



Port Health & Environmental Services Committee

Date: TUESDAY, 7 MAY 2024
Time: 11.00 am
Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL
Members:

Mary Durcan	Wendy Hyde
Deputy Peter Dunphy	Henry Jones
George Abrahams	Deputy Elizabeth King BEM JP
Shahnan Bakth	Gregory Lawrence
Alderman Alexander Barr	Andrew McMurtrie
Deputy Christopher Boden	Deborah Oliver
Tijs Broeke	Deputy Henry Pollard
Deputy Timothy Butcher	Hugh Selka
Deputy Simon Duckworth OBE D L	Deputy Dr Giles Shilson
Deputy John Edwards	Alethea Silk
John Foley	Mandeep Thandi
Dawn Frampton	Luis Felipe Tilleria
Deputy Marianne Fredericks	Jacqui Webster
Steve Goodman OBE	Glen Witney
Caroline Haines	Alderman Kawsar Zaman
Jaspreet Hodgson	

Enquiries: **Kate Doidge**
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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. **COURT ORDER**

To receive the Order of the Court of Common Council dated 25th April 2024 appointing the Committee and setting its Terms of Reference.

For Information
(Pages 5 - 6)

4. **ELECTION OF CHAIRMAN**

To elect a Chairman in accordance with Standing Order No. 29.

For Decision

5. **ELECTION OF DEPUTY CHAIRMAN**

To elect a Deputy Chairman in accordance with Standing Order No. 30.

For Decision

6. **MINUTES**

To agree the public minutes and non-public summary of the meeting held on 12th March 2024.

For Decision
(Pages 7 - 12)

7. **OUTSTANDING ACTIONS**

Report of the Town Clerk.

For Information
(Pages 13 - 14)

8. **APPOINTMENTS TO SUB COMMITTEES AND REPRESENTATIVES TO OUTSIDE BODIES**

Report of the Town Clerk.

For Decision
(Pages 15 - 20)

9. **DRAFT AIR QUALITY STRATEGY 2025 TO 2030**

Report of the Interim Executive Director for Environment.

For Decision
(Pages 21 - 92)

10. **ANIMAL HEALTH TEAM - ADJUSTMENT TO FEES**

Report of the Interim Executive Director for Environment.

For Decision
(Pages 93 - 96)

11. **COMMERCIAL ENVIRONMENTAL HEALTH SERVICE PLAN 2024-25**

Report of the Interim Executive Director for Environment.

For Decision
(Pages 97 - 130)

12. **BREXIT READINESS - VERBAL UPDATE**

Interim Executive Director for Environment to be heard.

For Information
(Verbal Report)

13. **REPORT OF ACTION TAKEN**

Report of the Town Clerk.

For Information
(Pages 131 - 134)

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

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

Any items of business that the Chairman may decide are urgent.

16. **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

17. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on Tuesday 12th March 2024.

For Decision
(Pages 135 - 136)

18. **PORT HEALTH AND ENVIRONMENTAL SERVICES DEBTORS - PERIOD ENDING 31 MARCH 2024**

Report of the Interim Executive Director for Environment.

For Information
(Pages 137 - 146)

19. **WALBROOK WHARF UPDATE ON SOFT MARKET TESTING**

Report of the City Surveyor.

For Information
(Pages 147 - 166)

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

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

MAINELLI, Mayor	RESOLVED: That the Court of Common Council holden in the Guildhall of the City of London on Thursday 25 th April 2024, doth hereby appoint the following Committee until the first meeting of the Court in April, 2025.
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PORT HEALTH & ENVIRONMENTAL SERVICES COMMITTEE

1. **Constitution**
A Ward Committee consisting of,
 - two Aldermen nominated by the Court of Aldermen
 - up to 31 Commoners representing each Ward (two representatives for the Wards with six or more Members regardless of whether the Ward has sides) or Side of Ward.

2. **Quorum**
The quorum consists of any nine Members.

3. **Membership 2024/25**

ALDERMEN

- 8 Alexander Robertson Martin Barr (*also representing the Ward of Cordwainer)
- 3 Kawsar Zaman

COMMONERS

3	Steve Goodman OBE.....	Aldersgate
1	Deborah Oliver TD.....	Aldersgate
3	Mandeep Thandi	Aldgate
3	Luis Felipe Tilleria	Billingsgate
3	Simon D'Olier Duckworth, OBE DL, Deputy	Bishopsgate
10	Wendy Marilyn Hyde.....	Bishopsgate
3	Dr Giles Robert Evelyn Shilson, Deputy	Bread Street
2	Hugh Selka.....	Bridge and Bridge Without
3	Shahnan Bakth.....	Broad Street
3	Christopher Boden, Deputy.....	Candlewick
8	Mary Durcan	Castle Baynard
3	Glen David Witney.....	Castle Baynard
8	Tijs Broeke.....	Cheap
9	Andrew Stratton McMurtrie JP.....	Coleman Street
8	Alexander Robertson Martin Barr, Alderman*.....	Cordwainer
12	Peter Gerard Dunphy, Deputy.....	Cornhill
1	Dawn Frampton	Cripplegate
2	Jacqueline Webster	Cripplegate
11	James Henry George Pollard, Deputy.....	Dowgate
5	John Ernest Edwards, Deputy	Farringdon Within
2	John Ross Foley	Farringdon Within
4	George Christopher Abrahams.....	Farringdon Without
1	Gregory Alfred Lawrence	Farringdon Without
2	Timothy Richard Butcher, Deputy	Langbourn
	(Lime Street has paired with Cornhill for this appointment)	Lime Street
8	Henry Llewellyn Michael Jones MBE.....	Portsoken
3	Caroline Wilma Haines.....	Queenhithe
4	Marianne Bernadette Fredericks, Deputy	Tower
2	Jaspreet Hodgson.....	Vintry
3	Alethea Silk.....	Walbrook

Together with the following Member in place of the Ward (Bassishaw) not taking up their appointment on this occasion:-

Elizabeth Anne King, BEM, Deputy

4. **Terms of Reference**

To be responsible for:-

- (a) all the City of London Corporation's environmental health, port health, animal health, consumer protection, licensing (with the exception of those which are in the province of another Committee), public conveniences, street cleansing, refuse collection and disposal, the street trading enforcement functions in the London Local Authorities Act 1990 including any decision as to whether the s.101 arrangements should be discontinued, and cemetery and crematorium functions;
- (b) the implementation of those sections of any Acts of Parliament and/or European legislation which direct that the local authority take action in respect of those duties listed at (a) above;
- (c) determining any appeals against a decision not to grant City premises a licence under the provisions of the Marriage Act 1994 and the City of London (Approved Premises for Marriage) Act 1996 to conduct civil marriage ceremonies;
- (d) the appointment of the City of London Coroner;
- (e) making recommendations to the Court of Common Council in respect of the making and sealing of byelaws for the variance of charges at the Animal Reception Centre.

PORT HEALTH & ENVIRONMENTAL SERVICES COMMITTEE

Tuesday, 12 March 2024

Minutes of the meeting of the Port Health & Environmental Services Committee held at the Guildhall EC2 at 11.00 am

Present

Members:

Mary Durcan (Chairman)	Henry Jones
Deputy Peter Dunphy (Deputy Chairman)	Deputy Elizabeth King BEM JP
Deputy Timothy Butcher	Natasha Maria Cabrera Lloyd-Owen
Deputy John Edwards	Andrew McMurtrie
Helen Fentimen OBE JP	Deputy Henry Pollard
John Foley	Hugh Selka
Steve Goodman OBE	Deputy Dr Giles Shilson
Jaspreet Hodgson	Glen Witney
Wendy Hyde	

Officers:

Bob Roberts	- Interim Executive Director for Environment
Joanne Hill	- Environment Department
Ian Hughes	- Environment Department
Joe Kingston	- Environment Department
Susie Pritchard	- Environment Department
Rachel Pye	- Environment Department
Gavin Stedman	- Environment Department
Jenny Pitcairn	- Chamberlain's Department
Frank Marchione	- Comptroller and City Solicitor's Department
Kate Doidge	- Governance Officer

1. APOLOGIES

Apologies were received from Alderman Alexander Barr, Deputy Christopher Boden, Alderman Prem Goyal, Deputy Marianne Fredericks, Caroline Haines, Deputy Alastair Moss, Alethea Silk, Henrika Priest, and Jason Pritchard.

Deputy Simon Duckworth, Deputy Marianne Fredericks, Jason Pritchard, Alethea Silk, and Luis Tilleria observed the meeting virtually.

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

There were no declarations.

3. MINUTES

The Committee received the public minutes and non-public summary of the previous meeting, held on 9 January 2024, for approval.

RESOLVED – That the public minutes and non-public summary of the previous meeting, held on 9 January 2024, be approved as a correct record.

The Committee discussed the following matters arising from the minutes, as follows:

Nicotine Inhaling Products (Vapes)

The Committee heard that officers were visiting the premises which sold nicotine inhaling products (vapes), in order to ensure they were aware of their duties for proper disposal.

City of London Police Horses

The Committee heard that the issue of horses leaving waste on the streets had been raised with the Commissioner.

Wooden Planters on London Bridge

The Committee heard that some of the planters on London Bridge were owned by the City Corporation, and the remainder were owned by Transport for London (TfL). Funding was being sought to fix or replace the planters owned by the City Corporation, and there was work with the third party for funding to fix the planters owned by TfL.

Dog Fouling and Bins

The Committee heard that the Natural Environment Board had approved a City Gardens Keeper. It was raised that there were no bins for dog waste within the City of London area, or signs on fines for littering. The Committee heard that £90k of fines were issued in the last year, which covered all types of littering. Historically, there were no dog waste bins as there had been few dogs in the City of London area. Bins had to be placed strategically around the City, and having separate dog waste bins would have to be considered further following the review of the recently-approved street cleansing resources.

The Committee requested that standard wording be circulated that could be provided to residents on the actions taken on street cleansing resources, and how residents could feed into the review process in the future.

4. **OUTSTANDING ACTIONS**

Members received the Committee's Outstanding Actions.

The Committee heard that the Interim Executive Director, Environment Department, had raised the Committee's concerns on the noise from the London Underground that were affecting the Barbican Estate to TfL. A letter would be sent to TfL re-stating the urgency and importance of the issue. The Committee heard that due to costs of the works, this could not be prioritised within TfL among its other works. The letter would state for this to be considered as a priority.

The Committee requested that Members be copied into the letter sent to TfL.

5. **DRAFT HIGH-LEVEL BUSINESS PLAN 2024/25 - ENVIRONMENT DEPARTMENT**

The Committee received a report of the Interim Executive Director for Environment, concerning the approval of the draft High-Level Business Plan 2024/25 for the Environment Department.

It was confirmed that the noise strategy was held within the Public Protection Team.

Feedback was requested on the strategic commitment to Destination City, and the implications for the Committee based on the shifts on working and living in the City of London. The Committee heard that there was a review into Destination City on its future emphasis. Street cleansing was an example of how the Committee would be affected, but this did not fall into one strategy but rather across multiple departments at the City Corporation.

RESOLVED – That Members:

- (i) Note the factors taken into consideration in compiling the Environment Department Business Plan; and
- (ii) Approve, subject to the incorporation of any changes sought by this Committee, the elements of the draft high-level Business Plan 2024/25 (Appendix A) which fall into the remit of the Port Health and Environmental Services Committee.

6. **BUSINESS PLAN 2023/24: PROGRESS REPORT (PERIOD TWO: 1 AUGUST - 30 NOVEMBER 2023)**

The Committee received a report of the Interim Executive Director for Environment concerning the Business Plan 2023/24 Progress Report, for Period Two (1 August – 30 November 2023).

RESOLVED - That the report be received, and its contents noted.

7. **RISK MANAGEMENT UPDATE**

The Committee received a report of the Interim Executive Director for Environment, concerning a risk management update.

A Member queried what actions were being taken to mitigate the risk of fire or flooding at Walbrook Wharf. The Committee heard that officers worked with the City Surveyor to ensure clarity on the risks and challenges from fire, given the context of Grenfell in recent years. There could be additional funding for building repairs and maintenance as part of a separate review of facilities. There was a longer-term review of Walbrook Wharf that would look at the state of the building and the nature of the equipment. There were short-term requirements to ensure that the building was fit for purpose, and a longer-term plan for managing the property. There would be further information following soft-market testing. On flooding, there was a Riverside Strategy that looked at mitigating the risk of flooding from the breaking of the riverside wall and considered a longer-term plan for riverside protection. Following this, it was suggested that the Risk Register be amended to remove the reference that the City Corporation was unable to reduce the likelihood or impact of the risk, given the steps taken as described above.

The Committee heard that the funding from Defra was allocated until July 2024 for the Port Health Service in its Brexit preparations. From July, the charges would work toward a full-cost recovery service. Officers had been working with the Chamberlain to ensure that the budget took account of the additional controls and the additional generated funding. To mitigate the risk, fixed-term contracts were being used, and officers had written to Defra to raise the uncertainty of funding. Defra were supportive of the plan, and there was reserve funding to offset any losses. With regards to any impact from a General Election, the phased introduction of controls had been set and had begun in January 2024. There were later phases which could be affected by a General Election but this was unknown. Following a query on whether the additional costs could cause a rise in food inflation, the Committee heard that when any food imported was subject to multiple charges, such as storage costs. The Port Health service charge was a small percentage of these charges. Officers would follow up on the exact percentage.

The 'Driver Check' issues were caused by an IT integration issue. This was currently being mitigated using manual updates, which took time and resource. The issue had been escalated with the HR Department to resolve this matter and was reported on daily. This also changed daily, as it was affected by casual workers, contractors, and staff departures.

RESOLVED – That the report be received and its contents noted.

8. **RE-INTRODUCTION OF STREET CLEANSING RESOURCES - VERBAL UPDATE**

The Committee received a verbal update of the Interim Executive Director for Environment concerning an update on the Street Cleansing Resources.

The Committee noted that a report would be received at its meeting in September 2024, which would concern the impact of the additional resources agreed by the Committee. A project plan had been implemented, and officers had been meeting regularly with Veolia to map out 'beats'. Recruitment was currently underway. Keep Britain Tidy were independently monitoring the work and had been commissioned to undertake this on evenings and weekends. From 15th April 2024, all resources should be deployed.

Following a query on the responsibility of litter surrounding stations, it was confirmed that there were boundaries between the stations and the streets. Officers would meet and engage with Network Rail if there were issues regarding litter around stations.

RESOLVED – That the verbal report be received.

9. **PORT HEALTH BREXIT READINESS - VERBAL UPDATE**

The Committee received a verbal update of the Interim Executive Director for Environment concerning Port Health Brexit Readiness.

The Committee heard that on 31st January 2024 pre-notification paperwork for importers had been introduced. From 30th April 2024, there would be physical, sampling, and identity checks on medium risk food and feed. There had been engagement with teams across the multiple ports to ensure the correct shift patterns and resourcing, and the process for recruiting and onboarding of new staff was underway. Defra had agreed a phased introduction of approximately 40 new officers. This was to cover the increased work in documentary checks. The increased work was matching the estimations made. There were regular meetings with Defra, other relevant government agencies, trade bodies, and individual importers to prepare for the implementation of the changes from 30th April. The Committee would be updated on the progress.

Following a query, the Committee heard that the City Corporation had the responsibility for the regulatory services at the ports. The port operators provided the facilities. The funding from Defra included staffing and equipment, and the income from the new border control regime would support full cost recovery in the future.

RESOLVED – That the verbal report be received.

10. **DATES OF FUTURE COMMITTEE EVENTS**

The Committee received a report of the Town Clerk concerning dates of future committee events. The Port of Tilbury 2 would include visiting the new facility designed to deal with the EU trade. The Annual River Inspection would include a visit to Walbrook Wharf, and the incinerator further down the river.

On the Fishery Experiment, the Committee heard that following its requests for the event to have a more scientific approach, officers had been reaching out to educational institutions, and working with the Environment Agency and Port of London Authority to provide the best impact from the event. Officers would also be contacting relevant companies and individuals for funding and sponsorship.

RESOLVED – That the report be received and its contents noted.

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

The Committee noted that a question had been submitted to the Court of Common Council concerning recognising the anniversary of the Royal National Lifeboat Institute (RNLI). Due to time constraints, the response had been received to the Member in writing. The Member in question raised whether the City Corporation could recognise the work of the RNLI on the Thames. It was noted that concerns had previously been raised with the RNLI's connection to slavery. It was agreed that a representation be made to the Civic Affairs Sub-Committee, and the Members comments would be passed onto the relevant officers. It was noted that safety on the Thames sits with the Port of London Authority. A response would be provided separately on the commemoration of the Marchioness disaster.

A question was raised on demographic data provided under Agenda Item 5. The data could not be broken down further as there was a risk of individuals

being identified. The data could be linked to the Social Mobility Strategy in future reports.

12. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
There were no items of public urgent business.
13. **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.
14. **NON-PUBLIC MINUTES**
RESOLVED – That the non-public minutes of the previous meeting held on 9 January 2024 be approved as a correct record.
15. **HEATHROW ANIMAL RECEPTION CENTRE UPDATE**
The Committee received a report of the Interim Executive Director for Environment concerning an update on the Heathrow Animal Reception Centre (HARC) forward plan.
16. **REPORT OF ACTION TAKEN**
The Committee received a report of the Town Clerk concerning a Report of Action Taken.
17. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
There were no non-public questions.
18. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERED URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**
There were no items of non-public urgent business.

The meeting closed at 12.31 pm

Chairman

Contact Officer: Kate Doidge
kate.doidge@cityoflondon.gov.uk

Port Health & Environmental Services Committee – Outstanding Actions

Item	Date	Action	Officer(s) responsible	To be completed/ progressed/ to next stage	Progress Update
1. Page 13	15 January 2019	Measurement and mitigation options for operational rail noise from London Underground affecting the Barbican Estate	Executive Director of Environment	Ongoing	<p>A meeting was held on 30th January. LUL have now completed their Tunnel Vibration Investigation to understand the effect of moving the points and crossings (P&C) currently situated under Brandon Mews further west onto the floating slab track. The study has shown that moving the P&Cs would reduce noise experienced by residents in Brandon Mews markedly without causing a negative effect elsewhere.</p> <p>LUL also outlined the financial position TFL are facing and detailed the projects which are being prioritized for future spend.</p> <p>A letter seeking the commitment of TFL to prioritise this issue at a future date has been sent and circulated to this committee.</p>

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Agenda Item 8

Committee(s): Port Health and Environmental Services Committee	Dated: 7 th May 2024
Subject: Appointments to Sub Committees and Representatives to Outside Bodies	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	N/A
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: Town Clerk	For Decision
Report author: Kate Dodge, Governance Officer, Town Clerk's Department	

Summary

Members are asked to approve various appointments which the Port Health and Environmental Services Committee makes annually to various other Committees and outside bodies. Further information on these bodies, including the previous appointees for 2023/24, is included at Appendix 1.

Recommendation(s)

- (i) That Members:-
- Appoint a Member of this Committee to serve on the Local Plans Sub-Committee;
 - Appoint a Member of this Committee to serve on the Streets and Walkways Sub-Committee;
 - Appoint a Member of this Committee to serve on the Projects and Procurement Sub-Committee;
 - Appoint a Member of this Committee to serve as a representative on the Thames Estuary Partnership;
 - Appoint a Member of this Committee to serve as trustee on Thame21's Board.
- (ii) That Members: -
- Note that the Chairman, or their representative, shall serve of the Health and Wellbeing Board;
 - Note that the Chairman and the Deputy Chairman, or their representatives, shall serve on the Crime and Disorder Scrutiny Sub Committee.

Appendices

- Appendix 1 – Further information on Committee appointments

Kate Doidge

Governance Officer, Town Clerk's Department

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Appendix 1 – Further Information on Committee Appointments

The following Sub Committees and Outside Bodies are for the Committee to determine an appointment:

a) Local Plans Sub (Planning and Transportation) Committee

This Sub-Committee is sometimes also referred to as the Local Implementation Plan Sub Committee. Its remit is to consider items relating to the Local Development Framework or the Local Implementation Plan that are referred to them for detailed consideration as necessary. A representative of the Port Health and Environmental Services Committee is appointed to this Sub Committee.

2023/24 appointee: Elizabeth King

b) Streets and Walkways Sub (Planning and Transportation) Committee

The Sub Committee is principally concerned with agreeing schemes affecting the function and appearance of the City's highways and walkways. Such schemes would include those associated with the Street Scene Challenge and planning obligations as well as City of London funded initiatives. The Sub Committee also report back, periodically, to the Planning & Transportation Committee on progress in implementing the Committee's plans, policies and strategies to streets and walkways. A representative of the Port Health and Environmental Services Committee is appointed to this Sub Committee.

2023/24 appointee: Deputy Oliver Sells

c) Projects and Procurement Sub Committee

Projects and Procurement Sub-Committee (Sub-Committee of Finance Committee) provides dedicated scrutiny for all City Corporation and City of London Police procurement contracts as prescribed in the Procurement Code, with a view to driving value for money. It also provides dedicated scrutiny for all City Corporation and City of London Police Projects as prescribed by the Projects Procedure.

The Sub-Committee agreed a renewed composition of the Sub-Committee in April 2024, which includes one representative of the Port Health and Environmental Services Committee.

d) Thames Estuary Partnership

The Thames Estuary Partnership (TEP) is a non-profit organisation delivering best practice, knowledge sharing and key connections to achieve a thriving living and working river for London. TEP was created 22 years ago to bring together the leaders of the organisations that are responsible for the sustainability, ecology and commercial activities on the Tidal Thames from Teddington to Shoeburyness. This partnership approach to date had proved incredibly successful; two decades ago, the Thames was in a very poor state of environmental decline, now it is one of the most sustainable estuaries, with a measurable and steady increase in natural habitat population. The partnership has also proved successful as a convener between local communities, special interest groups and large-scale ports and private developers

such as DP World, to find balanced solutions between commercial activity and protecting ecology, mitigating flood risk and providing access.

The position for the City Corporation representation on the TEP board of directors, and strategic input into the TEP plan going forward. Networking and leadership on behalf of partnership representatives is needed in order for TEP to realistically map out strategic goals and delivery outcomes. The time commitment is typical of a non-executive director. Quarterly board meetings, one or two strategic workshops and on occasion presenting and speaking on behalf of TEP as and when required. The core TEP partners support the organisation through value in kind or funding, or a combination of both.

2023/24 appointee: John Edwards

e) Thames21

Thames21 is the voice for London's waterways, working with communities to improve rivers and canals for people and wildlife. Thames21 mobilises volunteers to clean and green the capital's 400 miles network of waterways. Thames21 aims to transform neglected waterways into areas that everyone can use and enjoy.

Thames21 works hand-in-hand with local communities to improve and maintain our waterways by:

- Engaging people of all ages, abilities and from all parts of society in their local waterways.
- Removing litter.
- Creating new habitats for wildlife, flora and fauna.
- Controlling non-native invasive species.
- Introducing reedbeds to tackle pollutants.
- Creating sustainable drainage solutions to improve water quality and reduce flood risk.
- Promoting safe and equitable access to waterways.
- Undertaking monitoring and research into the health of our local rivers.
- Deliver environmental education to children and adults.
- Campaigning against waterway pollution and promoting sustainable behaviour.
- Accrediting and training community groups to deliver safe and sustainable waterway improvement events.

2023/24 appointee: Andrew McMurtrie

The following are for Members to NOTE the Committees and Sub-Committees on which Chairman and/or the Deputy Chairman, or their representative shall serve:

Health & Wellbeing Board

This is a statutory committee which is responsible for all duties of the Health and Social Care Act 2012. It therefore counts as a Grand Committee within the City of London Corporation. It provides collective leadership for advancement of Health and Wellbeing of all people within the City of London by promoting integration of health and social care services. We identify key priorities for health and local government commissioning. Working with Hackney Public we prepare a joint needs assessment and a joint health and wellbeing strategy. We have representatives from Healthwatch (always interesting if you are interested in the provision of local health services such as General Practice surgeries), the Police, the Clinical Commissioning Group, the Hackney Department of Public Health, Community and Children's Services, and Port Health and Environmental Services Committee. We often have presentations on topical issues. It is an interesting committee meeting every 2 months with relevance to all residential and business wards, their Members and electors and others within the City of London. We would welcome members of Port Health who believe they can contribute to this important work. The Chairman of Port Health and Environmental Services Committee, or their representative, are appointed to this Committee.

2023/24 appointee: Helen Fentimen

Crime and Disorder Scrutiny Sub Committee

The Crime and Disorder Scrutiny Committee is responsible for the review and scrutiny of decisions and actions taken by the Safer City Partnership in connection with the discharge of it (and its constituent members') crime and disorder functions. It acts as a critical friend to the Partnership, providing constructive analysis and scrutiny of the Partnership's work and suggestions as to how it might function more effectively in future. The Chairman and Deputy Chairman of the Port Health and Environmental Services Committee, or their representatives, are appointed to this Committee.

2023/24 appointees: Mary Durcan and Deputy Peter Dunphy

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Agenda Item 9

Committees: Port Health and Environmental Services Health and Wellbeing Board Planning and Transportation	Date: 7 May 2024 3 May 2024 16 May 2024
Subject: Draft Air Quality Strategy 2025 to 2030	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	Leading Sustainable Environment. Providing Excellent Services. Diverse Engaged Communities.
Does this proposal require extra revenue and/or capital spending?	N
Report of: Bob Roberts, Executive Director (Interim), Environment	PHES for decision H&WB and P&T for information
Report author: Ruth Calderwood, Air Quality Manager	

Summary

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

The City Corporation has had an air quality action plan in place since 2002. In 2011, the action plan was incorporated into an Air Quality Strategy. The current strategy is for the period 2019 to 2024. This draft strategy covers 2025 to 2030 and includes new data, new targets, and new responsibilities for helping to reduce emissions of very fine particles (PM_{2.5}). The draft strategy supports the outcomes of the Corporate Plan 2024 to 2029, Climate Action Strategy, Transport Strategy, City Plan and Procurement Strategy.

The current Air Quality Strategy, supported by national and regional action, has delivered around a 40% reduction in the pollutants nitrogen dioxide and fine particles (PM₁₀). The national standards for PM₁₀ are met across the Square Mile, and the annual mean standard for nitrogen dioxide is only exceeded adjacent to the busiest roads. With continued action, it is likely that the national standard for nitrogen dioxide will also be met everywhere in the next 2 to 3 years.

The World Health Organisation (WHO) issues health-based air quality guidelines to help governments manage the impact of air pollution on health. National air quality standards are based on WHO guidelines issued in 2005. Since then, there has been a significant amount of evidence about the adverse health effects of air pollution. This led to new air quality guidelines being published in 2021.

The new guidelines are much tighter than the ones issued in 2005. They have not yet been incorporated into national legislation or adopted by the Mayor of London. It is however recommended that the City Corporation Air Quality Strategy 2025 to 2030 works towards

the achievement of the latest WHO air quality guidelines, rather than the national standards, and thereby continues with its efforts to improve air quality in the Square Mile. By doing so, it will deliver better health outcomes and directly support the new Corporate Plan outcome *Leading Sustainable Environments, Providing Excellent Services and Diverse Engaged Communities*. It will also provide a robust set of data for the Corporate Plan performance measure '*Progress towards World Health Organisation Air Quality Guidelines*'.

Recommendation

Members are asked to:

- Approve the aims of the draft Air Quality Strategy which set a direction of travel towards achievement of the 2021 World Health Organisation Air Quality Guidelines
- Approve the draft Air Quality Strategy 2025 to 2030 for public consultation, subject to comments received at the meeting.

Main Report

Background

1. The City of London Corporation has a statutory duty to assist the Mayor of London and the UK government in taking action to reduce levels of air pollution. This is to ensure that concentrations of pollutants meet health-based standards as soon as possible. The City Corporation also has a responsibility to protect public health.
2. Action taken by the City Corporation is detailed in its Air Quality Strategy. The current Air Quality Strategy 2019 – 2024 includes measures being taken to fulfil statutory responsibilities, and for reducing the health impact of air pollution on residents, workers, and visitors to the Square Mile. Due to statutory requirements, the focus has largely been on the pollutants nitrogen dioxide (NO₂), a product of combustion, and fine particles (PM₁₀), of which there are many sources.
3. Owing to the success of previous strategies, along with national and regional action, air quality in the Square Mile has dramatically improved. In 2022, just 7% of the publicly accessible area breached the national standards for NO₂, down from 70% in 2018. With continued action, it is likely that the national standard for NO₂ will be met everywhere in the next 2 to 3 years. The national standards for PM₁₀ are now met everywhere in the Square Mile, and by a significant margin. For further information on concentrations and origins of air pollution in the Square Mile see Appendix 1.

Air quality standards and guidelines

4. Current national air quality standards for NO₂ and PM₁₀ were originally set in European Directives and transposed into domestic legislation. They are based on guidelines set by the World Health Organisation (WHO) in 2005.
5. As research has advanced, more focus has been placed on the pollutant PM_{2.5} as this has been shown to have the greatest impact on health. The Environment Act 2021

set new national standards for PM_{2.5} to be met by 2040, with interim targets set for 2028. Guidance has been issued which includes new responsibilities for local government to assist with national efforts to reduce emissions of this pollutant. These measures have been incorporated into the draft strategy.

6. Ongoing research has linked air pollution to an increasing number of diseases. This has led to the World Health Organisation issuing new Air Quality Guidelines in 2021. The guidelines are designed to offer quantitative health-based recommendations for managing air quality. They are not legally binding, but they do provide an evidence-based tool to inform legislation and policy in WHO Member States, of which the United Kingdom is one. In addition to new guidelines, interim targets have been set to guide the reduction of air pollution towards the achievement of the guidelines. No target dates have been set by the WHO for achievement of the interim targets or guidelines.
7. Table 1 details the current national standards and WHO Air Quality Guidelines with interim targets. It also includes the aims in the draft Air Quality Strategy. The aims go beyond the current national standards for NO₂ and PM₁₀, whilst also committing to support action to achieve the new national standard for PM_{2.5} ten years early.
8. For nitrogen dioxide, the proposed aim within the strategy timeline is to achieve the second WHO interim target in over 90% of the publicly accessible space by 2030. This demonstrates a direction of travel towards the final WHO guideline. This aim has been set as it takes into account current levels of NO₂, whilst considering the amount of influence the City Corporation has on levels of air pollution in the Square Mile (see Appendix 1). For PM₁₀, the WHO air quality guideline itself is recommended as, despite the City Corporation having little direct influence over levels of this pollutant, much of the Square Mile already meets the guideline.

Table 1

Pollutant (annual mean (µg/m ³))	National Standard (µg/m ³)	2021 WHO Guidelines (µg/m ³)				Draft Air Quality Strategy aims (µg/m ³)	Current levels in the Square Mile (µg/m ³)	
		Interim Target						Final Guideline
		1 st	2 nd	3 rd	4 th			
Nitrogen dioxide (NO ₂)	40	40	30	20	-	10	30**	20 to 52
PM ₁₀	40	70	50	30	20	15	15***	15 to 18
PM _{2.5}	10*	35	25	15	10	5	10***	12

* To be met by 2040

** Over 90% of the Square Mile to meet this target by 2030

*** To support national and regional action to meet these targets by 2030

Draft Air Quality Strategy

9. The draft strategy includes 27 actions to be delivered under the headings: Air Quality Monitoring; Leading by Example; Collaborating with Partners; Reducing Emissions and Public Health and Raising Awareness. Annual reports will be published demonstrating progress with each action.
10. Delivery of the strategy will see the management of emissions of pollutants from construction sites; new developments being low emission; action to tackle unnecessary vehicle engine idling and the best practice of our partners being rewarded. Additional powers will continue to be sought to manage remaining sources of pollution; research into new technologies supported and consideration given to managing pollutants associated with diesel standby generator plant. Attention will also be given to activities that emit relatively high levels of PM_{2.5}, such as commercial cooking.
11. Much of the strategy will be delivered by partnership work with external organisations. This is due to the amount of air pollution measured in the Square Mile that comes from beyond the boundary (see Appendix 1).
12. An important aspect of the work is engagement with communities such as schools, residents, and businesses, raising awareness about the health impacts of air pollution and what steps can be taken to help to deliver the aims of the strategy. The City Corporation is also part of a pan London project to raise awareness about the impact of poor indoor air quality on health.
13. The draft Air Quality Strategy is underpinned by a wealth of monitoring data and a large database of emissions of pollutants. This information is used to shape action, and to provide robust evidence to demonstrate the success of City Corporation action to improve air quality.

Corporate & Strategic Implications

Strategic implications

14. Air quality policy is supported by the Climate Action Strategy, Transport Strategy, Procurement Strategy, and draft City Plan.
15. The work on air quality supports the new Corporate Plan outcomes:
 - Leading sustainable environment
 - Providing excellent services
 - Diverse engaged communities

Financial implications

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

Resource implications

17. The strategy will be delivered using existing resources

Legal implications

18. None

Risk implications

19. Air quality is listed as a Corporate risk. The most recent Deep Dive into the risk was presented to Audit and Risk Management Committee in January 2021.

Equalities implications

20. Action to improve air quality has a positive impact on all sections of the population. The benefit is greatest for children and the elderly as they are more susceptible to the health impacts of air pollution. There is also a positive impact on individuals whose lives are affected by asthma and other respiratory and cardiovascular conditions.

Security implications

21. None

Conclusion

22. The City Corporation has produced a draft Air Quality Strategy 2025 to 2030 for consultation. This strategy follows on from the current Air Quality Strategy 2019 to 2024 and includes new data, new targets, and new responsibilities for helping to reduce emissions of PM_{2.5}.

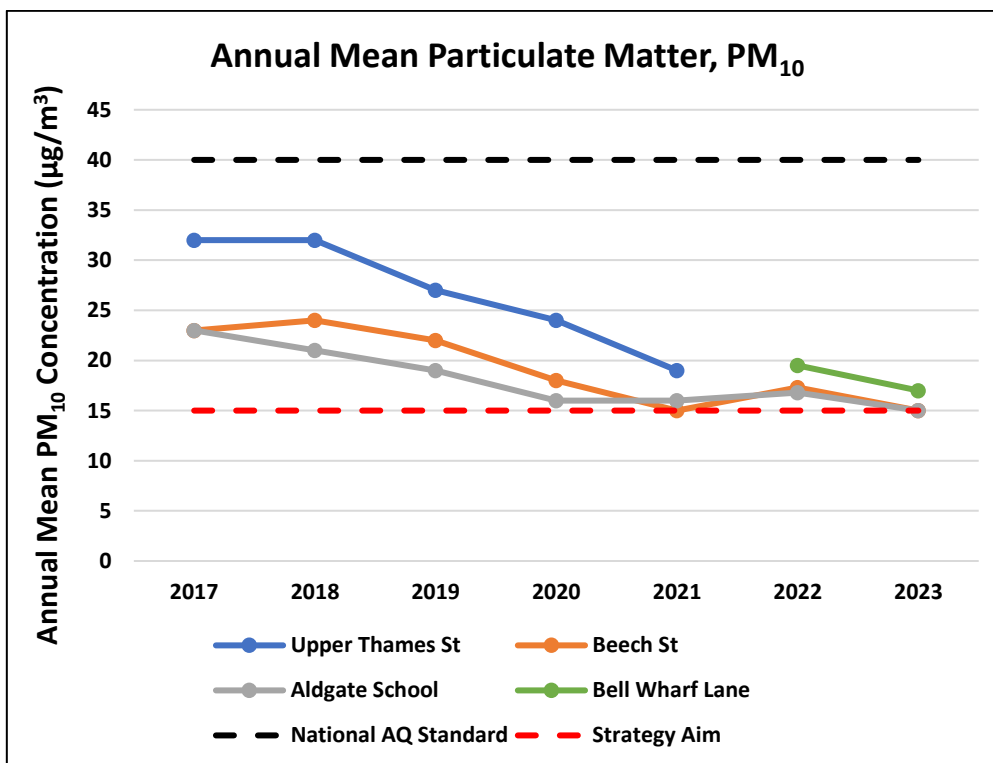
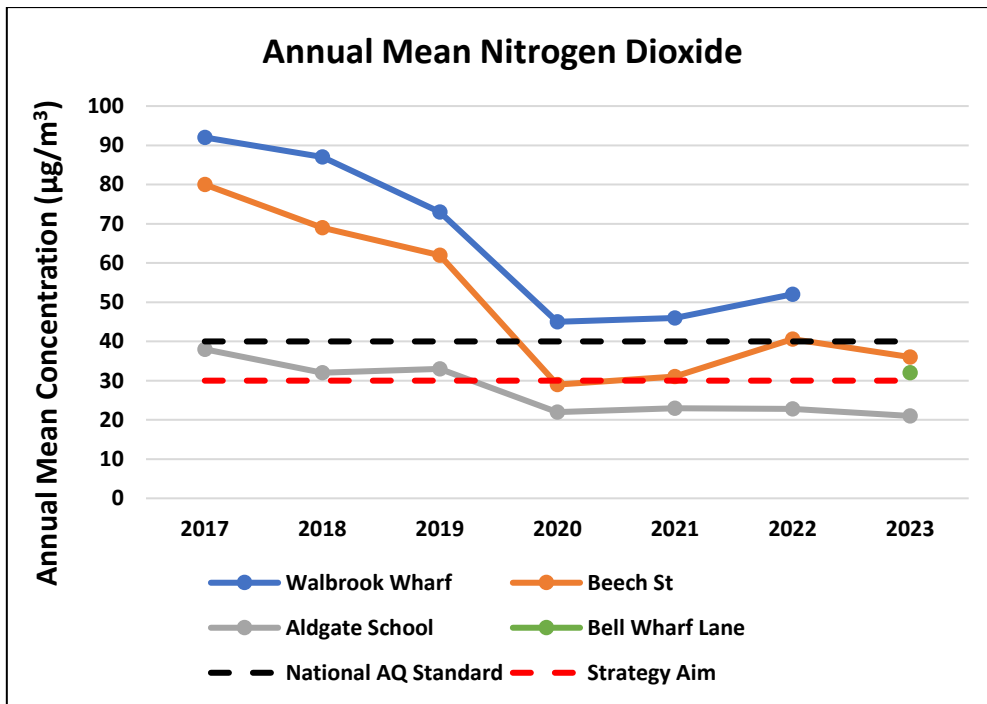
23. Due to the success of previous strategies, along with regional and national action, air quality in the Square Mile has dramatically improved. In 2022 just 7% of the publicly accessible area breached the national standard for the pollutant nitrogen dioxide, down from 70% in 2018. The national standard for fine particles (PM₁₀) is now met everywhere.

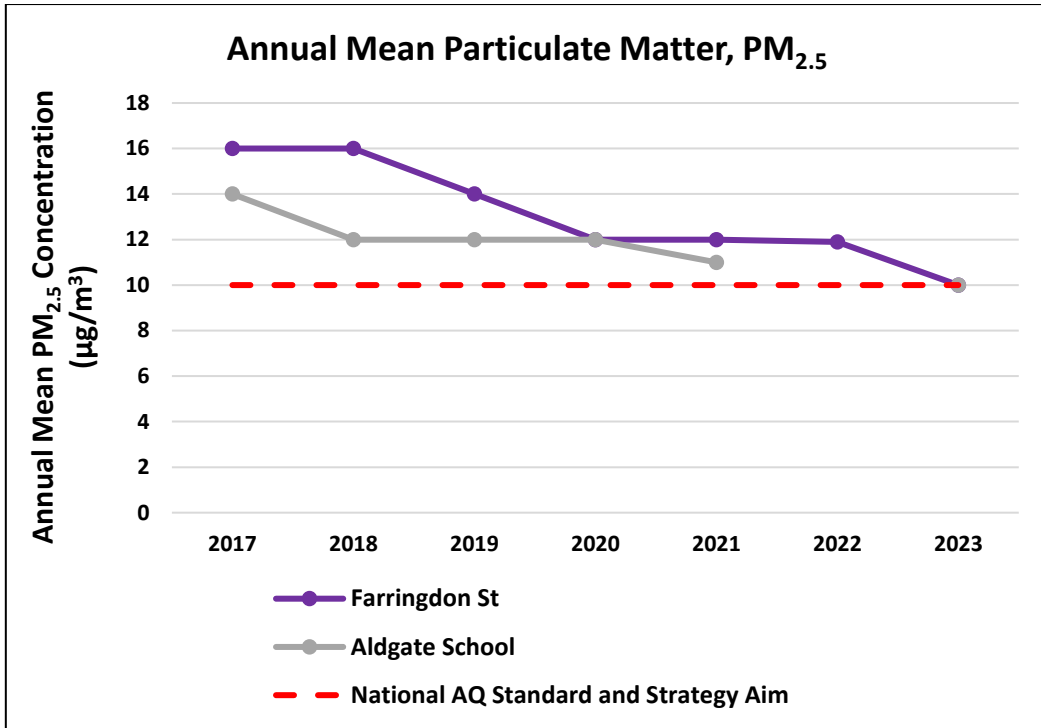
24. It is recommended that the City Corporation Air Quality Strategy 2025 to 2030 aligns itself with the latest WHO air quality guidelines, rather than the national standards, and thereby continues with its efforts to improve air quality in the Square Mile. By doing so, it will deliver better health outcomes and support the Corporate Plan outcomes *Leading Sustainable Environments, Providing Excellent Services and Diverse Engaged Communities*. It will also provide a robust set of data for the Corporate Plan performance measure '*Progress towards World Health Organisation Air Quality Guidelines*'.

Appendices

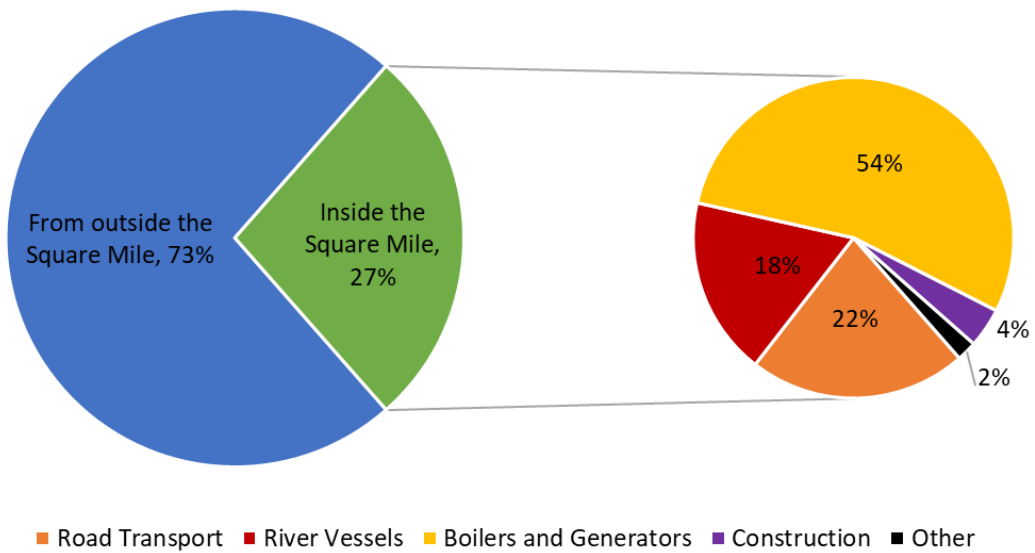
- Appendix 1 – Air quality data
- Appendix 2 – Draft Air Quality Strategy 2025 to 2030

Appendix 1: Air Quality Data

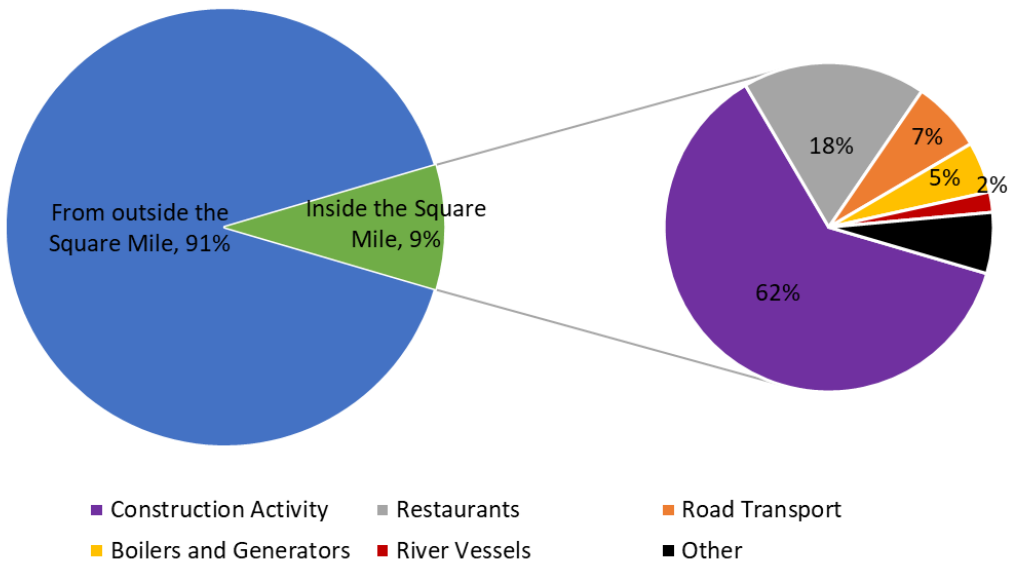




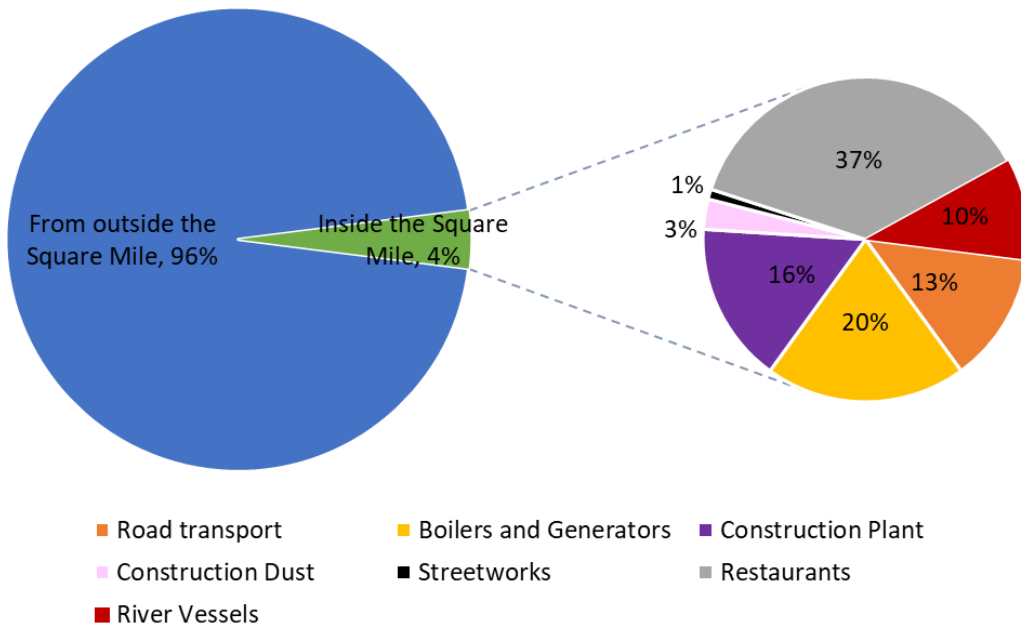
Source of Nitrogen Oxides



Source of PM₁₀



Source of PM_{2.5}



City of London

Air Quality Strategy

Delivering Healthy Air in the City of London
Draft for Consultation

2025 – 2030



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This report will be available on the City of London Corporation website.

Foreword

The City of London Corporation has long been at the forefront of tackling air pollution. We have been measuring air quality for over 60 years and in 1954, following the infamous London Smogs, we published our own legislation to ban the production of smoke in the City. This paved the way for the national Clean Air Act of 1956. The form and source of air pollution has changed since the 1950's and, though much improved, remains at a level that impacts on health.

We have been taking more focussed action to improve air quality for over 20 years, and I have great pleasure in presenting our fourth Air Quality Strategy for consultation. It outlines action that we will take to continue to achieve better air quality for our communities. Our last Air Quality Strategy, supported by national and regional action, delivered around a 40% reduction in the pollutants nitrogen dioxide and fine particles (PM₁₀). This was measured using our extensive network of monitoring equipment.

The data we collect is compared to health-based standards. The current national standards for PM₁₀ are achieved across the Square Mile, and the annual mean standard for nitrogen dioxide is only exceeded adjacent to the busiest roads. With continued action, it is likely that the national standard for nitrogen dioxide will also be met everywhere in the next two to three years.

However, we are not complacent. Since the current national air quality standards were set, research has shown that air pollution has an impact on health at lower levels than previously thought. This has been reflected in air quality guidelines issued in 2021 by the World Health Organisation. The aims of the strategy therefore go beyond the national standards and instead take us on a pathway to meet these guidelines. This goes beyond our statutory obligation.

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

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

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

We look forward to hearing your thoughts on our proposals to achieve our vision of having air quality in the Square Mile that is healthy to breathe.

Mary Durcan CC
Chair, Port Health and Environmental Services Committee

Air Quality Strategy 2025 – 30: Delivering Healthy Air in the City of London

Our definition of healthy air: Concentrations of nitrogen dioxide (NO₂) and particulate matter (PM₁₀ and PM_{2.5}) that meet national health-based standards and are on a pathway to meet the 2021 World Health Organisation (WHO) Air Quality Guidelines.

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

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

Our Vision

The Square Mile has air that is healthy to breathe.

Our Aims

- Over 90% of the Square Mile meets an annual average ⁽¹⁾ of 30µg/m³ for nitrogen dioxide by 2030⁽²⁾.
- To support national and regional action that leads to the Square Mile meeting an annual average of 15µg/m³ for PM₁₀ by 2030⁽³⁾.
- To support national and regional action that leads to the Square Mile meeting an annual average of 10µg/m³ for PM_{2.5} by 2030⁽⁴⁾.

Our Key Outcomes (Corporate Plan 2024-2029)

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

Demonstrating success: Annual reports will be published detailing progress with each action and with the strategy aims.

¹ Measured as the *mean*.

² World Health Organisation 2021 2nd interim target

³ World Health Organisation 2021 Air Quality Guideline

⁴ National air quality standard to be achieved by 2040 and World Health Organisation 2021 4th interim target.

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1 Introduction

The City of London, also known as the Square Mile, is the historic heart of London. It is home to approximately 8,600 permanent residents with a working population of around 614,500 people. In addition to workers and residents, each year the City of London welcomes millions of visitors. The City of London Corporation (City Corporation) is the governing body for the Square Mile. It manages a wide range of functions including 11,000 acres of open space which provide green lungs for the Capital.

Although much improved, air pollution remains at a level where it impacts on health. The pollutants of current concern are nitrogen dioxide (NO₂), a colourless and odourless gas that is a product of fuel combustion, and particulate matter, of which there are a wide range of sources. Particulate matter is referred to as PM₁₀ and PM_{2.5}, which are particles with a diameter of 10 micrometers (µm) or 2.5µm respectively.

The City Corporation is required by statute to monitor these air pollutants through a framework called London Local Air Quality Management (LLAQM). Following detailed air quality monitoring, the whole of the Square Mile was declared an Air Quality Management Area (AQMA) in January 2001 for annual mean concentrations of nitrogen dioxide and PM₁₀, and 1-hour concentrations of nitrogen dioxide. This was due to levels in 2001 being higher than the national standards. Once an AQMA has been designated, there is a requirement to develop and implement an Air Quality Action Plan (AQAP). The national standards were originally set in European Directives and transposed into domestic legislation.

The Environment Act 2021 set new national standards for the pollutant PM_{2.5}. Guidance that followed includes new responsibilities for local government to assist with national efforts to reduce emissions of this pollutant. These requirements are reflected in this strategy.

The City Corporation has had an AQAP in place since 2002. In 2011, the AQAP was incorporated into an Air Quality Strategy. The strategy outlined steps that would be taken to both improve local air quality and reduce the impact of air pollution on public health. The strategy is updated every five years, as a minimum, with updates published in 2015 and 2019. This strategy builds upon previous action and includes new responsibilities for helping to reduce concentrations of PM_{2.5}.

A significant improvement in air quality has been experienced across the Square Mile since the initial AQMA designation in 2001. The current national standards for PM₁₀ are met across the Square Mile, and the annual mean standard for nitrogen dioxide is only exceeded adjacent to the busiest roads. The new national standard for PM_{2.5}, 10µg/m³ as an annual mean to be achieved by 2040, is not currently achieved in the Square Mile.

Since 1987, the World Health Organisation (WHO) has issued air quality guidelines for air pollutants that have a damaging impact on health. As evidence about the adverse health

impacts of air pollution advances, the air quality guidelines are revised. The guidelines are designed to offer quantitative health-based recommendations for managing air quality. They are not legally binding, but they do provide an evidence-based tool to inform legislation and policy in WHO Member States, of which the UK is one.

Table 1.1: World Health Organisation Recommended Air Quality Guidelines and Current National Standards

Pollutant	National Standard (annual mean $\mu\text{g}/\text{m}^3$)	2021 WHO Guidelines (annual mean $\mu\text{g}/\text{m}^3$)				
		Interim Target				Guideline
		1 st	2 nd	3 rd	4 th	
Nitrogen dioxide (NO_2)	40	40	30	20	-	10
PM_{10}	40	70	50	30	20	15
$\text{PM}_{2.5}$	10*	35	25	15	10	5

* To be achieved by 2040

The aims of this strategy are:

- Over 90% of the Square Mile meets an annual mean of $30\mu\text{g}/\text{m}^3$ for nitrogen dioxide by 2030*.
- To support national and regional action that leads to the Square Mile meeting an annual mean of $15\mu\text{g}/\text{m}^3$ for PM_{10} by 2030.
- To support national and regional action that leads to the Square Mile meeting an annual mean of $10\mu\text{g}/\text{m}^3$ for $\text{PM}_{2.5}$ by 2030.

* Where total area includes roads, pavements and public spaces but excludes buildings.

These aims support the Corporate Plan outcome of providing a leading sustainable environment, providing excellent services and diverse engaged communities. The strategy will be delivered across five areas:

- 1. Air quality monitoring**
- 2. Leading by example**
- 3. Collaborating with partners**
- 4. Reducing emissions**
- 5. Public health & raising awareness**

A complete table of actions to deliver the aims of the strategy is presented in Appendix 1, with further information on air quality standards and guidelines outlined in Appendix 2.

1.1 Source of Air Pollution in the Square Mile

The quality of the air in the City of London is influenced by a range of sources, from both inside and outside of the Square Mile.

To assist with the development of targeted measures, the Greater London Authority (GLA) and Transport for London (TfL) have developed a database of emission sources across London. This is called the London Atmospheric Emissions Inventory (LAEI)⁵. The data in the inventory is approximate and should not be viewed as absolute. It has been developed as a guide to assist in decision making for tackling the main sources of air pollution. The City Corporation has also undertaken its own research to look in more detail at emissions of PM_{2.5} in the Square Mile⁶.

Nitrogen oxides (NO_x) refers to nitric oxide (NO) and nitrogen dioxide (NO₂), both of which are formed during the combustion of fuels. Nitric oxide reacts with other gases in the air to form nitrogen dioxide. These reactions take place quickly and are reversible, so the two gases are referred to together as nitrogen oxides.

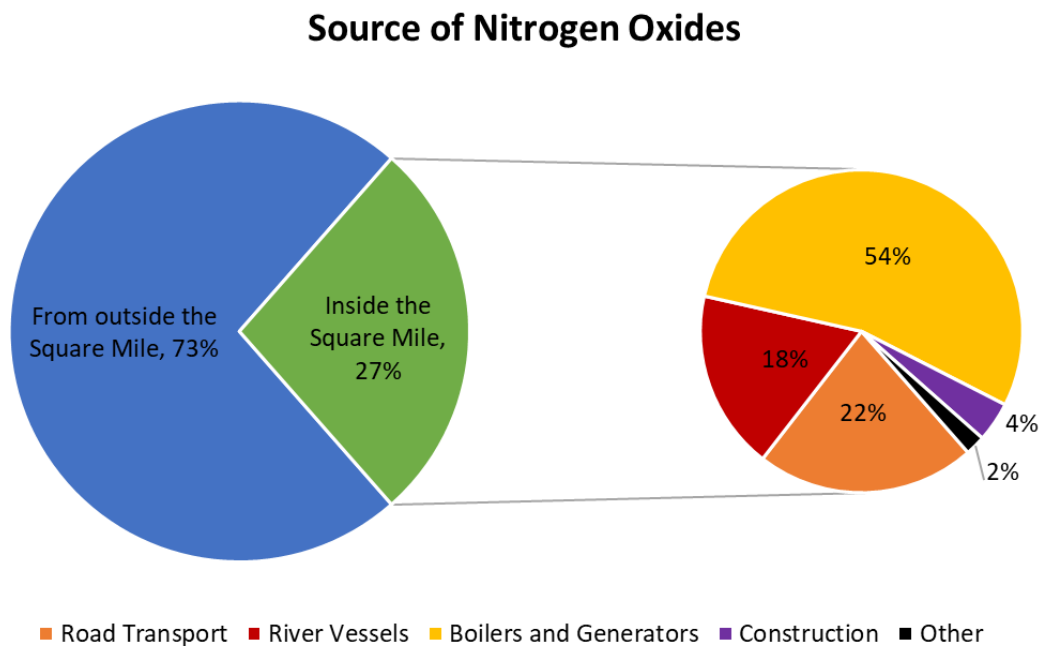
Figure 1.1 presents approximate emissions of NO_x that impact on air pollution measured in the Square Mile⁷. Approximately 75% of the nitrogen oxides in the Square Mile come from outside the boundary. The remaining 25% is made up of emissions from combustion plant such as boilers, generators, combined heat, and power plant (CHP), road transport, river vessels and construction activity. Appendix 3 details how emissions sources in the Square Mile have changed over time.

⁵ Greater London Authority (2021), London Atmospheric Emissions Inventory 2019, London Datastore

⁶ Ricardo Energy & Environment (2022), City of London – PM_{2.5} Emissions Inventory and Source Apportionment, ED16224

⁷ Cambridge Environmental Research Consultants (2024), Determination of the area of the City of London exceeding the NO₂ air quality limit value in 2022 using modelling and measurements, FM1424.

Figure 1.1: Emission Sources, Nitrogen Oxides



Particulate matter can travel large distances, with up to 33% transported to the UK from other European countries. Additionally, around 15%, comes from natural sources such as pollen, sea spray and desert dust. The remaining amount, approximately 50%, comes from anthropogenic sources such as solid fuel burning and road transport⁸.

Figure 1.2 details the approximate origin of PM₁₀ measured in the Square Mile. Over 90% is generated outside the boundary with the largest source within the Square Mile being associated with construction activity.

⁸ Department for Environment Food & Rural Affairs (2024), Emissions of air pollutants in the UK – Particulate matter (PM₁₀ and PM_{2.5})

Figure 1.2: Emission Sources, PM₁₀

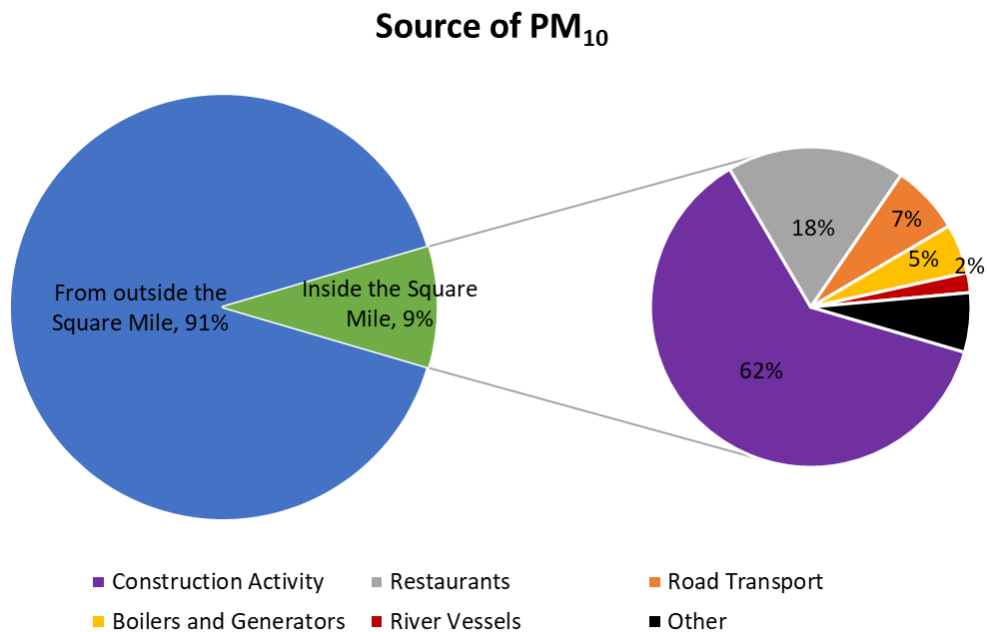
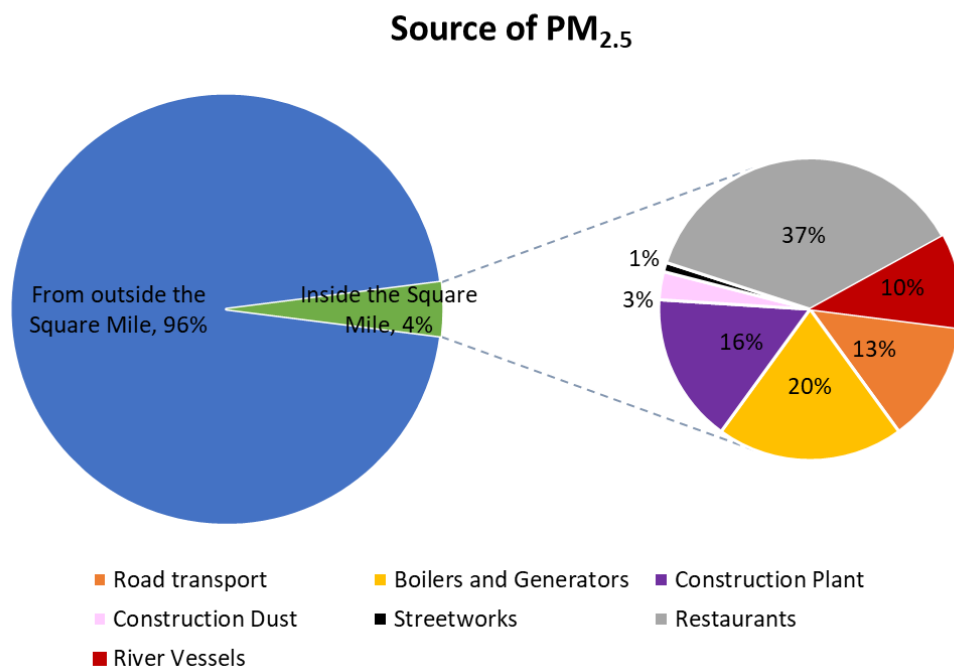


Figure 1.3 shows the approximate origin of PM_{2.5} measured in the Square Mile. 96% of that measured comes from outside the City of London boundary. Of the remaining 4%, the main contributor to local PM_{2.5} is commercial cooking, both from the fuel used and the food itself.

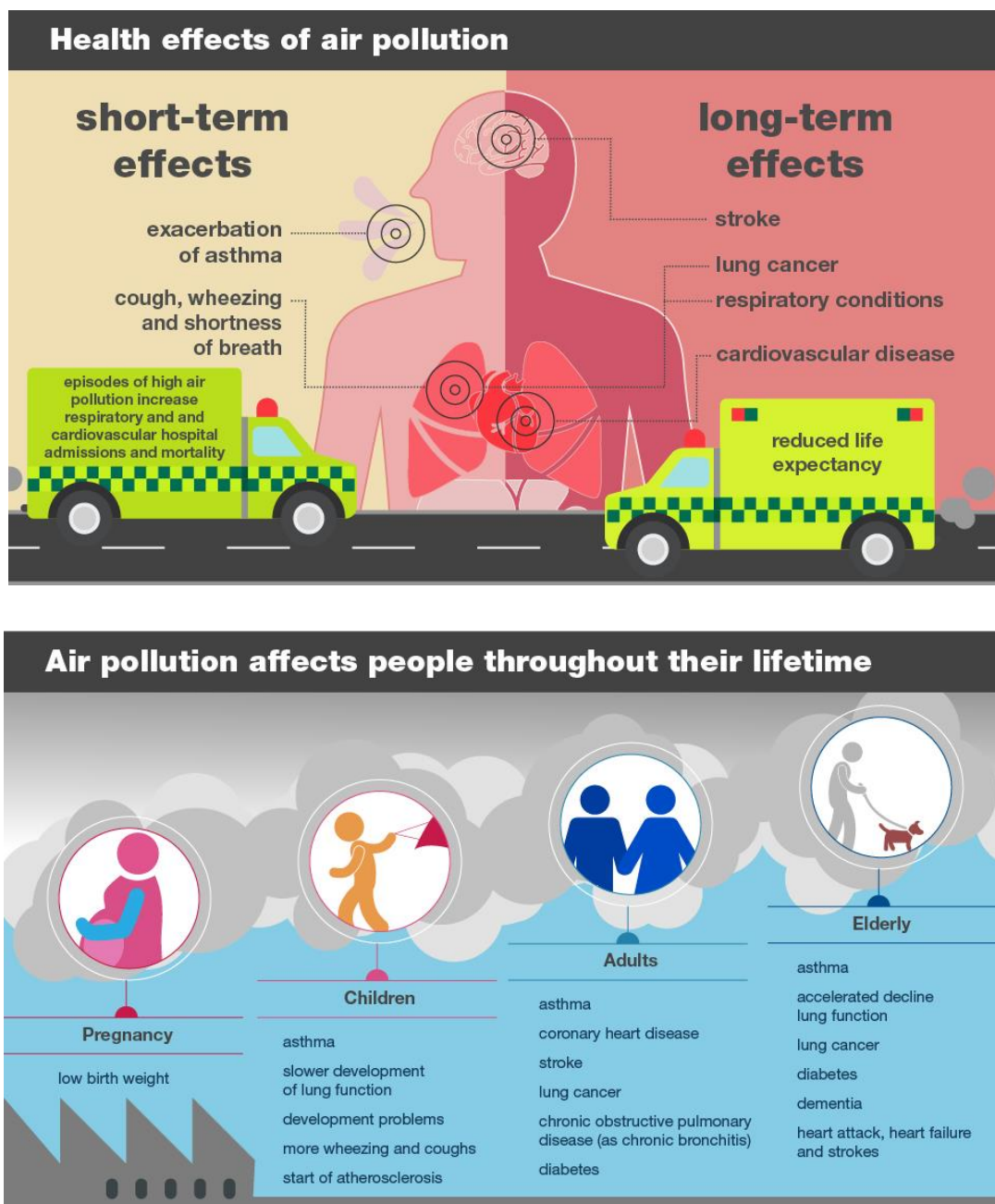
Figure 1.3: Emission Sources, PM_{2.5}



1.2 Health Impacts of Air Pollution

Air pollution is associated with a range of adverse health impacts, with the evidence base strengthening year on year. Elevated concentrations of air pollution particularly affect society's most vulnerable populations; children, the elderly, and those with existing medical conditions. Long-term exposure to air pollution can cause chronic conditions such as cardiovascular and respiratory diseases as well as lung cancer, leading to reduced life expectancy. Short-term acute exposure can impact on lung function, exacerbate asthma, and lead to an increase in respiratory and cardiovascular hospital admissions and mortality.

Figure 1.4: Health Effects of Air Pollution⁹



⁹ Source: UK Health Security Agency (2018), Health matters: air pollution

2 Air Quality Monitoring

Commitment:

The City Corporation will monitor air quality to assess compliance with national air quality standards and internal air quality targets.

The City Corporation has been monitoring air quality for over 60 years. Monitoring is a vital component of air quality management and fulfils the following functions:

- to assess compliance against air quality standards and health guidelines, and consequently the impact on health;
- to assess long term monitoring trends and the effectiveness of policies and interventions to improve air quality;
- to raise public awareness and create alerts when levels of air pollution are high.

Air pollution monitoring is undertaken across the Square Mile using two methods: automatic analysers and passive monitoring. The pollutants nitrogen dioxide, PM₁₀, PM_{2.5} and ozone (O₃) are monitored using automatic analysers. The Aldgate School monitoring site (pictured) houses equipment to measure nitrogen dioxide, PM₁₀, and PM_{2.5}. Full details of the automatic monitoring sites are provided in Appendix 4, and their locations are presented in Figure 2.1.

Passive diffusion tube samplers are devices which are exposed to the air for a month and then analysed in a laboratory later. They are used to measure NO₂ and in 2023 there were over 70 monitoring locations, see Figure 2.2. The locations selected for air quality monitoring are reviewed annually.

Full details of past monitoring locations can be found in the City Corporation Annual Status Reports (ASRs). All City Corporation automatic monitoring data is currently available on the Air Quality in England website, and diffusion tube results are available on the City Corporation website.

All 2023 monitoring data included in this draft strategy is provisional. All data undergoes rigorous checks before it is certified. The certified data for 2023 will be included in the final strategy which will be published in autumn 2024.



Figure 2.1: City Corporation Automatic Monitoring Sites

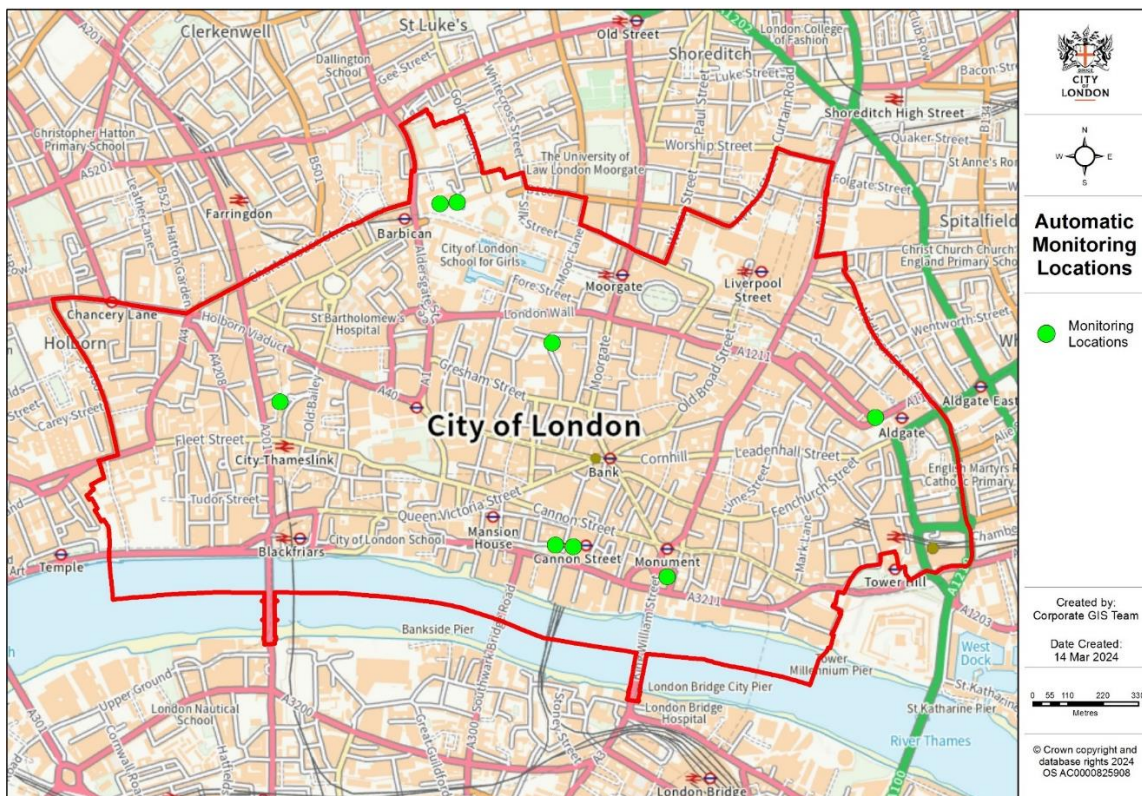
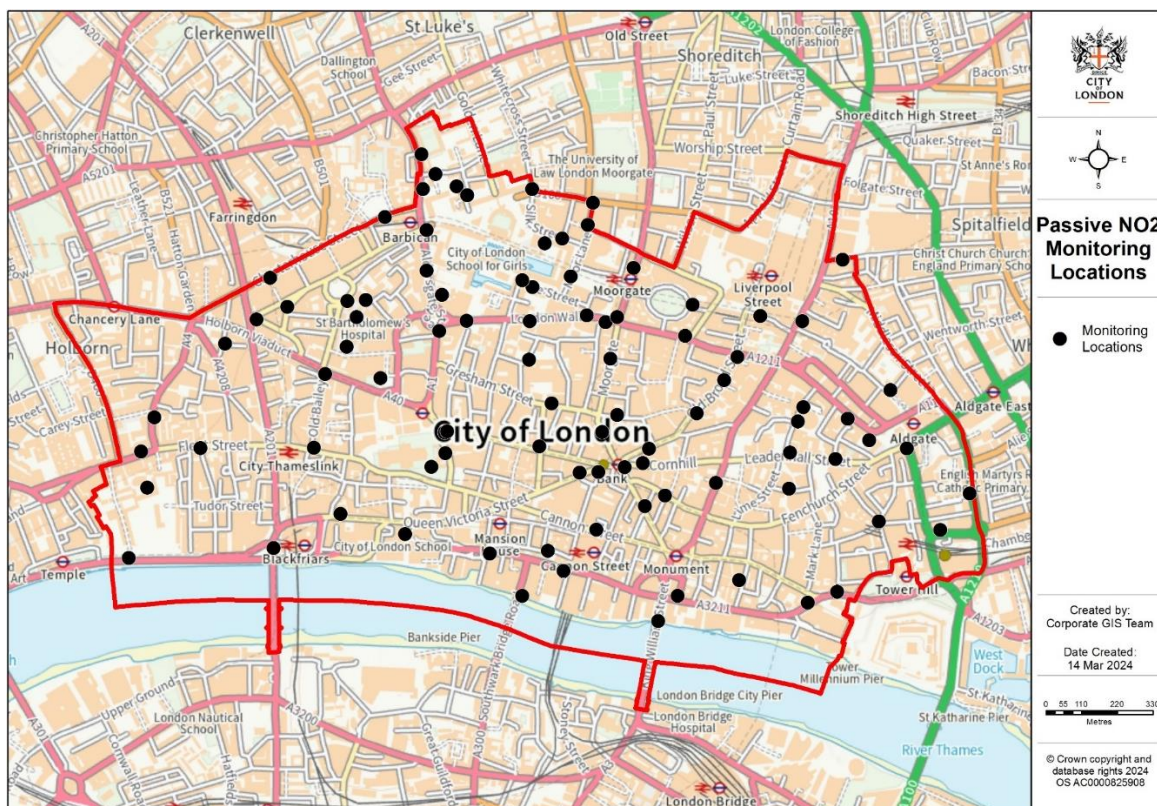


Figure 2.2: City Corporation Passive Nitrogen Dioxide Monitoring Sites



2.1 Nitrogen Dioxide, NO₂

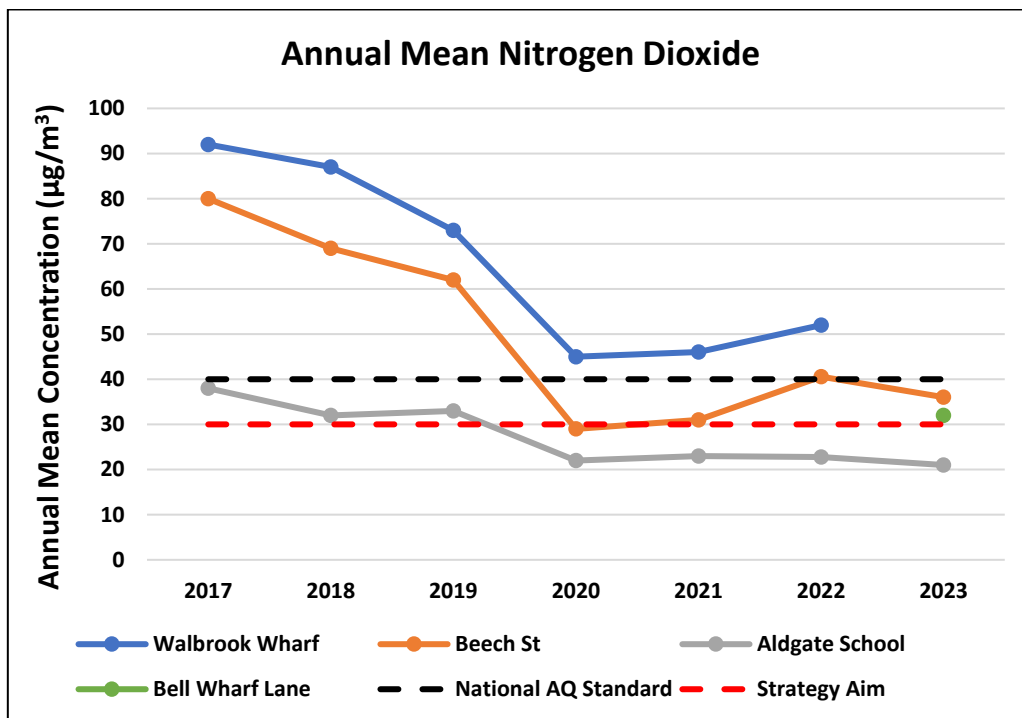
2.1.1 Continuous Monitoring

Figure 2.3 details annual mean nitrogen dioxide concentrations at City Corporation monitoring sites for the past seven years. To see how concentrations have changed over the past 15 years, see Appendix 4.

Concentrations have significantly reduced at all three locations measured. The lowest annual mean concentrations were experienced during the COVID-19 pandemic of 2020. Since 2020 there has been, as expected, a small rebound in roadside concentrations, though concentrations have not returned to pre-pandemic levels.

The final year where monitoring data was collected at the Walbrook Wharf location was 2022. This location has now been decommissioned due to changes in office accommodation, with a new monitoring site established nearby on Bell Wharf Lane.

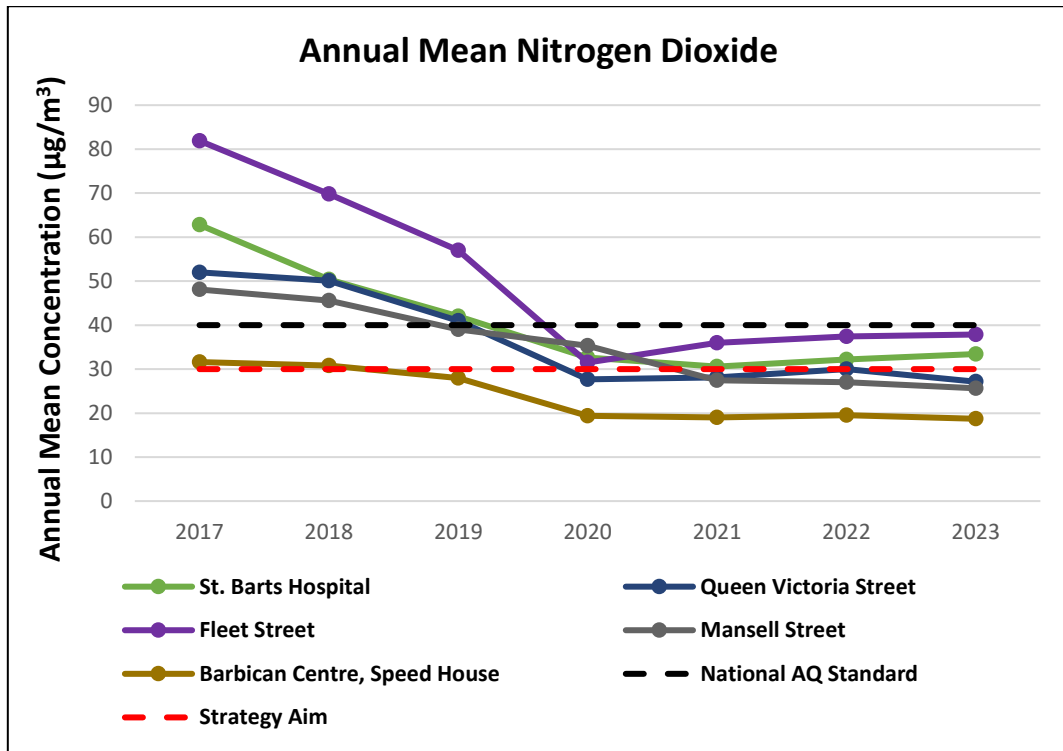
Figure 2.3: Annual Mean Nitrogen Dioxide



2.1.2 Non-continuous (Passive) Nitrogen Dioxide Monitoring

Data for five locations where nitrogen dioxide has been measured long-term using passive diffusion tubes is presented in Figure 2.4. All five sites have been compliant with the national annual mean standard since 2020, with three of the sites meeting the strategy aim for levels below $30\mu\text{g}/\text{m}^3$ in 2023.

Figure 2.4: Annual Mean Nitrogen Dioxide, Passive Monitoring

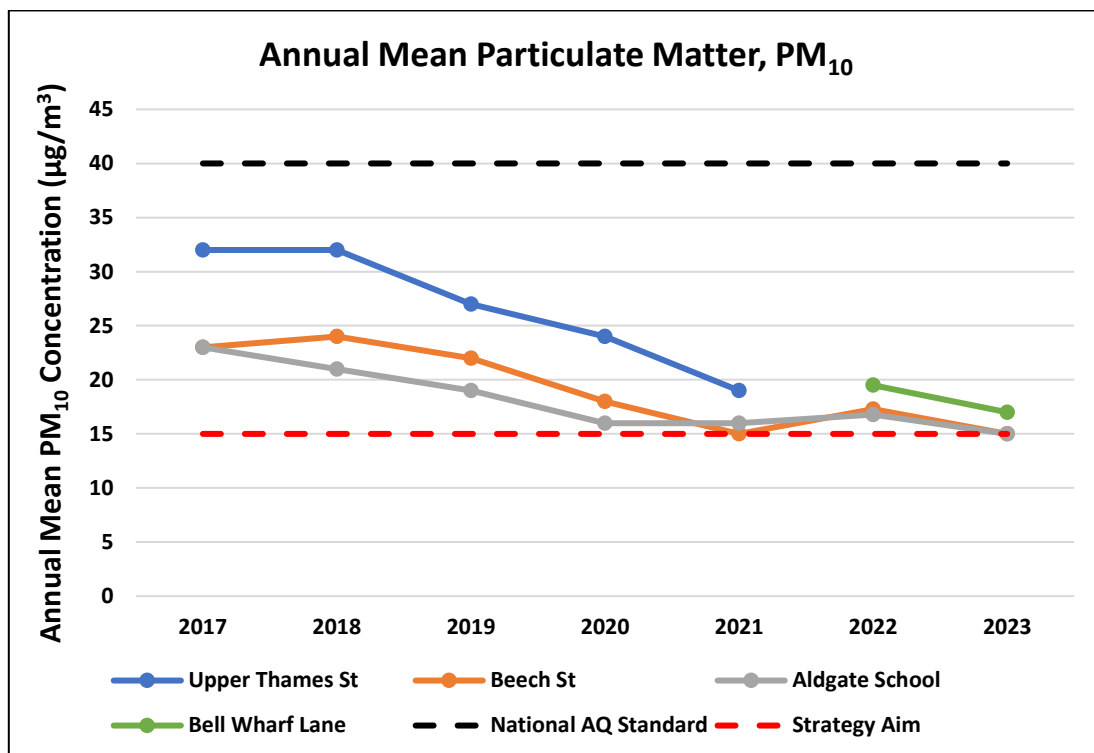


2.2 Particulate Matter, PM₁₀

Annual mean PM₁₀ concentrations have also reduced. Compliance with the national PM₁₀ annual mean standard has been achieved at all sites for the past seven years. The aim to achieve an annual PM₁₀ concentration of 15µg/m³ by 2030 was met at Beech Street in 2021, and at the Aldgate School in 2023.

2021 was the final year where monitoring data was collected at the Upper Thames Street location. This monitoring site has since been decommissioned, with a new monitoring site established nearby on Bell Wharf Lane.

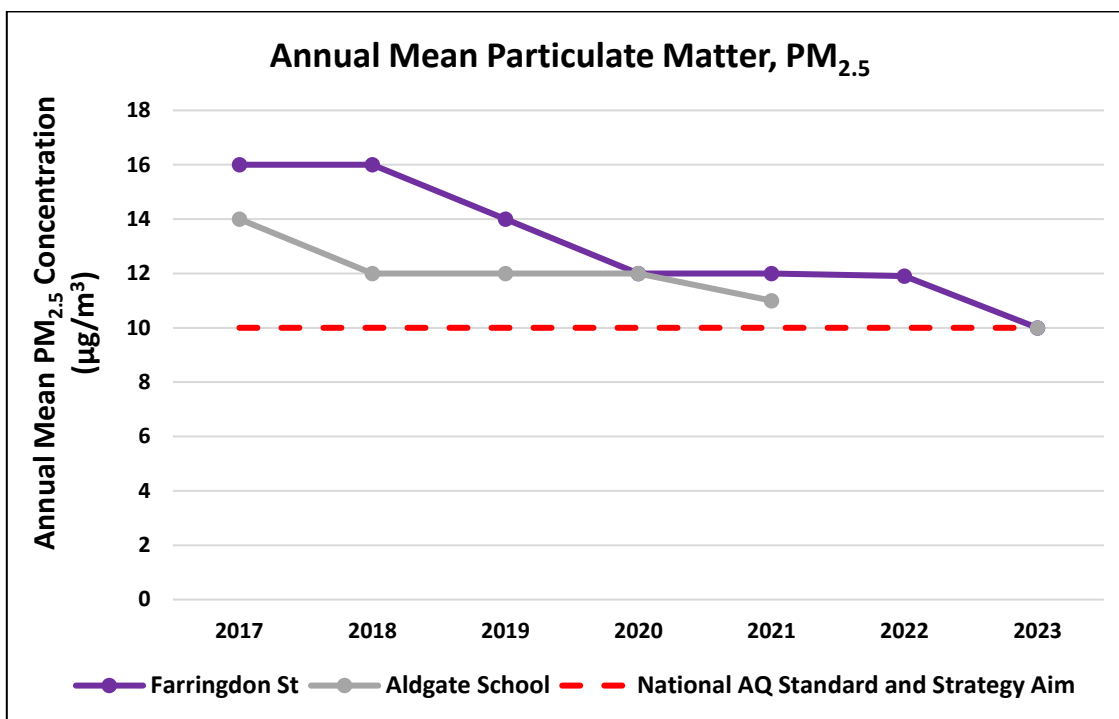
Figure 2.5: Annual Mean PM₁₀



2.3 Particulate Matter, PM_{2.5}

Both monitoring sites breach the new national standard of 10µg/m³ that is to be achieved by 2040. Similar concentrations of PM_{2.5} have been monitored at the two monitoring sites since 2020.

Figure 2.6: Annual Mean PM_{2.5}



Notes:

The 2022 result for The Aldgate School is not available due to poor data capture for the year.

2.4 Dispersion Modelling

Air quality monitoring provides data for specific locations. The monitoring data is supplemented by computer modelling to enable the assessment of a wider geographical area. In addition, modelling is also used to predict future concentrations of air pollution which assists with action planning.

The LAEI estimates both concentrations and emissions for each of the 32 London Boroughs and the City Corporation. Analysis of the current LAEI data for the City Corporation is presented in Appendix 3.

2.4.1 Demonstrating Success

Whilst air quality in the Square Mile is undoubtedly improving, there is further work to be done to ensure that the aims of this strategy are achieved.

One aim of the previous strategy was to ensure that the national air quality standard for annual mean nitrogen dioxide (40µg/m³) was achieved in over 90% of the Square Mile by 2025. An annual assessment has been undertaken since 2018 to track progress. The most recent assessment completed is for 2022. Data for 2023 will be available for the final

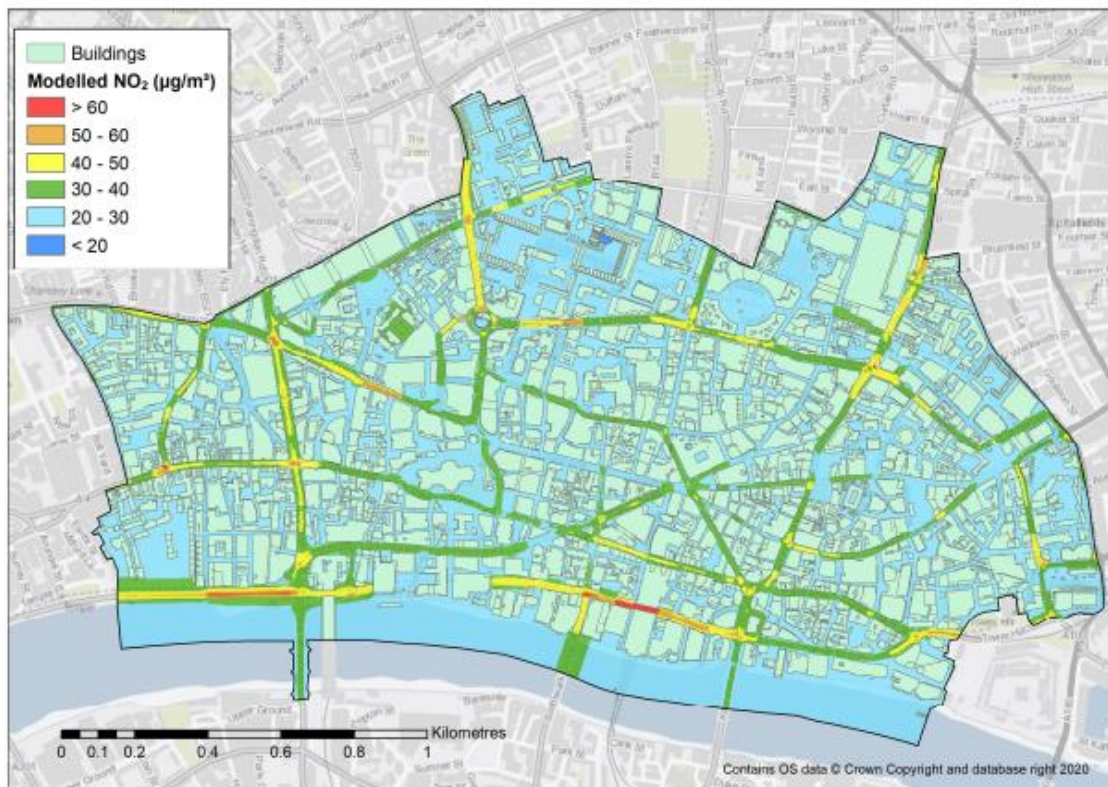
version of the strategy. As can be seen in Table 2.1 the target was met ahead of time in 2020.

Table 2.1: Nitrogen Dioxide Assessment Statistics, 2018-2022

Year	Publicly Accessible Area Meeting the Annual Mean Nitrogen Dioxide Standard, 40µg/m ³
2018	30%
2019	67%
2020	93%
2021	94%
2022	93%

One of the aims of this strategy is for over 90% of publicly accessible areas in the Square Mile to meet a nitrogen dioxide annual mean of 30µg/m³ by the end of 2030. In 2022, 76% of the Square Mile was below 30µg/m³.

Figure 2.7: Modelled Annual Mean Nitrogen Dioxide, 2022



2.5 Air Quality Monitoring on the wider City Corporation Estate

In addition to monitoring air quality in the Square Mile, the City Corporation also undertakes periodic monitoring at the City Markets, Open Spaces (public parks) and in 2024 will commence monitoring on the City Bridges.

Monitoring generally takes place to assess levels of pollution that users of the sites are exposed to. For Open Spaces, it is also done to see how air pollution impacts on

ecosystems. In Epping Forest, nitrogen dioxide and ammonia will be measured for 12 months starting in April 2024. These sites will be located near roads, in the forest itself and in locations that are sensitive to nitrogen pollutants such as heathlands and sites that are home to vulnerable species of moss. The data will be assessed to see whether levels of pollution might be damaging habitats. A similar study was undertaken in 2004.

Air Quality Monitoring

We will

Undertake monitoring of nitrogen dioxide, PM₁₀, PM_{2.5} and ozone using continuous analysers at a minimum of five locations.

Maintain a nitrogen dioxide monitoring network utilising diffusion tubes, ensuring a high degree of spatial coverage.

Review all monitoring locations annually.

Ensure the live data from the continuous monitoring network is made available to the public.

Undertake an annual assessment to demonstrate progress with the aims of this strategy.

3 Leading by Example

Commitment:

The City Corporation will lead by example to improve local air quality and reduce exposure to air pollution.

Improving air quality is a priority for the City Corporation with the development and implementation of air quality policy being overseen by the Port Heath and Environmental Services Committee. The City Corporation Health and Wellbeing Board supports measures for improving local air quality. The City's Joint Strategic Needs Assessment recognises the significance of air pollution on public health.

The City Corporation Corporate Plan 2024 to 2029¹⁰ details the City Corporation's commitment to act as a leader on environmental sustainability. Climate action and resilience, air quality, and sustainability are all aspects of ambitious targets for the entire City to be net zero by 2040.

3.1 City Corporation Fleet

The City Corporation has been reducing emissions from its own fleet for several years. This has been achieved by improved management, a reduction in size of the fleet and the purchase of newer, cleaner vehicles. The City Corporation owns or leases 122 vehicles. The majority of these are not used in the Square Mile. At the time of writing, forty of the vehicles are fully electric or hybrid.

Since January 2016, a policy has been in place that diesel vehicles cannot be purchased or leased if there are low or zero tailpipe emission options available. A fuel hierarchy is in place for new vehicles:

1. Full electric
2. Plug-in hybrid
3. Petrol hybrid (regenerative braking)
4. Petrol
5. (Euro 6/ VI) Diesel Fleet Operator Recognition Scheme Accreditation

The Fleet Operator Recognition Scheme (FORS) is a voluntary accreditation scheme designed to help fleet operators improve standards in their organisation. Bronze, Silver, or Gold accreditation is awarded to organisations based on a range of criteria including emissions and fuel efficiency. The City Corporation has been awarded the Gold FORS accreditation standard for over a decade.

3.2 Procurement Strategy

The City Corporation Procurement Strategy 2020 to 2024 and Responsible Procurement Policy, support the aims of this strategy by:

¹⁰ City Corporation (2024), Our Corporate Plan 2024-2029

- Ensuring that suppliers minimise air and noise pollution associated with contracts;
- Procuring vehicles, plant and equipment with the lowest emissions and pollutants possible.
- Large contracts include a ‘no vehicle engine idling’ policy.

Contracts that use vehicles are required to put additional measures in place to help reduce air pollution. For example, the City Corporation’s waste collection contract uses a fully electric fleet of dustcarts. There is a flexible approach with a menu of options, detailed below, which are periodically reviewed:

- Set ambitious targets for the reduction of nitrogen oxides, PM₁₀ and PM_{2.5} emissions from vehicles over the life of the contract.
- Set an ambitious target for increasing the use of zero tailpipe emission vehicles over the life of the contract.
- Set a target for a reduction in the number of motorised vehicle trips that form part of the services.
- Develop a logistics approach that avoids vehicle movements during peak congestion and pedestrian footfall times, 07:00–10:00, 12:00–14:00, 16:00–19:00.
- Use technology that supports air quality improvement e.g., gear shift indicators, stop-start ignition, software to monitor green driving.
- Green driver training for Contractor Staff used on the Contract, offer safer urban driving courses to drivers.
- Another innovative action to support the Air Quality Strategy that the City would reasonably deem of an equivalent level of ambition.

3.3 Climate Action Strategy

The City Corporation has an ambitious Climate Action Strategy (CAS)¹¹ supported by a £68 million investment. Annual carbon emissions from the City Corporation’s own operations have already been reduced by 66% between 2018/2019 and 2021/2022¹². Since 2018, 100% of the electricity purchased by the City Corporation has been from renewable sources, and in 2020 the City Corporation became the first UK local authority to sign a 15-year Power Purchase Agreement to purchase electricity from a new solar farm of 49.9MW capacity. At the time of writing, more than half of the City Corporation’s electricity comes from this renewable source.

The CAS contains the following commitments which support the aims of this strategy:

- Net zero by 2027 in the City Corporation’s operations
- Net zero by 2040 across the City Corporation’s full value chain
- Support the achievement of net zero by 2040 in the Square Mile

Measures underway to achieve the aims of the CAS include:

- Transforming the energy efficiency of operational buildings through the adoption of best available technologies

¹¹ The City of London Corporation (2020), Climate Action Strategy 2020-2027

¹² The City of London Corporation (2024), Taking Climate Action: Our Progress 2023

- Maximising use of renewable energy
- Accelerating the move to net zero carbon and improving energy efficiency in tenanted buildings
- Developing a Square Mile Local Area Energy Plan

3.4 Transport Strategy

The City Corporation Transport Strategy¹³ has delivered a reduction in the number of motor vehicles in the Square Mile¹⁴:

- The total number of motor vehicles decreased by 26% between 2017 and 2022.
- The number of freight vehicles decreased by 14% between 2017 and 2022.

At the time of writing, the City Corporation 25-year Transport Strategy is undergoing a review. The proposed approach is to continue to improve air quality through traffic reduction and support the transition of the remaining vehicles on City streets to low and zero emission.

The focus of the Transport Strategy is:

1. Prioritising the needs of people walking, making streets more accessible and delivering high quality public realm.
2. Making the most efficient and effective use of street space by reducing motor traffic, including the number of delivery and servicing vehicles.
3. Seeking to ensure that no one is killed or seriously injured while travelling on City streets, including measures to deliver safer streets and reduced speeds.
4. Enabling more people to choose to cycle by making conditions for cycling in the Square Mile safer and more pleasant.
5. Improving air quality and reduce noise, including by encouraging and enabling the switch to zero emission capable vehicles.

3.5 Rewarding Best Practice

The City Corporation runs award schemes to recognise stakeholder best practice.

3.5.1 *The Clean City Awards Scheme*

This scheme has been devised to encourage and reward sustainable business and it celebrated its 30th anniversary in 2024. The awards focus on driving action across the following areas:

- Air quality and climate action
- Communication and engagement
- Resource efficiency and circular economy
- Transitioning towards a Plastic Free City

¹³ The City of London Corporation (2019), City Streets: Transport for a changing Square Mile, City of London Transport Strategy

¹⁴ The City of London Corporation (2023), City Streets 2023 summary report

The 2024 winner of the Air Quality and Climate Action Award was 20 Fenchurch Street Ltd through their work to reduce the environmental impact of light pollution. Project Go Dark reduced energy use by 3,3780kW over a 13-month period by turning office lights off when not needed.

Figure 3.1: 2024 Air Quality and Climate Action Award Winners, 20 Fenchurch Street Ltd¹⁵



3.5.2 Considerate Contractors and Street works Schemes.

The Considerate Contractors and Street works schemes are open to contractors undertaking building and civil engineering, or street works in the Square Mile. Members of both schemes agree to follow a Code of Conduct which exceeds the legal minimum requirement and ensures that general standards of work are improved.

There are annual awards attached to membership of the schemes. The Considerate Contractors Award includes a category for exceptional or innovative environmental practice. The 2023 Environment Award was given to the Mace Group for their work at Stonecutter Court.

3.6 Proposal for New Regulatory Powers

Whilst there is a great deal of action underway to reduce emissions from road traffic, there is currently a lack of effective control to deal with emissions from combustion plant (boilers, generators, non-road mobile machinery [NRMM] and CHP).

Monitoring has revealed that there can be a significant local impact on levels of air pollution from some combustion plant. The City Corporation identified the need for a practical, local authority focused piece of legislation to deal with this form of pollution and put the proposals together in a Private Members Bill. The Emissions Reduction (Local Authorities in London)

¹⁵ 20 Fenchurch Street Ltd, courtesy of Clive Totman

Bill¹⁶ had its first reading in the House of Lords and is used as a basis for pressing for new powers to manage emissions of pollutants from combustion plant.

Leading by Example

We will:

Fulfil the City Corporation's Climate Action Strategy commitments.

Reduce emissions from the City Corporation's fleet.

Deliver the City Corporation Transport Strategy to reduce emissions from vehicles in the Square Mile.

Encourage the use of zero tailpipe emission vehicles through the City Corporation supply chain.

Deliver the Clean City Awards and Considerate Contractors Environment Award Schemes to reward exceptional and innovative practice to improve air quality.

Work with external organisations to promote the proposals in the Emissions Reduction (Local Authorities in London) Bill.

¹⁶ UK Parliament (2019), Emissions Reduction (Local Authorities in London) Bill

4 Collaborating with Partners

Commitment:

The City Corporation will work with a wide range of external partners on air quality policy and action to improve air quality across the Square Mile and Greater London.

As a significant amount of air pollution monitored in the Square Mile is not generated within its boundary, the City Corporation works with a wide range of partners to improve air quality. This collaborative work is an essential component of air quality management.

4.1 Designated Air Quality Partners

The Environment Act 2021 introduced the new concept of designated Air Quality Partners (AQPs) into the Local Air Quality Management (LAQM) framework. An AQP is required to assist a local authority with any reasonable request to work towards reducing air pollution emissions.

The designated AQPs relevant to the strategy are listed in Table 4.1, and the actions being taken by the AQPs to reduce air pollution are detailed in Appendix 5.

Table 4.1: Designated Air Quality Partners

The Mayor of London: The Greater London Authority	The London Environment Strategy was published with an aim for London to have the best air quality of any major city by 2050. The City Corporation works closely with the GLA to knowledge share and develop targeted actions to reduce air pollution.
The Mayor of London: Transport For London	Through the Mayor of London, the City Corporation also works very closely with TfL. TfL is the integrated transport authority responsible for meeting the Mayor's commitments on transport. It runs the day-to-day operation of public transport, including the licencing of taxi cabs and private hire vehicles.
The Environment Agency	The Environment Agency (EA) is a public body with responsibilities for the protection and enhancement of the environment. The EA regulates several operations that have the potential to affect air quality negatively under the Environmental Permitting Regulations. This includes combustion plant that are subject to the requirements of the Medium Combustion Plant (MCP) Directive. All new MCP should now comply with the regulations, and all existing MCP above 1MWth should have a permit in place by 1 January 2029.
The Port of London Authority	The Port of London Authority (PLA) is the custodian of the tidal Thames. The relative proportion of the river's contribution to London's emissions has been increasing as emissions from road vehicles have fallen due to newer cleaner vehicles. Initially published in the 2018, the PLA Air Quality Strategy was the first strategy developed by a port.

4.2

4.3 Additional Partnerships

In addition to the designated AQPs, the City Corporation works very closely with a range of other partners on actions to improve air quality and raise awareness.

Table 4.2: Additional Partnerships

<p>London Boroughs and London Councils</p>	<p>The City Corporation sits within the Central London Air Quality Cluster Group which is comprised of 7 London Boroughs plus the City Corporation. The group meets quarterly to discuss best practice and deliver joint programmes for improving air quality. The City Corporation also chairs the London Air Quality Steering Group. The group aims to direct and influence air policy across London. Members include London Councils, London Boroughs, the EA, the GLA, TfL, the PLA, and the UK Health Security Agency (UKHSA).</p>
<p>Cross River Partnership</p>	<p>Cross River Partnership (CRP) supports public, private, and voluntary organisations to address challenges around air quality, transport, placemaking and wellbeing. The chair of the Port Health and Environmental Services Committee co-chairs the CRP Board, and officers engage with CRP on a range of pan London projects.</p>
<p>Universities and Research Groups</p>	<p>The City Corporation sits on the Air Pollution Research in London (APRIL) steering group. APRIL identifies priority areas for research to improve air quality in London and other major cities, supports the development of new scientific research and communicates the latest research findings. In addition, the City Corporation commissions and supports research that aids understanding and improvement of air quality.</p>
<p>Third Sector</p>	<p>The City Corporation works with a range of non-government and non-profit-making organisations, with particular focus on health messaging and community engagement.</p>
<p>Businesses operating in the Square Mile</p>	<p>The City Corporation works with a range of organisations in the Square Mile to quantify and where possible reduce, air pollution emissions from their activities. This includes, but is not limited to, the construction, restaurant, finance, accounting, and legal sectors.</p>

An example of a collaborative project is *Clean Air Thames* where the City Corporation worked with the PLA and CRP. For the project, a 34-year-old river vessel was retrofitted with pollution emission reduction technology. For the vessel, Driftwood II, this resulted in reductions for all pollutants monitored, including nitrogen dioxide and particulate matter.



Collaborating with Partners

We will:

Work with designated and non-designated Air Quality Partners to collaborate on policies and measures to improve air quality across the Square Mile and Greater London.

Support research into measures to improve air quality and into the health impacts of air pollution.

5 Reducing Emissions

Commitment:

The City Corporation will implement a range of measures to reduce emissions of air pollutants across the Square Mile

5.1 Transport Emissions

The movement of people and goods in and around the Square Mile contributes to air pollution. The road network is used intensively; particularly during the working week as vehicles service City businesses. The Square Mile is located within the London Low Emission Zone, the Congestion Charge Zone, and Ultra Low Emission Zone.

The City of London is very well served by public transport. There are a high number of bus routes passing through the Square Mile, with most buses being hybrid or fully electric. A high number of Hackney Carriages are present. At the time of writing almost 8,500 licensed taxis are zero tailpipe emission capable (ZEC), which accounts for over half of the fleet.

5.1.1 Idling Vehicles Engines

The City Corporation takes a wide range of action to deal with unnecessary vehicle engine idling. This includes:

- Responding to complaints and engaging directly with drivers.
- Issuing Penalty Charge Notices where appropriate. In 2023 11 warning notices and 4 Penalty Charge Notices were issued for unnecessary engine idling in the Square Mile.
- Distributing information leaflets.
- Installing street signs and place signs on lamp posts.
- Writing directly to companies.
- Working with local businesses.
- Enforcement at street works and construction sites.



Since pioneering the volunteer led Idling Action Days in 2015, the City Corporation has overseen pan London Idling Action, and continues to work with other London boroughs on programmes to tackle unnecessary vehicle engine idling across the capital.

5.1.2 Parking Charges

The City Corporation operates an emission based on-street and off-street parking charging system. Older, more polluting vehicles pay a higher charge to park in the Square Mile, see table 5.1.

Table 5.1: Parking Charges as of 2024

Vehicle Type	On Street, Mon-Fri (p/hr)	Off Street (p/hr) *	Off Street Annual Season Ticket (per quarter)	Smithfield Overnight (up to 3-hours)
Electric or hydrogen or hybrid	£5.00	£4.50	£2,500	£1.80
Petrol vehicles registered from 2005	£7.20	£5.00	£2,650	£2.00
Diesel vehicles registered from 2015	£7.20	£5.00	£2,650	£2.00
Other vehicles	£10.00	£7.00	£3,650	£3.50

*City Corporation car parks: Baynard House, London Wall, Minorities and Tower Hill

5.2 Non-Transport Emissions

Non-transport sources make a significant contribution to air pollution in the Square Mile. As emissions from road vehicles have declined in recent years, the relative proportion of emissions from non-transport sources had increased.

5.2.1 New developments

The Square Mile is in a constant state of redevelopment with planning policy being an important mechanism for improving air quality. The City Corporation is developing a new Local Plan, the City Plan 2040. This sets out the Corporation’s vision, strategy, and objectives for planning, together with policies that will guide future decisions on planning applications.

The draft City Plan 2040 supports the City Corporation’s drive to improve local air quality. The draft proposals relating to air quality are detailed in Appendix 6.

The City Corporation published an Air Quality Supplementary Planning Document (SPD) in July 2017. The SPD provides developers with information on air quality assessments, and how to mitigate air pollution through appropriate building design, method of construction and choice of heating and energy plant.

The SPD will be updated to align with the City Plan 2040, following its adoption. The update will include the latest best practice guidance and technological advances.



5.2.2 Construction and Demolition

At any given time, there are many active demolition, construction, and refurbishment sites in operation in the Square Mile. There are also many short-term street works. The City Corporation has a Code of Practice (CoP) for construction and demolition¹⁷, detailing environmental standards and operational techniques that it expects all contractors to adhere to.

Construction has been identified by the LAEI as the highest source of PM₁₀ emitted in the Square Mile. Therefore, close management and mitigation of construction emissions is a priority for the City Corporation. The CoP reflects best practice guidance issued by the Mayor of London¹⁸. Regular on-site checks are completed on all large construction sites to ensure compliance with the CoP.



5.2.3 Non-Road Mobile Machinery (NRMM)

NRMM is a broad category which includes mobile machines and equipment, or vehicles not intended for transporting goods or passengers on roads.

The City of London is within the Central Activity Zone (CAZ) of the London NRMM Low Emission Zone. The NRMM Low Emission Zone requires that all engines used on construction sites with a power rating of between 37kW and 560kW must meet a specified emission standard.

Table 5.2 details the dates by which equipment used during construction is required to meet the specified standard. Construction sites across the Square Mile are regularly inspected to ensure compliance.

Table 5.2: NRMM Low Emission Zone Requirements

	NRMM Low Emission Zone Area	
	Greater London	CAZ / Canary Wharf / Opportunity Area
Before January 2025	Stage IIIB	Stage IV
From 1 January 2025	Stage IV	Stage IV
From 1 January 2030	Stage V	Stage V

NRMM is also used in short-term street works. The emission standards used on construction sites don't apply to street works. The City Corporation has been pressing for new powers to deal with this unregulated source of pollution through its Emissions Reduction (Local Authorities in London) Bill.

¹⁷ City of London Corporation (2019), City of London Code of Practice for Deconstruction and Construction Sites, Ninth Edition

¹⁸ Mayor of London (2014), The Control of Dust and Emissions During Construction and Demolition: Supplementary Planning Guidance

5.2.4 Commercial Heat and Power

The largest source of nitrogen oxide emissions in the Square Mile is gas boilers providing heat and hot water to commercial premises. Back-up or standby diesel generators are an additional source which, although only used periodically, do contribute to air pollution in the Square Mile⁶.

The London Plan requires major developments to be net zero-carbon. The 'Be Clean' section of the energy hierarchy process, below, has driven a design shift from gas boilers to air source heat pumps in commercial buildings:

1. Connect to local existing or planned heat networks.
2. Use zero-emission or local secondary heat sources.
3. Use low-emission CHP (only where there is a case for it).
4. Use ultra-low nitrogen oxide gas boilers.

The installation of diesel fuelled backup generators in new developments is assessed through the planning process. Developers are asked to consider alternatives where possible. In 2024, a project to investigate the existing stock of backup generators in the Square Mile commenced. The aim of the project is to gather information, and to ensure any Environmental Permit requirements managed by the Environment Agency are complied with.

5.2.5 Commercial Cooking

Research undertaken by the City Corporation to assess PM_{2.5} emission sources in the Square Mile revealed that commercial cooking is the largest source at 37%⁶. Work is underway to consider how emissions from this sector can be reduced.

5.2.6 Chimneys

Under the Clean Air Act 1993¹⁹, a gas boiler with a rating of 366.4 kilowatts or more is required to have its chimney height approved by the local authority. The City Corporation ensures that chimneys of large boilers are sited and operate in a way that leads to maximum dispersal of pollutants.

5.2.7 Environmental Permitting Regulations

Local authorities regulate a variety of industrial operations to control emissions to air. In the Square Mile, the only operations subject to this are one dry-cleaning operation and the energy centre at Barts Hospital.

Larger combustion plant, boilers, generators, and combined heat and power plant are regulated by the EA. The requirement for a permit depends upon the size of the plant, and in the case of standby generators, how often they are used. All new medium sized plant, put into operation on or after 20th December 2018, will have a permit to operate with conditions designed to minimise pollution. All existing plant between 5MWth and 50MWth

¹⁹ Clean Air Act 1993. (c.11). London: The Stationery Office.

should have a permit in place by 1st January 2024 and all plant above 1MWth by 1st January 2029²⁰.

5.2.8 Smoke Control

The whole of the Square Mile is a Smoke Control Area (SCA) which means it is an offence to emit smoke from the combustion of fuel from any premises. Exemptions are allowed, for example, for a short period during start-up of an engine. The SCA has been in place since 1954²¹. In a SCA, only fuels that are on the list of authorised fuels or 'smokeless' fuels, can be burnt, unless an 'exempt appliance' is used. Authorised fuels, smokeless fuels and exempt appliances are listed on the Department for Environment, Food and Rural Affairs (Defra) website.

The City Corporation is responsible for enforcing the sale of domestic solid fuels in accordance with domestic solid fuel regulations²². Compliance checks are undertaken regularly in shops to ensure only certified solid fuel with the correct labelling is sold.

²⁰ The Environmental Permitting (England and Wales) (Amendment) Regulations (EPR) 2018 SI 110, the Medium Combustion Plant Directive (MCPD) EU/2015/2193

²¹ City of London (Various Powers) Act 1954. (2 & 3 Eliz. 2. c. xxviii). London: HMSO

²² The Air Quality (Domestic Solid Fuels Standards) (England) Regulations 2020 (SI 2020 No. 1095)

Reducing Emissions

We will:

Develop further action to reduce annual average concentrations of nitrogen dioxide on all City Corporation roads to below 40µg/m³.

Take action to discourage unnecessary vehicle idling and enforce anti-idling policies across the Square Mile.

Ensure City Corporation vehicle parking charges favour low and zero tailpipe emission vehicles.

Assess planning applications for air quality impact.

Revise the City Corporation Supplementary Planning Document for Air Quality to reflect the City Plan 2040 and London Plan Guidance.

Ensure emissions from construction sites are minimised.

Manage and mitigate emissions from non-road mobile machinery.

Reduce emissions associated with standby power generation across the Square Mile.

Develop and implement a plan to mitigate emissions of PM_{2.5} from commercial cooking.

Ensure that where possible chimney stacks terminate above the height of the nearest building.

Ensure that the City Corporation's prescribed processes comply with emission control requirements.

Promote and enforce the requirements of Smoke Control Areas and regulate the sale of solid fuel.

6 Public Health and Raising Awareness

Commitment:

The City Corporation will continue to raise awareness about air pollution and provide information on how to reduce exposure to pollution.

Although air quality is improving in the Square Mile, it remains at a level that has a detrimental impact on health. The City Corporation therefore takes a wide range of action to increase public awareness and understanding about air pollution. With the right information, people can take steps to avoid high levels of air pollution to reduce the impact on their health.

The City of London Joint Health and Wellbeing Strategy²³ has identified improving air quality as a key priority to improve the health and wellbeing of residents and workers.

A Public Health Outcomes Framework has been introduced and consists of a set of indicators compiled by the UK Health Security Agency. One of these indicators is Air Pollution, and this is measured against levels of particles (PM_{2.5}). The City of London Health profile for 2022 shows that the City of London has a proportion of mortality attributable to particulate air pollution of 8.3%. This is higher than both London as a whole (7.1%) and England (5.8%).

6.1 Provision of Information

The City Corporation uses a range of methods to inform businesses, workers, and residents about air pollution. This includes social media, the City Corporation website and providing information at events. In addition, an e-newsletter is produced every month.

The City Corporation has an X account @_CityAir. This helps to raise awareness about air pollution and support campaigns such as anti-vehicle idling and National Clean Air Day.

Overall levels of air pollution in the Square Mile vary from day to day in response to weather conditions. Levels of air pollution each day are defined as either 'low', 'medium', 'high' or 'very high' which reflects banding devised by the Government²⁴. High levels of air pollution occur in the City of London on a small number of days in any year and instances of very high levels of air pollution are now very rare.



The City Corporation's free Smart Phone App 'CityAir' provides advice to users when pollution levels are high or very high. People can sign up and receive tailored messages to help them avoid high levels of air pollution. The App includes a map of current pollution

²³ The City of London Corporation (2017), Joint Health and Wellbeing Strategy: 2017-2020

²⁴ Department for environment, Food and Rural Affairs (2013), Update on Implementation of the Daily Air Quality Index: Information for Data Providers and Publishers

levels and has a function to guide users along low pollution routes. The City Corporation also supports the provision of the AirText messaging service. AirText is promoted to residents and workers who use the service to receive alerts by email, text, and voicemail.

The Mayor of London provides information about levels of pollution through a range of outlets. TfL broadcasts advice whenever air pollution is moderate, high, or very high, and information is sent directly to schools, healthcare professionals, and care homes across London.



As part of a Defra funded project, and in collaboration with the three London boroughs: Hackney; Tower Hamlets and Newham, a web-based information tool 'Air Aware' has been developed. Air Aware aims to improve awareness of air quality and highlights ways in which people can reduce their exposure, and their emissions, of air pollution. A group of residents from all participating boroughs helped design the website to ensure it contained information relevant to them and their communities.

6.2 National Clean Air Day

National Clean Air Day is held in June each year. A range of activities are carried out nationally to raise awareness of air pollution and inspire behaviour change. National Clean Air Day is supported by the City Corporation and each year a diverse schedule of events and activities are run by the air quality team.



6.3 Working with Schools and nurseries

Air quality is measured at all schools and nurseries in the Square Mile. Annual reports are produced containing the monitoring data, and all schools and nurseries are offered awareness raising support and information on how to reduce exposure on routes to and from school.

6.4 Working with businesses

Around 614,500 people work in the City of London. Through the CityAir business engagement programme, the City Corporation has been raising awareness of air pollution with workers. This includes supporting events and providing information for internal dissemination.



6.5 Indoor air quality

As concentrations of ambient air pollution improve, attention is turning to indoor air quality. Whilst there is no statutory obligation for local authorities to review and assess indoor air

quality, they are encouraged, through government guidance, to provide information to residents. The City Corporation has produced an information leaflet on the sources and health impacts of indoor air pollution.

The City Corporation is also part of a consortium of 16 London boroughs working on a project to assess indoor air quality and the impact of household behaviour change.

Public Health and Raising Awareness

We will:

Prepare annual air quality briefings for colleagues and for the Director of Public Health.

Disseminate information about air quality.

Run events in support of National Clean Air Day.

Work with schools and nurseries in the Square Mile.

Work with businesses to raise awareness of air pollution amongst workers.

Raise awareness of the health impacts of poor indoor air quality.

Appendix 1: Actions to deliver the Air Quality Strategy

Table Key

Dept. = Department responsible

CHB = Chamberlain's

Env = Environment

IG = Innovation and Growth

Cost = Approximate cost to the organisation per annum:

✓ = <£10,000, ✓✓ = £10,000 - £50,000, ✓✓✓ = >£50,000

		Action	Detail	Timeline	Outcome	Dept.	Cost
99 ebe Ad Quality Monitoring	1	Air quality monitoring.	<p>Undertake monitoring of nitrogen dioxide, PM₁₀, PM_{2.5} and ozone using continuous analysers at a minimum of five locations in the Square Mile.</p> <p>Maintain a nitrogen dioxide monitoring network utilising diffusion tubes, ensuring a high degree of spatial coverage across the Square Mile.</p> <p>Review all monitoring locations annually.</p>	Present to 2030	<p>An effective monitoring network providing accurate, trusted, and accessible data.</p> <p>Monitoring data to demonstrate compliance with statutory obligations and assessing the impact of interventions.</p>	Env	✓✓
	2	Air quality data dissemination.	<p>Ensure live data from the continuous monitoring network is made available to the public.</p>	Present to 2030	<p>Better informed public who can make decisions based on available data.</p>	Env	✓✓
	3	Compliance assessment.	<p>Undertake an annual assessment to demonstrate progress with the aims of this strategy.</p>	Annually	<p>Meet statutory obligations for reporting.</p> <p>Track progress with meeting the aims of this strategy.</p>	Env	✓✓

		Action	Detail	Timeline	Outcome	Dept.	Cost
Learning Example	4	Fulfil the City Corporation's Climate Action Strategy commitments.	<p>Improve the energy efficiency of operational buildings.</p> <p>Maximise the use of renewable energy sources across operational buildings.</p> <p>Accelerate the move to net zero carbon and improving energy efficiency in tenanted buildings.</p> <p>Develop a Square Mile Local Area Energy Plan.</p>	Present to 2030	Reduced emissions from the City Corporation's operations.	IG	✓✓✓
	5	Reduce emissions from the City Corporation's fleet.	<p>Increase the proportion of electric, hybrid and other low emission / zero tailpipe emission vehicles in the fleet.</p> <p>Work to reduce the size of the corporate fleet.</p>	Present to 2030	Reduced emissions from the City Corporation's fleet.	Env CHB	✓✓✓
			<p>Maintain the Freight Operator Recognition Scheme Gold accreditation.</p>	Annually			
6	Deliver the City Corporation Transport Strategy.	<p>Prioritising the needs of people walking, making streets more accessible and delivering a high-quality public realm.</p> <p>Making the most efficient and effective use of street space by reducing motor traffic, including the number of delivery and servicing vehicles.</p> <p>Enabling more people to choose to cycle by making conditions for cycling</p>	Present to 2030	Reduced emissions from transport across the Square Mile.	Env	✓✓✓	

		in the Square Mile safer and more pleasant.				
		Encouraging and enabling the switch to zero tailpipe emission capable vehicles.				
7	Encourage the use of zero tailpipe emission vehicles through the City Corporation supply chain.	Apply a menu of options for air quality to assist in reducing air pollution from major contracts. Review the menu of options every two years.	Present to 2030 Biannually	Reduced emissions associated with the City Corporation's contracts.	CHB Env	✓
8	Deliver the Clean City Awards and Considerate Contractors Environment Award Schemes.	Reward businesses that take positive action to improve air quality through an annual award. Reward building and civil engineering projects that demonstrate exceptional or innovative practice	Annually	Reduced emissions from City businesses.	Env	✓✓
9	Work with external organisations to promote the proposals in the Emissions Reduction (Local Authorities in London) Bill.	Work with Defra to highlight the need for additional powers for local authorities. Respond to consultations promoting the proposals in the Bill.	Present to 2030	Closed gap in regulatory powers for tackling sources of pollution in the Square Mile.	Env	✓✓

		Action	Detail	Timeline	Outcome	Dept.	Cost
Collaborating With Partners	10	Work with designated and non-designated Air Quality Partners to collaborate on policies and measures to improve air quality across the Square Mile, and Greater London.	<p>Support the activities of the Mayor of London air quality department.</p> <p>Monitor air pollution along the river and support the delivery of the Port of London Air Quality Strategy.</p> <p>Support the Environment Agency with the implementation of the Medium Combustion Plant Directive.</p> <p>Work with Cross River Partnership on collaborative projects.</p> <p>Work on joint projects with the Central London Air Quality Cluster Group.</p> <p>Chair quarterly meetings of the London Air Quality Steering Group.</p>	Present to 2030	Collaboration and the development and implementation of cross London policies for improving air quality.	Env	✓✓
	11	Support research into measures to improve air quality and into the health impacts of air pollution.	<p>Identify priority areas for research to improve air quality and communicate the latest research through membership of APRIL.</p> <p>Investigate the impact of tall buildings on levels of air pollution at street level</p> <p>Subject to funding, commission and support research that aids the understanding and improvement of air quality.</p>	Present to 2030	<p>Improved understanding of how air pollution behaves in a complex urban environment.</p> <p>Increased understanding and support for new technologies and other solutions for reducing air pollution</p>	Env	✓✓

		Action	Detail	Timeline	Outcome	Dept.	Cost
Reducing Emissions	12	Assess options for reducing annual average concentrations of nitrogen dioxide on all City Corporation roads to below 40µg/m ³ .	Identify all roads that breach the national standard for nitrogen dioxide. Assess options for reducing emissions of air pollutants to ensure compliance.	2025 - 2027	All roads in the Square Mile that meet the annual average national standard of 40µg/m ³ .	Env	✓✓✓
	13	Take action to discourage unnecessary vehicle idling and enforce anti-idling policies across the Square Mile.	Issue Penalty Charge Notices for unnecessary vehicle engine idling. Respond to complaints and erect signs in hot spot areas. Provide awareness training to advise drivers to switch off when parked. Work with London boroughs on pan London action to deal with unnecessary engine idling	Present to 2030	Reduced emissions from unnecessary vehicle idling in the Square Mile. Raised awareness amongst drivers and increased support for anti-idling policy.	Env	✓
	14	Ensure City Corporation parking charges favour low and zero tailpipe emission vehicles in the Square Mile.	On-street and off-street parking charges applied based on vehicle emissions.	Present to 2030	Parking policies that favour low and zero emission vehicles.	Env	✓
	15	Assess planning applications for air quality impact.	Review all relevant planning applications for air quality impact. Require air quality assessments for major developments. Encourage the use of non-combustion technology. Apply stringent emission standards for combustion plant where non-combustion plant is not feasible.	Present to 2030	New developments that do not have a negative impact on local air quality.	Env	✓

		<p>Require all new developments to be Air Quality Neutral as a minimum, and Air Quality Positive where relevant.</p> <p>Require developers to consider alternatives to diesel standby generators.</p> <p>Update the Supplementary Planning Document for Air Quality to reflect the latest guidance.</p>	2025			
16	Ensure emissions from construction sites are minimised.	<p>Ensure compliance with the Code of Practice for Deconstruction and Construction Sites.</p> <p>Inspect construction sites and respond to complaints.</p>	Present to 2030	Reduced emissions from construction activities and plant.	Env	✓
17	Manage and mitigate emissions from non-road mobile machinery.	<p>Undertake inspections of all sites to ensure compliance with the NRMM Low Emission Zone.</p> <p>Support the Mayor of London NRMM Beyond Construction project to understand emissions from NRMM used for roadworks and licenced events.</p>	<p>Present to 2030</p> <p>2025 - 2026</p>	Reduced emissions associated with construction and demolition operations.	Env	✓
18	Reduce emissions associated with standby power generation across the Square Mile.	Work with building owners to investigate options for reducing emissions and an alternative means of providing emergency back-up power.	2025 - 2026	Reduced emissions from generators.	Env	✓
19	Develop and implement a plan to mitigate emissions of PM _{2.5} from commercial cooking.	Run an awareness raising campaign for mobile food vendors and commercial cooking establishments.	2025 - 2026	Reduced emissions of particulate pollution associated with commercial cooking.	Env	✓

		Work with neighbouring authorities on proposals to mitigate emissions from commercial cooking operations.				
20	Ensure that where possible chimney stacks terminate above the height of the nearest building.	Where combustion plant is installed, good dispersion of emissions will be required.	Present to 2030	Emissions from chimney stacks have minimal impact on ground level concentrations of air pollution.	Env	✓
21	Ensure that the City Corporation's prescribed processes comply with emission control requirements.	Carry out risk-based inspections of prescribed processes in the Square Mile.	Present to 2030	Regulated operations that comply with the requirements of the legislation.	Env	✓
22	Promote and enforce the requirements of Smoke Control Areas and regulate the sale of solid fuel.	<p>Enforce smoke control provisions and raise awareness of the requirements across the Square Mile.</p> <p>Annual inspections of retail premises that sell solid fuel</p> <p>Engage with food premises to ensure the correct appliances and compliant fuels are used.</p>	Present to 2030	A reduction in the amount of smoke, PM ₁₀ and PM _{2.5} emitted in the Square Mile.	Env	✓

	Action	Detail	Timeline	Outcome	Dept.	Cost	
Public Health and Raising Awareness	23	Prepare annual air quality briefings for colleagues and for the Director of Public Health.	Annual summary report detailing air quality data and action being taken to tackle air pollution.	Annually	Better informed colleagues.	Env	✓
	24	Disseminate information about air quality.	Promote the free CityAir Smart Phone App, the AirText service and Air Aware.	Present to 2030	Better informed public able to take steps to reduce exposure to poor air quality.	Env	✓
			Disseminate an e-newsletter.	Monthly			
			Raise awareness through social media channels.				
			Bi-monthly community engagement at City of London libraries.	2025			
	25	Run events in support of National Clean Air Day.	Run up to three events each year.	Annually	Better informed individuals able to take steps to reduce exposure to poor air quality.	Env	✓
	26	Work with schools and nurseries in the Square Mile.	Monitor air pollution at all schools and nurseries. Provide ongoing advice and support and produce annual information reports for each school and nursery.	Annually	Reduced the impact of air pollution on the health of children in the Square Mile.	Env	✓
27	Work with businesses to raise awareness of air pollution amongst workers.	Engage with business through the CityAir business engagement programme.	Present to 2030	Raised awareness of air pollution amongst workers in the City of London	Env	✓✓	
28	Raise awareness of the health impacts of poor indoor air quality.	Disseminate a leaflet about indoor air quality. Work with a consortium of 16 London boroughs to investigate residential indoor air quality.	Present to 2030 2024-2026	Improved understanding of how to improve indoor air quality. Identify sources of air pollution in residential properties.	Env	✓	

Appendix 2: Air Quality Standards and Guidelines

National Context

In the UK, the responsibility for meeting air quality standards is devolved to the national administrations. The Secretary of State for Environment, Food and Rural Affairs has responsibility for meeting these in England. The Air Quality Standards Regulations 2010²⁵ contains the relevant standards and compliance date for different pollutants.

Table A2.1: UK Air Quality Standards

Pollutant	Standard	Concentration (mean)	Date to be achieved
Nitrogen Dioxide (NO ₂)	200µg/m ³ not to be exceeded more than 18 times per year	1-hour	1 January 2010
	40µg/m ³	Annual	1 January 2010
Particulate Matter, PM ₁₀	50µg/m ³ not to be exceeded more than 35 times per year	24-hour	31 December 2004
	40µg/m ³	Annual	31 December 2004
Particulate Matter, PM _{2.5}	20µg/m ³	Annual	1 January 2020
	20% reduction in concentrations	Annual	Between 2010 and 2020
Ozone	100µg/m ³ not to be exceeded more than 10 times per year	8-hour	31 December 2005

The Environment Act 2021, set additional legally binding targets for PM_{2.5} in England.

Table A2.2: The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023

Pollutant and Metric	Standard	Target Year
PM _{2.5} annual mean concentration	Interim target: 12µg/m ³	2028
PM _{2.5} annual mean concentration	Legally binding target: 10µg/m ³	2040
PM _{2.5} population exposure	Interim target: 22% reduction in exposure compared to 2018	2028
PM _{2.5} population exposure	Legally binding target: 35% reduction in exposure compared to 2018	2040

The Air Quality Standards Regulations²⁵ requires the UK to complete an air quality assessment annually and to report the findings. The annual Air Pollution in the UK report²⁶ provides a high-level summary of compliance, against the pollutants stated above and

²⁵ The Air Quality Standards Regulations 2010 (SI 2010 No. 1001)

²⁶ Department for Environment, Food and Rural Affairs (2023), Air Pollution in the UK 2022

many others, alongside background information on the UK’s legal and policy framework and how air pollution is assessed.

For further information about national air quality legislation please see footnotes²⁷ and ²⁸.

Local Authority Context

The statutory process for action by local authorities is the Local Air Quality Management (LAQM) Framework. The framework sets local limits for air pollution prescribed in the Air Quality (England) Regulations 2000 (as amended in 2002)²⁹. Local authorities are required to assess the quality of ambient air. If it does not comply with the relevant concentrations, an Air Quality Management Area (AQMA) must be declared, and an Air Quality Action Plan (AQAP) published to address the areas of poor air quality. This strategy fulfils the role of an AQAP.

In London, the Greater London Authority (GLA) provides technical and policy context to all London boroughs plus the City Corporation. This London specific guidance is called London Local Air Quality Management (LLAQM) framework.

Table A2.3: LAQM Air Quality Standards in England

Pollutant	Standard	Averaging Period
Nitrogen dioxide (NO ₂)	200µg/m ³ not to be exceeded more than 18 times a year	1-hour mean
	40µg/m ³	Annual mean
Particles (PM ₁₀)	50µg/m ³ not to be exceeded more than 35 times a year	24-hour mean
	40µg/m ³	Annual mean
Particles (PM _{2.5})	Work towards reducing emissions/concentrations of (PM _{2.5})	Annual mean

International Context

The above sets out the national context in terms of air quality legislation. On an international scale, the World Health Organisation (WHO) sets Air Quality Guidelines (AQGs) for ambient air pollutants³⁰. They are designed to offer quantitative health-based recommendations for managing air quality. They are not legally binding, but they do provide an evidence-based tool to inform legislation and policy in WHO Member States, of which the United Kingdom is one. Current air quality targets in the UK are based on the 2005 guidelines.

²⁷ House of Commons (2024), Air Quality: policies, proposals, and concerns

²⁸ Department for Environment, Food and Rural Affairs (2023), Air quality strategy: framework for local authority delivery

²⁹ The Air Quality (England) (Amendment) Regulations 2002 (SI 2002 No. 3043)

³⁰ World Health Organisation (2021), WHO global air quality guidelines: Particulate matter (PM_{2.5} and PM₁₀), ozone, nitrogen dioxide, sulfur dioxide and carbon monoxide

As evidence about the harmful health impacts of air pollution advances, the air quality guidelines are revised. The latest set of guidelines were published in September 2021. The 2021 guidelines are more stringent than those set in 2005 for nitrogen dioxide and particulate matter, PM_{2.5} and PM₁₀. They are presented in Table A2.4 below.

In addition to the guidelines, interim targets have been set to guide the reduction of air pollution towards the achievement of the guidelines. This recognises the difficulty that some countries will face in meeting the new recommendations. The WHO considers there to be no safe limit of exposure to PM_{2.5}, and any reduction in PM_{2.5} leads to positive health outcomes.

Table A2.4: World Health Organisation Recommended Air Quality Guidelines

Pollutant	Averaging Period	2021 Guidelines					2005 Guidelines
		Interim Target ($\mu\text{g}/\text{m}^3$)				AQG ($\mu\text{g}/\text{m}^3$)	AQG ($\mu\text{g}/\text{m}^3$)
		1 st	2 nd	3 rd	4 th		
Nitrogen dioxide (NO ₂)	Annual mean	40	30	20	-	10	40
	24-hour*	120	50	-	-	25	-
PM ₁₀	Annual mean	70	50	30	20	15	20
	24-hour*	150	100	75	50	45	50
PM _{2.5}	Annual mean	35	25	15	10	5	10
	24-hour*	75	50	37.5	25	15	25

* 99th Percentile, equates to 3-4 exceedance days per year.

Appendix 3: London Atmospheric Emission Inventory

The Greater London Authority maintains a database of emission sources across London known as the London Atmospheric Emissions Inventory (LAEI). At the time of writing, the latest release of the LAEI has a baseline of 2019 and forecast years of 2025 and 2030. It should be noted that 2025 and 2030 are predictions from the baseline of 2019 and so the data should not be treated as absolute. The forecasts are based upon Mayor of London and wider national policies.

Pollutant Concentrations

Figures A3.1-A3.3 present computer modelled concentrations of nitrogen dioxide and particulates, PM₁₀ and PM_{2.5}, across the City of London for 2025 and 2030. Both 2025 and 2030 have been presented as they align with the implementation of this strategy. The forecasts do not include the measures detailed in Appendix 1.

Figure A3.1 shows that the majority of the Square Mile is predicted to be below the nitrogen dioxide annual mean standard of 40µg/m³ in 2025. The areas that remain in exceedance are the main road links. Away from the transport sources concentrations are between 25 and 30µg/m³. This is confirmed by monitoring data.

When compared to nitrogen dioxide, there is less geographical variation in modelled concentrations of particulate matter. Figure A3.2 shows that the majority of the Square Mile will have an annual mean concentration for PM₁₀ in 2025 of between 15 and 20µg/m³. This is significantly below the PM₁₀ annual mean standard of 40µg/m³. Slightly elevated concentrations are predicted in the carriageway of busy road links such as Farringdon Street, Bishopsgate, and Upper/Lower Thames Street.

Figure A3.3 shows that the majority of the Square Mile will have an annual mean concentration for PM_{2.5} in 2025 of between 10 and 12.5µg/m³. Like the PM₁₀ concentration maps, slightly elevated concentrations of PM_{2.5} are expected in the carriageway of the busiest roads.

Figure A3.1: Annual Mean Nitrogen Dioxide Concentrations, 2025 and 2030

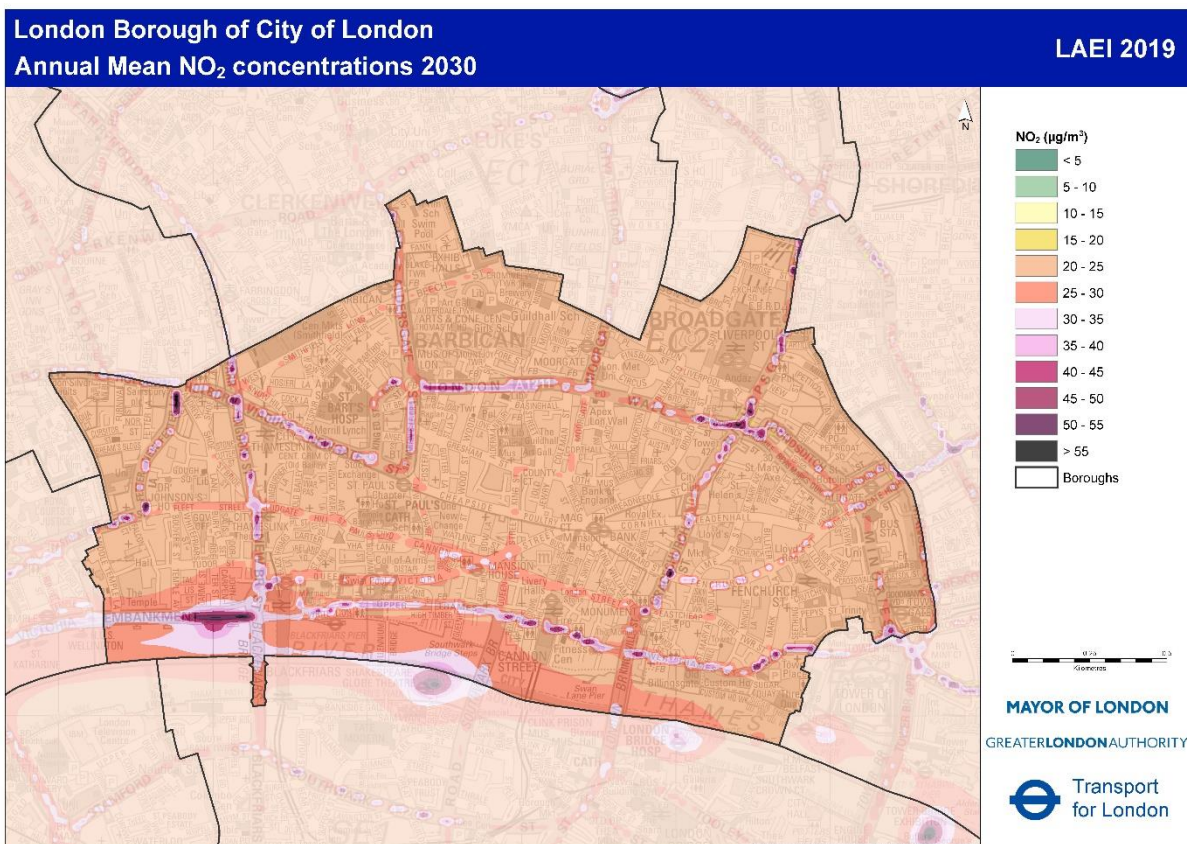
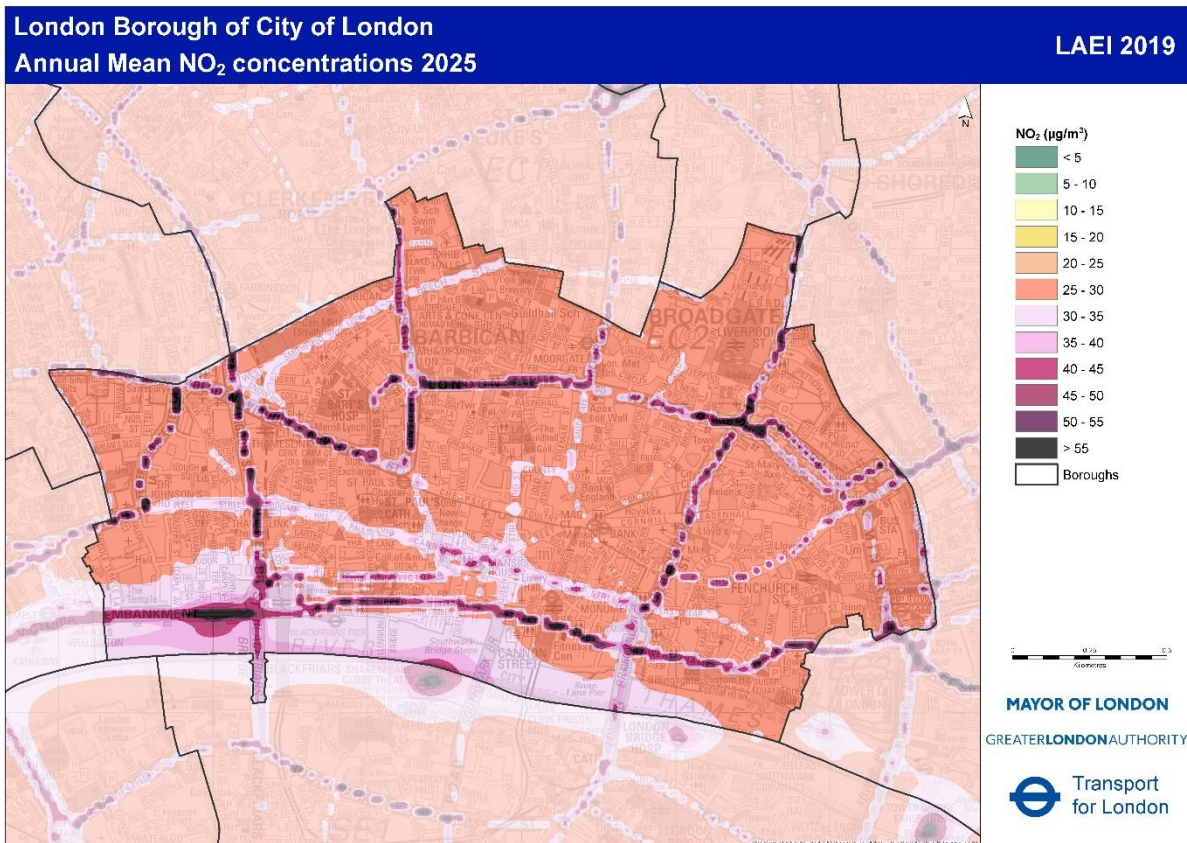


Figure A3.2: Annual Mean PM₁₀ Concentrations, 2025 and 2030

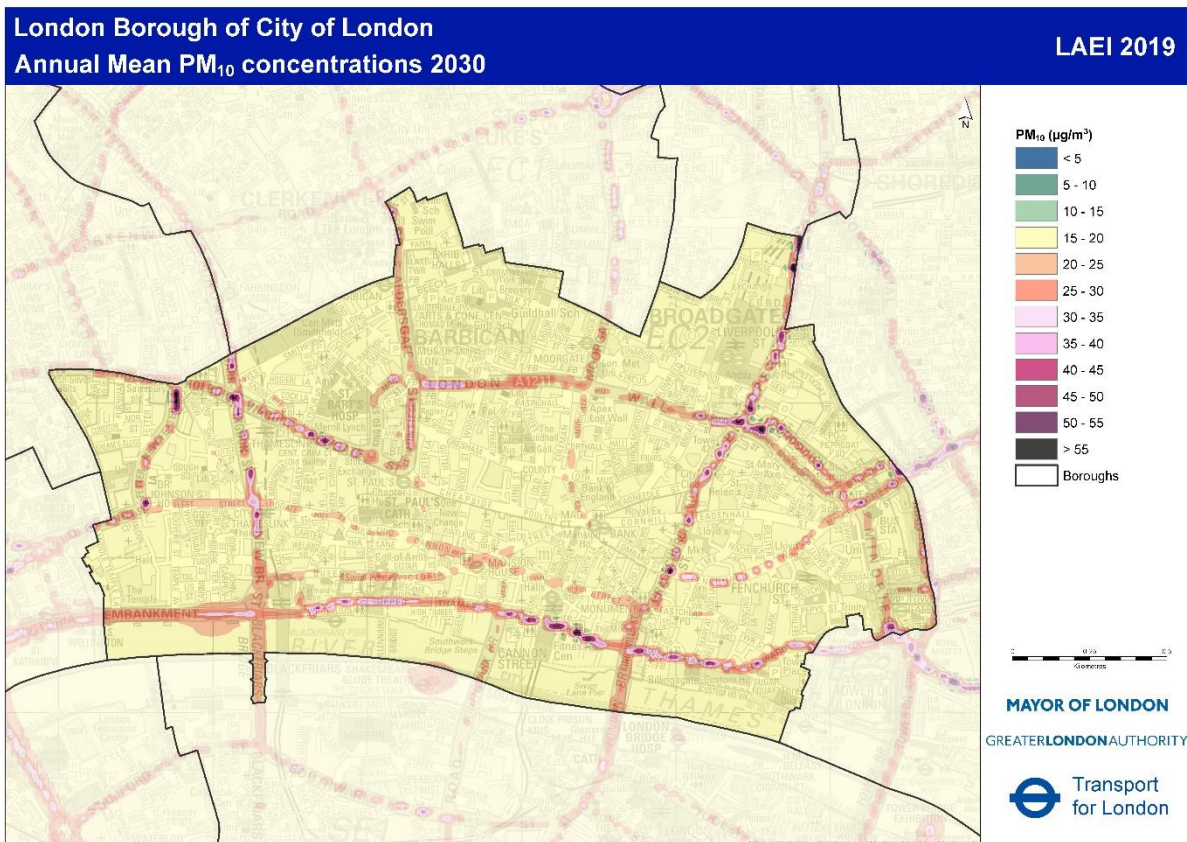
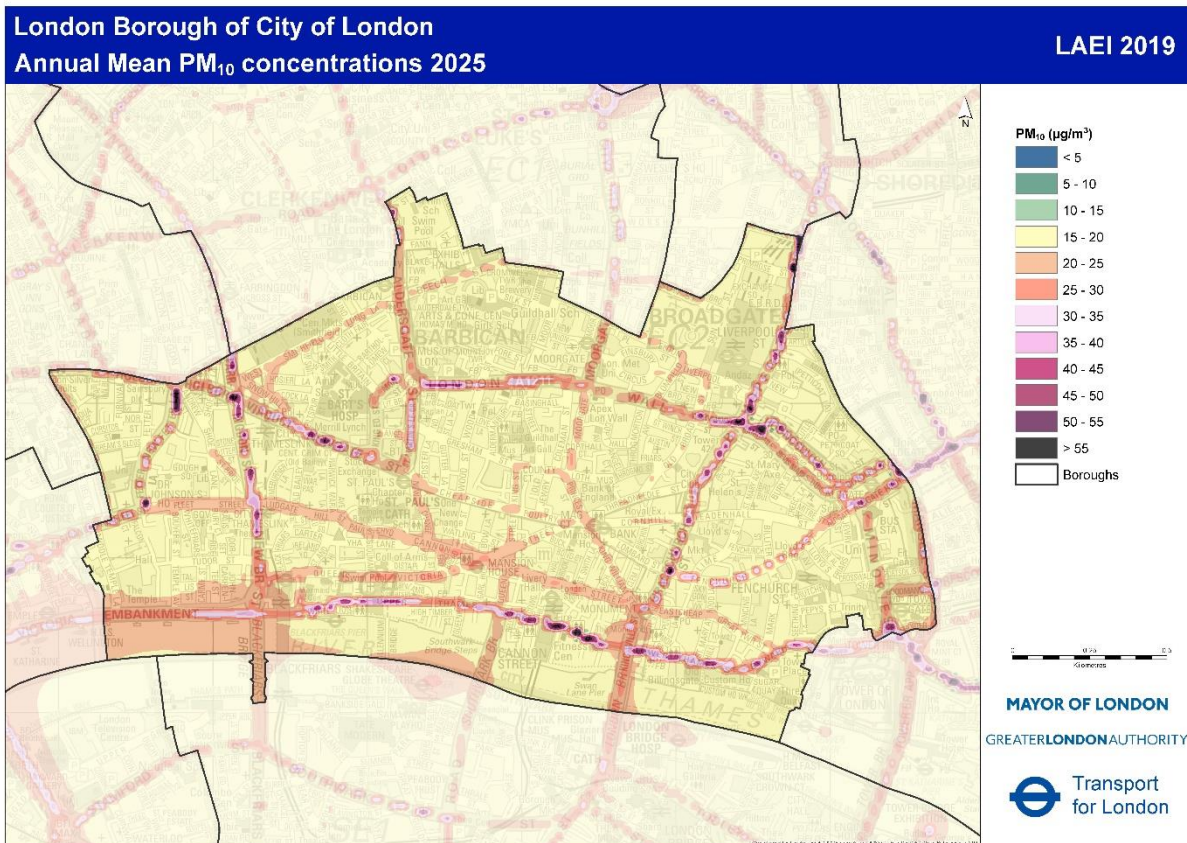
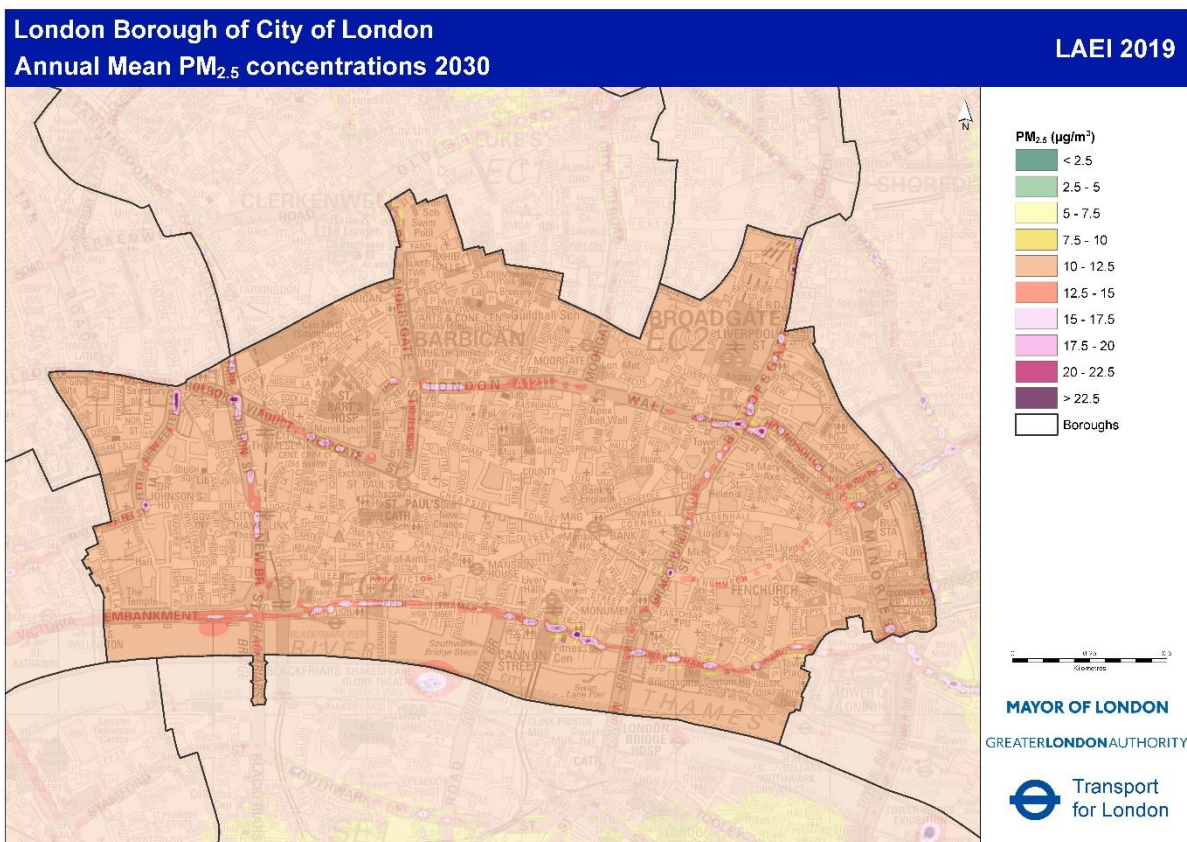
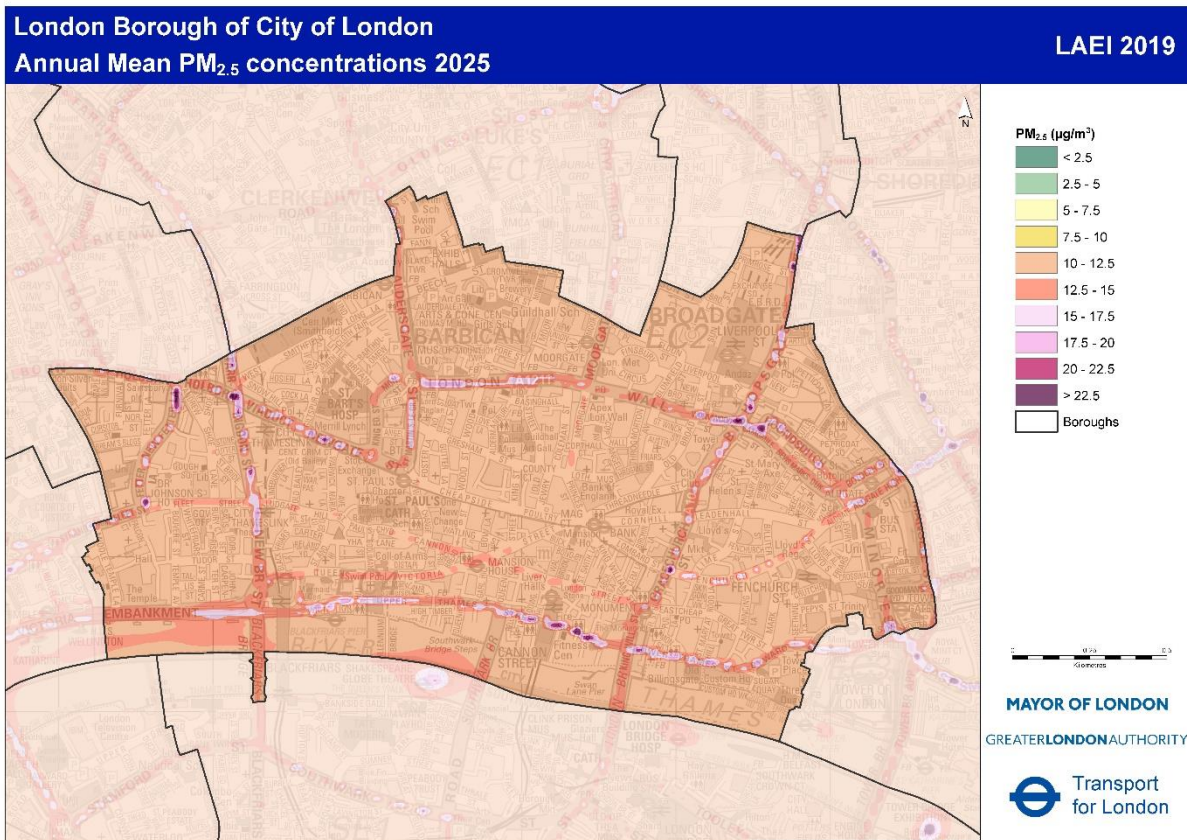


Figure A3.3: Annual Mean PM_{2.5} Concentrations, 2025 and 2030



Pollutant Emissions

Figures A3.4-A3.6 show how emissions of nitrogen oxides and particulates originating in the Square Mile have changed from 2013 to 2019 and are predicted to change by 2030. The data allows identification of areas where targeted improvements can be made and is used as a tool to guide action.

Figure A3.4: LAEI Emissions, Nitrogen Oxides

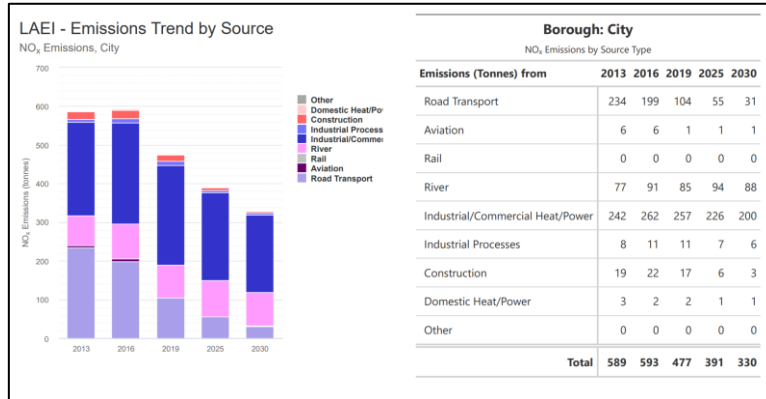


Figure A3.5: LAEI Emissions, Particulates, PM₁₀

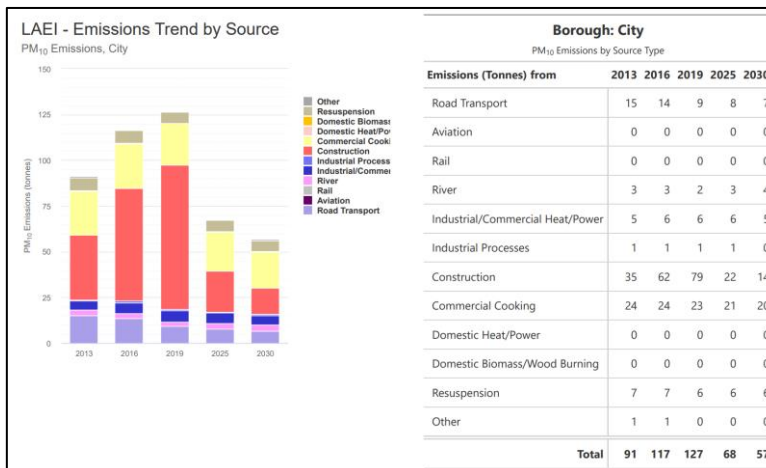
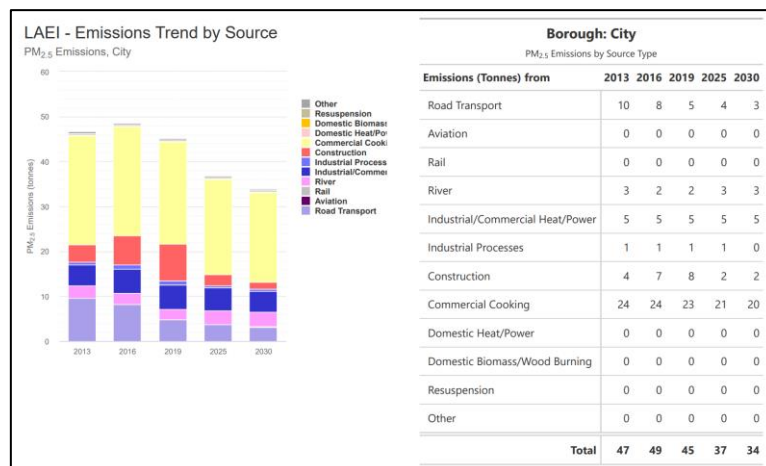


Figure A3.6: LAEI Emissions, Particulates, PM_{2.5}



Appendix 4: Monitoring Data, Further Assessment

The automatic and passive monitoring sites used for assessing long term changes over 15-years, are detailed in Table A4.1 and Table A4.2.

Table A4.1: Automatic Monitoring Sites

Site Name	Site ID	Site Type	Pollutants Monitored
Farringdon Street	CT2	Roadside	PM _{2.5}
The Aldgate School*	CT3	Urban Background	NO ₂ , PM ₁₀ PM _{2.5}
Beech Street	CT4	Roadside	NO ₂ , PM ₁₀
Walbrook Wharf**	CT6	Roadside	NO ₂
Upper Thames Street***	CT8	Roadside	PM ₁₀
Guildhall	CT9	Urban Background	O ₃
Bell Wharf Lane	CTA	Roadside	NO ₂ , PM ₁₀

Notes:

* Previously known as Sir John Cass Foundation Primary School.

** Walbrook Wharf was decommissioned in January 2023 with the NO_x analyser relocated to Bell Wharf Lane.

*** Upper Thames Street was decommissioned in September 2021 with the PM₁₀ analyser relocated to Bell Wharf Lane in May 2022.

Table A4.2: Long-term Passive Nitrogen Dioxide Monitoring Sites

Site Name	Site ID	Site Type
St Bartholomew's Hospital	CL5	Urban Background
Queen Victoria Street	CL38	Roadside
Fleet Street	CL39	Roadside
Mansell Street	CL40	Roadside
Barbican Centre, Speed House	CL55	Urban Background

Nitrogen Dioxide

Annual Mean Standard

A comparison of nitrogen dioxide annual mean concentrations between 2009 and 2023 is detailed in Table A4.3. Over a 15-year period, significant reductions have been experienced at all sites. The greatest reduction in concentrations between 2009 and 2023 was 79µg/m³ at Walbrook Wharf, and in terms of percentage reduction the greatest was 63% at the Aldgate School.

Table A4.3: 15-year Reduction of Nitrogen Dioxide Concentrations

Site ID	Site Type	Annual Mean		Concentration Reduction	
		2009	2023	$\mu\text{g}/\text{m}^3$	%
CL5	Urban Background	42.7	33.4	9.3	22%
CL38	Roadside	66.9	27.1	39.8	59%
CL39	Roadside	102.3	37.9	64.4	63%
CL40	Roadside	66.8	25.6	41.2	62%
CL55	Urban Background	42.6	18.7	23.9	56%
CT3	Urban Background	56	21	35.0	63%
CT4	Roadside	90	36	54.0	60%
CT6	Roadside	131	52 (2022)	79.0	60%
CTA	Roadside	-	32	-	-

Over the 15-year period, the average reduction at roadside sites was $55.7\mu\text{g}/\text{m}^3$, compared to an average reduction of $18.0\mu\text{g}/\text{m}^3$ at urban background locations. This average reduction can be seen in Figure A4.3. When compared against national nitrogen dioxide average concentrations, although concentrations have reduced significantly, average roadside and urban background concentrations have always been higher than national averages.

Figure A4.1: Annual Mean Nitrogen Dioxide, 2009 to 2023: Automatic Monitoring Sites

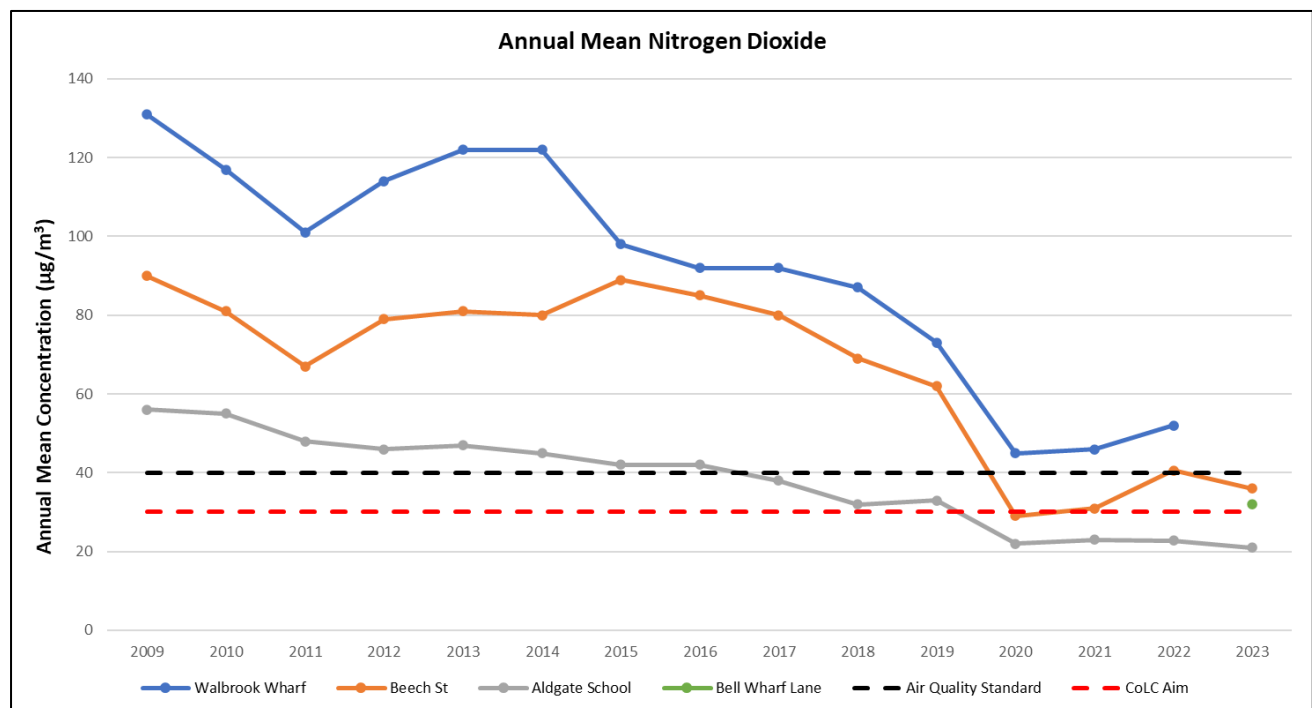


Figure A4.2: Annual Mean Nitrogen Dioxide, 2009 to 2023: Long-term Passive Sites

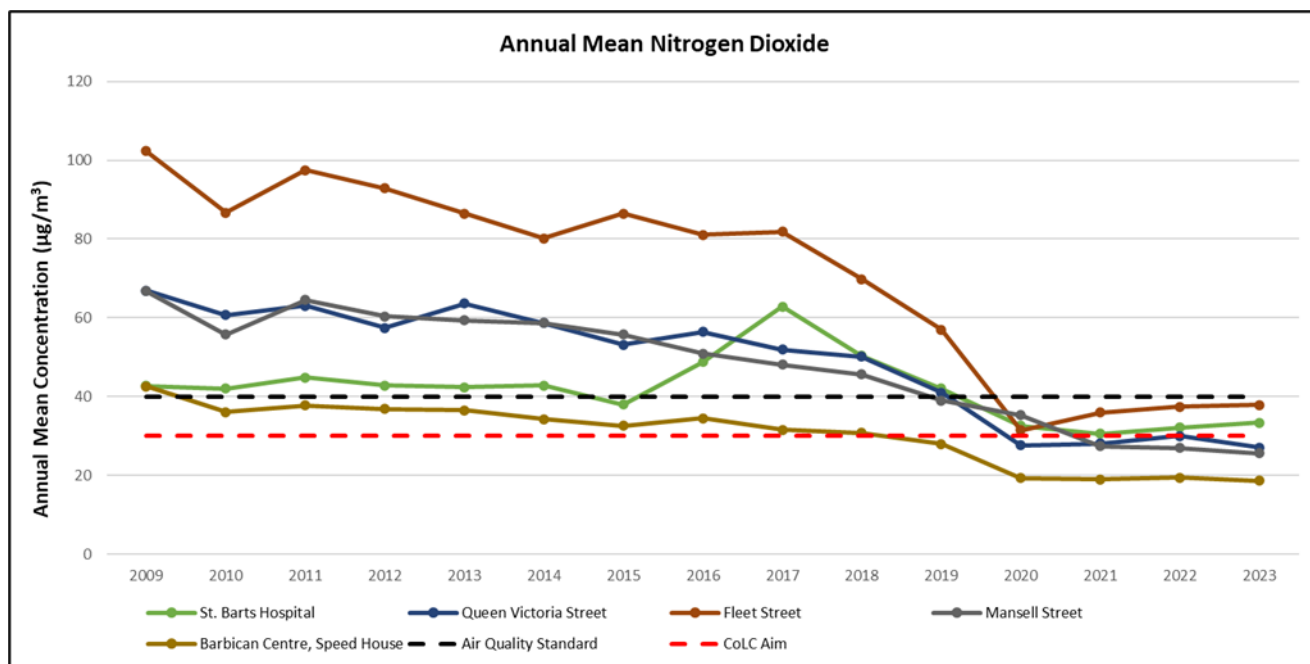
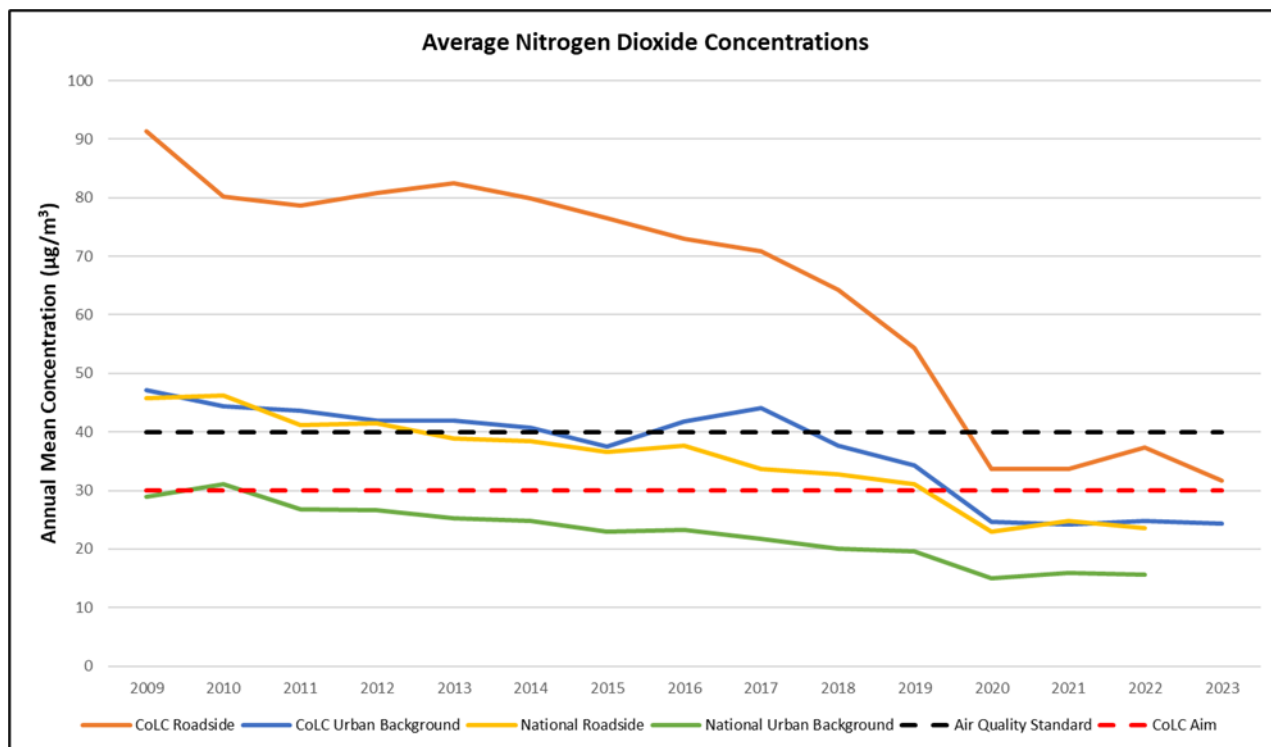


Figure A4.3: Average Annual Mean Nitrogen Dioxide Concentrations, 2009 to 2023: City of London and National Trends

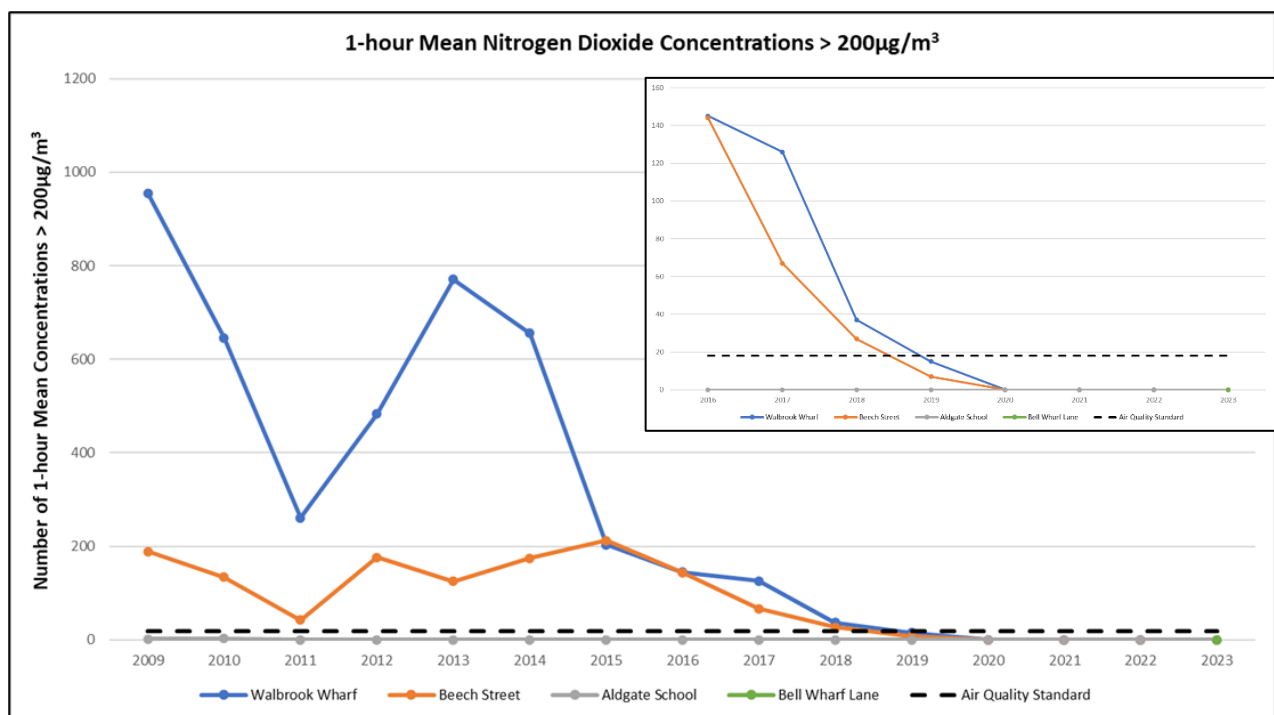


One Hour Standard

In addition to the annual mean standard for nitrogen dioxide, the 1-hour air quality standard of $200\mu\text{g}/\text{m}^3$ is also assessed in the Square Mile. To achieve compliance there must be no more eighteen instances of the 1-hour concentration in a year. To accurately assess compliance against the 1-hour standard, automatic analysers are used to assess hourly monitoring data, but due to their passive nature, diffusion tubes are not. As per LLAQM guidance³¹, a proxy annual mean concentration of $60\mu\text{g}/\text{m}^3$ can be used to predict if there is likely to be an exceedance of the 1-hour standard at a passive nitrogen dioxide monitoring site.

Figure A4.4 details 1-hour mean concentrations greater than $200\mu\text{g}/\text{m}^3$ at the automatic monitoring sites. There has been a significant reduction achieved at both roadside monitoring locations. In 2009 there were almost 1,000 1-hour concentrations greater than $200\mu\text{g}/\text{m}^3$ monitored at Walbrook Wharf, the site achieved compliance in 2019. The Aldgate School has continually reported compliance with the 1-hour standard, and all automatic sites have reported compliance since 2019.

Figure A4.4: 1-hour Mean Nitrogen Dioxide, 2009 to 2023



³¹ Mayor of London (2019), London Local Air Quality Management (LLAQM): Technical Guidance 2019 (LLAQM.TG (19))

Particulate Matter, PM₁₀

Annual Mean Standard

Over a 15-year period, significant reductions in annual mean PM₁₀ concentrations have been experienced at all sites, primarily at roadside monitoring locations. Annual mean concentrations at Upper Thames Street and Beech Street have declined by 17µg/m³ and 13µg/m³ respectively, and experienced similar percentage reductions of 47% and 46%. The Aldgate School, an urban background monitoring location, experienced a smaller overall reduction in terms of concentration and as a percentage over the 15-year monitoring period of 3µg/m³ and 17%.

Over the 15-year period, there was only one exceedance of the 40µg/m³ annual mean air quality standard at Upper Thames Street in 2015. In addition, the aim of achieving an annual mean of 15µg/m³ was met at Beech Street in 2021 and at The Aldgate School in 2023.

24-Hour Standard

In addition to the annual mean standard for PM₁₀, the 24-hour air quality standard of 50µg/m³ applies. To achieve compliance there must be no more thirty-five instances of the 1-hour concentration in a year. Figure A4.6 details instances of 24-hour mean concentrations greater than 50µg/m³. There has been a significant reduction at both roadside locations in the time-period, and there have been no instances of non-compliance since 2016. The Aldgate School has continually reported compliance with the 24-hour standard for the 15-year period.

Figure A4.5: Annual Mean PM₁₀, 2009 to 2023

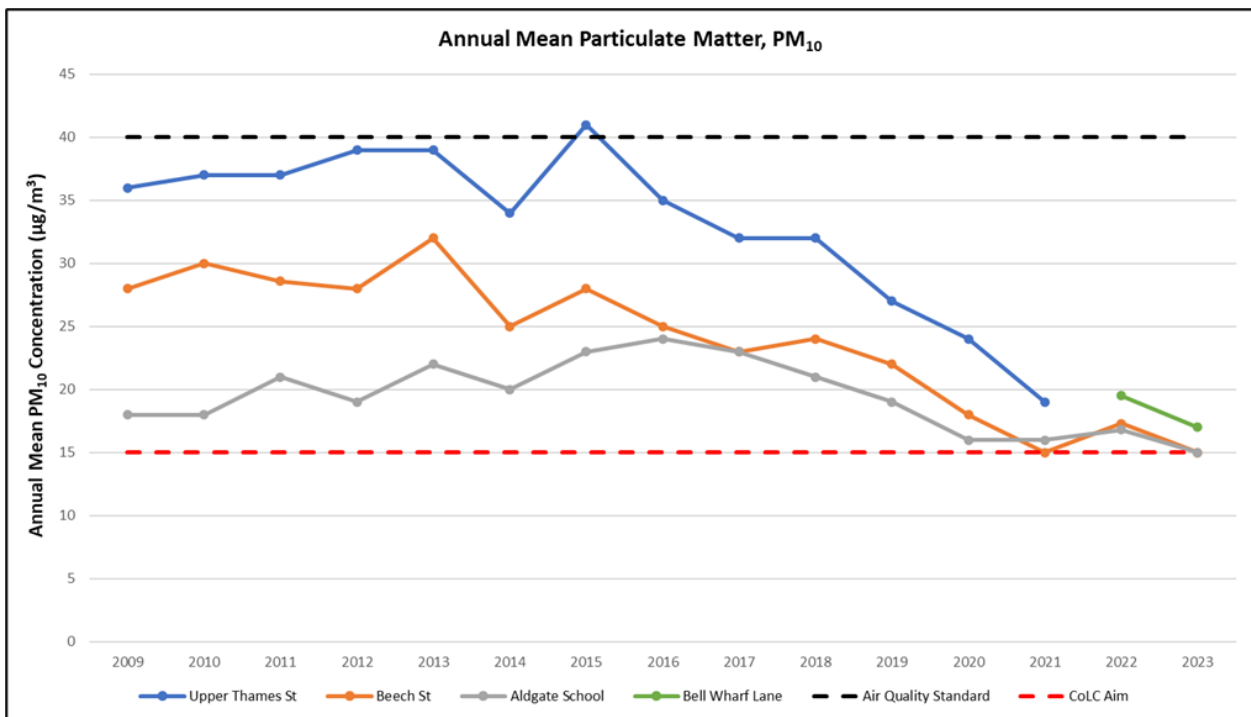
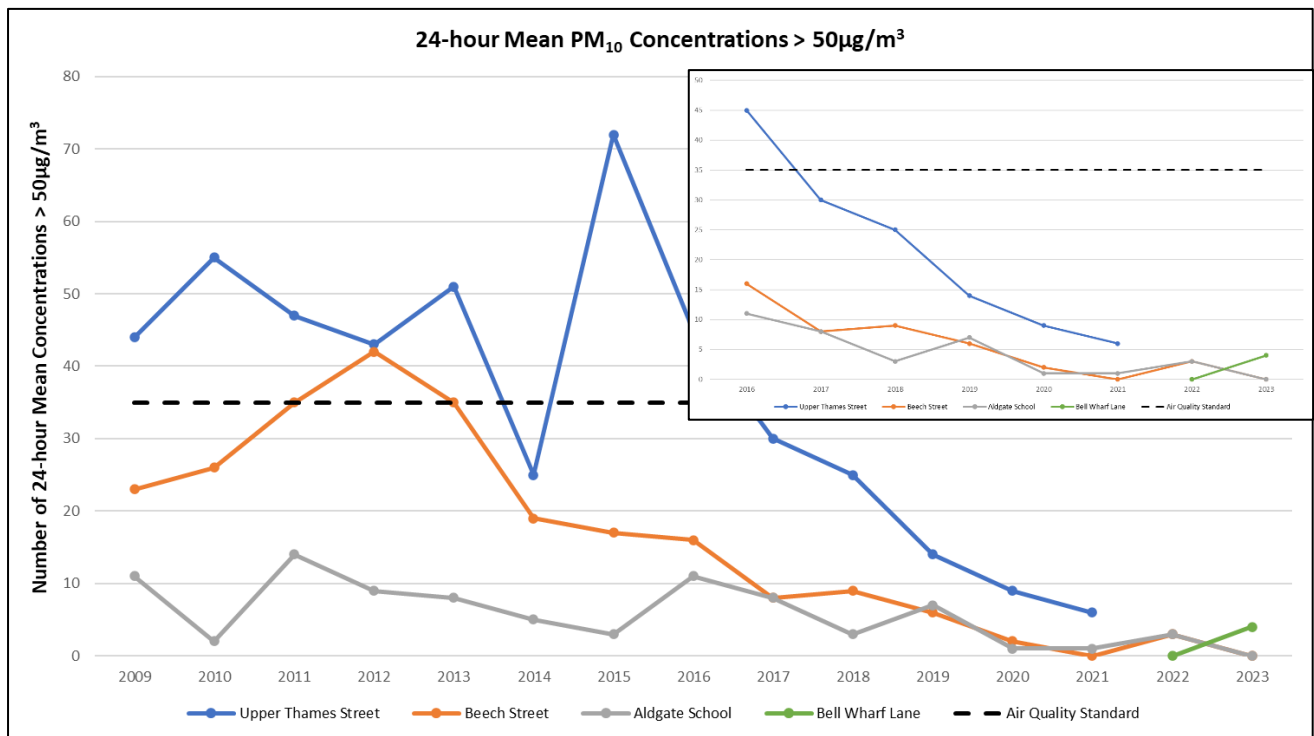


Figure A4.6: 24-hour Mean PM₁₀, 2009 to 2023



Particulate Matter, PM_{2.5}

The PM_{2.5} analysers at both Farringdon Street and the Aldgate School were installed in 2016, therefore all results for the two sites have been presented in Figure 2.6 in the main report. The annual mean concentrations for the two monitoring sites do not vary significantly, with the greatest difference between the two sites being 4µg/m³ in 2018.

Compared to nitrogen dioxide and PM₁₀, PM_{2.5} has a smaller variation between a roadside and urban background site. This is partly due to concentrations of PM_{2.5} being lower than other pollutants, and due to increased dispersion of PM_{2.5} rather than a simple source and concentration relationship.

Ozone

Ozone has been measured at the Guildhall since March 2022. Although this is not a requirement through the LLAQM framework, it is measured as it has an impact on health at high levels.

Ozone is primarily a secondary pollutant, therefore there are no major emission sources in the Square Mile. Most of the ozone is instead formed in the air from reactions between other pollutants. Pollutants photochemically react outdoors in the presence of sunlight to produce ground-level ozone. Similar reactions can occur with nitrogen oxides as a precursor.

In addition to the annual mean, a comparison against the 8-hour air quality standard is presented in Table A2.1.

Table A4.4: Ozone Monitoring Results

	2022	2023
Annual Mean (µg/m ³)	54.1	52.5
100 µg/m ³ not to be exceeded more than 10 times per year	22	22

Appendix 5: Air Quality Partner Commitments

The Environment Act 2021³² introduced the concept of Air Quality Partners (AQPs) into the LAQM framework. AQPs are public bodies that are required to assist local authorities with reasonable requests and contribute to AQAPs.

The City Corporation has identified three AQPs:

1. The Environment Agency;
2. The Port of London Authority;
3. The Mayor of London:
 - a) The Greater London Authority; and
 - b) Transport for London

Engagement with these organisations has taken place to ascertain the actions they are currently taking to reduce pollutant emissions from the operations that they are responsible for. The information received from each AQP is summarised overleaf. Active engagement will continue with each AQP throughout the delivery of the strategy.

³² Environment Act. (c.30). London: The Stationery Office.

Table A5.1: Air Quality Partner Information

The Environment Agency (EA)	The Port of London Authority (PLA)	The Greater London Authority (GLA) and Transport for London (TfL)																														
<ul style="list-style-type: none"> We continue to implement the requirements for the Medium Combustion Plant (MCP) Directive and domestic legislation of Specified Generators (SG). These will apply MCP Directive Annex II Emission Limits; applied to new and existing combustion plant depending on the date they are put into operation and the thermal capacity. Compliance with Emission Limit Values for existing MCP with a rated thermal input greater than 5MWth is the 1 January 2025. For existing MCP with a rated thermal input less than 5MWth, which is more likely to be plant located within the City of London and its surrounding, the compliance date is 1 January 2030. MCP that are also Specified Generators may have stricter Emission Limits than specified in the MCP Directive Annex II or Schedule 25B EPR where they are necessary to ensure Air Quality Standards are met. In the City of London this situation may apply to reciprocating engines providing combined heat and power to residential and commercial premises. We have implemented BAT for new standby back-up generation on Part A (1) Installations and may require the use of abatement (beyond BAT) for large arrays of diesel back-up standby, such as Data Centres, to manage short term peak NO₂ immediately adjacent to these regulated facilities. Implementation of the Waste Incineration BAT conclusions has reduced emissions of NO₂ from existing waste incineration plant by at least 10% by the end of last year, which will reduce the transboundary contribution from incineration plant within the capital and its surroundings. This work will have less reduction on emissions of PM_{2.5} as Waste Incineration Plant are low emitters of particulate matter due to the high capture efficiency of flue gas abatement systems. In terms of plant that are regulated by the EA the following is relevant to the Square Mile: <ul style="list-style-type: none"> There are three issued permits for MCP/SG, all of which are standard rules and have been appropriately consulted on There are no new or current MCP applications in our systems located within the City of London boundary or within 800m of it. There is one Industrial Emissions Directive Environmental Permitting Regulations installation permit of aggregated MCP to >=50MWth (UBS AG Broadgate EPR/ZP3238DK) which was subject to Best Available Techniques and consultation. 	<ul style="list-style-type: none"> The PLA has an Air Quality Strategy (Air Quality Strategy for the Tidal Thames: June 2020) which details an action plan for reducing emissions on the Thames. Since the 2018 and 2020 strategies were published, 14 actions have been completed and 13 are still ongoing, with the aim of raising awareness, knowledge sharing and monitoring emissions on the river. More information on the progress of the previous strategy actions will be detailed in the upcoming 2024 strategy update. The PLA conduct quarterly and annual river-side monitoring of the river from London Gateway to Richmond. This is done via real-time monitoring and passive NO₂ monitoring. Monitoring allows us to track progress against our PM and NO_x emission reduction targets which reflect the objectives of the Clean Maritime Plan, Clean Air Strategy and Climate Change Act 2008: <ul style="list-style-type: none"> 20% reduction by 2026 40% reduction by 2030 50% reduction by 2040 80% reduction by 2050 The updated Air Quality Strategy is to be published in 2024 with updated actions that plan to deliver emission reduction river wide. In 2024 the PLA's Net Zero River Plan will be published, which has been created with the input of river operators on the Thames. It is an action plan to facilitate the achievement of net zero ambitions on the river, working in partnership with stakeholders. The PLA fleet currently consists of 29 vessels which have been involved various trials to demonstrate the effectiveness of certain technologies to reduce emissions to air. <table border="1" data-bbox="1062 1129 1899 1335"> <thead> <tr> <th colspan="2">Recent changes to the PLA fleet include:</th> </tr> </thead> <tbody> <tr> <td>In 2022 a workboat vessel was retrofitted with selective catalytic reduction (SCR) technology to test pre and post emissions. Results showed a reduction in both NO_x and PM emissions.</td> <td>Following a successful trial in 2021, the whole of the PLA fleet transition to hydrotreated vegetable oil (HVO) fuel in 2022 instead of diesel fuel.</td> </tr> </tbody> </table> <table border="1" data-bbox="1062 1365 1899 1541"> <thead> <tr> <th colspan="2">Future changes to the PLA fleet include:</th> </tr> </thead> <tbody> <tr> <td>The Director of Marine Operations is currently conducting a fleet review. This review will consider the sustainability of the current fleet.</td> <td>Funding has been secured to operate an unmanned hydrogen fuelled survey vessel. It is estimated that this will be part of the fleet by 2025.</td> </tr> </tbody> </table> <ul style="list-style-type: none"> Internally, we are exceeding our targets of emission reduction thanks to our transition to biofuel (HVO) in 2022. This transition reduced our scope 1 emissions by 50%, putting us two years ahead of our target schedule. Our river-side monitoring network and newly developed Maritime Emissions Platform by RightShip is allowing us to track against our targets more effectively from 2023. By 2026 we do aim to hit our targets of emission reduction of 20% NO_x and PM port wide. The Net Zero River Plan and Thames Vision are our action plans for achieving our targets outlined for beyond 2026, with the goal of aiding our operators reach their internal net zero targets as well as the overarching government target of net zero by 2050. 	Recent changes to the PLA fleet include:		In 2022 a workboat vessel was retrofitted with selective catalytic reduction (SCR) technology to test pre and post emissions. Results showed a reduction in both NO _x and PM emissions.	Following a successful trial in 2021, the whole of the PLA fleet transition to hydrotreated vegetable oil (HVO) fuel in 2022 instead of diesel fuel.	Future changes to the PLA fleet include:		The Director of Marine Operations is currently conducting a fleet review. This review will consider the sustainability of the current fleet.	Funding has been secured to operate an unmanned hydrogen fuelled survey vessel. It is estimated that this will be part of the fleet by 2025.	<ul style="list-style-type: none"> The Mayor's Transport Strategy sets the ambitious target of 80% of trips made by sustainable modes such as public transport, cycling and walking by 2041. The Mayor and TfL will continue to invest in making it easier and safer to travel by these modes, which will also have air quality benefits. Between 2016 and 2020, TfL replaced older buses and new buses, and retrofitted mid-life buses with new exhaust systems meeting Euro VI emissions. Since January 2021, the entire bus fleet has met or exceeded this standard. Upgrading the fleet to meet the latest Euro VI emissions has significantly reduced the contribution from TfL buses to transport-related NO_x emissions, with the proportion of transport NO_x emissions coming from TfL's buses reducing from 15% to around 4%. TfL has been introducing zero-emission buses from 2016 onwards and there are now over 1,300 zero-emission buses in the fleet that operate across London. TfL has a target of converting the entire bus fleet to zero-emission no later than 2034 or accelerate to 2030 with additional government funding. Most buses operate in London for between 10-14 years. After this time, existing vehicles leave the fleet (once a route contract has ended) and new zero-emission buses will join. There are 35 current bus routes that pass through the Square Mile. Of these routes, 97% operate a mix hybrid and fully electric vehicles and 17% of routes operate solely fully electric vehicles. Additionally, it is planned for the diesel route and three hybrid routes to become fully electric in 2024/25. <table border="1" data-bbox="1932 1083 2279 1264"> <thead> <tr> <th>Vehicle Type</th> <th>Routes</th> </tr> </thead> <tbody> <tr> <td>Diesel</td> <td>1</td> </tr> <tr> <td>Hybrid</td> <td>27</td> </tr> <tr> <td>Electric/Hybrid</td> <td>1</td> </tr> <tr> <td>Electric</td> <td>6</td> </tr> </tbody> </table> <table border="1" data-bbox="2386 1083 2772 1293"> <thead> <tr> <th>Engine Type</th> <th>Routes</th> </tr> </thead> <tbody> <tr> <td>Euro V+SCRT</td> <td>5</td> </tr> <tr> <td>Euro V+SCRT / Euro VI</td> <td>2</td> </tr> <tr> <td>Euro VI</td> <td>21</td> </tr> <tr> <td>Electric / Euro VI</td> <td>1</td> </tr> <tr> <td>Electric</td> <td>6</td> </tr> </tbody> </table> <ul style="list-style-type: none"> TfL contracted bus operators are responsible for maintaining the vehicles they operate. TfL monitors air quality in London but does not monitor individual bus emissions as buses have been type approved by the Vehicle Certification Agency to the latest Euro standards and have On Board Diagnostics (OBD) for monitoring in service by the DVSA. Currently 8,419 licensed taxis are zero emission capable (ZEC), which accounts for over half of the fleet. Since January 2018, all vehicles new to licencing have been required to be ZEC. As a result of the specified age limits for taxi vehicles, which is set out as a maximum of 15 years for Euro 6 vehicles, by January 2033 at the latest the whole fleet will be ZEC. For more information regarding the schemes delivered by the Mayor of London, please visit the GLA Air Quality website, Mayors Transport Strategy and London Environment Strategy. These strategies outline the ambitious work delivered by the Mayor to improve air quality across London. 	Vehicle Type	Routes	Diesel	1	Hybrid	27	Electric/Hybrid	1	Electric	6	Engine Type	Routes	Euro V+SCRT	5	Euro V+SCRT / Euro VI	2	Euro VI	21	Electric / Euro VI	1	Electric	6
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Appendix 6: Air Quality Policies in the Draft City Plan 2040

Draft Policy HL2: Air Quality

1. Developers will be required to effectively manage the impact of their proposals on air quality. Major developments must comply with the requirements of the Air Quality SPD for Air Quality Impact Assessments (AQIAs);
2. Development that would result in a worsening of the City's nitrogen dioxide or PM₁₀ and PM_{2.5} pollution levels will be strongly resisted;
3. All developments must be at least Air Quality Neutral. Developments subject to an EIA should adopt an Air Quality Positive approach. Major developments must maximise credits for the pollution section of the Building Research Establishment Environmental Assessment Method (BREEAM) assessment relating to on-site emissions of oxides of nitrogen (NO_x);
4. Developers will be expected to install non-combustion energy technology where available
5. A detailed AQIA will be required for combustion based low carbon technologies (e.g. biomass, combined heat, and power), and any necessary mitigation must be approved by the City Corporation;
6. Developments that include uses that are more vulnerable to air pollution, such as schools, nurseries, medical facilities, and residential development, will be refused if the occupants would be exposed to poor air quality. Developments will need to ensure acceptable air quality through appropriate design, layout, landscaping, and technological solutions;
7. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to fully minimise air quality impacts possible. Impacts from these activities must be addressed within submitted AQIAs. All developments should comply with the requirements of the London Low Emission Zone for Non-Road Mobile Machinery;
8. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest part of the development to ensure maximum dispersion of pollutants and be at least three metres away from any publicly accessible roof spaces.

Technical Glossary

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

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

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

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

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

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

µg/m³: Microgrammes per cubic metre. A measure of concentration in terms of mass per unit volume. A concentration of 1µg/m³ means that one cubic metre of air contains one microgram of pollutant.

kW: Kilowatts, unit of electric power.

MW: Megawatt, equal to 1,000 kilowatts.

MWth: Megawatt thermal, unit of thermal power.

Emission: The release, direct or indirect, of an air pollutant into the atmosphere.

Concentration: The amount of a particular air pollutant in the air.

Committee(s): Port Health & Environmental Services Committee	Dated: 07/05/2024
Subject: Animal Health Team – Adjustment to fees	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	Providing Excellent Services
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: Bob Roberts, Interim Executive Director – Environment	For Decision
Report author: Susie Pritchard – Assistant Director – Animal Health & Welfare Gavin Stedman – Director Port Health & Public Protection	

Summary

The Animal Health Team enforce animal health and welfare across Greater London and carry out inspections of activities involving animals under contract for 42 Local Authorities. The fees for this service were approved by Port Health and Environmental Service Committee on 9th January 2024. This report details an adjustment that is required due to an unexpected increase in charges for veterinary inspections contracted to a third party.

Recommendation(s)

Members are asked to:

Approve the adjusted Animal Health Team fees described in section 5 of this report and listed in Appendix 1.

Main Report

Background

1. The City’s Animal Health Team consists of highly experienced officers, with responsibility for the enforcement of certain animal health and welfare legislation across Greater London. The majority of their work is focussed on the licensing of activities involving animals (pet shops, dog and cat boarding, dog breeding, hiring of horses and animal exhibits). The City offers an Animal Health contract

service to other Local Authorities who do not have their own function-specific teams, or sufficient skills and knowledge to discharge their statutory duties. The team currently delivers services for 42 Local Authorities across Greater London and the Home Counties.

2. A new Veterinary Officer was recruited in July 2023 to fill a vacant position. However, it was not possible to recruit a veterinarian who is also approved by the Royal College of Veterinary Surgeons to inspect horseriding establishments. At present, inspections of horseriding establishments are carried out by a contracted third party.
3. In late 2023, the Animal Health Team inspection fees were reviewed to better reflect the hours taken per inspection type and therefore give a more transparent and accurate reflection of cost to contracted authorities. An increase of between 4% and 35% across the inspection types was approved by this Committee in January 2024.
4. The fees charged by the third-party veterinarians contracted for horseriding establishments and some Dangerous Wild Animal inspections, have increased above what was anticipated, and above the level that could be absorbed by the approved 2024/25 fees charged to Local Authorities.

Proposals

5. The following fee increases are required to cover this cost:

Veterinary Officer Inspection type	Current approved fee (exc.VAT) 2024/25	Proposed adjusted fee (exc.VAT) 2024/25
Hiring of horses – renewal license	£288	£300
Hiring of horses – annual horse check	£144	£216
Hiring of horses - interim	£156	£216
Hiring of horses – price per horses (over 51)	£9	£10
DWA – new license (domestic)	£288**	£300
DWA – renewal (commercial/non domestic)	£288**	£300
DWA – renewal (domestic)	£216**	£300

**plus mileage over 100 miles @ 50p per mile

Corporate & Strategic Implications

6. Strategic implications – This proposal contributes towards the Corporate Plan aim of Providing Excellent Services.
7. Financial Implications - The increase in the specific fees described will ensure that the cost for veterinary services charged to the City by a third party is fully recovered.
8. Resource implications – The proposal has been designed to contribute towards cost recovery for the Animal Health and Welfare Service which includes the Animal Health Team and HARC.

9. Legal implications – The charges for Animal Activities Licensing services delivered under contract to other Local Authorities are not subject to HARC Byelaws which require Court of Common Council approval, and can therefore be approved by this Committee.
10. Risk implications – Increasing Animal Health Team fees may result in a loss of contracts with Local Authorities. This risk is perceived to be minimal as the fee is passed on to the business operator as part of cost recovery.
11. Equalities implications – None
12. Climate implications – None
13. Security implications – None

Conclusion

14. This proposal will ensure that the Animal Health Team is fully recovering the cost of sub-contracted veterinary services.

Appendices

Appendix 1; Animal Health Inspection fees in full, with adjusted veterinary fees.

Background Papers

Annual Review of Charges – Animal Health. 9th January 2024

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Director – PHPP

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Appendix 1

LEVEL OF CHARGES 1st April 2024 - 31st March 2025 - all fees are subject to VAT at the current rate		Cost 2024-2025 (exc. VAT)
Contract Charge	Charged quarterly on all contracts	£1350-1900
Animal Boarding Est (Kennel / Cattery)	New Licence application or 1st inspection by C of L - combined (dogs & cats)	364
	Renewal Licence application Inspection - combined (dogs & cats)	312
	New Licence application or 1st inspection by C of L - single species (dogs or cats)	312
	Renewal Licence Inspection - single species (dogs or cats)	260
	Unannounced mid licence visit	156
	reassessment of star rating visit	156
	Complaint Visit 1st hour including travel and report writing	156
	Complaint / visit additional charge per hour	52
Home boarder	New Licence application or 1st inspection by C of L	208
	Renewal Licence Inspection	156
	Unannounced mid licence visit	156
	Complaint Visit 1st hour including travel and report writing	156
	Complaint visit additional charge per hour	52
	reassessment of star rating visit	156
Franchisee arrangers licence	Assessment of an existing arranger / Franchisee	156
	Assessment of a new application or 1st inspection by C of L of an arranger / Franchisee	208
	Assessment of a hobby host as part of a arranger / franchisee licence	156
	Unannounced mid licence visit	156
	Complaint Visit 1st hour including travel and report writing	156
	Complaint visit additional charge per hour	52
	reassessment of star rating visit	156
Dog Day Care	Renewal Licence Inspection	208
	New Licence application or 1st inspection by C of L - less than 10 dogs	260
	New Licence application or 1st inspection by C of L - more than 10 dogs	364
	Unannounced mid licence visit	156
	Complaint Visit 1st hour including travel and report writing	156
	Complaint visit additional charge per hour	52
	reassessment of star rating visit	156
Dog Breeding Establishment	New applicant vet inspection with kennel units	432
	Renewal applicant inspection with kennel units	312
	New applicant vet inspection domestic dwelling	288
	Renewal applicant inspection breeding in a domestic dwelling	208
	Unannounced mid licence visit	156
	Complaint Visit 1st hour including travel and report writing	156
	Complaint visit additional charge per hour	52
	reassessment of star rating visit	156
*Riding Establishment	Existing licence inspection veterinary fee + fee per horse	300
	New premises licence inspection veterinary fee + fee per horse	432
	Annual vet. inspection veterinary fee + fee per horse	216
Example of charge per horse in a yard with 60 horses	Fee per horse for the first 10 horses	17
	Fee per horse for next 11-50 horses	11
	Fee per horse 51 horses & over	10
1st 10 horses @ £17 = £170	Complaint Visit 1st hour including travel and report writing	156
horses 11-50 @ £11 = £440	Complaint visit additional charge per hour	52
horses 51-60 horses @ £10 = £90	Unannounced mid licence visit (on top of annual vet inspection)	216
	reassessment of star rating visit	156
Pet Vending / Sale of pets	New Licence or new premises to City of London application Inspection - up to 2 species	364
	New Licence or new premises to City of London application Inspection - more than 2 species	416
	Renewal Licence application Inspection -	312
	Unannounced mid licence visit	156
	reassessment of star rating visit	156
	Complaint Visit 1st hour including travel and report writing	156
	Complaint visit additional charge per hour	52
Dangerous Wild Animals	100 miles @ 50p per mile	432
	Renewal applicant vet inspection commercial / outside premises (plus mileage over 100 miles @ 50p per mile)	300
	New applicant or new premises to City of London vet inspection domestic dwelling (plus mileage over 100 miles @ 50p per mile)	300
	Renewal applicant vet inspection domestic dwelling (plus mileage over 100 miles @ 50p per mile)	300
	DWA on Location - 1st hour including travel and report writing	144
	DWA on location visit additional charge per hour	72
	Complaint Visit 1st hour including travel and report writing	144
	Complaint visit additional charge per hour	72
Illegal Imports outside of CofL jurisdiction	Collection and Detention	52
	Mileage at 65p per mile	
Zoos	Periodical / Informal / Special (Full Day)(Vet) without travel time (hourly rate to be added)	800
	Periodical / Informal / Special (Full Day)(AHI)	416
	Periodical / Informal / Special (Half Day)(Vet) without travel time (hourly rate to be added)	450
	Periodical / Informal / Special (Half Day)(AHI)	208
	Veterinary 14.1a exemption inspection	576
Circus / Animal for Exhibit on location	DWA on Location (Exhibit) - 1st hour including travel and report writing	156
	DWA on location visit additional charge per hour	52
Animal for Exhibition	New Licence or 1st Inspection by City of London application Inspection - Single species	364
	New Licence or 1st Inspection by City of London application Inspection - Multi species	416
	Renewal Licence application Inspection -	260
	Complaint Visit 1st hour including travel and report writing	156
	Complaint visit additional charge per hour	52
Shows-Exhibitions-AGO- Markets	Inspection (Full day per officer)	416
	Inspection (Half day per officer)	208
Animal Keepers Farm stook (Hobby / Domestic Address)	Inspection Visit	208
Animal Keepers / non Domestic address (Half Day)	Inspection Visit	260
Animal Keepers / non domestic address (full day)		416
Daily Rate	1 x veterinary officer £72 per hour	576
Daily Rate	1 x Animal Health Inspector £52 per hour	416
* RCVS Veterinary Surgeon.		
AHI = Animal Health Inspector		
Unless stated all inspections include travelling costs and report writing		2024/25
		1350
		1650
		1750
		1900

Committee: Port Health & Environmental Services Committee (<i>For Decision</i>) Health & Wellbeing Board (<i>For Information</i>)	Dated: 7 th May 2024 5 th July 2024
Subject: Commercial Environmental Health Service Plan 2024-25	Public
Corporate Plan:	<ul style="list-style-type: none"> • Providing Excellent Services • Vibrant Thriving Destination- • Dynamic Economic Growth • Diverse Engaged Communities
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: Bob Roberts Interim Executive Director Environment	For Decision
Report authors: Gavin Stedman, Port Health & Public Protection Director Peter Brett, Commercial Environmental Health Team Manager	

Summary

This report seeks approval for the Commercial Environmental Health Service Plan 2024-25 (Appendix 1) and the Port Health Service Plan 2024-25 (Appendix 2).

National Codes of Practice allow local authorities flexibility over how to deliver their regulatory functions for food and occupational health and safety. Service plans set out how and at what level regulatory controls will be provided, in accordance with those Codes of Practice.

This years' Service Plans update this Committee on the Food Standards Agency's (FSA) plans for local authorities and the updates they have provided in terms of their achieving business compliance (ABC) (regulatory modernisation) programme.

Recommendation(s)

Members are asked to:-

- a) Approve
 - i. The Commercial Environmental Health Service Plan 2024-25 (Appendix 1).
 - ii. The Port Health Service Plan 2024-25 (Appendix 2).

Main Report

Background

1. As an enforcement authority the City Corporation has obligations for the delivery of certain food and health and safety controls arising from existing legislation, statutory Codes of Practice and related guidance, and in the Framework agreements that set out requirements for the planning, management and delivery of the requisite local authority enforcement services.
2. To help to ensure local transparency and accountability and to show our contribution to the authority's corporate plan, both FSA and the Health and Safety Executive (HSE) advise that service plans and performance reviews should be approved at the relevant level established for the authority. Our service plans have traditionally been presented to this Committee annually.
3. In May 2021, the FSA's Board endorsed a Local Authority Recovery Roadmap strategy or "Recovery programme" covering the period September 2021 to March 2023. The suggested aim was to assist local authorities to tackle any backlogs in their food hygiene inspection programmes as the country began recovering from the pandemic.
4. At the time the planned food activities set out for the Commercial Environmental Health Team were in line with the activities and milestones set out in the FSA recovery programme including the expectation that we moved at a faster pace in realigning with the Code of Practice requirements where we were able.
5. The FSA have continued to set out how they would work with local authorities to bring down inspection backlogs, starting with those businesses which pose the highest risk. The FSA had been assessing local authority performance against agreed milestones using data from quarterly "temperature checks". They now ask for data in regular (six monthly) surveys, these surveys replace the original annual Local Authority Enforcement Management (LAEMS) return. We also provide regular (weekly) updates on food hygiene ratings for food premises.
6. A paper on local authority (LA) performance was presented to the Food Standards Agency (FSA) Board at their meeting in December 2023. As a result, in February 2024 the FSA's Chief Executive, wrote to local authority leaders, to set out the Board's concerns about LA resources, and to remind them of the statutory nature of official food controls as they consider and set budgets.
7. The FSA's expectation is that we will deliver a programme of interventions that now aims to meet the full requirements in the current (but revised) Food Law Code.

Current Position

Commercial Environmental Health

8. Commercial Environmental Health are still prioritising their work to ensure that City businesses in a variety of sectors operate and remain safe for their customers.
9. The team met the milestones in the recovery programmes to bring interventions at the highest risk businesses back on track. Although progress has been made to return to the normal inspection frequencies for lower risk businesses there remains a backlog of inspections to complete which will be prioritised.
10. In ending the recovery programmes the FSA have also confirmed that they will now work with local authorities in a more bespoke way, to help ensure the return to delivery of pre-pandemic levels of service and because further changes are planned in the delivery models for both food hygiene and food standards.
11. In that regard, the FSA are still working through their Achieving Business Compliance (ABC) Programme to develop further regulatory reforms; the reforms will affect both food hygiene and food standards delivery. We trust that any such reforms will help us to target available regulatory resources at the areas which pose the greatest risk.
12. A new food standards delivery model has been published in the revised Code and we will work towards implementing this, this year. Delivery of the new model becomes a requirement in 2025-26.
13. Plans for a corresponding new food hygiene delivery model have been postponed but the FSA are still working on several programmes to reform food hygiene delivery.
14. The backlog of food hygiene work in lower risk food businesses categorised as 'D' remains a challenge; City hospitality is some of the largest around with some establishments catering for many hundreds or even for many thousands. We need to continue to integrate an extra portion of these 'D' rated premises into the programme.
15. Objectives have been refreshed and set out what we plan to achieve in the coming year, mindful of the above pending changes outlined in paragraphs 12 & 13 above. In terms of the more detailed programme of other work objectives for the whole team (i.e., not just food safety) these are outlined in our Plan in Appendix 1.

Port Health Service

16. The Port Health Service has focussed its attention on undertaking border controls on food and feed that have been imported from countries outside of the EU.
17. The Service has been preparing for border controls on EU food and feed imports and responded to the Draft Border Target Operating Model (BTOM); a high-level plan that outlines the new regime for SPS checks on all food, feed and live animals entering the UK. In addition to the existing controls that came into force on 31st January 2024; introduction of health certification on imports from the EU, the Service is preparing for the next phase of controls which come into effect from 30th April 2024; identification, physical checks and sampling.
18. Food premises interventions on river vessels and within the London Port Health Authority area will be done in accordance with the same requirements outlined above for Commercial Environmental Health; there are a smaller number of food businesses that need inspections in the Port Health area. Details can be found in Appendix 2.

Corporate & Strategic Implications

19. Strategic Implications - The Service Plans link to a number of the objectives in the City Corporation's revised Corporate Plan 2024-29:
 - Providing Excellent Services
 - Vibrant Thriving Destination-
 - Dynamic Economic Growth
 - Diverse Engaged Communities
20. Financial implications - None. The Service Plans will be met from within existing local risk budgets.
21. Resource implications - None.
22. Legal implications - Failure to plan and implement a programme of official food controls and health and safety interventions could result in sanctions by the FSA or HSE, in extremis taking over the operational control of the City Corporation's Food Authority and health and safety enforcing authority functions.
23. Risk implications - Potential reputational risk to the City Corporation if the above happens.
24. Equalities implications – None following a test of relevance.
25. Climate implications - None.
26. Security implications - None.

Proposals

27. Commercial Environmental Health will continue to undertake the work set out in their Service Plan for 2024-25.
28. The Port Health Service will continue to:
 - a) focus on imported food and feed controls at the border,
 - b) prepare for the implementation of the new border control regime for food and feed; and
 - c) undertake the work set out in their Service Plan for 2024-25.

Conclusions

29. The Service Plans outline a programme of work objectives and how these will be delivered. We will continue to ensure our work is risk-based, supportive of businesses where they are, or seek to be compliant, but providing protection to workers, consumers and the public.
30. At the same time, the City Corporation will continue to meet its obligations to central Government and its agencies as outlined in the various Codes.

Appendices

- Appendix 1 - Commercial Environmental Health Service Plan 2024/25
- Appendix 2 – Port Health Service Plan 2024/25

Background Papers

None

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Appendix 1



**Environment Department
Port Health & Public Protection Division
Commercial Environmental Health Service Plan 2024-25**

Foreword

This year's Service Plan updates previous plans and takes into consideration further developments from the Food Standards Agency (FSA) regarding local authority delivery plans for food controls and updates on their Achieving Business Compliance (ABC) modernisation programme. The Plan also utilises the updated Health and Safety Executive (HSE) guidance on setting priorities and targeting interventions for health and safety, with a renewed emphasis on health.

The FSA have determined that official food control delivery should be set to meet the full requirements of the updated Food Law Code of Practice (the Code).

In line with the Code, we will continue to focus resource on the highest risk establishments, while considering the greater flexibility offered for lower risk establishments. When we consider the delivery of interventions, we will be mindful of the national changes but also what is appropriate for our local businesses, visitors and residents.

The wider context has changed significantly too, with the implementation of the Borders Target Operating Model that introduces a new border control regime for imported food and feed from the EU, the new regime will have implications for both Port Health and inland authorities.

In terms of our more detailed programme of work objectives for the whole Commercial Environmental Health team (i.e. not just food) these are outlined in further detail in this Service Plan. The plan updates and refreshes our objectives and sets out how we plan to achieve them this coming year.

Gavin Stedman
Port Health & Public Protection Director

May 2024

Introduction

The Commercial Environmental Health Team regulates food safety, occupational health and safety and some public health controls arising from commercial businesses' activities for which we are the enforcing authority.

This plan has been prepared to accord with Food Standards Agency's (FSA) and Health & Safety Executive's (HSE) current frameworks on the planning and delivery of our services. The food intervention framework remains subject of further change as the FSA effects the modernisation programme, known as Achieving Business Compliance (ABC); the pandemic Recovery Plans reflect the transitions to new intervention delivery models for both food standards and food hygiene.

The delivery of our overall team goals and guiding principles will consider the various changes in these delivery models; the new food standards model is expected to be introduced this service year and details on the requirements of the food hygiene model are also expected. The current health and safety delivery model is driven by LAC 67-2 (revision 13)

<https://www.hse.gov.uk/lau/assets/docs/67-2-priorities-targeting-interventions.pdf>.

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Our plan is now guided by the City Corporation's newly developed Corporate Plan 2024-29; the strategic outcomes in this new Corporate Plan will be embedded and reflected within our processes to ensure that there is a 'golden thread' through everything we do. Our plan will be guided by the revised Health and Wellbeing Strategy, the City's first [People Strategy](#) and the Digital Strategy as these are developed.

There are six corporate outcomes in the new Corporate Plan; a more detailed breakdown of each, with context setting, overarching objectives and performance measures are expected as the Corporate Plan develops and they will be considered in our service delivery. The intention to bring to life a golden thread, embedding the Corporate outcomes in this Plan and how it is delivered.

The six Corporate outcomes are...

- [Providing Excellent Services](#) – Helping to protect and promote public, animal and environmental health and consumer protection including at our borders.
- [Vibrant Thriving Destination](#)- "Attracting businesses and people to a safe, secure, and dynamic location is vital to our future." Example Performance measure FHRS ratings improvement.
- [Dynamic Economic Growth](#)- 'Ensure that the City has the safest, most secure business environment'.

- [Diverse Engaged Communities](#)- "Across our residents, workers, businesses, and visitors, everyone should feel that they belong. Connecting people of all ages and backgrounds will help build diverse, engaged communities that are involved in co-creating great services and outcomes."
- [Flourishing Public Spaces](#)- Contributing to a vibrant commercial offer.
- [Leading Sustainable Environment](#)

Our team goals are that:

- We promote and support a risk based, goal setting regulatory regime.
- Higher risk activities are properly managed, and employers are committed to developing healthier workplaces.
- Food is hygienically prepared, safe to eat and what it says it is.
- We regulate in a way that supports businesses to comply and where necessary evolve, whilst not losing sight of the integrity and assurance of safe food for consumers and safe workplaces needing to be at the heart of what we do.

Our guiding principles are:

- working with partners to make workplaces safer and healthier, providing a level playing field for responsible employers, by advising, promoting, and where necessary, enforcing good standards of risk control;
- developing services that contribute to improved management and control of risks, sharing our knowledge;
- continuing our dialogue with stakeholders to improve the service, always looking to provide simple, pragmatic advice and support;
- using the range of tools at our disposal effectively to influence duty holder behaviour and keep the interests of consumers at the heart of what we do;
- ensuring our workforce is adequately resourced and experienced, enabling the service to fulfil the objectives set in the Department's Business Plan and this local Service Plan.

Resources, Service Delivery and Recovery- what's changed?

- We are now in a transition phase to new intervention delivery models for food. The FSA recognised that during this period there would be a significant amount of work for LAs and the FSA to undertake in preparation.

- We have introduced a new management information system which went live in 2023-24 but Officers in the team remain involved in developing its use; this will be developed further as FSA requirements become clearer and the City Corporation imbeds its own Data Strategy and revised performance measures.
- Revisions to the food standards intervention model will be incorporated to enable the operation of the new standards risk matrix this year and to capture the revised data that will be required for reporting and KPIs.
- We will explore optimal methods for gathering data related to our regulated activities to develop a comprehensive dataset that will inform our enforcement activity. This will also allow us to monitor & analyse our effectiveness.
- Decisions about how and where we work will be made in accordance with the City Corporation's People Strategy, focusing on productivity & effectiveness, whilst maintaining a flexible, dynamic & responsive workforce.

Performance management and monitoring

Our enforcement activity and certain key performance Indicators (KPIs) are reported to the Port Health & Environmental Services Committee along with other planned activities and key highlights, as part of the regular oversight of our work.

Service Plan objectives

Our more detailed programme of work objectives for the Team are set out below.

Objective	Activities
<p>1. Manage the impacts as the regulatory landscape continues to evolve, including; ongoing issues around; the FSA's ABC Programme; and our need to 'make adequate provision' for health and safety enforcement.</p>	<ul style="list-style-type: none"> ▪ Continue to evaluate the impact of proposed new Regulatory regimes. ▪ Continue to explore and develop our strategic networking; lobby and inform relevant stakeholders of the perceived impact of proposed workstreams, the framework programme as a whole and its likely effect on PH&PP and them. ▪ Prepare and align the Commercial EH Team to new regulatory frameworks for the delivery of food and health and safety and where relevant public health, ▪ Strengthen and maintain long-term Member commitment to delivery of our duty as enforcers of workplace health & safety.
Outcome – Corporate Plan objectives are in bold	Responsibility
<p>Providing Excellent Services Vibrant Thriving Destination- Dynamic Economic Growth</p> <p>The Commercial EH Team continues to be aligned to take advantage of relevant new regulatory frameworks and is structured and designed so that it;</p> <ul style="list-style-type: none"> • is dynamic enough to keep pace with the changes; • can harness new technologies and; • can adapt to future circumstances. <p>Publicly committed to the HSE / Local Authority Statement of Commitment on health & safety regulation and embed the principles within this service plan.</p>	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

Objective	Activities
<p>2. Deliver official food controls.</p> <p>Meet the revised service delivery expectations for LAs. An FSA Board Paper in 2023 highlighted continuing challenges for Local Authority service delivery, authorities are told to return to the interventions and intervals outlined in the Food Law Code of Practice but these have also changed and evolved</p> <p>Continue to prioritise planned interventions for high-risk category and non-compliant establishments in specific subordinate objectives and their activities. Lower risk premises will be returned to the programme using the revised guidance from FSA.</p> <p>To improve hygiene and standards compliance and reduce risks by focusing activity where non-compliance is identified and by undertaking appropriate follow-up and enforcement action.</p> <p>Manage any transition to the new food standards delivery model and plan similarly for any further revisions to food hygiene model.</p>	<ul style="list-style-type: none"> • Official controls are undertaken where the nature and frequency are prescribed in specific legislation and official controls recommended by FSA guidance are undertaken to support trade and enable export • Reactive work including; enforcement in the case of non-compliance, managing food incidents and food hazards, and investigating and managing complaints • Sampling in accordance with the local authority sampling programme or as required in the context of assessing food business compliance, and any follow-up necessary in relation to the FSA Surveillance Sampling Programme • Ongoing proactive surveillance to obtain an accurate picture of the local business landscape and to; identify open/closed/recently re-opened/new businesses; as well as businesses where there has been a change of operation, activities, or food business operator. • Prioritisation of 'new businesses' for intervention based on risk. • Responding to FHRS requested re-visits in line with the timelines specified in the FHRS Brand Standard for England.
<p>Outcome – Corporate Plan objectives are in bold</p>	<p>Responsibility</p>
<p>Providing Excellent Services Vibrant Thriving Destination Dynamic Economic Growth</p> <ul style="list-style-type: none"> ▪ We improve hygiene and standards compliance and reduce risks by focusing activity where non-compliance is identified and by undertaking appropriate follow-up and enforcement action. ▪ Receive and investigate appropriately all requests for service, food incidents and complaints about food and food premises. ▪ Ongoing proactive surveillance to obtain an accurate picture of the business landscape. ▪ New businesses receive an appropriate and timely intervention. ▪ Where required establishments receive an onsite intervention and are thereafter back in the system for interventions in accordance with the Food Law Codes of Practice. 	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

Objective			Activities																																
<p>2a: Appropriate food hygiene interventions are completed. New and refreshed food hygiene ratings are given [where possible*].</p> <table border="1"> <thead> <tr> <th rowspan="2">Category</th> <th colspan="2">Interventions</th> </tr> <tr> <th>Due to 2024-25</th> <th>Done 2023-24</th> </tr> </thead> <tbody> <tr> <td>New (unrated)</td> <td>40</td> <td>176</td> </tr> <tr> <td>A (*due every 6 months)</td> <td>7</td> <td>10</td> </tr> <tr> <td>B (*due every 12 months)</td> <td>61</td> <td>25</td> </tr> <tr> <td>C (less than broadly compliant)</td> <td>21</td> <td>14</td> </tr> <tr> <td>C</td> <td>203</td> <td>148</td> </tr> <tr> <td>D</td> <td>557</td> <td>291</td> </tr> <tr> <td>D (less than broadly compliant)</td> <td>2</td> <td>4</td> </tr> <tr> <td>E</td> <td>187</td> <td>164</td> </tr> <tr> <td>Total</td> <td>1078</td> <td>683</td> </tr> </tbody> </table>			Category	Interventions		Due to 2024-25	Done 2023-24	New (unrated)	40	176	A (*due every 6 months)	7	10	B (*due every 12 months)	61	25	C (less than broadly compliant)	21	14	C	203	148	D	557	291	D (less than broadly compliant)	2	4	E	187	164	Total	1078	683	<ul style="list-style-type: none"> ▪ The Table in this objective shows all the hygiene inspections due to year end 2024-25. ▪ All higher risk establishments receive an onsite intervention in accordance with the Food Law Codes of Practice. ▪ New premises receive an appropriate intervention within 28 days of registration (or opening). This will be triaged if other higher risk work is required. ▪ Lower (rated) risk premises continue to be brought back into the programme and appropriate on-site interventions are completed where this is possible; the focus will be on larger/complex D rated establishments. ▪ We will use Alternative Enforcement Strategies and other interventions to gather intelligence/information on all lower risk establishments – this includes those in category D - broadly compliant or better (FHRS 3, 4 or 5) for hygiene, and category B for standards. ▪ When intelligence suggests risks have increased (irrespective of the risk category) we will undertake interventions to assess and address those risks The requirements on allergen labelling for products prepacked for direct sale will be considered at appropriate hygiene interventions rather than any separate food standards intervention. [*Where an appropriate inspection/audit intervention has been completed].
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Outcome			Responsibility																																
<ul style="list-style-type: none"> ▪ Complete the required risk-based food hygiene interventions: ▪ Higher risk new premises receive an intervention within 28 days of registration (or opening) or as triaged. ▪ Target >90% of other food establishments selected for an intervention are completed. 			<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food; H&S)</p>																																

Objective	Activities	
<p>2b: Focused follow up activity is conducted in food businesses that are not compliant [in the lower tiers of FHRS (0, 1 & 2)]</p> <p>We look to support compliant businesses and protect customers from non-compliant businesses.</p>	<ul style="list-style-type: none"> ▪ Reinforce our intervention strategy with additional follow-ups, including visits, coaching and advice. ▪ Use agreed national food safety managements systems such as “Safer Food, Better Business” where these are appropriate. Use on-site inspection reports and mobile working systems. Support the use of ethical business regulation principles. ▪ Formal enforcement action will be informed by our current Policy Statement on Enforcement. 	
Outcome –	Responsibility	
<ul style="list-style-type: none"> ▪ Action is taken against food businesses that fail to fulfil their obligations. ▪ Improving standards in riskier food businesses. ▪ Reduction in the number of non-complaint food businesses through improved food hygiene performance and with the confidence this will be sustained. 	Assistant Director (Regulation and Compliance) Commercial EH Team Manager Lead Officers (Food Safety and Health & Safety)	

Objective	Activities	
<p>2c: Appropriate food standards interventions are completed.</p> <p>We are responsible for verifying compliance with food law in the majority of food business establishments.</p> <p>The FSA anticipate that the new food standards model will help better target LA resources towards the highest risks. The new model is set to ensure that the frequency of food standards controls is based on a better understanding of the level of risk a food business poses.</p>	<ul style="list-style-type: none"> ▪ The backbone of our regulatory work remains a targeted (risk-based) intervention program developed in accordance with national requirements. ▪ All high-risk premises are rated in accordance with the existing intervention rating scheme in the Food Law Code; all others including any overdue inspections are picked up when the next relevant Food Hygiene intervention falls due. ▪ Introduce use of the new food standards rating system as soon as possible ▪ Reinforce our intervention strategy with additional follow-ups, including visits, coaching and advice. Formal enforcement action will be informed by our current Policy Statement on Enforcement. 	
Outcome –	Responsibility	
<ul style="list-style-type: none"> ▪ Action is taken against food businesses that fail to fulfil their obligations. ▪ Improving standards in riskier food businesses. 	Assistant Director (Regulation and Compliance) Commercial EH Team Manager	

<ul style="list-style-type: none"> Reduction in the number of non-complaint food businesses through improved food standards performance and with the confidence this will be sustained. 	Lead Officers (Food Safety and Health & Safety).
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Objective	Activities																								
<p>2d: Maintain support for the national Food Hygiene Rating Scheme (FHRS)</p> <p>We will continue to support FHRS and any development of mandatory display and endeavour to complete interventions that enable an updated rating to be provided; keeping the system relevant for businesses and consumers.</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr style="background-color: #cccccc;"> <th>FHRS Rating</th> <th>No premises</th> <th>Category, %</th> </tr> </thead> <tbody> <tr style="background-color: #ff0000; color: white;"> <td>0</td> <td>4</td> <td rowspan="3">Non-compliant 3.3</td> </tr> <tr style="background-color: #ff0000; color: white;"> <td>1</td> <td>13</td> </tr> <tr style="background-color: #ff0000; color: white;"> <td>2</td> <td>34</td> </tr> <tr style="background-color: #ffcc00;"> <td>3</td> <td>52</td> <td>Broadly compliant 2.5</td> </tr> <tr style="background-color: #92d050;"> <td>4</td> <td>129</td> <td rowspan="2">Good or better 93.4</td> </tr> <tr style="background-color: #92d050;"> <td>5</td> <td>1328</td> </tr> <tr style="background-color: #cccccc;"> <td>Unrated/outside program</td> <td>110</td> <td></td> </tr> <tr style="background-color: #cccccc;"> <td>Total</td> <td>1670</td> <td></td> </tr> </tbody> </table>	FHRS Rating	No premises	Category, %	0	4	Non-compliant 3.3	1	13	2	34	3	52	Broadly compliant 2.5	4	129	Good or better 93.4	5	1328	Unrated/outside program	110		Total	1670		<ul style="list-style-type: none"> It is important for consumer and business confidence that the FHRS system remains credible and objective; the central tenet of the scheme remains a risk-based intervention programme that meets the required FSA standard. Consumers see mandatory display of ratings as a necessary part of any new regulatory model. Our intervention work will therefore endeavour to continue to establish compliance even in lower risk premises. We will therefore consider adaptations to our interventions to ensure lower risk premises remain compliant. This will include interventions that allow formal rating, where this is possible. We will support re-rating visits according to the process outlined on our website.
FHRS Rating	No premises	Category, %																							
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Outcome	Responsibility																								
<ul style="list-style-type: none"> Improvements in the number of businesses that meet minimum compliance levels and, in the number, evidencing 'very good' standards of compliance. We deliver the required (risk based) intervention programme outlined in this plan. Food Business Operators want a 5 FHRS rating, they achieve it and then show it by displaying their sticker enabling customers to see that food safety is a top priority and foremost in their minds. 	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>																								

<ul style="list-style-type: none"> The further development of the re-rating scheme is supported in the City as FHRS itself moves towards alignment with the ones in the devolved Governments of Wales and Northern Ireland (where FHRS is mandatory). 	
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Objective	Activities
<p>2e: Develop and implement a risk-based food sampling programme.</p>	<ul style="list-style-type: none"> Consider our Sampling Policy and local, regional, and national priorities utilising all intelligence available. Take part in relevant regional/national identified studies where we are able. Exchange intelligence and findings on sampling results using relevant local and national intelligence, a key element to a robust system of Official Food Controls. If requested, we will acknowledge and respond to any originating local food authority, in respect of inland referrals, confirming any action taken.
Outcome	Responsibility
<ul style="list-style-type: none"> Delivery of a risk-based sampling programme. This work was drastically scaled back during the pandemic and has still not been fully reinvigorated. We comply with the FSA Data Standard for the collection of food and feed sampling intelligence. Contribute to relevant sampling projects selected by UKHSA and the public analyst services. 	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

Objective	Activities
<p>3. Ensure adequate arrangements are in place for the enforcement of health and safety.</p> <p>Focus on duty-holder business and activities where risks are highest.</p> <p>Section 18(4) of the Health and Safety at Work Act etc. 1974 places a duty on Local Authorities to make 'adequate arrangements for the enforcement' of health and safety and the Code sets out what is meant by 'adequate arrangements for enforcement'.</p> <p>Consider activities in the sectors identified in LAC 67/2 (rev 13); Setting Local Authority Priorities and Targeting Interventions including local intelligence.</p> <p>Subordinate objectives and their activities are outlined in 3a-f below</p>	<ul style="list-style-type: none"> ▪ Planned proactive health and safety interventions which focus on national priority topics; ▪ Undertaking targeted initiatives based on local intelligence and evidence of risk; ▪ Evidence-based education of employers, employees and contractors through guidance and information; ▪ Promoting proportionate and sensible health and safety through business engagement and partnership working; ▪ Undertaking and participating in health and safety promotion campaigns; ▪ Working with and liaising with other internal stakeholders and external organisations ▪ Devising material to help businesses comply with the law and promote good practice
Outcome – Corporate Plan objectives are in bold	Responsibility
<p><u>Providing Excellent Services</u> <u>Vibrant Thriving Destination-</u> <u>Dynamic Economic Growth</u> <u>Diverse Engaged Communities</u></p> <ul style="list-style-type: none"> ▪ Planned interventions are evidence based. Proactive inspections are only used for the activities in the sectors contained in the list of priority topic areas which is embodied in the National Code and LAC 67/2 (rev 13), or where there is local intelligence of failure to manage risk or for making it a specific local priority. ▪ All reactive and proactive work is underpinned by local, regional, and national liaison. An appropriate mechanism for ensuring consistency between enforcers, for sharing good practice, for sharing information and for informing other enforcers of potential difficult situations 	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

Objective	Activities	
<p>3a; Management of legionella in cooling towers.</p> <p>In 2024-25 Cooling towers located in built-up areas are a considered by HSE as appropriate for interventions in the revised LAC 67/2 (rev 13)</p> <p>At a local level the risk of a Legionnaires' disease outbreak affecting the Square Mile is considered an unacceptable public health and reputational risk, especially when compared with any perceived burden from our intervention activity.</p> <p>66 sites are due an intervention in the period to end March 2025. 23 are in the higher risk categories and will receive an on-site intervention</p>	<ul style="list-style-type: none"> ▪ Proactive interventions are considered necessary based on local intelligence and following the considerable upheaval of the pandemic and potential impact on the management of legionella, e.g. building occupancy and use during various Lockdown iterations. ▪ Risk-based interventions at sites with cooling towers; revisits and enforcement action taken as necessary; ▪ Review status of decommissioned tower sites and follow up accordingly. ▪ Engagement with duty holders at new / proposed cooling tower sites: Advice to Principal Designers and Designers including at the pre-application or Planning Application stage of development. ▪ Focus attention on sites that have: - <ul style="list-style-type: none"> ○ not yet demonstrated the ability to manage their Legionella risk in a sustained manner, and includes new cooling towers / evaporative condensers; and/or ○ relevant enforcement action in the last 5 years and have not yet demonstrated sustained control of Legionella risk. ▪ Legionella Control Association attend quarterly meetings. ▪ Deliver training for inspectors on legionella and cooling towers (in conjunction with ALEHM and wider). ▪ Host / support further professional development events for the regulatory and public health community. 	
Outcome –	Responsibility	
<p>Planned interventions are evidence based for cooling tower systems. Proactive inspections are a reliable means of intelligence gathering. This type of intervention remains broadly supported by duty-holders who value our input and oversight</p>	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>	

Objective	Activities	
<p>3b; Electrical safety in hospitality settings. The Electricity at Work Regulation 1989 requires that any electrical equipment which has the potential to cause injury is maintained in a safe condition.</p>	<ul style="list-style-type: none"> ▪ Consider matters of evident concern and raise at on site food hygiene interventions. 	
Outcome –		Responsibility
<p>Planned interventions are evidence based. Proactive inspection are only be used for the activities in the sectors contained in the list of priority topic areas which is embodied in the National Code and LAC 67/2 (rev 13), or where there is local intelligence of failure to manage risk.</p>		<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

Objective	Activities	
<p>3c: Gas safety in commercial catering premises. The proper installation, maintenance and inspection by a competent Gas Safe registered engineer is essential to ensuring that staff and customers at commercial catering premises are protected from exposure to carbon monoxide gas.</p>	<ul style="list-style-type: none"> ▪ Gas safety in commercial catering premises. The proper installation, maintenance and inspection by a competent Gas Safe registered engineer is essential to ensuring that staff and customers at commercial catering premises are protected from exposure to carbon monoxide gas. ▪ Continue to survey food premises likely to be using solid fuel appliances (at the time they become due for an on-site food hygiene inspection). ▪ Follow-up enforcement in premises where there are matters of evident concern 	
Outcome		Responsibility
<p>Planned interventions are evidence based. Proactive inspections are only be used for the activities in the sectors contained in the list of priority topic areas which is embodied in the National Code and LAC 67/2 (rev 13) , or where there is local intelligence of failure to manage risk.</p>		<p>Assistant Director (Commercial Services)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

Objective	Activities	
<p>3d: Crowd management & injuries/fatalities to the public</p> <p>Event Safety / Crowd control at large scale public gatherings/ events remains a priority.</p> <p>The City Corporation host many high-profile events, and the City are also the enforcement authority for some of the larger higher risk events.</p>	<ul style="list-style-type: none"> ▪ Work with Licensing, Operational and Safety Planning Groups to better understand proposed event plans. ▪ Work as part of the City Corporation's Safety Advisory Group (SAG) to advise on and help promote risk management and good practice with event organisers. ▪ Visits to events to verify the application of appropriate risk control measures. ▪ Where necessary intelligence is shared between appropriate stakeholders, e.g. City of London Police, London Fire, London Ambulance, City Corporation's Highways service. 	
Outcome	Responsibility	
<p>Lack of suitable planning, management and monitoring of the risks arising from crowd movement and behaviour as they arrive, leave, and move around a venue is addressed where this is necessary.</p>	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>	
Objective	Activities	
<p>3e: All London Borough Health & Safety Liaison Group (ALBHSLG)</p> <p>Under LAC 67/2 (rev 13) LAs should consider whether they can gain regulatory efficiencies by planning activity collectively e.g. with members of their local LA liaison groups.</p>	<ul style="list-style-type: none"> ▪ Any planned activity programme formulated by ALBHSLG for 2024-25 will be considered and resourced appropriately. 	
Outcome	Responsibility	
<ul style="list-style-type: none"> ▪ Work with a potential range of agencies to develop partnership approaches that improve compliance and help duty-holders to manage health and safety. <p>Note: Planned project activity was paused following Coronavirus measures</p>	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>	

Objective	Activities	
<p>3f: Reactive health and safety interventions</p>	<ul style="list-style-type: none"> ▪ Investigating reported accidents, occupational diseases and dangerous occurrences that meet the appropriate criteria for follow up; ▪ Responding to complaints and requests for service; ▪ Permissioning work; <ul style="list-style-type: none"> ○ In MST premises (in liaison with Licensing colleagues); ○ Asbestos notifications; and, ○ Thorough examination (usually lift) reports; ▪ Responding to consultations, e.g. from Licensing; ▪ Providing or signposting advice and information to duty holders; ▪ Prioritised and targeted health and safety promotional campaigns. 	
<p>Outcome – Corporate Plan objectives are in bold</p>	<p>Responsibility</p>	
<ul style="list-style-type: none"> ▪ Incidents / Accidents: a decision to investigate is made in accordance with the appropriate Incident Selection Criteria Guidance LAC 22/13¹ or using revised criteria that is expected to appear this year ▪ Initial enquiries are completed to national guidelines: establishing or verifying key facts and further information to inform a decision on whether to investigate further and to what extent. ▪ Investigation and any follow-up enforcement action is taken in accordance with the HSE guidelines including the Enforcement Management Model (EMM) 	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>	

¹ Health & Safety Executive and Local Authorities Enforcement Liaison Committee (HELA) Incident Selection Criteria www.hse.gov.uk/lau/lacs/22-13

Objective	Activities
<p>4. Help promote and support the growth and successful delivery of workplace health and wellbeing in City businesses.</p> <p>Where appropriate we will align this work with the evolving public health agenda (including regulation).</p>	<ul style="list-style-type: none"> ▪ Encourage sign up to the community Business Healthy network. ▪ Encourage development and use of the good practice framework for the workplace charter. ▪ Raise awareness of the work-related stress and mental health campaign. Signpost the 'Working Minds' campaign which is relevant to all businesses but is aimed particularly at SMEs and is encouraging employers and employees to use the five 'R' approach to: <ul style="list-style-type: none"> ○ make stress and mental health ROUTINE, as part of employee engagement ○ REACH out to their colleagues, ○ RECOGNISE the signs of stress, ○ RESPOND to reduce the risk, ○ REFLECT on how these experiences can be used to improve the workplace. ▪ Signpost and encourage use of the helpful resources including the SIT tool, management standards and risk assessments. ▪ We still need to reinvigorate the HCC scheme and develop and promote the initiative anew in relevant food establishments. ▪ Maintain and enhance our links with the pan London development of HCC.
Outcome – Corporate Plan objectives are in bold	Responsibility
<p>Diverse Engaged Communities</p> <p>Engagement with and buy in from, potential businesses using referral mechanisms, existing networks, and resources such as Public Protection Team Business Healthy initiative. Work is part of the City & Hackney's Joint Health and Wellbeing Strategy, including mental health and is supported by the 'Business Healthy' initiative.</p> <p>In October 2018, the City Corporation formally pledged to tackle obesity and promote healthier choices by signing the Local Government Declaration on Sugar Reduction and Healthier Food. Evidence suggests a healthy workforce can reduce sickness absence, lower staff turnover and boost productivity -good for employers, workers, and the wider economy.</p> <p>More food businesses are signed up to the HCC Award.</p>	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

Objective	Activities
<p>5. Develop Primary Authority Partnership work.</p> <p>Primary Authority enables businesses to form a legal partnership with one local authority, which then provides assured and tailored advice on complying with environmental health, trading standards and other regulations that local regulators must respect.</p> <p>The Regulatory Enforcement and Sanctions Act 2008, as amended by the Enterprise Act 2016 established Primary Authority as a statutory scheme.</p>	<ul style="list-style-type: none"> ▪ Pursue our on-going Primary Authority Partnership (PAP) work, where benefits remain for the partnership. ▪ Consider further PAPs where this is likely to be a good fit and we have the capacity and resource to help make the difference. ▪ The enhanced development of our Primary Authority offering was not pursued but we remain active in the development of individual partnerships and with the development of regional and sector specific national PA groups.
<p>Outcome – Corporate Plan objectives are in bold</p> <p><u>Providing Excellent Services</u> <u>Vibrant Thriving Destination-</u> <u>Dynamic Economic Growth</u> <u>Diverse Engaged Communities</u></p> <ul style="list-style-type: none"> ▪ Improved support for businesses and economic growth to enable them to better manage their key health, safety, and food related risks. ▪ Ensuring progress towards the Government's better regulation agenda, providing streamlined and improved regulation. ▪ Increased Primary Authority work. With Increased income and enhanced reputation for the City of London. ▪ Improved working with national and other regulators on the provision of specific advice. ▪ Businesses that sign up to a Primary Authority partnership have access to reliable, timely and tailored regulatory advice. 	<p>Responsibility</p> <p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

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Objective	Activities
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<p>6. Further develop the Commercial EH Team in line with the agreed objectives.</p> <p>Focus on our people and work in collaboration with others. Produce training and development opportunities for peers.</p> <p>Accord with the City Corporation’s developing People Strategy</p>	<ul style="list-style-type: none"> ▪ Continue to develop and enhance the competency of our frontline professionals. ▪ Further develop our succession and workforce plan and embed the Corporate mechanisms designed to support this process. ▪ Develop further (suitable) training arrangements; job shadowing; mentoring and coaching using the developing People Strategy framework. ▪ Specific training will be developed in line with the FSA and HSE competency frameworks. ▪ Further develop health & safety training for peers ▪ Continue to improve officers' awareness and understanding of business' needs, how to effectively communicate messages using a broad range of intervention strategies to influence the behaviour of organisations.
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<p>Outcome – Corporate Plan objectives are in bold</p>	<p>Responsibility</p>
<p>Corporate Plan & People Strategy</p> <ul style="list-style-type: none"> ▪ Our workforce is adequately resourced and experienced, enabling the service to fulfil its key objectives. ▪ We have a more efficient service and improved staff morale, resulting in a better service for our customers. ▪ We are, and we remain an excellent, modern, and accountable regulator focused on delivering a better service. ▪ Our workforce will be well led and experienced, enabling the service to fulfil the objectives set now and for the foreseeable future. 	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

<p>Objective</p>	<p>Activities</p>
<p>7. Further develop IT and information management systems and capabilities and improve our online service offer.</p> <p>The new Environment Department has now moved to the IDOX Uniform back-office system which we continue to develop</p>	<ul style="list-style-type: none"> ▪ The project to replace the two current back-office systems with one shared Uniform system was completed in late April 2023. ▪ We will continue to work collectively with the relevant Module Administrators/ Key People in order to embed and develop Uniform so that it matches the desired business processes of the team.

	<ul style="list-style-type: none"> Work to further improve our digital customer services streamlining both internal and external processes to everyone's advantage*.
Outcome – Corporate Plan objectives are in bold	Responsibility
<p>Corporate Plan and the developing Digital Strategy will help provide the framework.</p> <ul style="list-style-type: none"> Faster data and information capture, improved intelligence and targeting enforcement, more effective communication with businesses. The existing Service delivers a streamlined, accessible format with a clear focus on customer requirements. The shared Uniform system will enable officers in different Divisions and their teams to share data more effectively and be sighted on the activities of the wider Department. Reduce the administrative and reporting burdens that we place on our front line, professionals, while improving for the longer term the information and intelligence we gather to aid our operational planning. We will be better able to identify poor performing businesses and sectors. More 'open data' provision is considered. *Activities still to include: Online form integrations with our MIS; further data gathering and development of data analytics (incorporating any FSA work on performance management); development and integration with the inspection and audit management system, Safety Culture. 	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p> <p>Module Administrators (for the shared Uniform system)</p>

Appendix 2 – Port Health Food Safety Enforcement Plan 2024-25

Service Aims and Objectives

Through this plan, the London Port Health Authority (LPHA) aims to:-

- Ensure compliance with legislation related to imported food and animal feed to protect food safety and animal health
- Deliver a high quality, accessible and responsive service to protect, enhance, and improve public, environmental, and animal health throughout the London Port Health district

This Plan aims to ensure that our enforcement remains targeted, proportionate, consistent and transparent, and sets out the framework for its delivery. It has been prepared as required by the Food Standards Agency (FSA) and the content of this Plan provides the basis upon which the LPHA will be monitored and audited by the FSA.

The LPHA also has responsibility for Animal Feed Stuffs, Shellfish Classification, Infectious Disease Control, Pollution Control and Pest Control.

Food Hygiene and Food Standards Inspections

The Port Health Service undertakes food hygiene and food standards inspections of premises within the Port domain, including Approved Premises. The Port is also responsible for the inspection of some fixed craft and moving vessels serving food and drink on the tidal Thames. Food premises airside at London City Airport are also the regulatory responsibility of the LPHA.

LPHA currently regulates 135 port premises and 12 Logistics Park food premises which are comprised of the following categories:

Table 1. Food Business Food Hygiene Rating Scheme Classifications for Port Premises

Category	Number of Port Premises
New (unrated)	1
5 (hygiene standards are very good)	124
4 (hygiene standards are good)	6
3 (hygiene standards are generally satisfactory)	1
2 (some improvement is necessary)	3
1 (major improvement is necessary)	0
0 (urgent improvement is necessary)	0
TOTAL	135

The number of Food Hygiene/Food Standards inspections undertaken in 2023-24 were 62 for Food Hygiene (including Alternative Enforcement Strategy) and 11 Food Standards.

The City has also entered into a Local Government (Miscellaneous Provisions) Act section 101 agreement with Thurrock Council to exercise Thurrock's functions under the feed and food laws in a section of the Logistics Park which has resulted in another area of responsibility for LPHA.

Table 2. Food Business Food Hygiene Rating Scheme Classifications for Logistics Park Premises

Category	Number of Logistic Park Premises
New (unrated)	1
5 (hygiene standards are very good)	0
4 (hygiene standards are good)	3
3 (hygiene standards are generally satisfactory)	0
2 (some improvement is necessary)	0
1 (major improvement is necessary)	1
0 (urgent improvement is necessary)	0
Excluded from Rating	7
TOTAL	12

Alternative Enforcement Strategy

The LPHA has also exercised the advice in the Food Law Code of Practice (FLCOP) which allows for an alternative enforcement strategy (AES) for low-risk premises, i.e. food hygiene category E based on the FLCOP risk rating.

All new registrations will have an initial formal inspection and if rated as an E they will then come under the AES. Under the AES the premises will be due an intervention every 3 years and the intention is that a physical inspection will be carried out every 9 years.

Premises and vessels under the AES will receive a specific questionnaire which will be scrutinised by a competent officer to assess if enough information has been obtained. A follow up telephone call may be necessary to verify the details provided or obtain further information. Some premises will receive a follow up visit to verify information on the questionnaire and visits. Visits may also take place following complaints, infectious disease notifications, changes of activity/management or the non-return of questionnaire.

It is the intention that the larger E rated premises within the Port, which have comprehensive HACCP documentation, such as large-scale storage facilities and milling plants will still have a visit at each due intervention.

Table 3. Food Business Risk Classifications

Category	Number of Premises
New (unrated)	2
A (due every 6 months)	0
B (due every 12 months)	3
C (due every 18 months)	6
D (due every 2 years)	37
E (due every 3 years)	99
TOTAL	147

Feed and Food Complaints

The Service follows the corporate policy in relation to any complaints. Where matters are time dependant we aim to provide a same day response to consumer complaints relating to food matters.

Home Authority Principle and Primary Authority Scheme

It is our policy to contact the Local Authority and the Primary Authority (where there is a relationship in place) when we become aware of an importer not conforming with the relevant import regulations. We also try to identify and contact inland Local Authorities following adverse sample results.

Before any interventions are undertaken the Primary Authority database is examined to check for any partnerships in relation to any food premises that face interventions.

Food and Feed Sampling

The introduction of the EU imported checks in the second quarter of 2024, will see different products entering through new and existing Ports within the control of the LPHA. The sampling programmes and the surveillance undertaken throughout 2024-25, will need to be agile to reflect emerging issues and evidence.

All samples in respect of imported food are taken in accordance with Port Health's Sampling Plan. Details regarding the selection, procurement and preparation of samples are contained in the Service's Sampling Plan.

The main aim of our sampling programme is to proactively detect foods outside specific regulations which may be a threat to public or animal health. In addition, we monitor and sample on a risk basis having regard to information from a range of sources including Border Notifications, FSA / Defra intelligence, previous adverse sample results, new products and random sampling.

In 2023 - 24 the service undertook the following samples:

Products of Animal Origin (POAO)

- 152 National Monitoring Plan (NMP) samples and 125 Intensified Official Controls (IOC)/Protective measures, excluding Brazil,
- There were no unsatisfactory results for the NMP sampling and just 4 for the IOC/Protective measures, excluding Brazil)

Products Not of Animal Origin (NAO) samples

- 217 Products Not of Animal Origin (NAO) consignments of food and feed were sampled for chemical and bacteriological contamination;
- 121 NAO unsatisfactory results for chemical, biological and product labelling issues

This equates to 98.5% of all POAO and 44.2% of all NAO samples being considered satisfactory.

Formal actions to address the unsatisfactory results have included detention and/or destruction of the consignment, for adverse chemical and biological results.

Where labelling issues are identified, these are referred to the responsible Trading Standards service at the consignment's destination.

Since 30 March 2017, the EU Commission implemented enhanced checks on consignments of meat and meat derived products from Brazil resulting in all consignments being subject to physical examination with 20% of the consignments being also subject to sampling for microbiological standards.

The level of enhanced checks was in response to fraudulent activities in Brazil. This has amounted to 247 samples taken between April 2023 to July 2023 and 246 were found to be satisfactory. This is the equivalent of 99.6% of all consignments determined as satisfactory.

A subsequent audit in 2022 and report published by DEFRA in July 2023, found that the Brazilian competent authorities have made significant progress in correcting the systemic failings in the framework of controls, and the application of those controls, that led to the imposition of enhanced salmonella controls for poultry meat and poultry and beef meat products and preparations and the suspension of pre-listing of beef and poultry establishments. Therefore the enhanced checks of checks on consignments of meat and meat derived products from Brazil ended in July 2023.

Selection of Consignments

The requirement and selection of a consignment for routine sampling is decided by officers either during the documentary check process or at the time of the physical examination of the product.

Officers can subject any consignment at any stage of the checks to any sampling and laboratory tests if it is considered necessary to ascertain that the consignment meets the import requirements. Officers are either a qualified Environmental Health Practitioner or Official Veterinarian.

Information that can be used to help identify and prioritise risks include:

1. Intelligence obtained from different national and international databases, including IPAFFS and Risk Likelihood Dashboard (RLD) from the Food Standards Agency
2. Specific priorities and alerts issued by the different Regulators
3. Local intelligence/professional expertise from sampling results from previous years and type of imports

The risk assessment is likely to be a combination of data, judgement and expert knowledge.

The plan specifies the types of products, origin of the products (if relevant) and the analysis or exam required. The sampling plan aims to proactively detect food or feed which may be a danger to public or animal health and to ensure compliance with food standards and relevant legislation. The sampling plan covers POAO or NAO food and feed. The plan is not fixed, but is reviewed at regular intervals during the year, to adjust it to the fluctuations in trade and the on-going assessment of the existent and emerging risks.

Officers will undertake sampling in accordance with the standards required in the various Codes of Practice, and in compliance with any methodology when specified in the Regulations.

New products will be sampled where possible or where the Inspecting Officer suspects the consignment does not comply with the import conditions.

Products of Animal Origin and Non-Animal Origin (Food & Feed) - Sampling Plan 2024-25

The purpose of the plan is to specify the imported Products of Animal Origin (POAO) and Non-Animal Origin (NAO) food/feed that should be sampled for examination and analysis each year. The plan also includes locally sourced samples of shellfish from the Thames Estuary. The plan is devised using a risk-based approach when deciding which tests and products to be sampled, balanced with the requirement of randomisation in the selection of consignments.

The LPHA Imported Food Sampling Policy allows sampling of food and feed to be decided on a local basis according to product type, local knowledge, seasonal variation and historical import records at each individual port. Deviations from the sampling protocol are permitted to take account of an importer's history of non-compliance with legislative requirements, previous adverse sample results and intelligence received, for example, from inland local authorities, importers and consumer complaints.

The 2024-2025 Food Standards Agency (FSA) National Monitoring Plan (NMP) has not yet been produced to enable the LPHA to produce its local sampling plan for POAO's and NAO's for 2024/2025.

It is proposed that a further update will be provided to the Port Health and Environmental Services Committee at a subsequent meeting, that will detail the LPHA's monitoring plans for POAO including fishery products and NAO products once the National Monitoring Plan has been published.

FSA Food Sampling Survey

The FSA also oversees a food sampling survey, where funding is obtained directly from Central Government. The purpose of this survey is to supplement Local Government food sampling with specific priorities, so foods of national concern can be tested.

Further details are awaited of the proposed 2024-25 plan, to determine if the LPHA will take part.

Sampling Results

When the sampling results are received, they are entered onto the LPHA's database Port Health Interactive Live System (PHILIS) and UK databases, where appropriate.

For unsatisfactory results, officers will instigate further action, which can include the following interventions:

1. Notifying the food/feed business operator of the failure and issue the appropriate notifications to reject the consignment if still not released for import (for instance in the case of suspicious consignments). The possible options will be destruction or re-export, depending on the assessment of the risk posed by the failure.
2. Notifying the Local Authority of the premises of destination when the consignment was released pending the results, to allow them to take appropriate action for the non-compliant product in circulation.
3. Depending on the failure IPAFFS might trigger the issuing of emergency national or localised notifications.

Feed and Food Safety Incidents

LPHA are committed to responding promptly to all food or feed safety incidents. The Service has arrangements in place to ensure that it is able to respond to Food Alerts issued by the FSA. Warnings are received electronically, and all urgent Food Alerts receive immediate attention and action where necessary. Out of hours arrangements are also in place.

Border Notifications issued by the European Commission are sent to a designated officer who is responsible for their distribution amongst LPHA officers involved in Imported Food Enforcement. LPHA's database, Port Health Interactive Live Information System (PHILIS) can be used to issue reminders when specific products are subject to control.

Organisational Structure

The service is currently part way through a consultation period to align the service with the needs, demands and opportunities that will be placed upon the LPHA following the introduction of the EU imported checks. Staffing numbers will be impacted by these changes.

It is proposed that an update will be provided to the Committee later in 2024; once the consultation has concluded and there has been an opportunity to implement and subsequently review the position of the service provision.

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Agenda Item 13

Committee: Port Health and Environmental Services Committee	Date: 7 May 2024
Subject: Report of Action Taken	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	See background papers
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: Town Clerk	For Information
Report author: Kate Doidge, Governance Officer	

Summary:

This report provides details of delegated decisions taken under urgency between Committee meetings.

Recommendation

Members are asked to note the report.

Delegated Decisions Under Standing Order 41A

London Port Health Authority Order

1. The City of London Corporation is the Port Health Authority ('LPHA') for the tidal Thames. The London Port Health Authority Order 1965 currently governs the functions and jurisdiction of the LPHA.
2. The London Port Health Authority Order 1965 ('the Order') is in urgent need of renewal to reflect changes in legislation that are relevant to the exercise of its functions and jurisdiction, which has remained a long-running project with the City of London Corporation. The changes are 'updating' in their nature, and do not practically alter the way in which the LPHA operates nor the cost of carrying out its functions. The changes do ensure that its legislative underpinning is fit for purpose.
3. The Remembrancer finalised a draft Order which needs to be made by Ministers in Department of Health and Social Care under section 7 of the Public Health (Control of Disease) Act 1984. The text of the draft Order had been finalised with the Department of Health and Social Care.
4. A short consultation on the proposed renewal of the Order was held in late 2022. Maldon District Council and Rochford District Council have been consulted as a change made by this Order deals with what is currently 'no man's land', where there is a boundary between port health authorities that is non-contiguous (i.e., a gap). Whilst it has not caused practical problems to date, it was deemed sensible to have contiguous borders and both Councils have confirmed they are content, being the only Councils whom such a change might impact given proximity to their areas.
5. The request under urgency was for the City of London Corporation to ask the Department of Health and Social Care to proceed to recommend to their Ministers that the Order be signed. Once signed, it would come into force the following day. Agreement under urgency procedures was sought as this was a long-running project which had already had delays with the Department of Health and Social Care to finalise the wording of the draft Order. With uncertainty of when a General Election is to be held, it was inadvisable for any further delay as the Order would be unable to proceed due to the pre-election period, causing a delay of several months. In addition, the Department of Health and Social Care had indicated that they were in a position to recommend to their Ministers to signed the Order.
6. The Town Clerk therefore agreed, in consultation with the Chairman and Deputy Chairman of Port Health and Environmental Services Committee, to request that the City of London Corporation ask the Department of Health and Social Care to proceed to recommend to their Ministers that the London Port Health Authority be signed. This would enable the Order to come into force without any further delay.

Background Papers

Memorandum – The London Port Health Authority Order – March 2024

Kate Doidge

Governance Officer

Deputy Town Clerk's Department

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