² then a sign that is 1m² will give an illuminance of just under 125 lx at the 2m plane.</p> <p>XX. <u>Glossary</u>: For light intrusion, remove text which goes beyond glossary definition in Appendix C. For light trespass, propose alternative definition: "Light trespass means any light that falls beyond the legal boundaries of the property it is intended to illuminate. Light trespass means light falling where it is not wanted or needed, generally light from one property that shines onto another property or the public right of way."</p> <p>XXI. <u>Submission requirements</u>: Should also include significant lighting projects which may not be major development. Should be a requirement for applicant to resubmit details if luminaires within the approved scheme are changed.</p> <p>XXII. <u>Uniformity</u>: Reservations giving such emphasis to uniformity. Perhaps "distribution" could be used instead of uniformity.</p> <p>XXIII. <u>Lighting Strategy and Lighting Concept submission</u>: There should be flexibility for lighting strategy to be submitted with lighting concept as information may not be available. It is important to ensure that the results submitted are achievable and can later be implemented at detailed design stage and recommend that the SPD contains a table of reasonable ranges of assumptions for key variables e.g. glass light transmission.</p> <p>XXIV. <u>Energy use</u>: For energy load of all external lighting, it is unclear how the total installed load will be used to assess the success or otherwise of a scheme. The size of the area being illuminated and running hours are also important to an overall energy consumption. More guidance needed, e.g. a statement of how energy use has been minimised/optimised.</p> | <p>XIX. <i>The tables have been amended to be more closely aligned with levels with the 'Professional Lighting Guide PLG05 – The Brightness of Illuminated Advertisements Including Digital Displays' as published by the Institution of Lighting Professionals (ILP). In order to protect amenity and to respond to the unique City context, the proposed levels have been adapted from those included in the ILP guidance and are considered achievable in the context. Clarification added in paragraph 4.19. Signage is to be considered separately to light spill from windows.</i></p> <p>XX. <i>Light intrusion definition has not been amended in construction lighting appendix as considered appropriate for subject. The definition for light trespass updated as suggested in Appendix 'E'.</i></p> <p>XXI. <i>Paragraph 2.2 amended to include lighting proposals. Applicants would be required to resubmit details if change from previously approved details. Applicants will be required to adhere to approved details through condition discharge process.</i></p> <p>XXII. <i>Amended to 'distribution' in document apart from Appendix 'C'.</i></p> <p>XXIII. <i>The Lighting Concept requirements have been amended and include the resubmission of the Lighting Strategy again (if already submitted at pre-application stage). This was previously included in paragraph 3.2 also (now 2.2). Text has been added to 'Table 4' (e) to state that details of assumptions should be provided.</i></p> <p>XXIV. <i>Included text in Table 4 to state "such as statement of how energy use has been minimised/optimised". The SPD will not be used to directly control energy use as there are other instruments and requirements such as the Building Regulations and BREEAM that address this.</i></p> |
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| <p>XXV. <u>Lighting accessories</u>: Paragraph 4.7(e) - Not all exterior fixtures will always benefit from these accessories, should add "where appropriate".</p> <p>XXVI. <u>Lux-leasing</u>: Not necessarily the right solution for all and particularly for external lighting; would place restrictions on the selection of equipment and could result in poorer quality/less efficient schemes.</p> <p>XXVII. <u>Colour temperature</u>: Should be limit of 3000k not 4000k.</p> <p>XXVIII. <u>Biodiversity</u>: Should include details of green areas or corridors which are deemed to be of particular importance to be retained in darkness, or a definition to reinforce the statement. There is ambiguity with later paragraphs which support sensitive lighting to green landscape.</p> <p>XXIX. <u>Lighting Strategy (2018)</u>: Clarify the status of the SPD alongside the "Light + Darkness in the City/ A Lighting Vision for the City of London' 2018".</p> <p>XXX. <u>Future technologies</u>: Needs more for future technology, approaching.</p> <p>XXXI. <u>Curfew</u>: Should avoid using the term 'curfew' due to negative connotations.</p> <p>XXXII. <u>Light spill</u>: This is generally spoken about as a negative, the SPD should make distinction between light spill from ground floor / street frontages and light spill from first floor and above. Queried whether this is from inside the building.</p> <p>XXXIII. <u>Intensity and upward light ratio</u>: Intensity is one of the key indicators for light source and is often more the problem than illuminance when undertaking light nuisance evaluations, whilst it cannot practically be measured it is a consideration that should be calculated for any sensitive receptor.</p> | <p>XXV. 'Where appropriate' added to paragraph 3.7(e).</p> <p>XXVI. <i>Lux-leasing is presented as an example of innovative procurement strategy that could be appropriate for a development.</i></p> <p>XXVII. <i>Range provided is considered acceptable in the City context.</i></p> <p>XXVIII. <i>Prescribed areas will not be provided as biodiversity should be protected across the City. The SPD highlights examples of potential sensitive areas.</i></p> <p>XXIX. <i>Clarification added to paragraph 1.11.</i></p> <p>XXX. <i>This is considered to be outside the scope of the SPD and due to the changing nature of this, it has been included.</i></p> <p>XXXI. <i>Noted, however this is considered appropriate for the purposes of the document.</i></p> <p>XXXII. <i>Paragraph added at 4.10 to make distinction from ground floor and upper levels. Table 10 also applies to light from within the new development.</i></p> <p>XXXIII. <i>It is considered difficult to apply to a building interior, or fittings within a building interior, given the limits of planning. The measures proposed are considered sufficient to limit obtrusive light from new development.</i></p> |
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- XXXIV. Additional guidance: Should mention TM66 - Creating a circular economy in the lighting industry, TM65 Embodied carbon in building services, The Environmental Product Declaration / Life Cycle Assessment. Could provide target values to add more clarity on what good practice. CIBSE Code for External Lighting is out of date (2016). Include "LG21 Protecting the night-time environment (2021)". Title for ILP PLG05 to be updated. ILP GN08 bats and artificial lighting and BS EN 12464-2 2014 should be included. Issue number should be removed for GN01.
- XXXV. Charter: Should be careful that the owners, occupiers do not make material changes to existing buildings that leads to additional product waste and associated embodied carbon and queried colour temperature level.
- XXXVI. Street lighting: Should include consideration for street lighting luminaires dimming and consider future technologies, paragraph 4.9(g) should be amended to state applies where the street lighting light source can be viewed / seen as this is normal practice. Does not state that limits in tables include public realm lighting.
- XXXVII. Safety: Needs more about perceived safety at night.
- XXXVIII. Introduction: Page 3 - "... right light, in the right place at the right time, controlled by the right system" could be a trademark of DPA Lighting.
- XXXIX. Efficiency: All lighting equipment used should also meet the highest standards of energy efficiency and this should include repair and refurbish. Queried proposed recommendation of 70 lm/circuit watt.
- XL. Glossary: Many terms that are not used in the SPD but included. Instead of light trespass, the term light spill or nuisance should be used. Luminous intensity is confusing.

- XXXIV. *The SPD aims principally with light in the planning process for applications for new development therefore further sustainability guidance although useful, is considered to be beyond the scope of this document and proposals will also be subject to separate sustainability policies and guidance. Included LG21 reference, updated PLG05 and included ILP GN08 and BS EN12464-2, 2014 in Appendix 'C'. Issue number removed for GN01.*
- XXXV. *The Charter comprises nine commitments to be made by existing buildings and these would be expected to consider carbon impacts of any changes and whether deemed appropriate as part of the process of reviewing a lighting system. This has been amended to state to avoid cooler colour temperatures after dark.*
- XXXVI. *This has been adopted and installed as part of the upgrading of the street lighting which is the subject of the Lighting Strategy 2018, and the SPD applies to new development. Paragraph 4.9(g) has been removed to reflect that street lighting is supported and carefully considered by the Street Lighting Team. Paragraph 4.16 states "the values are the summation of all lighting installations including light spill from the development" which includes street lighting.*
- XXXVII. *The SPD references the importance of safety in several places, and is considered a key 'lighting outcome' of the document. Included reference to 'sense' of safety in paragraph 3.12(d).*
- XXXVIII. *This is taken from the ILP guidance on obtrusive light and is credited on the page.*
- XXXIX. *Efficiency is included in 'Table 6'. The SPD also states in paragraph 2.3 that the guidance applies to refurbishment schemes, where these are development. Reference to 70 lm/circuit watt amended.*
- XL. *Wide range of definitions included for information. Definition for 'intensity' added to glossary.*

<p>XLII. <u>Structure</u>: Paragraphs should have subheadings to make it even easier to navigation, introduction could be clearer including context in policy.</p> <p>XLIII. <u>Night workers</u>: Make reference. There is a focus on residential amenity and some offices work 24 hours and these workers should be considered too.</p> <p>XLIV. <u>Secure by Design</u>: Include reference.</p> <p>XLV. <u>Topic 'A'</u>: What is meant by 'minimal' and queried what would be considered 'good' such as including lm/w or similar, and how will success with renewables be measured. Should be Greenhouse Gas Emissions, as carbon is one aspect.</p> <p>XLVI. <u>Biodiversity</u>: Reference Toronto Green Standard guide on Bird Strike. Section wording implies that it is acceptable to have spill light in some areas unless it is a green area or dark area.</p> <p>XLVII. <u>Construction Lighting</u>: Construction lighting should only be used during the hours construction use and not left on overnight if no work is being undertaken.</p> <p>XLVIII. <u>Policy section</u>: The requirement for artificial light to be considered as a nuisance came out in 2005 therefore should not be referred to as being a new requirement. Should add to be circular economy compliant be considered as well.</p> <p>XLIX. <u>WELL standards</u>: Consider whether this would increase illumination levels for certain credits.</p> <p>L. <u>Residential amenity</u>: Should consider whether would result in use of darker internal materials which could be less supportive for wellbeing. Queried why 11pm as City closes sooner, and the definition of near to residential buildings. This section could include mention of the importance of the night-time view and the role of light in that view.</p> <p>L. <u>Coloured light</u>: May be better to state that there may be instances where this is appropriate, noting successful projects.</p>	<p>XLII. <i>The layout and formatting has been amended. Clarification provided on policy context in the executive summary.</i></p> <p>XLIII. <i>Text included at 3.12(c) to include night workers. in addition, the SPD aims to balance the interests of all uses in the City and acknowledges in the "City of London has become a diverse 24-hour destination".</i></p> <p>XLIV. <i>This should be considered as part of the wider design process undertaken by the applicant therefore has not been included.</i></p> <p>XLV. <i>Applicants are expected to minimise the environmental impacts of light from development, and the SPD promotes best practice, however there is a need to limit guidance within this SPD which is considered in wider sustainability considerations for applications. Paragraph 3.6 amended to include GHG emissions.</i></p> <p>XLVI. <i>Included in Appendix 'C'.</i></p> <p>XLVII. <i>Following text added at paragraph 3.7(d): "...turn lights off when not needed..."</i></p> <p>XLVIII. <i>'New' removed from paragraph 1.8 in appendix 'B' and circularity is included in paragraph 1.15 in appendix 'B'.</i></p> <p>XLIX. <i>Applicants are expected to consider issues holistically to achieve the best lighting outcomes for the development.</i></p> <p>L. <i>This is considered to be a wider issue for the development, some of which is not controlled by planning. The times are considered appropriate for the unique City context which needs to balance a range of uses.</i></p> <p>L. <i>This is considered clear in the "general presumption" and it is recognised in 3.10(e) that "Small-scale creative lighting has the potential to create welcoming routes and improve sense of place and should be employed where appropriate."</i></p>
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<p>LI. <u>Assessment</u>: some of the required performance criteria can't be validated on site. Should state how many points are needed to assess compliance such as the adoption of a formula such as spacing formula from BS EN 126464-2.</p> <p>LII. <u>Above ground level light</u>: In urban settings, levels are often higher at ground level compared with above. Residential windows below the first floor where light levels can be higher should be individually identified and efforts made to protect them from intrusive light.</p> <p>LIII. <u>Construction lighting</u>: This is well detailed / covered by CIRIA who have developed an Environmental good practice on site guide. A further consideration to make is the materials used for construction including site hoardings and visual impacts.</p> <p>LIV. <u>Glazing perimeter</u>: The lack of glazing perimeter reflectance can lead to a fall in uniformity of illumination over task areas. It has become standard practice in office schemes to support the uniformity with perimeter downlights. A risk this pushes design in a way that does not support the interior working environment. For example, uplight can be positive for visual comfort, glare control, enhancing wellbeing and creating a circadian supportive environment and guidance could lead to more direct only light with associated negatives.</p>	<p>LI. <i>Performance criteria can be evidenced through modelling/calculation and is used for other environmental impacts as part of planning applications, as stated in paragraph 4.9: "Evidence of compliance with the requirements in Tables 10-13 should be provided through details submitted by the applicant including outputs from light modelling studies." Whilst it may be useful to provide a formula for assessment points, it is considered beyond the scope of the document although the applicant is required to identify the existing context and sensitive receptors.</i></p> <p>LII. <i>Paragraph 4.10 has been added to acknowledge the lighting that directly affects the streetscape should be considered in the specific context and may exceed levels identified. The SPD also identifies that sensitive receptors should be identified at an early stage of the process.</i></p> <p>LIII. <i>The guidance has been included in Appendix 'D'. Regarding site hoarding, although related, is considered outside the remit of this SPD.</i></p> <p>LIV. <i>Paragraph 4.14 has been added to include design measures for proposals. In addition, each case will be considered on a case-by-case basis with input from an officer.</i></p>
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<p>Combined responses from resident groups</p>	
<p>I. <u>Control systems</u>: Should address issue of systems not working and lights left on or activated, should be required to turn off, and should be operational before condition discharged.</p> <p>II. <u>Applicable development</u>: Expectations on developments that are less than "Major" not clear. Explain what "(in line with SPD)" means.</p>	<p>I. <i>'Table 13' includes operation and maintenance details including for control systems. Planning conditions will require details, including for management, to be approved prior to lighting works and development must adhere to approved details.</i></p> <p>II. <i>Paragraph 2.2 amended to provide clarification. In line with SPD requires developers to consider the guidance and technical requirements for applications.</i></p>

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| <p>III. <u>Existing buildings</u>: Some changes to internal lighting schemes in existing buildings do not need planning permission, queried how will this be addressed in the Charter.</p> <p>IV. <u>Planning process</u>: Require that developers include discussions of lighting in their consultations with stakeholders, at pre-application, demolition and construction, and handover stages. To include lighting design, "lights off" times; and the commissioning of lighting management systems.</p> <p>V. <u>Blinds</u>: Should require blinds (including automated) next to residential and should state not acceptable for a developer or building manager to propose providing blinds as a mitigation to intrusive light. Blinds should be a planning condition and apply to all proposals including refurbishment. For paragraph 4.9 d) The use of the word "or" is problematic – developers should not be asked to choose between smaller windows or blinds.</p> <p>VI. <u>Glazing</u>: Should advise to reduce glazed areas in order to reduce light pollution.</p> <p>VII. <u>Residential amenity</u>: Needs to be reflected in all policies in the SPD and in Table 5. The advice in 'F' for temporary lighting should apply also to 'B' for residential amenity. Should refer to designing out "nuisance" (as in the section on "environmental impact"). Lighting concept design should also show planned mitigation to protect residential amenity.</p> <p>VIII. <u>Brightness zones</u>: Queried the process for agreeing a brightness zone and hence lighting curfew. Local residents should be consulted during the making of this agreement. The brightness zones do not really address the fundamental problem of light pollution including cumulative impacts. Should consider a fourth brightness zone to encompass areas of green and parkland and biodiversity and to follow the guidance.</p> <p>IX. <u>Refurbishment</u>: Does not include much reference to this and to 'retrofit' missing. Text should strengthened where developments, refits and refurbishments face directly onto homes in the City - both during construction and in later operation - including impact on health and wellbeing.</p> | <p>III. <i>Planning powers are limited to existing buildings. The Charter is a voluntary commitment for existing buildings, not for new development. The wider SPD applies to new development.</i></p> <p>IV. <i>'Table 2' updated to include "nearby sensitive receptors', and Paragraph 2.2 added to state importance of consultation with nearby sensitive uses, including developing a community engagement strategy.</i></p> <p>V. <i>The SPD includes a range of mitigation measures including at the early stage of design to avoid obtrusive light. A general condition is used for lighting details which requests details of mitigation for light spill, which could include blinds if appropriate. Amended 3.9(d) from "or" to "and".</i></p> <p>VI. <i>This is stated in paragraph 3.9(d).</i></p> <p>VII. <i>The advice and all sections should be considered holistically by applicants, and there is naturally some overlap. Paragraph 3.9 refers to addressing "nuisance" for residential amenity. Reference to residential amenity added to 'Table 3' for Lighting Concept.</i></p> <p>VIII. <i>District Brightness Zones (DBZs) have been amended to 'City Environmental Zones' which have been adapted from the ILP Guidance and tailored to the City context. Confirmation of these are the at discretion of officers as per paragraph 4.11. The requirement for consultation including nearby sensitive uses is included in paragraph 2.2 and 'Table 2'. The consideration of cumulative impacts has been added 'Table 2'.</i></p> <p>IX. <i>Refurbishment (where it is considered development) is mentioned in paragraphs 2.3 and 3.11, and is considered to cover 'retrofit' also. Paragraph 3.9 sets out the guidance to protect residential amenity for new development and also acknowledges that "...bright external and internal lighting schemes and light sources can not only cause a nuisance but also contribute to health issues including..."</i></p> |
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<p>X. <u>Curfew times:</u> Should be absolute limits and should be turned off earlier if possible. A 10 pm curfew is too late and blinds should be required to be used at 6pm. Intrusive lighting before 10.00pm is a nuisance which the City has a statutory duty to mitigate. Should apply to all proposals including refurbishment.</p> <p>XI. <u>Construction sites:</u> all lighting internal to the site (except specific safety lighting) should be switched off completely when work has finished for the day. Windows should be blacked out. Repercussions for not meeting requirements on construction sites should be clear. Should not fall short of the City of London's Code of Deconstruction and Construction which already mandates blacking out windows during fit out. make it clear that any glazing specified in the development must be capable of withstanding the blackout. should hold developers to their obligations to keep site lighting under control and fully black out windows once they are glazed and right through fit-out. Better compliance monitoring is crucial.</p> <p>XII. <u>Planning controls and enforcement:</u> In Westminster, the lighting strategy and design must be done by a suitably qualified lighting expert and that lighting conditions are not discharged until all is installed and commissioned by expert. Explain how will enforce compliance with conditions for operational use, such as with curfew. City will find it difficult to enforce the curfew, or any other lighting controls, through planning conditions as often many years after completion, developments do not have automated lighting systems operating. Add a further section to the SPD explaining how the City proposes to enforce compliance with conditions relating to operational use, such as making sure that the curfew is met. The lighting systems must demonstrate that they are operating in line with the design before planning conditions are discharged.</p> <p>XIII. <u>Street lighting:</u> Amend 4.9(g) to include public realm lighting and state that the same shall apply when replacing or repairing existing light fittings and luminaires. Should add specific routes including Barbican Podium Highwalk.</p>	<p>X. <i>The times are considered appropriate for the unique City context which needs to balance a range of uses. There are pre-curfew levels for earlier than 10pm.</i></p> <p>XI. <i>Appendix 'D' provides detailed guidance for construction lighting which applicants will be expected to follow. The applicant is likely to be required to submit separate detail for a scheme to protect residents from the construction phase, with detail to be reviewed by the Environmental Health team. Appendix 'D' now includes the following text: "Consideration should also be given to blocking windows to reduce obtrusive light during construction, especially when near to residential."</i></p> <p>XII. <i>The SPD encourages the appointment of a suitably qualified professional in paragraph 2.4 however it is not considered necessary to require this, although it is expected for major developments. The applicant will be required to adhere to details approved through condition discharge, and enforcement action will be taken if deemed appropriate.</i></p> <p>XIII. <i>'Table 12' addresses the replacement of lighting through the requirements for the operation and maintenance of lighting. This paragraph relating to street lighting has been removed and clarification has been added to the introduction at paragraph 1.12, and the application applies to new development.</i></p>
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<p>XIV. <u>Legislation references:</u> Mention of Section 17 of the Crime and Disorder Act 1998 which states that all relevant authorities have a duty to consider the impact of all their functions and decisions on crime and disorder in their local area and lighting is a key consideration here, especially in the public realm.</p> <p>XV. <u>Heritage assets:</u> Add: "Lighting located at heritage assets shall not be exempt from, or have a lower standard of, residential amenity related requirements."</p> <p>XVI. <u>Public realm:</u> Heavily planted terraces and planting should be considered when being lit as part of building identity including public realm trees and green walls, and whether this directly supports inclusion and accessibility and should state "wherever possible" as measures may actually be general legibility.</p> <p>XVII. <u>Skyglow:</u> Queried whether impact to sky glow will be required to be assessed.</p> <p>XVIII. <u>Charter:</u> Should award a "charter mark" following adoption, maintaining publicly available lists and regular publicity programmes, and should be funded. Lighting more than 2 metres from a window will still cause light spill especially when viewed from height. Should mention residential amenity. Officers should be responsive to complaints from residents. Should include changes to schemes that do not require planning.</p>	<p>XIV. <i>The SPD does not apply to street lighting, which is dealt with separately, paragraph 1.11 has been added to clarify.</i></p> <p>XV. <i>The SPD requires all issues to be considered holistically and paragraph 3.9 requires applicants to consider range of issues that impact on residential amenity.</i></p> <p>XVI. <i>Mention of roof terraces added at paragraph 3.12(c).</i></p> <p>XVII. <i>The SPD asks applicant to avoid contribution to obtrusive light, although is not requiring details for the contribution made to sky glow.</i></p> <p>XVIII. <i>The programme for management and publicity of the Charter is to be confirmed in due course, and these comments will be considered. The Charter is intended for existing buildings.</i></p>
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Consultation responses from organisations:

Ref	Organisation	Summary of response	City of London officer response
1	British Sign and Graphics Association	1. Exclude all forms of advertisement at the beginning of document. All advertisements must be considered only on considerations of amenity and public safety, as specified in the Control of Advertisements Regulations. Paragraph 4.7(c) would directly contradict the PPG by requiring a judgement of "need". As stated in the NPPF (paragraph 136) and the PPG (ID 18b-001-20140306), advertisements are	1. <i>The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended) states: "...factors relevant to amenity include the general characteristics of the locality, including the presence of any feature of historic, architectural, cultural or similar interest..." and that "...factors relevant to public safety include— (i) the safety of persons using any highway, railway, waterway, dock, harbour or aerodrome (civil or military); (ii) whether the display of the advertisement in question is likely to obscure, or</i>

		<p>controlled under a separate system as specified in the Control of Advertisements Regulations (which are not even mentioned in Part 2 of the draft SPD). The attempt to include them within this SPD creates confusion and inaccuracy, as well as direct contradiction of advice and law.</p> <p>II. Illuminated advertisements come in many colours and can be through coloured luminaires, although commonly white luminaires through coloured glass, Perspex etc. These would also fail the SPD's proposed limitations on colour.</p> <p>III. Paragraph 4.10 (n and o) not considering how Advertisements Regulations operate, 4.10(n) is vague and unclear.</p> <p>IV. Paragraph 4.10(o) would require dimmers to be fitted to all illuminated advertisements. This is not a requirement of the Advertisements Regulations. No need for dimmers to be fitted to every "advertisement" which, under the statutory definition in TCPA would include all road signs.</p> <p>V. District Brightness Zones (Table 8) is carried forward into Table 12 which seeks to define the maximum level of surface brightness of "illuminated media". From the supporting text (paragraph 5.13), this would appear to include "signs". What the SPD refers to as "signs" and "illuminated media" have no statutory definition.</p>	<p><i>hinder the ready interpretation of, any traffic sign, railway signal or aid to navigation by water or air; (iii) whether the display of the advertisement in question is likely to hinder the operation of any device used for the purpose of security or surveillance or for measuring the speed of any vehicle."</i></p> <p><i>All the aforementioned instances can be impacted by artificial light, therefore advertisements are considered relevant for the SPD and the relevant requirements it sets out are considered to be in the interests of amenity and/or public safety.</i></p> <p><i>In addition, the Light Pollution PPG, which advises on how to consider light within the planning system, states that "complaints to local authorities include domestic, shop or office exterior security lights, illuminated advertising and flood lighting, so these installations may require particular attention".</i></p> <p>II. <i>The guidance relating to colour relate to lighting interventions specifically not materiality.</i></p> <p>III. <i>These lighting principles have been amended to state: "(m) For illuminated advertising, impact to amenity and public safety should be carefully considered and to achieve this, should be in compliance with 'Table 12'; (n) Illuminated advertising should be fully dimmable and controllable to help manage visual brightness."</i></p> <p>IV. <i>Although not a requirement of the Regulations, dimming is considered best practice, where appropriate. Paragraph 4.19 states the guidance on illuminated advertisements would exclude highway signage.</i></p> <p>V. <i>The SPD has been amended to reflect definition of 'illuminated advertising' in Advertisement Regulations (as amended).</i></p>
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2	Buglife – The Invertebrate Conservation Trust	<p>I. The City lies partially on the North/South London B-Line. B-Lines are designed to reconnect our landscapes, enabling pollinators and other wildlife to move freely, and supporting nature's recovery. Light pollution impacts pollinators and their ability to pollinate, reducing rates by up to 62%, it is therefore vital that light pollution is reduced along B-Lines to ensure the safety of these habitats for pollinators.</p> <p>II. Recommend addresses Correlated Colour Temperature (CCT) within the biodiversity guidance. There is no, perfect CCT, however, it is thought that in general CCT lower than 2200k will provide the least impactful conditions for the widest range of organisms, while still providing adequate lighting needs for human activity.</p> <p>III. Encourage retrospective steps to reduce light pollution and setting environmental targets to reduce overall levels of light pollution in the City.</p>	<p>I. <i>Included reference to B-lines in paragraph 3.8(b).</i></p> <p>II. <i>Added text into biodiversity section: "Correlated Colour Temperature (CCT) for sensitive sites such as churchyards, and by the river in consultation with ecologists. Such requirements should be carefully balanced with any requirements for safety and security."</i></p> <p>III. <i>The Considerate Lighting Charter seeks to help to address existing building issues.</i></p>
3	City Property Association	<p>I. <u>Lighting Outcomes:</u> Should include supporting economic growth and the night-time economy.</p>	<p>I. <i>The role of lighting in supporting the business function of the City is already included in SPD as a key consideration.</i></p>

	<p>II. <u>Charter</u>: City Corporation should work in partnership with other London boroughs and/or the GLA when developing and initiating this policy to harness expertise, pool resources and avoid a proliferation of different and competing charters across the capital. Could place an additional burden on businesses.</p> <p>III. <u>Planning submission requirements</u>: Should review the level of information required in the early stages of the planning application process contained in the document as may be onerous.</p> <p>IV. <u>Lighting efficacy</u>: The requirement for exterior lighting efficacy is unclear throughout the document. It cites 70lm/cw but unclear if average installation or minimum for all luminaires. Part L & BREEAM current guidance calls for average, i.e. a more flexible approach. Building regulations Part L have different minimum efficacy requirements for different types of specialist lighting.</p> <p>V. <u>Lighting angle</u>: ILP guidance states this angle to be 70°. The requirement to reduce further to 45° may affect lower mounted lighting the most and discourage the use of pedestrian friendly lighting.</p> <p>VI. <u>Amenity lighting</u>: Unclear what is considered amenity lighting.</p> <p>VII. <u>Internal lighting</u>: The scope is frequently split between different consultants and it implies a coordinated response may be required.</p>	<p>II. <i>The consultation has included a wide range of expertise. City Charter is considered appropriate due to unique context.</i></p> <p>III. <i>Level of information required amended in 'Table 3' to remove technical information.</i></p> <p>IV. <i>'Table 6' amended to state: "All exterior lighting equipment should achieve efficiencies in line with the requirements of the Building Regulations and/or the requirements of BREEAM, whichever shall be the lowest in terms of lumens per circuit watt."</i></p> <p>V. <i>This has been amended to 60 degrees when considered ILP Guidance and the unique context of the City.</i></p> <p>VI. <i>Definition added to the Glossary.</i></p> <p>VII. <i>Noted. 'Table 3' has been amended to remove the requirement for some technical information at planning application stage.</i></p>
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	<p>VIII. <u>Technical requirements:</u> Clarify rationale behind the deviation from ILP's environmental zones, the 2m offset, and feasibility of restricting vertical illuminance values expected of rural and/or National Parks. Include methodology to help understanding and application of these requirements. New proposed District Brightness Zones are a significant deviation from ILP's environmental zones classification and seems particularly onerous for commercial buildings and for illuminated signs of up to 500cd/m2 to comply with. Equal Horizontal and Vertical illuminance values could potentially be set for a clash with the sign luminance values in Table 12. For <u>Advertisements:</u> There is no mention of size of sign/screen as a critical factor of perceived brightness. Values of table 12 are more onerous than the current ILP guidance PLG05 however the 'measuring plane' as suggests an average luminance value is to be taken which would provide a loophole for signs with significant variations in surface luminance i.e. digital media screens. No mention of daytime conditions and upper luminance values. Unclear how an illuminated sign to 500cd/m2 (250cd/m2 post curfew) can meet the values required on Table 11 for horizontal luminance on a 2m measuring plane.</p> <p>IX. <u>Dimming:</u> Setting dimming values prior to commissioning of installation seldom reflect the reality of brightness intended as luminaires dimming curves behave differently.</p> <p>X. <u>Charter:</u> Suggest the use of consistent language throughout the document to avoid ambiguity.</p>	<p>VIII. <i>The Technical Requirements guidance has been amended to more closely align with the ILP Guidance, and adapted for the City context. The guidance relates to artificial light at night-time.</i></p> <p>IX. <i>Noted. However the aim is to encourage best practice and a reduction of light pre and post curfew.</i></p> <p>X. <i>The Charter has been amended including for consistency with wider SPD, however the purpose of the Charter (for existing building) differs from the SPD (for new development).</i></p>
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4	CPRE London	<p>I. <u>Street lighting</u>: All authority owned street lighting should be <3000K with limits on spectral emissions under 500nm.</p> <p>II. <u>Light spill and pollution</u>: Fixtures should achieve zero upward light. Light pollution reduction targets should be established and link to biodiversity, energy-use and carbon emissions targets. Lighting development should follow industry standards and guidance for lighting and the reduction of obtrusive light.</p> <p>III. <u>Curfews</u>: Reduced illuminance curfews guided by British Standards should be used.</p> <p>IV. <u>Applicable applications</u>: Lighting impact assessments should be required for all major development, stating how impact on lighting in terms of spill, glare, sky glow and visual obtrusion will be kept to a minimum and with lighting having clear justification.</p> <p>V. <u>IDA Guidance</u>: Planning policies similar to those used in IDA (International Dark-Sky Association) places and protected landscapes (based on professional guidance which applies in any setting) should be adopted.</p> <p>VI. <u>Neighbouring boroughs</u>: Collaboration with neighbouring boroughs to ensure that lighting designs do not negatively impact over wider areas.</p> <p>VII. <u>Artistic and public realm lighting installations</u>: Those which aim to illuminate the night sky for effect, such as light towers, light domes, sky-scanners should be avoided. Should avoid prominent and bright installations that contribute to light pollution. Designers and artists should be required to meet an artistic brief that prioritises the environmental impact.</p>	<p>I. <i>Street lighting is informed by the Lighting Strategy (2018) and the requirements of the SPD do not apply. Text has been added to clarify at paragraph 1.12.</i></p> <p>II. <i>Zero upward light is considered too onerous in an urban setting. The Technical Requirements as been amended to more closely align with established ILP Guidance, and has been adapted for the unique City context.</i></p> <p>III. <i>The curfews have been applied to the unique context of the City which needs to balance a range of uses.</i></p> <p>IV. <i>Applies to all major development as set out in paragraph 2.3.</i></p> <p>V. <i>The SPD has considered a range of guidance including that published by the ILP. The City is a unique urban context and therefore relevant guidance has been adapted to reflect this.</i></p> <p>VI. <i>Neighbouring boroughs have been consulted as part of consultation. Paragraph 2.2 now states that applicants should refer to the Developer Engagement Guidance (2023) and develop a community engagement strategy for the development.</i></p> <p>VII. <i>Agreed. Paragraph 3.7 states: "a. The City Corporation's Lighting Strategy (2018) seeks the active reduction of all forms of obtrusive light including sky glow, light spill, glare, excessive visual brightness, and light intrusion" and "b. All developments within the City of London should take measures to limit all aspects of obtrusive light in accordance with the recommendations of this SPD and best practice." In addition paragraph 3.10 e) states: "Small-scale creative lighting has the potential to create welcoming routes and improve sense of place and should be employed where appropriate."</i></p>
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		<p>VIII. <u>Sustainability</u>: Compliance with sustainability metrics within projects should include light pollution.</p> <p>IX. <u>Illuminated advertising</u>: Recommend the SPD includes additional robust guidance regarding the location of LED advertising screens to ensure they are not installed on or near green spaces, nature reserves and Metropolitan Open Land.</p>	<p>VIII. <i>Sustainability issues for the wider development are assessed under a range of policies. Paragraph 3.6(c) states: "Buildings should seek to achieve the maximum number of credits for lighting in BREEAM Assessment (or similar schemes) using the most energy efficient lighting possible."</i></p> <p>IX. <i>The illuminated advertising section has been amended to more closely align with the ILP Guidance. Paragraph 3.8 sets out considerations for biodiversity including that "Lighting levels should generally be kept as low as possible with light focused only where it is needed in green areas / corridors."</i></p>
5	City of London Access Group (CoLAG)	<p>I. <u>General</u>: Guidance should be more specific throughout and less high level. Queried what needs will be considered most important of all issues when considering lighting, and access should leading consideration.</p> <p>II. <u>Guidance</u>: Should contain more specific accessibility guidance.</p> <p>III. <u>Needs of different people</u>: Glare and excessive visual brightness, pooling of light, affects those with sensory sensitivity and therefore should be mentioned including for neurodiversity, and people who are visually impaired and who suffer from chronic fatigue conditions.</p>	<p>I. <i>It is considered that each development should consider accessibility on a site-specific basis, and therefore additional work should be undertaken by the applicants, in consultation with stakeholders, when designing the development. Paragraph 3.12(b), added following text: "Lighting design, especially that which affects the public realm, should be informed by meaningful and constructive engagement, especially through engaging those with expertise and experience in accessibility, equality, diversity and inclusion" and reference to the Developer Engagement Guidance has been added as paragraph 2.2. Paragraph 3.12 also now acknowledges: "Lighting can affect the accessibility of the City by creating barriers". The applicant is required to balance the needs in each case, and must ensure the highest level of accessibility possible for each development.</i></p> <p>II. <i>Following added to Appendix C: Design for the mind – 'Neurodiversity and the building environment - Guide. PAS 6463:2022, The British Standards Institution' and lighting sections referenced for BS8300-1:2018 and BS8300-2:2018.</i></p> <p>III. <i>Paragraph 3.12(d) has been amended to include reference to inclusivity and accessibility and include pooling of light. This section aims to address a broad range of requirements as addressed in 3.12(a).</i></p>

	<p>IV. <u>Technical requirements</u>: Queried what had informed the proposed levels in technical requirements. Stated these requirements could result in less inclusive places.</p> <p>V. <u>Arrival modes</u>: Should include motorised vehicles including wheelchair or accessible parking.</p> <p>VI. <u>Format of document</u>: Accessible and easy read versions should be provided.</p> <p>VII. <u>Safety</u>: Impact of SPD could be to create unsafe conditions.</p> <p>VIII. <u>Reflections</u>: Make reference.</p> <p>IX. <u>Routes</u>: Importance of ability to preview route and requires adequate lighting.</p> <p>X. <u>Lighting concept</u>: Importance of uniformity of lighting of the public realm including building façades.</p> <p>XI. <u>Maintenance of lighting</u>: Important for the continuing accessibility and inclusion.</p> <p>XII. <u>Public Realm</u>: Link should also be made to signage policy and inclusion also needs to be mentioned.</p> <p>XIII. <u>Sustainability and climate change</u>: Emphasise that the health of disabled and elderly people is already often under stress and so regard for well-being will be particularly impactful for these groups.</p>	<p>IV. <i>The levels have been informed by the established ILP guidance and adapted to the City context. The 'Technical requirements' do not apply to street lighting, and paragraph 4.13 has been amended to include 'accessibility'.</i></p> <p>V. <i>Reference to 'wheelchair users' and 'motorised travel' added to Section 'F'.</i></p> <p>VI. <i>Accessible version will be provided and easy read will be considered.</i></p> <p>VII. <i>Safety is a key consideration of the document and curfew times do not apply to essential lighting required for accessibility and safety and does not apply to street lighting.</i></p> <p>VIII. <i>Mentioned in paragraph 3.12(d)</i></p> <p>IX. <i>Mentioned in paragraph 3.12(c).</i></p> <p>X. <i>This is covered in the Lighting Strategy (distribution) that is to be re-submitted with the Lighting Concept.</i></p> <p>XI. <i>'Table 13' addresses the requirement for operation and maintenance of lighting to ensure ongoing success.</i></p> <p>XII. <i>These are covered separately in the Public Realm, and Safe and Inclusive Design sections and there is naturally overlap throughout the document. The applicant is required to balance the needs in each case, and must ensure the highest level of accessibility possible for each development.</i></p> <p>XIII. <i>An important point, however further detail for WELL standard measures this is considered to be outside the remit of the SPD.</i></p>
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<p>6</p>	<p>DP9 on behalf of the Tower Limited Partnership</p>	<p>I. <u>Existing lighting</u>: Seeking to confirm that the lighting display on the Tower 42 building will not be subject to the constraints sought in the SPD. Include that the technical requirements section are not applicable to developments that have been consented and/or completed when SPD adopted.</p> <p>II. <u>Proposed Curfews</u>: 'Residential amenity' section should state that external lighting serving a public</p>	<p>I. <i>The SPD encourages all existing building occupiers to sign up to the Considerate Lighting Charter. The SPD requirements apply to new development.</i></p> <p>II. <i>It is considered this is addressed in paragraph 4.13 which states that 'Table 9: Lighting curfew times' for external lighting, except that specifically required for accessibility, safety and crime prevention such as street and essential amenity lighting, should automatically switch off, or be dimmed down to pre-agreed</i></p>

		<p>function should be exempt from the lighting curfew times.</p> <p>III. <u>The Charter</u>: for actions 9 to 11, request that clarification added that where lighting on buildings has already been agreed with the City of London, these actions will not be applicable.</p>	<p>levels.</p> <p>III. <i>This is not agreed as the Charter represents best practice at current day and is a voluntary commitment for existing buildings.</i></p>
7	Hertfordshire and North London Sustainable Places, Environment Agency	<p>I. <u>Lighting Strategy</u>: Should be updated to include Bats as a sensitive receptor.</p> <p>II. <u>Table 3</u>: Add that visual material should illustrate the impacts to sensitive receptors such as rivers, parks, gardens and churchyards with lighting levels clearly labelled.</p> <p>III. <u>Table 4</u>: Add that material should clearly illustrate the impacts to sensitive receptors and mitigation implemented to reduce this.</p>	<p>I. <i>Table amended to include 'sensitive receptors', which could include bats.</i></p> <p>II. <i>Addressed in 'III' below.</i></p> <p>III. <i>The following text added to 'Table 4': Should clearly demonstrate the impacts to sensitive receptors and mitigation implemented to reduce this."</i></p>
	Greenspace Information for Greater London CIC	<p>I. <u>GiGL</u>: Reference to GiGL in paragraph 4.8(I), should be rephrased to: "Developments should consult the existing evidence base, including a data search report from Greenspace Information for Greater London CIC (GiGL), which includes information on species and Sites of Importance for Nature Conservation (SINCs)."</p> <p>II. <u>Table 2(F)</u>: Reference to the mitigation hierarchy (avoid, mitigate, compensate) should be added, so if applicants foresee any potential biodiversity impacts they demonstrate the steps that will be taken to avoid, mitigate and compensate for potential impacts.</p>	<p>I. <i>Paragraph 4.8 amended to include suggested text.</i></p> <p>II. <i>The following text has been added to 'Table 2(f)': "...proposed mitigation measures..."</i></p>
9	Historic England	Welcome and support SPD.	Noted.

10	London City Airport	<p>I. <u>Aircraft Safety</u>: Obtrusive lighting can cause a risk to aircraft safety, particularly on take-off or landing if directed towards an airport. This risk should be acknowledged due to proximity of London City Airport.</p> <p>II. <u>Construction</u>: The use of lighting on tall cranes is necessary to protect aircraft safety, and a reference to the CAAs CAP1096 'Guidance to crane users on aviation lighting and notification' should be included to highlight the safety requirements.</p>	<p>I. Additional wording added to Topic 'A' and to Appendix 'C'.</p> <p>II. Guidance added to Appendix 'C'.</p>
11	London School of Economics, Department of Sociology	<p>I. <u>Expertise</u>: Text could be stronger for tables 1 and 2: at RIBA 1 it says to 'consider the early appointment of a lighting design professional'. Would be great if consulting a professional were mandatory at the earliest possible stage, and at RIBA 7 to push for required post-implementation assessment. Better to emphasise lighting designer rather than illumination engineer in the text.</p> <p>II. <u>Social Impacts</u>: These are fragmented in SPD, split between several headings. Emphasis needed on awareness of the range and diversity of users of the area who might be impacted, and consideration of diverse or conflicting lighting needs between those users. Developers should be asked to profile their area socially to consider diverse needs and implications for different elements of the community potentially at RIBA 1 or 2, add: "Consider researching the social composition of usership in the area and the different needs and impacts of lighting on diverse users." Ensure different constituents have a voice in this process and include requirement to do a serious analysis that identifies stakeholders and then considers their needs and potential impacts. For obtrusive or excessive light, there is social difference between potential users of a space for how this is defined.</p>	<p>I. It is not considered necessary to require this of applicants, however will be encouraged and expected, especially for major development. Post-implementation assessment can be considered by Officers on a case-by-case basis.</p> <p>II. Added text in 'Table 2': "Consider the social composition of the area and the different needs and impacts of lighting on diverse range of users". Paragraph 2.2 has been added to encourage applicants to produce a community engagement strategy to inform the proposals based on the unique context.</p>

		<p>III. <u>Table 2</u>: Should be asked to look at conflicts and complexity: e.g. "B. Analysis", the answers may be very different. Should be asked to expand on these criteria in terms of conflicting answers to these questions.</p> <p>IV. <u>'Topic A'</u>: Should state that although we are all concerned to reduce light pollution and energy consumption, this is a City and the overall aim is not to promote darkness above all else.</p> <p>V. <u>Biodiversity</u>: Should add "developers should actively seek the best possible current scientific advice". Point L refers them to the two main bodies however more is needed.</p> <p>VI. <u>Office lighting</u>: Lack of treatment of commercial lighting, and the over-illumination of office blocks, through the night. Queried whether this could be brought into the planning process, and there should be more explicit reference.</p>	<p>III. As 'II' above, additional text has been included in 'Table 2'.</p> <p>IV. It is considered this is addressed in the Technical Requirements section which excludes lighting required for accessibility, safety and crime prevention such as street and essential amenity lighting.</p> <p>V. Text has been added to paragraph 3.8: "n. Applicants should actively seek the best possible up-to-date scientific information and advice."</p> <p>VI. Paragraph 3.7 addresses obtrusive light and paragraph 4.14 has been added to the Technical Requirements section, which sets out design measures which would also apply to highly glazed buildings. The Considerate Lighting Charter seeks to address existing building issues.</p>
	Natural England	Do not wish to comment.	Noted.
13	Project Management London	The SPD should not only apply to new developments. Existing buildings have lighting on after hours.	<i>There are limits to controls outside of planning and the SPD applies to new development. The Considerate Lighting Charter seeks to address issues with existing buildings.</i>
14	Surveyor to the Fabric of St. Paul's Cathedral	I. <u>Policy</u> : Include explicit reference to the relevant policy, guidance and assessment regimes, in particular for heritage, townscape (in Topic D), and visual impact assessments. Should be embedded in text and more holistic in their outlook e.g. it would be useful if 'Topic C: Public Realm', which deals with views and explicitly referenced landmarks, more clearly referenced policy and guidance regarding view management used in	I. <i>Reference to Developer Engagement Guidance (2023) has been added at paragraph 2.2. The document includes detailed policy in Appendix 'B' and additional references not considered necessary to keep document concise. St. Paul's Cathedral is mentioned in paragraph 3.10.</i>

		<p>development. Should include more reference to City guidance e.g. the Developer Engagement Guidance.</p> <p>II. <u>Heritage assets</u>: Developers should recognise that the preservation and enhancement of heritage assets can either be achieved by lighting the heritage asset or by not lighting a new development, and thus not distracting attention from the heritage context or setting.</p> <p>III. <u>DBZs</u>: Should ensure that key landmark features (such as St Paul's and the Tower of London) are the dominant feature in views. Applicant must understand the cumulative effect of their proposals and if there is a breach of key contrast and illuminance levels, if not proven by design and clear calculation or modelling, the lighting proposal could be refused approval.</p> <p>IV. <u>The Charter</u>: Point 3 should include a list of sensitive receptors such as a 'consultee list' in relation to the City's Statement of Community Involvement. St. Paul's Cathedral can be seen from such a long distance, therefore it is very important for the Cathedral to be identified as a receptor and for developers to be alerted explicitly to these very long distance 'neighbours'.</p>	<p>II. <i>Text strengthened as suggested in paragraph 3.11(b).</i></p> <p>III. <i>'Cumulative impact' has been added to 'Table 2'. 'Paragraph 4.1 states "Where deviation occurs from these Technical Requirements applicants should explain their reasons and justify their design decisions including providing mitigation where needed."</i></p> <p>IV. <i>Paragraph 2.2 of the Charter includes the following commitments: "Consulting neighbouring properties, particularly those who are most affected by our lighting, as part of the review. We will publish information about changes to our internal and external lighting and provide contact details." Paragraph 2.2 of wider SPD now includes reference to Developer Engagement Guidance (2023). In addition, the following has been added to 'Table 2': "...and nearby sensitive receptors" and to 'Table 4': "Should clearly demonstrate the impacts to sensitive receptors and mitigation implemented to reduce this." St. Paul's Cathedral is mentioned in paragraph 3.10 which states "Lighting directly contributes to the character of the City of London after dark. This can range from the experience of pedestrians at street level to an appreciation of the skyline and key landmarks such as St. Paul's Cathedral when seen from a distance."</i></p>
15	The Royal Borough of Kingston Upon Thames	Should reference and align with the guidance from BCT and ILP's Bats and artificial lighting in the UK - Bats and the Built Environment series (Guidance note 08/18). There will be a 'Bats and Artificial Lighting' Guidance Note 2023 update available shortly.	<i>Noted. Reference to guidance added to Appendix 'C'.</i>
16	Virtual UK Services Company	Some existing commercial employ control systems. Queried whether applies to residential.	<i>The SPD applies to all new development.</i>

17	Port of London Authority	<p>I. Developments should minimise light spill and light intrusion that adversely impacts biodiversity, particularly in areas adjacent to or over the River.</p> <p>II. Lighting on or adjacent to the River Thames needs to consider any impacts to navigation, to ensure that proposed lighting does not cause a hazard for vessels using the river. SPD should reference this, potentially on page 12 (f) in reference to all lighting next to the River Thames.</p>	<p><i>I. Paragraph 3.8 (f) and (j) address this.</i></p> <p><i>II. Text added to paragraph 3.7(g).</i></p>
18	Surrey County Council	Confirmed do not have any comments to raise.	<i>Noted.</i>