



## Port Health & Environmental Services Committee

**Date:** TUESDAY, 9 JULY 2024

**Time:** 11.00 am

**Venue:** COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

**Members:**

Mary Durcan (Chairman)	Wendy Hyde
Deputy Peter Dunphy (Deputy Chairman)	Henry Jones
George Abrahams	Deputy Elizabeth King BEM JP
Shahnan Bakth	Gregory Lawrence, Farringdon Without North Side
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	

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**Ian Thomas CBE**  
**Town Clerk and Chief Executive**



# AGENDA

## Part 1 - Public Agenda

1. **APOLOGIES**

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

3. **MINUTES**

To agree the public minutes and non-public summary of the meeting held on 7<sup>th</sup> May 2024.

**For Decision**  
(Pages 7 - 14)

4. **RESOLUTIONS FROM THE GRAND COURT OF WARDMOTE**

- (a) To consider the following Resolution from the Ward of Cripplegate – 2<sup>nd</sup> November 2023 and 20<sup>th</sup> March 2024:

“This Wardmote resolves to call upon the City Corporation to provide an adequate number of constantly available public toilets to satisfy both the existing need and the ambition of Destination City.”

- (b) To consider the following Resolution from the Ward of Portsoken – 20<sup>th</sup> March 2024:

“We welcome the consideration of given by the City of London Corporation’s Licensing Committee and Port Health and Environmental Services Committee to the issue of anti-social behaviour in Portsoken associated with the night-time economy, and further encourage the relevant Committee to consider the installation of pop-up public conveniences at night-time economy hotspots in the City to address the common issue of street urination.”

- (c) To consider the following Resolution from the Ward of Portsoken – 20<sup>th</sup> March 2024:

“That the relevant Committee and/or Department of the City of London Corporation investigate whether there was a statutory nuisance or health and safety hazard under the Housing Health and Safety Rating System in the Mansell Street Estate with regard to pest infestation, and any necessary steps taken to resolve any nuisance identified.”

**For Information**

5. **CHANGES TO THE WASTE PRESENTATION RESTRICTIONS**  
Report of the Interim Executive Director for Environment.  

**For Decision**  
(Pages 15 - 20)
6. **PUBLIC CONVENIENCE PROVISION**  
Report of the Interim Executive Director for Environment.  

**For Decision**  
(Pages 21 - 32)
7. **AIR QUALITY ANNUAL STATUS REPORT FOR 2023**  
Report of the Interim Executive Director for Environment.  

**For Information**  
(Pages 33 - 56)
8. **BUSINESS PLAN 2023/24: PROGRESS REPORT (PERIOD THREE: DECEMBER 2023 - MARCH 2024)**  
Report of the Interim Executive Director for Environment.  

**For Information**  
(Pages 57 - 70)
9. **RISK MANAGEMENT UPDATE**  
Report of the Interim Executive Director for Environment.  

**For Information**  
(Pages 71 - 84)
10. **REVENUE OUTTURN 2023/24**  
Joint Report of the Chamberlain and the Interim Executive Director for Environment.  

**For Information**  
(Pages 85 - 94)
11. **BREXIT UPDATE**  
The Interim Executive Director for Environment to be heard.  

**For Information**  
(Verbal Report)
12. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

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

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

14. **EXCLUSION OF THE PUBLIC**

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

**Part 2 - Non-public Agenda**

15. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 7<sup>th</sup> May 2024.

**For Decision**  
(Pages 95 - 98)

16. **WRITE-OFF OF OUTSTANDING DEBT**

Report of the Interim Executive Director for Environment.

**For Information**  
(Pages 99 - 104)

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

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

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## PORT HEALTH & ENVIRONMENTAL SERVICES COMMITTEE

Tuesday, 7 May 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)	Deputy Marianne Fredericks
Deputy Peter Dunphy (Deputy Chairman)	Steve Goodman OBE
George Abrahams	Wendy Hyde
Alderman Alexander Barr	Henry Jones
Deputy Timothy Butcher	Deputy Elizabeth King BEM JP
Deputy John Edwards	Gregory Lawrence
John Foley	Luis Felipe Tilleria
Dawn Frampton	Jacqui Webster

#### **Officers:**

Gavin Stedman	- Environment Department
Joe Kingston	- Environment Department
Peter Brett	- Environment Department
Ruth Calderwood	- Environment Department
Ian Hughes	- Environment Department
Susie Pritchard	- Environment Department
Rachel Pye	- Environment Department
Joanne Purkiss	- Environment Department
Jenny Pitcairn	- Chamberlain's Department
Frank Marchione	- Comptroller and City Solicitor's Department
Kate Doidge	- Town Clerk's Department

### **MATTERS ARISING**

It was moved by Chief Commoner Deputy Peter Dunphy, and seconded, that Alderman Alexander Barr take the Chair until Item 4, Election of Chairman.

#### **1. APOLOGIES**

Apologies were received from Alderman Kawsar Zaman, Shahnaz Bakht, Deputy Christopher Boden, Caroline Haines, Jaspreet Hodgson, Andrew McMurtrie, Deborah Oliver, Deputy Henry Pollard, Hugh Selka, Deputy Dr Giles Shilson, Mandeep Thandi, and Glen Witney.

Caroline Haines, Andrew McMurtrie, Deputy Henry Pollard, Deputy Dr Giles Shilson, and Mandeep Thandi observed the meeting virtually.

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

There were no declarations.

3. **COURT ORDER**

The Committee received the Order of the Court of Common Council dated 25<sup>th</sup> April 2024, appointing the Committee and setting its Terms of Reference.

The Town Clerk notified the Committee of an error in the Order, which that the number of years served on the Committee for Deputy Dr Giles Shilson should be four years, not three years as listed.

4. **ELECTION OF CHAIRMAN**

The Committee proceeded to elect a Chairman in accordance with Standing Order No. 29. The Town Clerk informed the Committee that Mary Durcan, being the only Member expressing their willingness to serve, was duly elected Chairman of the Port Health and Environmental Services Committee for the ensuing year and took the Chair for the remainder of the meeting.

RESOLVED – That Mary Durcan be elected Chairman of the Port Health and Environmental Services Committee for the ensuing year.

5. **ELECTION OF DEPUTY CHAIRMAN**

The Committee proceeded to elect a Deputy Chairman in accordance with Standing Order No. 30. The Town Clerk informed the Board that no expressions of interest were received ahead of the one full working day deadline. However, one expression of interest had been received subsequent of the deadline. Nonetheless, the Town Clerk requested if there were any additional expressions of interest for the Deputy Chairman of the Port Health and Environmental Services Committee. Chief Commoner Deputy Peter Dunphy, being the only Member who indicated their willingness to serve, was duly declared to be Deputy Chairman of the Port Health and Environmental Services Committee for the ensuing year.

RESOLVED – that Chief Commoner Deputy Peter Dunphy be elected Deputy Chairman of the Port Health and Environmental Services Committee for the ensuing year.

6. **MINUTES**

The Committee received the public minutes and non-public summary of the previous meeting, held on 12<sup>th</sup> March 2024, for approval.

RESOLVED – That the public minutes and non-public summary of the previous meeting, held on 12<sup>th</sup> March 2024, be approved as a correct record.

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

Wooden Planters on London Bridge

The Committee heard that the wooden planters on London Bridge owned by the City Corporation and Transport for London (TfL) had been repaired or were in the process of being repaired.



### Risk Register

It was confirmed that the Committee's comments on amending the risk register on flooding or fire at Walbrook Wharf would be incorporated into the next cycle of reporting the Port Health and Public Protection key risks.

### Dog Littering

It was confirmed that the standard wording to provide to City residents had been circulated. Comments included that having dog litter bins present would send a message that families and their dogs were welcome, linking in with Destination City. Other comments included that it was more frequently residents not picking up dog litter than visitors, and that dog litter bins were often mis-used for regular litter. The response from officers was that a report was aimed to be received by the Committee in September 2024, which took a strategic view of the cleansing service following the introduction of additional street cleansing resources, and that this would consider a targeted approach on the placement of all types of bins, including dog litter. It was added that the additional resources included a staff post aimed at cleansing communications, such as signage and reporting.

## 7. **OUTSTANDING ACTIONS**

Members received the Committee's Outstanding Actions.

The Committee heard that a letter had been sent to TfL in April 2024, but no response had been received.

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

The Committee received a report of the Town Clerk relative to the Committee's appointments to sub-committees and its representatives on outside bodies.

The Committee considered the following appointments:

### **Local Plans Sub-Committee**

The Committee considered the appointment of one Member to the Local Plans Sub-Committee. The Town Clerk informed the Committee that no expressions of interest were received ahead of the meeting and invited any declaration of interest in the position. Deputy Elizabeth King, being the only Member willing to serve was duly appointed to serve on the Sub-Committee for the ensuing year.

RESOLVED – That Deputy Elizabeth King be appointed to the Local Plans Sub-Committee.

### **Streets and Walkways Sub-Committee**

The Committee considered the appointment of one Member to the Streets and Walkways Sub-Committee. The Town Clerk informed the Committee that John Foley had indicated his willingness to stand and invited any other declaration of interest in the position. John Foley, being the only Member willing to serve was duly appointed to serve on the Sub-Committee for the ensuing year.

RESOLVED – That John Foley be appointed to the Streets and Walkways Sub-Committee.

### **Projects and Procurement Sub-Committee**

The Committee considered the appointment of one Member to the Projects and Procurement Sub-Committee. The Town Clerk informed the Committee that no expressions of interest were received ahead of the meeting and invited any declaration of interest in the position. The Chairman, Mary Durcan, being the only Member willing to serve was duly appointed to serve on the Sub-Committee for the ensuing year.

RESOLVED – That Mary Durcan be appointed to the Projects and Procurement Sub-Committee.

### **Thames Estuary Partnership**

The Committee considered the appointment of one Member as a representative on the Thames Estuary Partnership. The Town Clerk informed the Committee that no expressions of interest were received ahead of the meeting and invited any declaration of interest in the position. Deputy John Edwards, being the only Member willing to serve was duly appointed as a representative on the Thames Estuary Partnership for the ensuing year.

RESOLVED – That Deputy John Edwards be appointed as a representative on the Thames Estuary Partnership.

### **Thames21**

The Committee considered the appointment of one Member as a trustee on Thames21's Board. The Town Clerk informed the Committee that no expressions of interest were received ahead of the meeting and invited any declaration of interest in the position. Deputy Timothy Butcher, being the only Member willing to serve was duly appointed as a trustee on Thames21 for the ensuing year.

RESOLVED – That Deputy Timothy Butcher be appointed as a Thames21 trustee.

### **Health and Wellbeing Board**

Members noted that Deputy Marianne Fredericks would serve as the Chairman's representative on the Health and Wellbeing Board.

### **Crime and Disorder Scrutiny Sub-Committee**

Members noted that the Chairman would be taking up her place on the Crime and Disorder Scrutiny Sub-Committee.

The Committee agreed that Mandeep Thandi would act as the Deputy Chairman's representative on the Crime and Disorder Scrutiny Sub-Committee.

RESOLVED – That Mandeep Thandi be appointed as the Deputy Chairman's representative on the Crime and Disorder Scrutiny Sub-Committee for the ensuing year.

RESOLVED – that the report be received, and the above appointments made.

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

The Committee received a report of the Interim Executive Director for Environment, concerning the approval of the draft Air Quality Strategy 2025 to 2030's aims, and to approve the draft Strategy to go out to public consultation. Following the introduction to the Strategy, Members asked questions and made comments, as detailed below:

The recent data showed that the level of nitrogen dioxide was within the national targets. However, officers were aware of the areas and roads of concern referenced by Members, and the strategy contained specific action to address the areas that exceeded the targets. With specific regards to the re-routing of traffic at Bank Junction, several surrounding areas were being monitored to measure the impact of displacement. The specific data would be included in the next annual report received by the Committee and could be highlighted in the final report.

Members referenced the high percentage of nitrogen oxide originating from boilers and generators and commented that the balance of pollution from demolishing versus refurbishing buildings was absent from the Local Plan and should be included. Officers would speak with the Corporation's planning team on this point. Members also encouraged stronger wording on encouraging alternatives to diesel engines for generators. Later, Members heard that diesel generators were regulated to meet the latest Euro Standards, and that site visits take place to ensure best practice was being followed. However, there was currently no ultimate solution for diesel engines. Members also heard that a Private Member's Bill had been introduced to tackle this issue to assist London Local Authorities to tackle non-transport sources of pollution, which was used as a mechanism to discuss additional regulatory powers, but that the Corporation currently had no power to control generators.

It was noted that the Health and Wellbeing Board had received the draft Strategy and has made comments to expand upon the health issues and health benefits to improved Air Quality.

A study had been conducted to monitor the particulates from the Underground and its air vents. This study had not found a measurable number of particulates from the vents, and officers were liaising with Transport for London, who said that there would be more cleansing of the vents in the future. It was important to continue collaborating and working with other partners, such as the Port of London Authority, to address the pollution that originated from outside the Square Mile.

The pollutant PM<sub>2.5</sub> formed 4% of the pollutants and originated from a number of sources. It was further explained that the minimum and maximum concentration of nitrogen dioxide ( $\mu\text{g}/\text{m}^3$ ) was 20 and 52, and that 30  $\mu\text{g}/\text{m}^3$  was the aim for over 90% of the Square Mile, which was below the current national standard. It

was expected that this could reduce further following studies of the data from 2023.

Lastly, suggestions from Members for additions to the draft Strategy included comparisons from previous years, referencing cargo bikes with the Transport Strategy, and graphs showing the pollution drop off on pavements.

RESOLVED – That Members:

- Approve the aims of the draft Air Quality Strategy which set a direction of travel towards achievement for the 2021 World Health Organisation Air Quality Guidelines.
- Approve the draft Air Quality Strategy 2025 to 2023 for public consultation, subject to comments received at the meeting.

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

The Committee received a report of the Interim Executive Director for Environment, concerning a required adjustment due to an unexpected increase for veterinary inspections contracted to a third party.

It was queried whether a certain percentage of adjustment to charges could be agreed under Delegated Authority, in conjunction with the Chairman and Deputy Chairman, to build a degree of flexibility and be able to be reactive to charges. The response was that officers would have to look further into the possibility of this query.

RESOLVED – That Members approve the adjusted Animal Health Team fees described in section 5 of the report and listed in Appendix 1.

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

The Committee received a report of the Interim Executive Director for Environment, concerning approval for the Commercial Environmental Health Service Plan 2024-25 and the Port Health Service Plan 2024-25. It was explained to the Committee that the Plans set out how objectives would be delivered and what priorities were in place. It was prepared in conjunction with national regulators such as Food Standards Agency (FSA) and Defra, who expect Member-approved Service Plans.

A Member suggested that the Corporation's duties relating to imported food and feed and food premises be separated into two functions. The response was that this would be considered in future plans..

The backlog of food hygiene work in the lower risk food businesses categorised as 'D' for was highlighted. It was explained that the Corporation was still recovering from the pandemic, and an intervention programme demonstrated that most of these premises were still compliant. A 'D' standard business could range from a coffee shop to a caterer operating within a business.

It was queried whether there was a possibility of sanctions due to failure to plan and implement a programme of official food controls and health and safety interventions was possible. It was explained that the approval of the Services

Plans, and quarterly performance reports managing its objectives, would prevent these failures.

A Member commented that whilst the City Corporation is compliant with its food hygiene interventions, it should be encouraging the FSA to go into the neighbouring Local Authorities to ensure a level playing field across London, and that the City Corporation should not be prioritised over other Local Authorities. The Committee heard that all Local Authorities were expected to produce an agreed Service Plan, which is then reported back to FSA.

RESOLVED – That Members approve:

- The Commercial Environmental Health Services Plan 2024-25 (Appendix 1)
- The Port Health Service Plan 2024-25 (Appendix 2)

**12. 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 30<sup>th</sup> April 2024, the second phase of controls on imported food and feed had been introduced, which included physical, sampling and identity checks. The new border control regime was projecting figures of throughout of approximately 140,000 consignments for the Port Health Service. Following the first day of the new regime, there had been some minor issues including IT issues, but these had since been resolved. There were no hold ups at the Ports, and the current position was good. In the coming months, the Service would be able to collect more data on imports which could be interrogated more closely to analyse progress.

RESOLVED – That the verbal report be received.

**13. REPORT OF ACTION TAKEN**

The Committee received a report of the Town Clerk, concerning details of delegated decisions taken under urgency between Committee meetings.

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

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

A Member of the Committee questioned what could be done to ensure a swift response for the removal of graffiti on Network Rail arches in the City, and what powers were available to escalate the removal. The response was for the specific case the Member referenced, a Community Protection Warning Notice has been issued, of which Network Rail had 28 days to respond. This formed part of the formal process to remove graffiti. Attempts for engagement were always the first step, however there could be difficulty if the property affected was vacant or owned by a third party employing a managing agent. If the Notice had not been responded to within 28 days, a further notice was issued to remove the graffiti. The legal process could take up to two months.

15. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**  
There were no public items of urgent business.
16. **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.
17. **NON-PUBLIC MINUTES**  
RESOLVED – That the non-public minutes of the previous meeting held on 12<sup>th</sup> March 2024 be approved as a correct record.
18. **PORT HEALTH AND ENVIRONMENTAL SERVICES DEBTORS - PERIOD ENDING 31 MARCH 2024**  
The Committee received a report of the Interim Executive Director for Environment, concerning the Port Health and Environmental Services debtors for the period ending 31<sup>st</sup> March 2024.
19. **WALBROOK WHARF UPDATE ON SOFT MARKET TESTING**  
  
**Note: During this item, the Committee agreed that, under Standing Order No.40, the meeting be extended by 10 minutes in order to conclude its business.**  
  
The Committee received a report of the City Surveyor, provide an update on the soft market testing for Walbrook Wharf.
20. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**  
There were no non-public questions.
21. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERED URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**  
There were no non-public items of urgent business.

**The meeting closed at 1.07 pm**

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Chairman

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

<b>Committee(s):</b> Porth Health and Environmental Services Committee	<b>Dated:</b> 9 <sup>th</sup> July 2024
<b>Subject:</b> Changes to the Waste Presentation Restrictions	<b>Public</b>
<b>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</b>	Providing excellent services Flourishing public spaces
<b>Does this proposal require extra revenue and/or capital spending?</b>	N
<b>If so, how much?</b>	N/A
<b>What is the source of Funding?</b>	N/A
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	N/A
<b>Report of:</b> Bob Roberts, Director of Environment	<b>For Decision</b>
<b>Report author:</b> Joe Kingston, Assistant Director Gardens and Cleansing	

## Summary

This report highlights an increase in domestic and commercial waste bags that are placed on street contravening the City’s current Time Banding restrictions.

To address this issue and the problems it causes, this report proposes changes to those restrictions to improve street cleanliness, accessibility, and environmental quality. The proposal seeks to adjust permitted times for waste placement on footways, accompanied by a strengthened communication, education, and enforcement strategy.

## Recommendation(s)

Members are asked to:

- Agree changes to the permitted times for the placement of residential and commercial waste on the footway.
- Agree a strengthened communication, education, and enforcement approach to help improve compliance.

## Main Report

### Background

1. In April 2012 the City Corporation introduced a “Time Banding” Scheme, restricting the hours that residential waste could be placed out on the footway for collection. This was intended to improve the City’s public realm by ensuring that waste was not on City streets between 8am and 6pm.
2. When left on-street for collection, bagged waste attracts loose litter from pedestrians and can provide a food source for vermin, so it is important to ensure waste is only left out for the minimum amount of time. Confining when bags can be placed on-street for collection to overnight hours also ensures the City’s

footways are kept clear and accessible during peak pedestrian flow times which is of particular benefit to wheelchair users and people with visual impairment.

3. Waste bags placed on streets in the City of London fall into two categories depending on the producer and are classified as either **domestic** or **commercial**. The local restrictions and associated legislation for these different types of waste vary and are dealt with separately for the purpose of this report.

## **Domestic**

### **Current Position**

4. Residential properties in the City of London which do not have access to a bin store are allowed to place their waste and recycling in City of London issued bags on the pavement close to their property. For operational efficiency reasons and to reduce noise issues, current residential waste collection restrictions allow for this waste and recycling to be left for collection between 6.30pm and 7.30pm, Monday to Saturday.

### Position Pre-Pandemic

5. Overall, the Time Banding scheme has been a success, resulting in clearer streets at peak footfall times and reducing littering associated with waste bags. The City's Recycling Officers and staff from our street cleansing and waste collection contractor Veolia make every effort to ensure that residents are aware of these restrictions, and that residents are engaged with a light touch where waste was presented in contravention of the restrictions.
6. For residents, advice on Time Banding is printed on domestic waste bags to supplement information available on the City's website. Leaflets are regularly delivered to individual households and enforcement activity in response to contraventions has typically been to write to all residents in the identified building or the surrounding area to reiterate the restrictions.
7. Officers have historically not pursued more formal enforcement measures mainly because of the small number of contraventions prior to the pandemic and the relatively lengthy process required to issue the required notices.

### Post-Pandemic

8. Since the pandemic there has been a 50% increase in domestic bags placed on street in breach of our regulations. The independent surveys carried out by Keep Britain Tidy (over three separate weeks each year, monitoring 900 street areas in total) reported 38 bags on monitored streets in 2019, and 57 in 2023. Additionally, there has been a 130% increase in warning letters sent to residents regarding Time Banding between 2019 (163 letters issued) and 2023 (375 letters issued).
9. This increase in non-compliance post pandemic is attributable to several factors: a high turnover of residents, new properties being developed and an increase in



short term lets. The light touch approach to enforcement against residents used pre-pandemic has not been found to be completely successful at solving the issues in all areas.

## Options

10. Do nothing – **Not Recommended.**
11. Widen the collection hours for domestic waste from 6.30pm - 7.30pm to 6pm - 8pm – **Recommended.**
12. Implement a renewed high-profile communication and education campaign – **Recommended.**
13. Implement a stronger approach to enforcement where non-compliance from residential properties continues after communication and education activities have already been undertaken – **Recommended.**

## Proposals

14. Widening collection hours for domestic properties will give residents more opportunity for compliance and will also be more in line with the placement of commercial waste. This simplification of the restrictions will make it easier to communicate the message to residents and can be accommodated within the current resource base. We are currently unable to extend the time restrictions for domestic waste further than this (for example for the whole night) as this would require an additional crew and vehicle at considerable expense to the current contract.
15. Identification and Monitoring: officers will regularly monitor previous known hot-spots and areas of the City where residential properties present their waste on street. Information from these inspections, along with reports of waste on street received by officers, will be used to identify areas to target for improvement.
16. Communication and Education: where waste is presented outside of restrictions, local residential properties will receive notices, in the form of a visually impactful communications containing the new simplified clearer messaging. This will include details of the violations and provide guidance on proper waste disposal procedures. Residents will also be visited by officers to ensure they are aware of their obligations. Consideration will also be given to the installation of appropriate, on-street signage explaining the regulations at locations where waste is regularly placed incorrectly.
17. Enforcement: where compliance with the restrictions cannot be obtained using the approaches outlined above, officers will commence enforcement procedures in line with best practice guidance to increase compliance. Officers will continue to use all other relevant legislation available to them to enforce against other environment and waste offences such as littering and fly-tipping.

## **Commercial**

### **Current Position**

18. The current time-banding scheme requirements for businesses are more complicated and does not allow for any waste to be left out for collection between 8am and 6pm, Monday to Sunday. Businesses are also required to coordinate their collections with their service providers to ensure their waste is collected within two hours if presented between 6pm and midnight. There are no restrictions on the presentation of business waste between midnight and 8am.

### **Position Pre-Pandemic**

19. As with the domestic part of the scheme, the commercial element of the Time Banding scheme has been a success, resulting in clearer streets at peak footfall times and reduced littering. The City's Street Environment Officers and staff from our street cleansing and waste collection contractor Veolia make every effort to ensure that businesses are aware of these restrictions, and that waste presented in contravention of the restrictions is enforced against and cleared.

20. Historically it has been easier to identify businesses contravening the restrictions than residents and officers will initially seek to engage with businesses to offer practical advice and assistance to resolve the issue before formal enforcement action is taken.

### **Post-Pandemic**

21. Our independent Keep Britain Tidy annual surveying shows an increase of 47% in the number of business bags placed on street in breach of our regulations between 2019 and 2023. The increase in non-compliance post pandemic is attributable to several factors: Staff turnover at commercial premises such as food outlets has been high, this has meant many staff have had to be educated about the local regulations. Enforcement activity was lower during the pandemic as there were fewer premises operating and fewer officers focused on the enforcement of these restrictions.

22. Custom practices have therefore developed and an increasing number of businesses placing bags on street during the day, which in turn is having a negative effect on the Public Realm, accessibility, and street cleansing standards.

23. To deal with this, enforcement against commercial waste has been stepped up and this has led to the increased issuing of Fixed Penalty Notices (FPNs). The Street Environment Team issued 948 Fixed Penalty Notices in 2023 relating to businesses for waste regulation infractions as compared to only 148 in 2019, a 640% increase.

24. Whilst officers have seen significant results from the above commercial waste enforcement activities, enforcing the two-hour restriction for bags placed out between 6pm and midnight has been time consuming and of little benefit to local environmental quality. It has also proved to be complicated for businesses to

understand and sometimes unmanageable for waste collection and cleaning companies.

25. To address these issues, we are proposing differing approaches for the domestic and commercial waste as detailed below. There will be some overlap in how this work is provided.

## Options

26. Do nothing – **Not Recommended.**
27. Remove the two-hour window restriction for commercial waste placed out after 6pm. All businesses will still only be able to place waste on street between the hours of 6pm and 8am – **Recommended.**
28. Implement a renewed high-profile communication and education campaign – **Recommended.**
29. Continue the robust enforcement approach towards businesses who are found to be breaching waste regulations – **Recommended.**

## Proposals

30. Removal of the two-hour restrictions for commercial waste collection between 8pm and midnight will ensure businesses and their commercial waste carriers have a clearer understanding of how to comply. This will also enable our Street Environment Team to focus current resources on ensuring compliance when the streets are most busy between 8am and 6pm.
31. Identification and Monitoring: officers will regularly monitor previous known hot-spots and areas of the City where businesses present their waste on street. Information from these inspections, along with reports of waste on street received by officers, will be used to identify areas to target for improvement.
32. Communication and Education: where waste is presented outside of restrictions, businesses will receive notices, in the form of a visually impactful communication containing the new clearer messaging. This will include details of the violations and provide guidance on proper waste disposal procedures. Businesses will also be visited by officers to ensure managers and or owners understand their obligations. Consideration will also be given to the installation of appropriate, on-street signage explaining the regulations at locations where waste is regularly placed incorrectly.
33. Enforcement: where compliance with the restrictions cannot be obtained using the approaches outlined above, officers will commence enforcement procedures in line with best practice guidance to increase compliance. Officers will continue to use all other relevant legislation available to them to enforce against other environment and waste offences such as littering and fly-tipping.

## **Key Data**

34. The Gardens and Cleansing Service maintains an extensive data set of street scene conditions assessed by independent surveys carried out by Keep Britain Tidy. This data set will enable us to accurately assess the impact of this approach in identified hot spots and the general street scene.
35. Officers will record all communication and enforcement action undertaken and updates can be included in the Business Plan updates provided to this committee.

## **Corporate & Strategic Implications**

Strategic implications – this approach supports the delivery of the Corporate Plan, specifically the supporting the outcomes to providing excellent services and flourishing public spaces.

Financial implications – this approach can be delivered within current budgets. There are no targets for income recovery.

Resource implications - this approach can be delivered within current resources.

Legal implications – this approach compliant with all necessary adopted legislation.

Risk implications – no more than current enforcement activities.

Equalities implications – assisted collections – access for clearer footpaths

Climate implications - none

Security implications – none

## **Conclusion**

36. The proposed amendments to the restrictions for presentation of waste on City streets will provide a clearer message on the City Corporation's waste presentation restrictions for both residents and businesses. By implementing these changes in conjunction with robust communication, education, and enforcement measures, we can ensure greater compliance, reduce the amount of waste visible on the City's streets and contribute to a further improvement in the overall street scene.

## **Appendices**

- None

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# Agenda Item 6

<b>Committee(s):</b> Porth Health and Environmental Services Committee	<b>Dated:</b> 9 <sup>th</sup> July 2024
<b>Subject:</b> Public Convenience Provision	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	Providing excellent services Vibrant thriving destination Flourishing public spaces
<b>Does this proposal require extra revenue and/or capital spending?</b>	N
<b>If so, how much?</b>	N/A
<b>What is the source of Funding?</b>	N/A
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	N/A
<b>Report of:</b> Bob Roberts, Interim Executive Director of Environment	<b>For Decision</b>
<b>Report author:</b> Joe Kingston, Assistant Director Gardens and Cleansing	

## Summary

This report highlights current public convenience provision in the Square Mile and outlines options for the future.

There are 20 sets of public conveniences for use within the City of London available at different times of the day and night. This is a non-statutory function for the City Corporation, and as such it is supplemented by various commercial third parties, including retail centres and national rail stations. Current Corporation facilities include two attended public conveniences near key tourist spots, four 'urilifts' near night-time economy locations, and toilets in public car parks and libraries.

Since 2009, the City Corporation has also managed a Community Toilet Scheme (CTS) which has 68 participating locations. Members of the public can access these facilities for free, with locations and hours available on the City Corporation's website.

Despite income from charging, the net cost to the City Corporation of operating its public conveniences is significant, with the facilities at Tower Hill & Paternoster Square losing around £340k pa combined (not including overheads). These facilities have considerably higher usage numbers than those at Bank Station and Eastcheap which were closed in 2021 when your committee was faced with delivering a balanced budget whilst absorbing a 12% (£1.2m) savings target.

Considering concerns being raised about the current provision of public conveniences, Members requested that officers undertake a root and branch review. This report sets out the findings from that review and recommends a number of actions that can be delivered within current budgets. Given wider budget constraints, further options are fully dependent on additional sources of funding being identified.

## **Recommendation(s)**

Members are recommended to agree the following (within currently agreed budgets):

- Review and enhance the publicity and signage for the City's public toilets at all locations
- Refurbish the toilet facilities within the City's car parks
- Identify potential locations for additional urilifts
- Explore opportunities for a limited reopening of the public toilets at Blackfriars (after the completion of the Tideway project)
- Review the benefits, promotion and funding of the Community Toilets Scheme
- Press for further private sector provision of public toilets through the Planning process
- Work with ParkGuard to focus their nighttime economy resources on anti-social behaviour hotspots
- Explore additional funding opportunities to reinvest into the provision and maintenance of public toilets

## **Main Report**

### **Background**

1. The provision of public conveniences in the City is currently delivered as a partnership between the City Corporation and the private sector, with a network of 20 facilities available at various times of the day and night across the Square Mile.
2. Despite there being no statutory requirement for the City to operate or fund public conveniences, it does so both directly through its attended public toilets and urilifts, and indirectly by making the facilities in some of its key buildings available for public use.
3. Under its Community Toilet Scheme, the City also offers a small financial payment to premises to allow public use from non-customers, and these are supplemented in turn by toilets provided by retail centres and national rail stations as part of their operating model and / or Planning requirements.
4. The last major review of public toilet provision was in 2021, when your Committee was faced with the considerable challenge of seeking to deliver a balanced budget whilst absorbing 12% savings (£1.2m). Given the relative lack of usage and significant operational costs of operating the toilets at Bank Station and Eastcheap, these were closed in order to prevent further cuts elsewhere in the service.

## Current Position

### Existing Provision – Attended Public Conveniences

5. The City Corporation maintains two attended public conveniences located close to the City's main tourist attractions of St Paul's Cathedral (at Paternoster Square) and the Tower of London (at Tower Hill).
6. Both locations are limited to daytime opening (Mon-Fri 8am to 8pm; 9am to 5pm at weekends) to match the respective tourist trade (Tower Hill extends to 7pm in the summer) and both are attended throughout their opening times. This is not just because their usage requires constant monitoring and cleaning, but also because evidence has shown that unattended toilets attract a much greater degree of anti-social behaviour (ASB) and damage.
7. ASB is also a contributory factor as to why these facilities are not open later in the evening, as regrettably lone workers in such facilities are at greater risk than if they are part of a wider facility such as a train station.
8. In terms of usage, Tower Hill is by far and away the most frequently used facility, with just over 400,000 users last year. To illustrate, this equates to roughly two users per minute during opening times, with its 'popularity' no doubt linked to its proximity to the City's coach park bringing tourists to the Tower of London and Tower Bridge. However, this figure is still somewhat short of the number of users pre-Covid, when then facility attracted over 500,000 users pa at its peak.
9. Usage at Paternoster Square is much lower with just over 70,000 users last year, or the equivalent of one person every three minutes. By comparison, the toilets at Bank Station had 28,000 users pa before their closure (a third of the usage at Paternoster and just over 5% by comparison to Tower Hill).
10. Given the staffing required to manage these facilities, the cost of operation is significant, amounting to around £580k pa in total for the two, not including repair and maintenance, and other overheads.
11. The income for both facilities is derived from a 50p entry fee which has not changed since it was introduced over 10 years ago. This was done at the time to offset the losses the facilities were making, and although they now take a combined £240k pa from users, this makes the net cost of running the City's two public conveniences around £340k pa. This has to be absorbed within Environment's wider local risk budget, and any reduction in footfall and usage has to be offset with equivalent savings or additional income from elsewhere within the department's budget.
12. Other providers such as Network Rail are able to offer their toilets free of charge because they can absorb their resource costs within a wider facility, but the City is not able to do this, meaning that charging a fee has had to become an essential part of the City's operating model for these facilities.
13. The City's fees have not increased in that time partly because of the desire to keep them affordable for users but also because of the need to keep the coinage

as simple as possible, meaning any potential increase to help cover costs would likely have to move from 50p to a £1. Payment can be made by both cash and card at both facilities, but despite cashless being offered for some time, a considerable number of transactions remain with coins.

14. Removing charges completely might increase usage but would further erode the financial position and increase the current loss. In addition, there is no firm data to suggest removing fees would reduce public urination in the vicinity. To illustrate this, the Tower Hill area does not generally have an ASB issue when the public toilets are open, whereas there are issues of public urination in the vicinity of the toilets at Liverpool St station which are free for the public to use.
15. Therefore there are both benefits and disbenefits to changing the current fee, but at present there is no hard data to confirm to what extent patterns of usage or income would result from a change.
16. Finally, other operating models for attended public conveniences have been tried elsewhere but these have not been a commercial success. In particular, Westminster City Council sought to have a private contractor operate their public conveniences on behalf of the Council, but this proved commercially unsuccessful and they decided to return them to public operation.

#### Past Provision – Attended Public Conveniences

17. In 2021, your Committee was faced with the difficult challenge of delivering a balanced budget whilst absorbing a 12% (£1.2m) savings target. Given the options available, it was agreed at the time to close the two least used (and greatest loss making) public conveniences at Bank Station and Eastcheap.
18. The facilities at Eastcheap were of Victorian design with accessibility issues and would have required significant investment and modernisation, with the close proximity of the toilets at Cannon St station also a factor.
19. More recently, Transport for London have proposed a major safety scheme to enhance the pedestrian facilities and road safety aspects of the Eastcheap / Cannon St / Gracechurch St junction, meaning there is every expectation that the entrance to this underground structure will have to be demolished to make way. As a result, options for the Eastcheap toilets are not being pursued.
20. The facilities at Bank Station were located within the London Underground structure but were operated by the City. As noted earlier, their usage was relatively small by comparison to the City's other attended toilets plus there are public toilets available within the Royal Exchange, reducing the impact of their closure. They currently remain 'mothballed' and could be reopened if alternative funding could be found (see options below).
21. Finally there were public toilets on the Embankment in the structure beneath Blackfriars Bridge that were demolished as part of the Tideway project for London's 'super sewer'. Thames Water are under an obligation to reprovide those facilities at the completion of the scheme, but the affordability of reopening them for continuous public use will be limited given the continuing budget



constraints. However, a limited reopening regime may be possible (see options below).

#### Existing Provision - Urilifts

22. There are four 'urilifts' in the City of London located close to areas of nighttime economy activity at Bishopsgate, Cornhill, Charterhouse Street and Watling Street. Each one is buried in the ground during the day but are then raised every evening between 8pm - 4am.
23. The facilities are free to use but have some obvious constraints, in particular that they are only practically available for use by men. It's also challenging to collect data about their usage and they require space underground which is an issue in the City given the number of utility cables and pipes under our streets. They are also relatively expensive to install at around £100-150k each.
24. Similar to the toilets at Bank Station and Eastcheap, these facilities were closed as a result of the need for your Committee to make savings in 2021, but they were reintroduced late last year following the provision of additional funding of £45k pa from the On-Street Parking Reserve to support the City's Cleansing operation and to enhance our public realm. The On-Street Parking Reserve might be a source of funding for future urilift facilities, but the attended public conveniences do not sit within the OSPR's strict ringfencing criteria and so this cannot be used to fund their reopening.
25. Environment's Highways Team are currently using ground penetrating radar to map the subsurface of the City of London as part of a separate project to identify space underground between the utility pipes and cables. This provides an opportunity to identify further locations where urilifts might be possible underground, albeit additional funding would have to be identified first to purchase and install them.

#### Existing Provision – Other City Corporation Premises

26. In addition to these bespoke public conveniences, public toilets are also available in three of the City's public car parks. These are free to use and are open 24hrs a day, cleaned and managed by the car park attendants at these sites.
27. The City Corporation also allows public access to toilets in the Guildhall (north and west wing), the Barbican Centre and its two public libraries at Artizan Street and Shoe Lane, the latter two just in the daytime aligned to their respective opening hours.
28. It is fully appreciated that the availability of these facilities is much less well known, and those in the car parks require a degree of refurbishment. Nevertheless these are a valuable additional resource that requires better signage and promotion given that they are within the City Corporation's gift to provide.

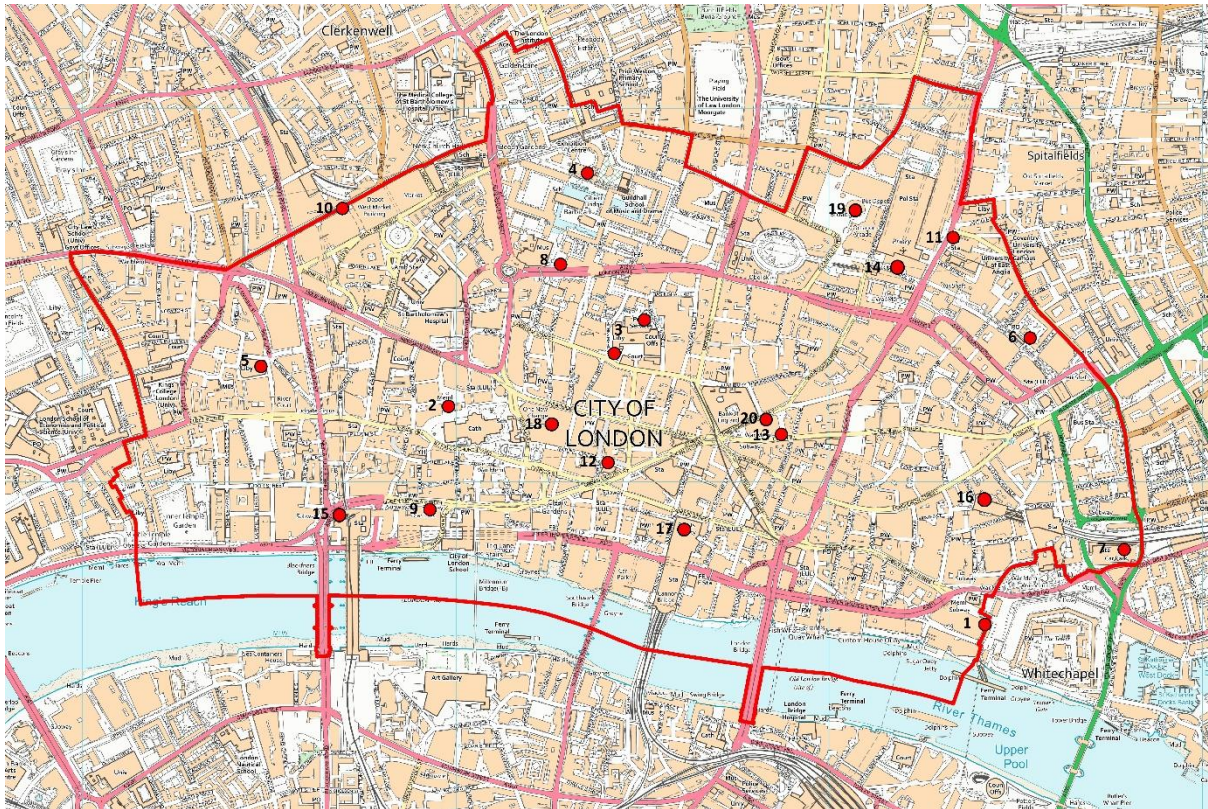
### Existing Provision – Commercial Premises

29. Aside from locations that are in the control of the City Corporation, there are several other facilities available for free public use. These include those connected to retail centres at One New Change, Royal Exchange and Broadgate Circle, as well as the main National Rail stations within the City at Blackfriars, Cannon Street, Liverpool Street and Fenchurch Street.

### Existing Provision – Summary

30. In total this amounts to 20 publicly accessible facilities throughout the Square Mile available at different times of the day and night:

Type	Location	Daytime	Evening
Attended Public Conveniences	Tower Hill (1)	✓	
	Paternoster Square (2)	✓	
City Corporation Buildings	Guildhall (3)	✓	✓
	Barbican Centre (4)	✓	
	Shoe Lane Library (5)	✓	
	Artizan St Library (6)	✓	
City Corporation Car Parks	Minories (7)	✓	✓
	London Wall (8)	✓	✓
	Baynard House (9)	✓	✓
Urilifts	Charterhouse St (10)		✓
	Bishopsgate (11)		✓
	Watling St (12)		✓
	Cornhill (13)		✓
Network Rail stations	Liverpool St (14)	✓	✓
	Blackfriars (15)	✓	✓
	Fenchurch St (16)	✓	✓
	Cannon St (17)	✓	✓
Retail	One New Change (18)	✓	✓
	Broadgate Circle (19)	✓	✓
	Royal Exchange (20)	✓	✓



31. As can be seen above, these represent a wide geographical spread across the City and, although it is fully appreciated that not all facilities are open at all times, most parts of the City have one within easy reach.

#### Existing Provision – Community Toilet Scheme

32. The City Corporation established a Community Toilet Scheme in 2009 to help increase the amount of toilet provision in the City. It began with an initial target of 50 participants but exceeded that target, with 68 premises currently members, the majority of which are open in the evening. The opening hours of the toilets are based on hours of trading / opening, and members of the public are not charged should they use the facilities.

33. Locations are available to find on the City Corporation's website and premises should be identified by a 30x30cm sticker displayed in their window. The sites are audited at twice a year to ensure they are displaying the correct signage, that staff are aware of the scheme and that the toilets are maintained to an acceptable standard.

34. In return for offering their facilities to passers-by, the businesses can claim up to £600 pa for additional expenses, although not all do. Based on the claims made by existing scheme members, the City's current budget allocation is £40k pa.

35. It is acknowledged that this scheme is challenging to publicise those premises that are available for public use, plus there is no easy method of identifying how many people make use of them who were not already at that particular pub or restaurant.

36. Nevertheless they remain an important toll to supplement the provision of public toilets, and they act as a reminder to the City's entertainment trade that they can support the public at large in providing such welcome facilities in partnership with the City.

### **Anti-Social Behaviour**

37. Officers monitor reported instances of anti-social behaviour (specifically public urination and defecation) and liaise with relevant departments (for example Licensing, Community Safety, and the homeless outreach team) across the Corporation and the City of London Police to enable services to be best targeted to both proactively and reactively clean and clear identified hotspots with available resources.

38. Current Urilift provision is located in areas identified with high levels of anti-social behaviour as a result of the local night-time economy.

### **Signage and Wayfinding**

39. It is recognised that appropriate and visible signage and wayfinding is essential to direct individuals to facilities. Many of the available toilets within the Square Mile are not included on the Legible London monoliths and maps. Officers are in the process of auditing all the on-street signage and wayfinding to identify where it is not clearly indicated when within a two or three-minute walk.

40. Signage at some City Corporation owned properties, such as car parks, the Guildhall and the libraries (as well as some members of the Community Toilets Scheme) currently do not clearly indicate there are toilet facilities available to members of the public, and this needs to be addressed.

41. All the facilities currently available to members of the public, including the community toilets, are on the City Corporation's online map along with opening times. This is available as open source data and numerous apps, including Toilets4London, pull locations from this to signpost users towards facilities.

### **Planning**

42. The City Plan 2040 Policy 'HL6 Public Toilets' requires the provision of directly accessible public toilet facilities for a range of users in major retail, leisure and transport developments particularly near visitor attractions and public open spaces and existing major transport interchanges.

### **Options**

#### Signage and Wayfinding

43. All the City Corporation's public toilets facilities would benefit considerably from a refreshed approach to signage and wayfinding which is joined up to ensure there is general awareness regardless of whether they are operated by the City Corporation, the retail sector, or Network Rail. Officers will look to identify a

budget to complete a review of current signage and wayfinding provision to update and improve this wherever possible.

#### Additional and refurbished facilities

44. Officers will review the results of the Highways Team's ground penetrating radar map of the subsurface of the City of London to identify space underground between the utility pipes and cables where further locations for urilifts might be possible underground. Should feasible sites be identified officers will explore options for funding.
45. Alongside the City Surveyors department, officers will undertake a condition survey of the public toilets located in in City Corporation car parks. Once assessed officers will explore options for funding for refurbishing these sites and improving access.

#### Community Toilet Scheme

46. The benefits of the Community Toilet Scheme are difficult to quantify, but closing the scheme in its entirety would likely be a retrograde step in that it does increase the numbers of toilets available which is particularly important at night. It also reinforces the need for a partnership approach to public toilet provision between the public and private sectors. and given not all the current business make a claim for costs, the
47. One option is for the City to withdraw the £600 subsidy and redirect that £40k budget to other areas of need, such as improved signage, communications on toilets in general and the operational requirements from other facilities. It would be difficult at this stage to quantify the impact of withdrawing that funding to members of the scheme but some businesses will likely remain given the publicity it affords to their premises..
48. There is also the opportunity provided by the national British Toilet Association Community Toilet Scheme which would help in joining up publicity and promotion for the premises in the City.

#### Planning

49. Officers within Planning have agreed to work with the Cleansing Service to actively promote the need for such facilities in future developments for the longer term.

#### Anti-social behaviour and ParkGuard

50. Officers will continue the liaison approach with partners and stakeholders across the Corporation to enable services to be best targeted to both respond to instances of anti-social behaviour. This approach will inform the tasking and focus of ParkGuard deployment and will also be used to inform on street signage and behaviour change campaign planning.

#### Attended Public Conveniences

51. In terms of the toilets at Blackfriars, Tideway is expected to complete some time in 2025, and although funding is not currently available to staff them full time, reopening them for major events such as London Marathon, Lord Mayor's Show and New Year's Eve would be an affordable option. Alternatively, there is the potential to work collaboratively with potential retail concessions that might be located in close proximity.
52. Reopening the attended public conveniences at Bank Station would require additional funding as this cannot be resourced within the Environment Department's existing budget envelope. In particular, around £20k would be required as a one-off cost to refurbish them following their closure, plus around £100k pa would be needed to fund the staffing required to attend them, plus additional overheads such as repair and maintenance. (To be clear, this would be for daytime opening only in line with the City's other toilets).
53. Should Members wish for officers to explore this possibility, several funding options may be possible, such as:
- Increasing the charge for users at Paternoster Square and / or Tower Hill, enabling the additional funding to be generated within the Cleansing Service itself
  - Seeking financial support from Transport for London, particularly given the commitment from the Mayor to provide £3m pa in additional funding for public toilets in London Underground stations
  - Potential internal funding bids such as the Community Infrastructure Levy (note the On-Street Parking Reserve is not available given its ringfencing criteria)
  - Funding support from the Business Improvement Districts.

## **Recommendations**

54. To summarise the above, the following options are recommended:
- Review & enhance the publicity and signage for the City's public toilets at all locations
  - Refurbish the toilet facilities within the City's car parks
  - Identify potential locations for additional urilifts
  - Explore opportunities for a limited reopening of the public toilets at Blackfriars (after the completion of the Tideway project)
  - Review the benefits, promotion and funding of the Community Toilets Scheme
  - Press for further private sector provision of public toilets through the Planning process
  - Work with ParkGuard to focus their nighttime economy resources on anti-social behaviour hotspots
  - Explore additional funding opportunities to reinvest into the provision and maintenance of public toilets

**Strategic implications** – this approach supports the delivery of the Corporate Plan, specifically the supporting the outcomes to providing excellent services, a vibrant

thriving destination where people feel safe with minimal antisocial behaviour, and flourishing public spaces where enjoy spending time.

**Financial implications** – There will be financial implications dependent on the options approved by members. Officers have only recommended options which do not negatively impact on local risk budgets. Some of the options recommended require further investigation and funding from various internal sources which is subject to separate processes and approvals.

**Resource implications** – The majority of proposed options can be delivered within the current level of resourcing. However, any increase in staffed public conveniences will require additional staff who are currently employed via an agency.

**Legal implications** - None

**Risk implications** - None

**Equalities implications** – A test of relevance has been considered for the outline options in this report and all will require a full equalities impact assessment to be carried out once members have provided officers with a direction of travel. Full equalities impact assessments will be provided in future reports where any projects have been further scoped and developed.

**Climate implications** - None

**Security implications** – None

## **Conclusion**

55. The City Corporation's recent approach to managing public conveniences has been shaped by budgetary constraints, leading to closures and mothballing of facilities. Despite this, a significant network of accessible toilets remains in place, supported by initiatives like the Community Toilet Scheme. The continued operation of two attended public conveniences and the deployment of urilifts aim to address both public needs and mitigate antisocial behaviour.

56. The various approaches proposed include improving signage, sconsidering additional funding source and exploring new opportunities for collaboration, particularly with TfL. These measures aim to ensure that public conveniences in the City of London remain accessible, well-maintained, and capable of meeting the needs of residents, workers, and visitors.

## **Appendices**

- None

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<b>Committees:</b> Port Health and Environmental Services Health and Wellbeing Board	<b>Date:</b> 9 July 2024 5 July 2024
<b>Subject:</b> Air Quality Annual Status Report for 2023	<b>Public</b>
<b>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</b>	Leading Sustainable Environment. Providing Excellent Services. Diverse Engaged Communities.
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>N</b>
<b>Report of:</b> Bob Roberts, Executive Director (Interim), Environment	<b>For Information</b>
<b>Report author:</b> Ruth Calderwood, Air Quality Manager	

## Summary

As part of its statutory duties for London Local Air Quality Management, the City of London Corporation is required to produce an Annual Status Report and submit the report to the Greater London Authority and the government. The report is designed to demonstrate progress with actions contained within the current Air Quality Strategy and to present air quality monitoring data. A copy of the full report, which is produced using a prescribed template, is available on the City Corporation web site. A summary of the monitoring data is attached to this report as Appendix 1.

The City Corporation runs a dense and comprehensive air quality monitoring network. In 2023, data was collected using three nitrogen dioxide (NO<sub>2</sub>) continuous monitors, three particulate PM<sub>10</sub> monitors, two particulate PM<sub>2.5</sub> monitors and one ozone monitor. Nitrogen dioxide data was also collected at 86 sites in the Square Mile using low-cost diffusion tubes.

Over the past 5 years there has been a significant drop in annual average concentrations of NO<sub>2</sub>. In 2023, 95% of the locations measured met the national standard of 40µg/m<sup>3</sup>.

Particulate matter is presented as PM<sub>10</sub> or PM<sub>2.5</sub> and is made up of many sources. All PM<sub>10</sub> monitoring sites have complied with the annual mean standard for the past seven years. In 2023, PM<sub>2.5</sub> concentrations at Farringdon Street and the Aldgate School met the new national standard of 10µg/m<sup>3</sup>. This is ahead of the 2040 deadline.

The improvements in air quality measured in the Square Mile are set to continue as further measures in the City Corporation’s Air Quality Strategy are implemented. The existing Air Quality Strategy runs to the end of 2024. A draft Air Quality Strategy for

2025 to 2030 has been published for consultation until 26<sup>th</sup> July 2024. The proposed aims of the new strategy are to go beyond our statutory obligation and continue to take action to improve air quality in pursuit of the 2021 World Health Organisation Air Quality Guidelines. This will deliver better health outcomes for our communities as the WHO guidelines are tighter than the national standards.

## **Recommendation**

Members are asked to:

- Note the contents of the Air Quality Annual Status Report for 2023

## **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 so that concentrations of pollutants meet health-based standards. The City Corporation also has a responsibility to protect public health.
2. The City Corporation's current Air Quality Strategy 2019 – 2024 was adopted in September 2019. It outlines actions that will be taken to fulfil the City Corporation's statutory responsibility for Local Air Quality Management, and for reducing the health impact of air pollution on residents, workers, and visitors to the Square Mile.
3. The City Corporation has a statutory obligation to submit an Annual Status Report to the Mayor of London and the government. The report must outline progress towards actions within the Air Quality Strategy and provide the results of air quality monitoring undertaken over a seven-year period. A copy of the full report, which is produced using a prescribed template, is available on the City Corporation web site at: [Air Quality Report](#) . A summary of the air quality data is attached as Appendix 1.

### **Air Quality Data**

4. In 2023, data was collected using long-term continuous monitors at three nitrogen dioxide (NO<sub>2</sub>) sites, three particulate PM<sub>10</sub> sites, two particulate PM<sub>2.5</sub> sites and one ozone site. These monitors provide hourly readings with up-to-date data being available on the web site [Air quality in England \(airqualityengland.co.uk\)](http://airqualityengland.co.uk). Data collected over the past five years for these sites, where available, is presented in Table 1.
5. An ozone (O<sub>3</sub>) analyser was installed in the Guildhall in January 2022. Ozone is what is known as a regional pollutant over which we have no direct control.

However, by measuring it, we can issue health warning alerts if concentrations are forecast to be high.

- Concentrations of air pollution are compared to health-based standards. The national standards for nitrogen dioxide and fine particles are taken from those set by the European Union. These standards were based on 2005 World Health Organisation (WHO) Air Quality Guidelines. The Guidelines were updated in 2021 and, in most cases, tightened. The new WHO guidelines have not been incorporated into domestic legislation but are presented in Table 1 alongside the national standards for comparison. The existing annual average standard for PM<sub>2.5</sub> is 20µg/m<sup>3</sup>. Given the particular health impact of this pollutant, the UK government has recently adopted a new PM<sub>2.5</sub> standard of 10µg/m<sup>3</sup> to be achieved by 2040.

Location	Pollutant (annual average unless specified)	UK standard (µg/m <sup>3</sup> )	2021 WHO Guideline (µg/m <sup>3</sup> )	2019 (µg/m <sup>3</sup> )	2020 (µg/m <sup>3</sup> )	2021 (µg/m <sup>3</sup> )	2022 (µg/m <sup>3</sup> )	2023 (µg/m <sup>3</sup> )
<b>The Aldgate School</b> (background)	NO <sub>2</sub>	40	10	33	22	23	23	22
	PM <sub>10</sub>	40	15	19	16	16	17	15
	PM <sub>2.5</sub>	10	5	12	12	11	12	10
<b>*Upper Thames Street</b> (roadside)	NO <sub>2</sub>	40	10	73	45	46	52	-
	PM <sub>10</sub>	40	15	27	24	19	19	-
<b>Bell Wharf Lane</b> (roadside)	NO <sub>2</sub>	40	10	-	-	-	-	32
	PM <sub>10</sub>	40	15	-	-	-	20	17
<b>Beech Street</b> (roadside)	NO <sub>2</sub>	40	10	62	29	31	41	36
	PM <sub>10</sub>	40	15	22	18	15	17	15
<b>Farringdon Street</b> (roadside)	PM <sub>2.5</sub>	10	5	14	12	12	12	10
<b>Guildhall</b> (background)	O <sub>3</sub> (max. daily mean)**	100	100	-	-	-	153	120

\* the UTS monitors were relocated to Bell Wharf Lane due to forthcoming changes to office accommodation and an issue with the electricity supply

\*\* the target for ozone is 100 µg/m<sup>3</sup> as an 8 hour mean, not to be exceeded more than 10 times a year. It was exceeded on 19 occasions in 2023.

Table 1

- There was a significant drop in levels of nitrogen dioxide across the City in 2020, when compared to 2019, largely due to the impact of the country's response to the COVID 19 pandemic. As workers have returned to the City, levels have increased but remain well below pre pandemic levels. In 2023 nitrogen dioxide was measured at 86 sites using low-cost diffusion tubes. 95% of the locations measured were at or below the annual standard of 40µg/m<sup>3</sup>.

8. The roads that breached the nitrogen dioxide standard of  $40\mu\text{g}/\text{m}^3$  in 2003 were:

- Old Bailey (north end) junction with Newgate Street
- St Marins Le Grand (north end) junction with Aldersgate Street
- Seething Lane/ Byward Street junction
- Upper Thames Street at Walbrook Wharf

The data for all sites is presented in the full report and summarised in Appendix 1.

9. One of the main aims of the current Air Quality Strategy is for over 90% of the Square Mile to meet the target for nitrogen dioxide by 2025. An area compliance assessment for 2023 is underway. The area of the Square Mile to comply with the nitrogen dioxide standard in 2022 was 93%, this is a significant increase from 2019 when it was 67% and just 33% in 2018.

10.  $\text{PM}_{10}$  concentrations have declined since before the pandemic, with levels in 2023 being lower than 2022.  $\text{PM}_{2.5}$  also went down in 2023 and met the new UK annual average standard of  $10\mu\text{g}/\text{m}^3$ . This is likely to be due, in part, to 2023 being wetter than average.

11. The national standard for ozone is  $100\mu\text{g}/\text{m}^3$  as an 8-hour average, not to be exceeded more than 10 times a year. It was exceeded on 19 occasions in 2023.

## **Progress with Actions**

12. The Air Quality Annual Status Report includes progress with each action in the City Corporation's Air Quality Strategy. Examples of action taken during 2023 are given below:

- Used the contents of the Emissions Reduction (Local Authorities in London) Private Members Bill to influence discussions with Defra about options for new powers for local authorities;
- Reviewed air quality action plans for five City schools and four nurseries;
- Hosted and chaired four meetings of the London Air Quality Steering group;
- Responded to complaints of unnecessary engine idling. In 2023, 11 warning notices and 4 Penalty Charge Notices were issued;
- Undertook 29 audits of construction sites to ensure compliance with emission requirements for on-site equipment;
- Inspected all shops likely to sell solid fuel to check for compliance with new Solid Fuel Regulations;
- Partnered with Clean City Award Scheme to deliver an 'Air Quality and Climate Change' award for business;
- Developed and promoted a new web-based tool that helps users to better manage their health by providing information about air pollution and easy access to the latest monitoring data;

- Trained healthcare professionals and pharmacists and created patient resources to provide advice on managing exposure to air pollution;
- Part of the working group that developed the British Standard Institute Code of Practice 2023 ‘Selection, deployment and quality control of low-cost air quality sensor systems in outdoor ambient air’;
- Sat on the Air Pollution Research in London (APRIL) committee which identifies priority areas for research to improve air quality in London, supports the development of new scientific research and communicates the latest research findings;
- Commissioned a case study to understand the operating regime of back-up generators used within the Square Mile;
- Hosted an event to launch the Environmental Policy Implementation Community (EPIC), which is part of the Institution of Environmental Sciences. The City Corporation chairs the EPIC steering committee;
- Detailed monitoring to assess the impact of proposed changes to the road layout around St Martin’s Le Grand including particulate monitoring adjacent to a London underground vent shaft in the locality to assess the potential impact on future users of the space;
- Provided advice through a monthly air quality e-newsletter, Twitter and LinkedIn.

## **Corporate & Strategic Implications**

### **Strategic implications**

13. Air quality policy and action at the City Corporation is framed in the Air Quality Strategy 2019 – 2024. It is supported by the Climate Action Strategy, Transport Strategy, Procurement Strategy, and draft City Plan.

14. The work on air quality supports the Corporate Plan outcomes:

- Leading sustainable environment
- Providing excellent services
- Diverse engaged communities

### **Financial implications**

15. None.

### **Resource implications**

16. None

### **Legal implications**

17. None

### **Risk implications**

18. 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**

19. 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**

20. None

## **Conclusion**

21. The City Corporation has completed its 2023 Air Quality Annual Status Report. This fulfils part of the City Corporation's statutory obligations for Local Air Quality Management.
22. In 2003, the national standards for particulates PM<sub>10</sub> and PM<sub>2.5</sub> were met everywhere. Of 89 locations monitored for nitrogen dioxide, 4 were above the 40µg/m<sup>3</sup> annual standard. The new draft Air Quality Strategy includes a specific action to consider additional action that can be taken in locations that continue to breach the standard.
23. Action to improve air quality is strongly supported across the organisation by a wide range of policies and strategies. This is most notable in planning policy, the Transport Strategy, and the Climate Action Strategy. The existing Air Quality Strategy runs to the end of 2024. A draft Air Quality Strategy for 2025 to 2030 has been published for consultation until 26<sup>th</sup> July 2024.

## **Appendices**

- Appendix 1 – Air Quality Annual Status Summary Report for 2023

Ruth Calderwood,  
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## Appendix 1 Air Quality Annual Status Summary Report for 2023

### Air Quality Monitoring Data

#### 1. Nitrogen Dioxide (NO<sub>2</sub>)

The current UK standard is an annual average (mean) of 40µg/m<sup>3</sup>.

#### Continuous analysers

Site	Site type	Annual Mean (µg/m <sup>3</sup> )						
		2017	2018	2019	2020	2021	2022	2023
The Aldgate School	Urban Background	38	32	33	22	23	23	22
Beech St	Roadside	80	69	62	29	31	41	36
Walbrook Wharf	Roadside	92	87	73	45	46	52	-
Bell Wharf Lane	Roadside	-	-	-	-	-	-	32

NO<sub>2</sub> monitoring ceased in Upper Thames Street in 2022 due to forthcoming changes to office accommodation. A new site was set up in 2023 in Bell Wharf Lane

#### Long term diffusion tube sites

Site	Site type	Annual Mean (µg/m <sup>3</sup> )						
		2017	2018	2019	2020	2021	2022	2023
St Bartholomew's Hospital Courtyard	Urban Background	63	50	42	33	31	32	34
St. Andrew's Church, Queen Victoria St	Roadside	52	50	41	28	28	30	28
St Dunstan's Church, Fleet Street	Roadside	82	70	57	31	36	37	38
Speed House, Barbican Estate	Urban Background	32	31	28	19	19	20	19
Guinness Trust Estate, Mansell St	Roadside	48	46	39	33	27	27	26

## Diffusion tube sites measuring the impact of the Bank on Safety traffic scheme

Site	Annual Mean ( $\mu\text{g}/\text{m}^3$ )						
	2017	2018	2019	2020	2021	2022	2023
Cannon Street	65	50	40	38	37	38	38
Queen Victoria Street	59	58	51	35	31	39	28
King Street	52	52	47	30	30	28	29
Magistrates Court	63	53	56	36	32	33	29
King William Street	70	61	61	42	35	36	33
Lombard Street	56	56	45	30	28	28	27
Cornhill-Royal Exchange	57	62	41	26	27	29	26
Threadneedle Street	69	62	42	31	28	29	26
31 Old Broad Street	57	53	45	28	26	27	25
Wormwood Street	61	57	49	32	32	36	32
3 London Wall	54	65	53	33	38	37	38
81 London Wall	59	62	53	36	41	40	38
55 Moorgate	66	66	52	36	36	34	34
85 Gresham Street	54	52	46	30	30	27	29
Lothbury	44	45	39	24	24	23	26
Princes Street	74	69	49	36	34	34	33
Gracechurch Street /Leadenhall	66	62	51	33	36	42	34



## Diffusion tube sites measuring the impact of the Low Emission Neighbourhood pilot

Site	Annual Mean ( $\mu\text{g}/\text{m}^3$ )						
	2017	2018	2019	2020	2021	2022	2023
Giltspur Street	53	43	38	28	27	29	28
Beech Street- Near Barbican Station	69	62	50	33	30	37	37
Aldersgate	62	57	47	41	35	43	35
Viscount Street	40	37	-	24	22	23	23
Corner of Whitecross St. / Beech St.	46	42	40	23	25	26	26
London Wall/ Brewers Hall Gardens	48	49	42	30	36	32	33
Fann Street	-	41	36	23	23	25	23

## Diffusion tube sites at other locations including schools and nurseries

Site	Annual Mean ( $\mu\text{g}/\text{m}^3$ )						
	2017	2018	2019	2020	2021	2022	2023
Walbrook Wharf	82	77	64	41	44	50	49
Southwark Bridge	-	41	35	29	31	34	31
Liverpool Street	-	71	52	35	35	31	35
Fenchurch Avenue	46	36	35	26	25	24	21
Fetter Lane	-	56	44	29	30	31	28
St Pauls Cathedral	-	41	39	24	24	26	26
Finsbury Circus	-	-	-	-	25	25	23
Christchurch Greyfriars Garden	-	-	-	-	27	27	27
Goodmans Yard	-	-	44	25	28	28	28
Goldman Sachs, Shoe Lane	-	-	-	24	25	26	32
Citigen	-	-	-	30	30	30	23
Hatching Dragons Nursery	-	-	-	22	22	23	20
Bright Horizons Nursery	-	-	-	24	21	21	32
St Pauls School front railings	-	-	42	31	28	30	21
CoL Boys School access ramp	-	-	-	21	23	24	23
Charterhouse Square School	-	-	-	-	25	25	29
Cheapside Sunken Garden	-	-	-	-	-	27	23
Temple Church Courtyard	-	-	-	-	-	21	31

## Diffusion tube supporting the Transport Strategy

Site	Annual Mean ( $\mu\text{g}/\text{m}^3$ )					
	2018	2019	2020	2021	2022	2023
Byward Street	67	51	35	40	38	37
Seething Lane / Byward Street junction	71	57	44	46	45	46
Crosswall	50	44	26	27	30	27
Minories	62	49	36	37	40	38
Stoney Lane	40	39	25	25	27	24
Heneage Lane	42	33	27	25	26	24
St Mary Axe	50	42	26	25	24	25
Blackfriars Bridge	62	56	41	38	37	38
Victoria Embankment	68	57	38	38	40	38
Fleet Street	62	47	36	30	35	33
Ludgate Hill	61	50	31	31	34	31
Museum of London	66	55	36	35	37	38
London Wall	65	52	39	36	37	32
The Fable	58	51	38	30	36	33
Old Bailey (north end)	73	56	36	43	44	42
The Gherkin	-	-	-	27	26	22

## Diffusion tubes measuring the impact of the Beech Street Zero Emissions Street Pilot

Site	Annual Mean ( $\mu\text{g}/\text{m}^3$ )				
	2019	2020	2021	2022	2023
Aldersgate Street	47	39	39	44	37
Bunhill Row/Chiswell Street	40	26	25	28	25
Moore Lane/Ropemaker Street	34	29	26	25	24
Moorgate	52	32	34	31	37
London Wall/ Moorgate	52	36	37	36	34
London Wall	49	34	35	35	33
Wood Street	29	24	24	21	22
Goswell Road		37	39	43	34

## Diffusion tubes measuring the impact of the St Martins Le Grand Regeneration Project

Site	Annual Mean ( $\mu\text{g}/\text{m}^3$ )
	2023
Wood Street	24
Cheapside East	33
Cheapside West	34
Cheapside / Newgate Street	38
Newgate Street East	40
Newgate Street West	34
King Edward Street	37
Postman's Park West	33
Little Britain	34
Montague Street	40
Postman's Park East	40
St Martin's Le Grand North	42
St Martin's Le Grand South	39
St Martin's Le Grand / Cheapside	31

## PM<sub>10</sub> Data

The UK standard is an annual average of 40µg/m<sup>3</sup>.

Site	Annual Mean (µg/m <sup>3</sup> )						
	2017	2018	2019	2020	2021	2022	2023
The Aldgate School	23	21	19	16	16	17	15
Beech St	23	24	22	18	15	17	15
Upper Thames St	32	32	27	24	19	-	
Bell Wharf Lane						20	17

PM<sub>10</sub> monitoring ceased in Upper Thames Street in September 2021 due to issues with the power supply. A new site was set up in May 2022 in Bell Wharf Lane.

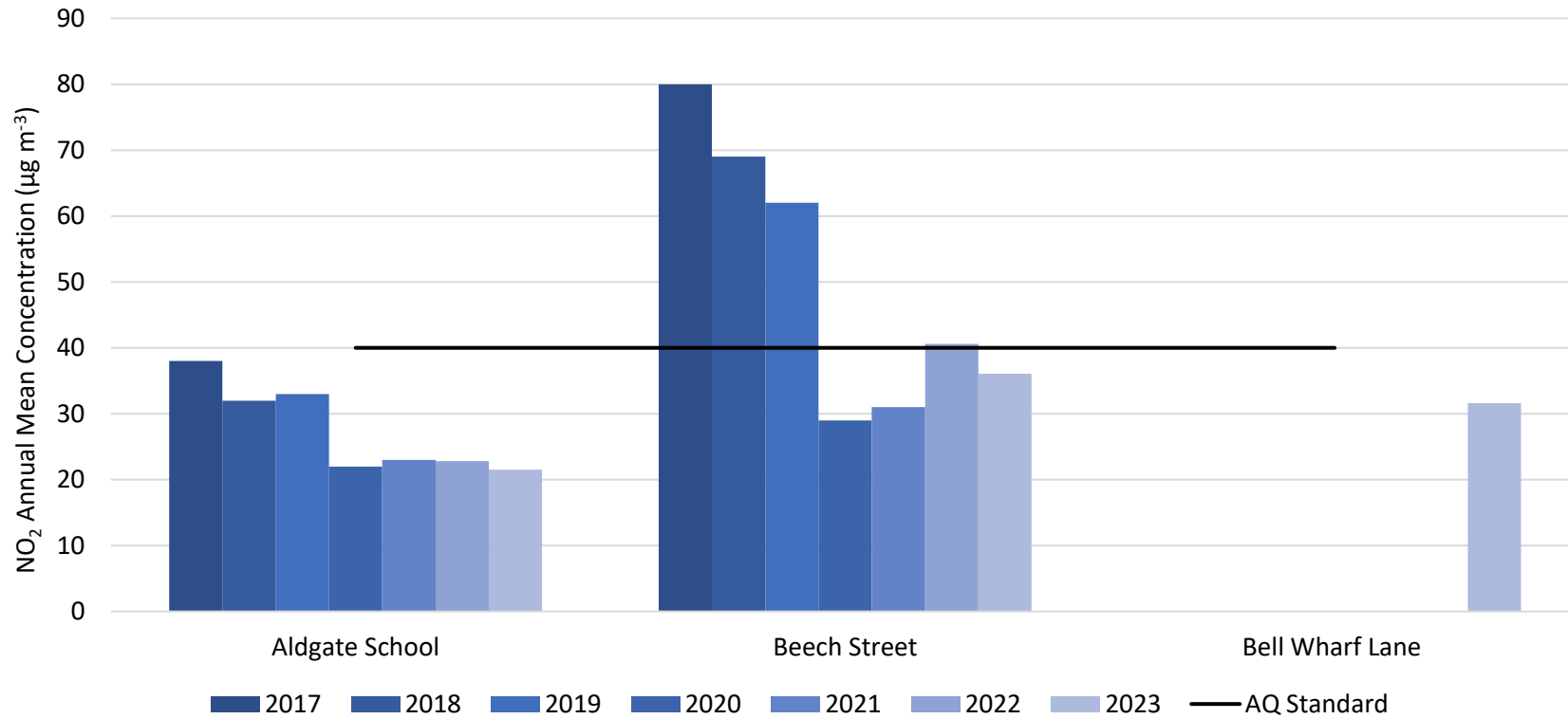
## PM<sub>2.5</sub> Data

The UK standard is an average of 10µg/m<sup>3</sup> to be met by 2040.

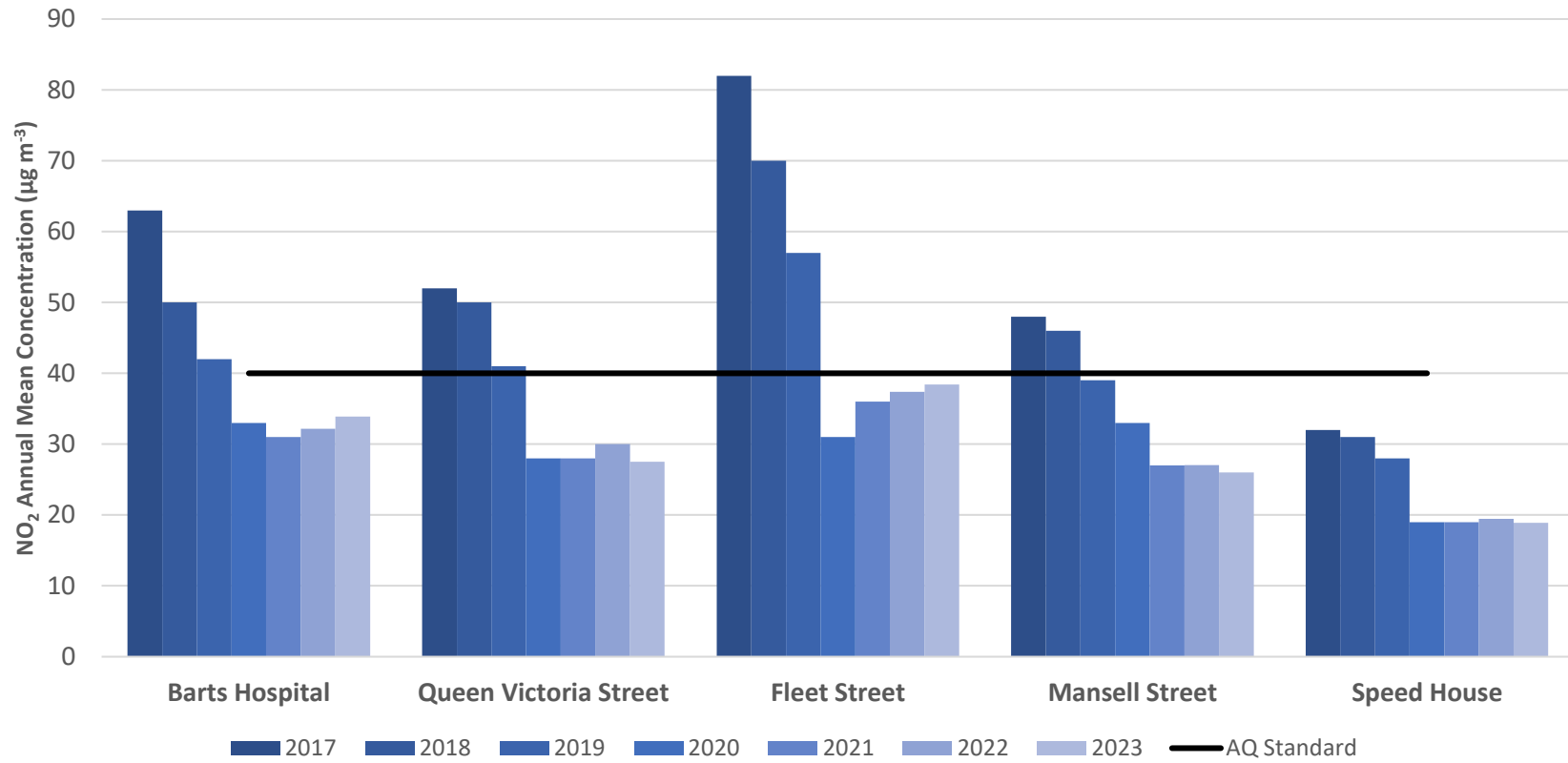
Site	Annual Mean (µg/m <sup>3</sup> )						
	2017	2018	2019	2020	2021	2022	2023
Farringdon Street	16	16	14	12	12	12	10
The Aldgate School	14	12	12	12	11	12	10

## Bar charts

### Annual Mean NO<sub>2</sub>: Continuous Monitoring Sites

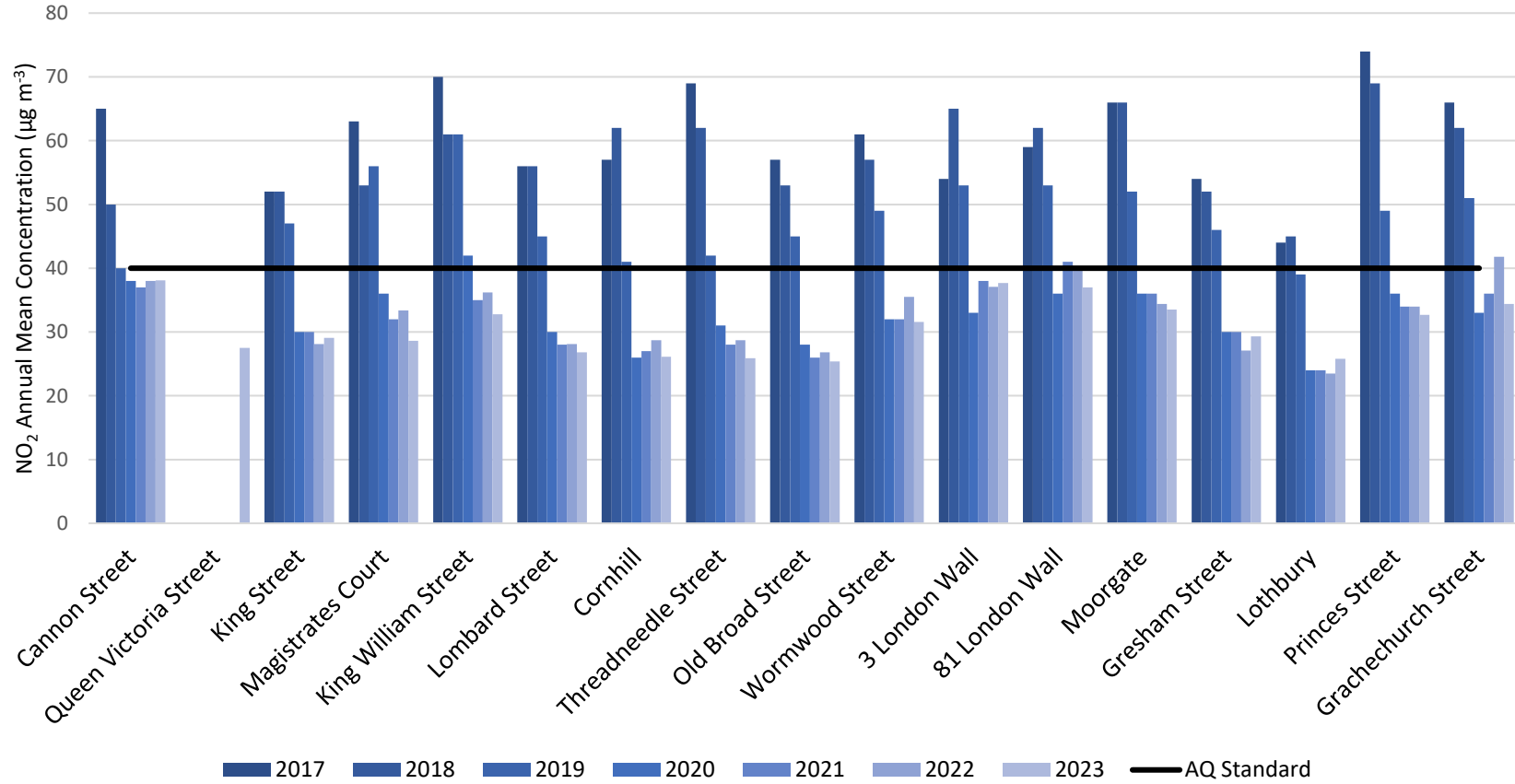


# Annual Mean NO<sub>2</sub>: Long Term Diffusion Tube Sites

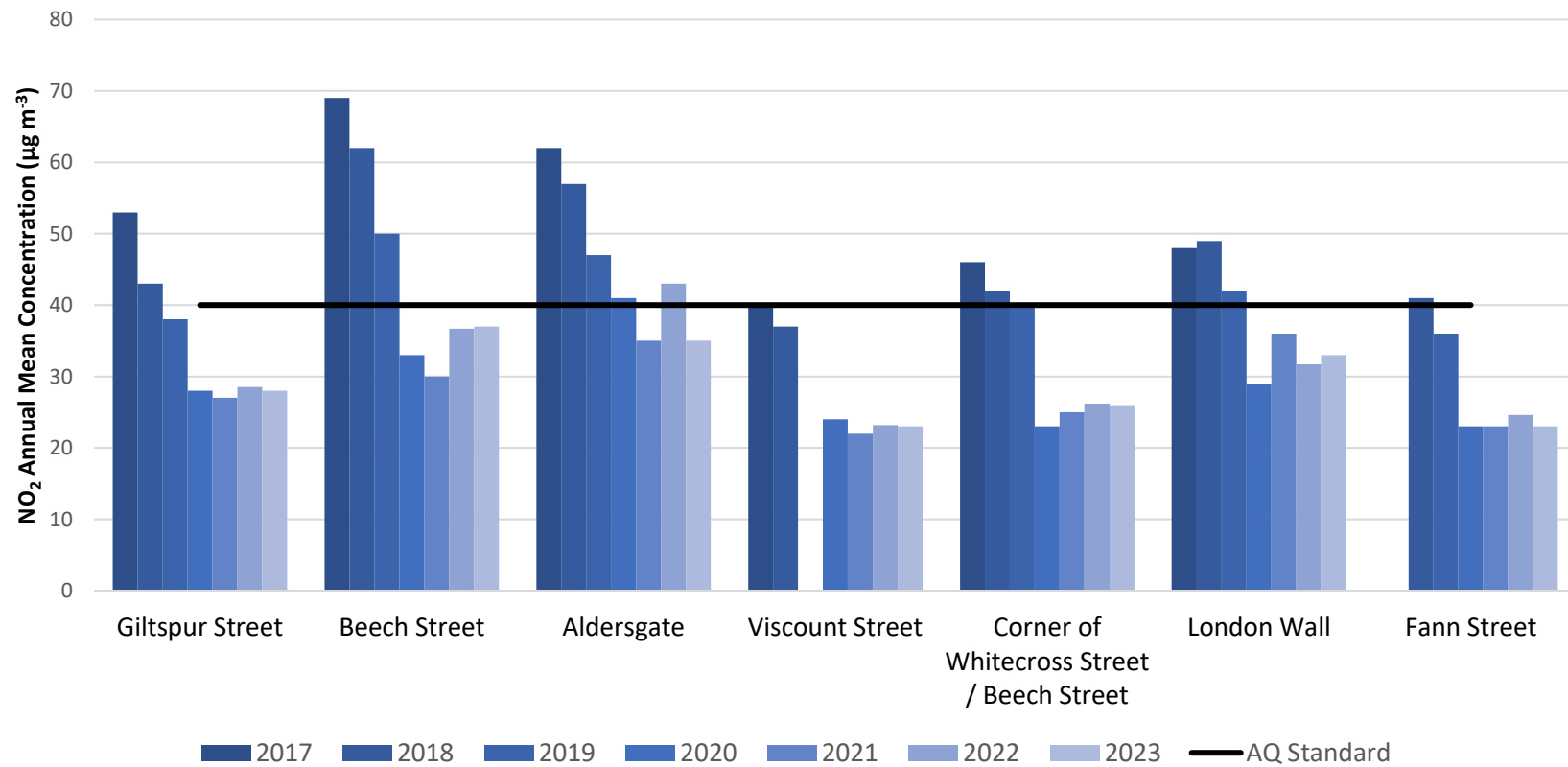


# Annual Mean NO<sub>2</sub>: Diffusion tube sites measuring the impact of the Bank on Safety traffic scheme

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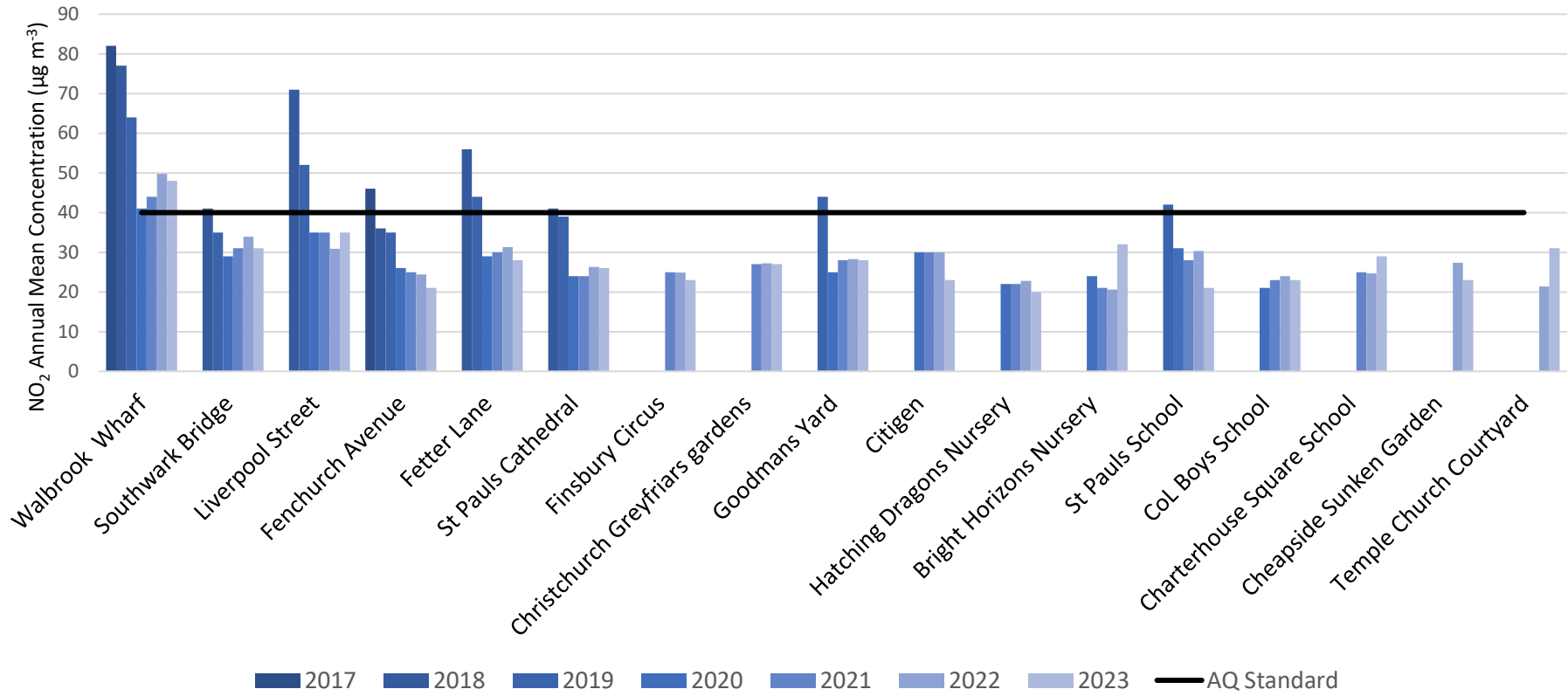
## Annual Mean NO<sub>2</sub>: Diffusion tube sites measuring the impact of the Low Emission Neighbourhood pilot





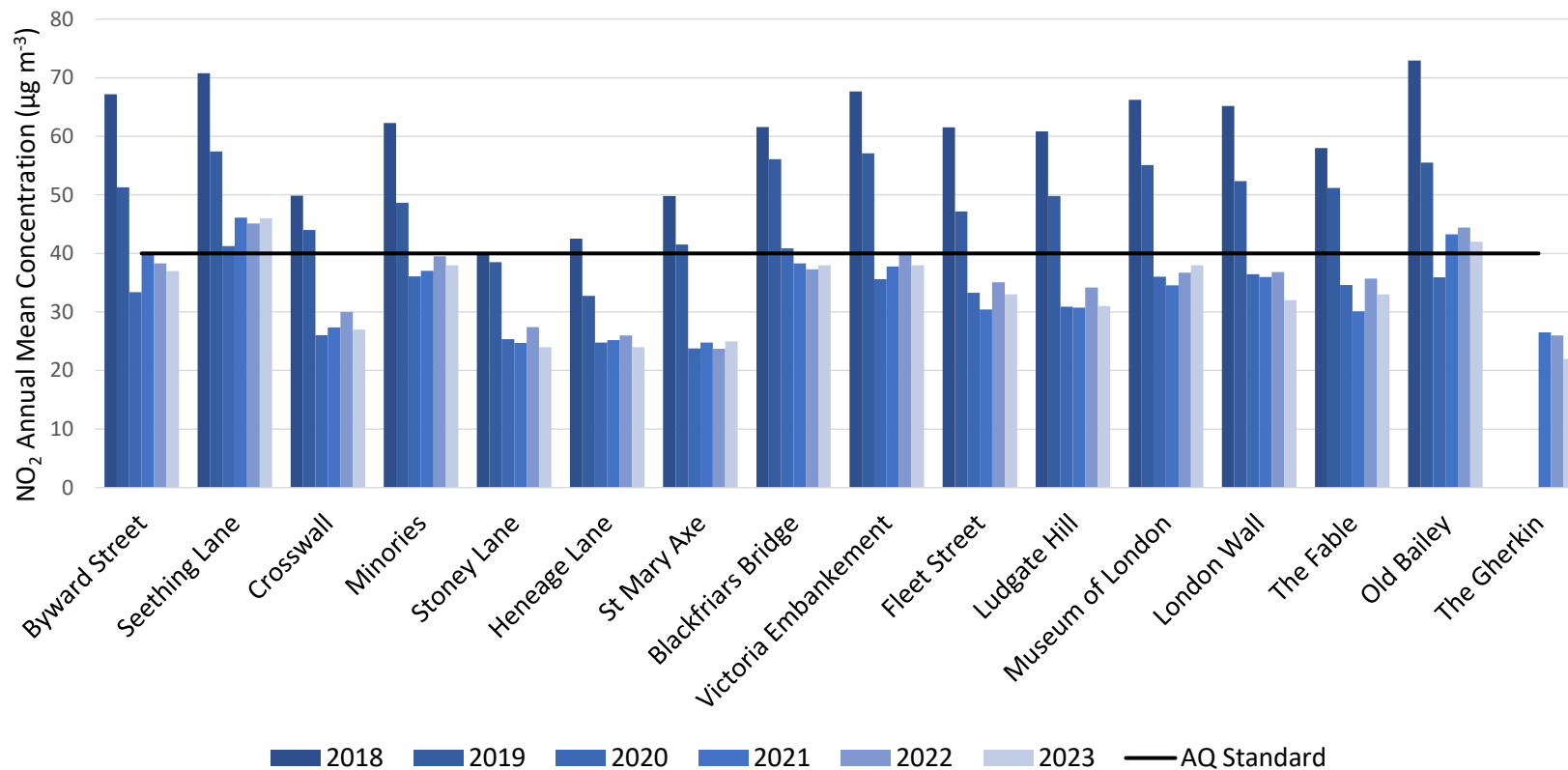
## Annual Mean NO<sub>2</sub>: Diffusion tube sites at other locations including schools and nurseries

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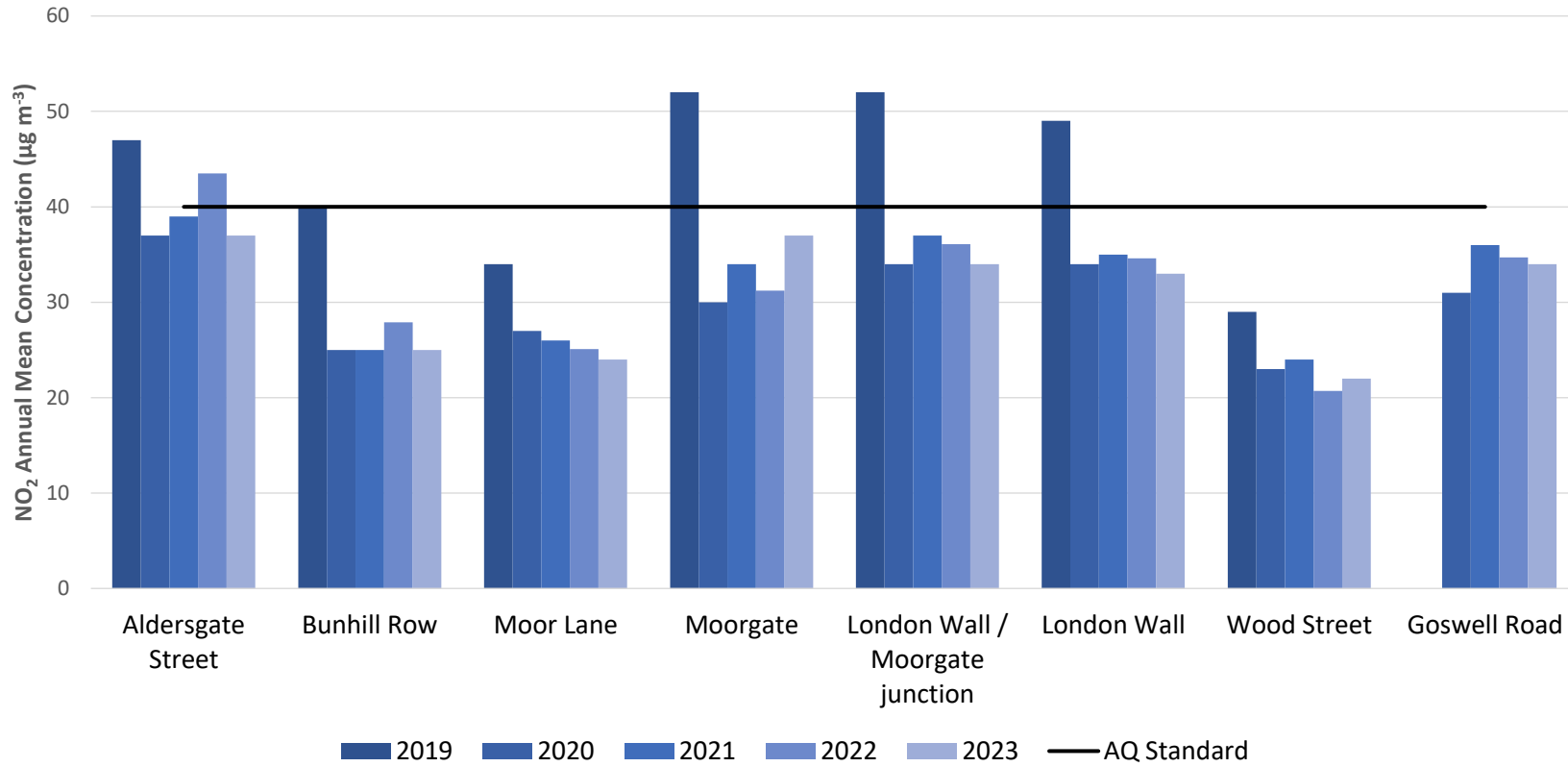


## Annual Mean NO<sub>2</sub>: Diffusion tube supporting the Transport Strategy

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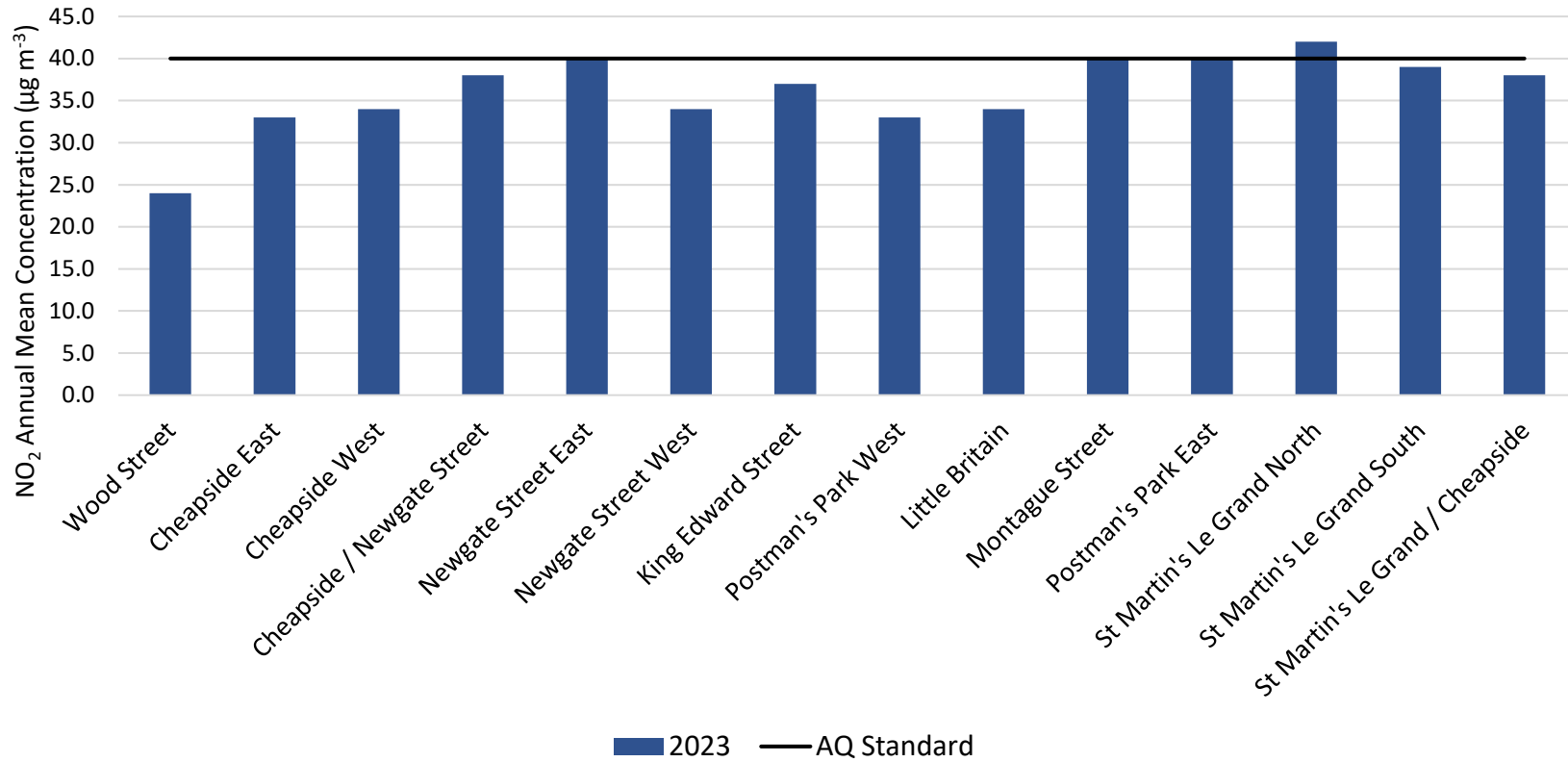


# Annual mean NO<sub>2</sub>: Diffusion tubes measuring the impact of the Beech Street Zero Emissions Street Pilot

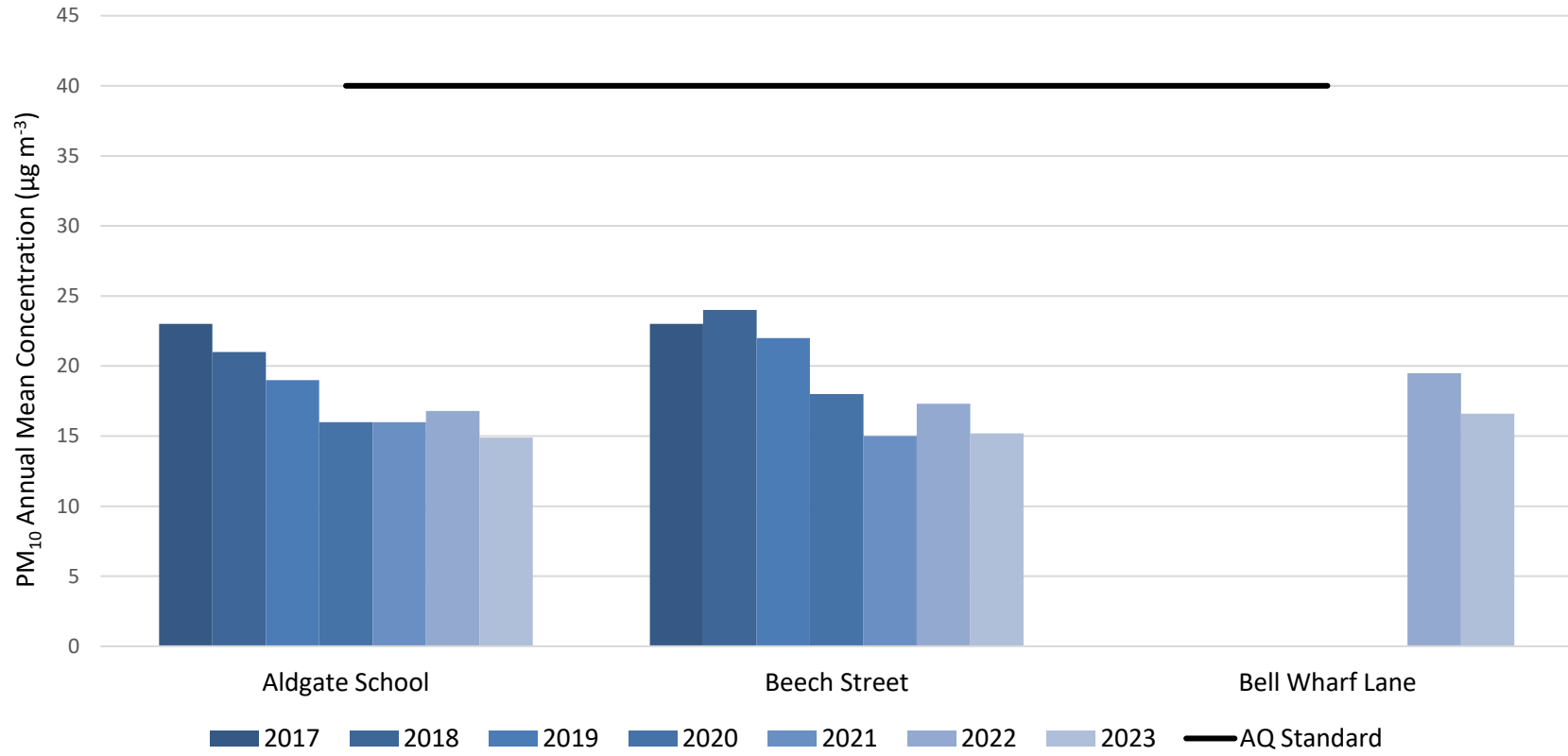


# Annual Mean NO<sub>2</sub>: Diffusion tube supporting the impact of the St Martins Le Grand Regeneration Project

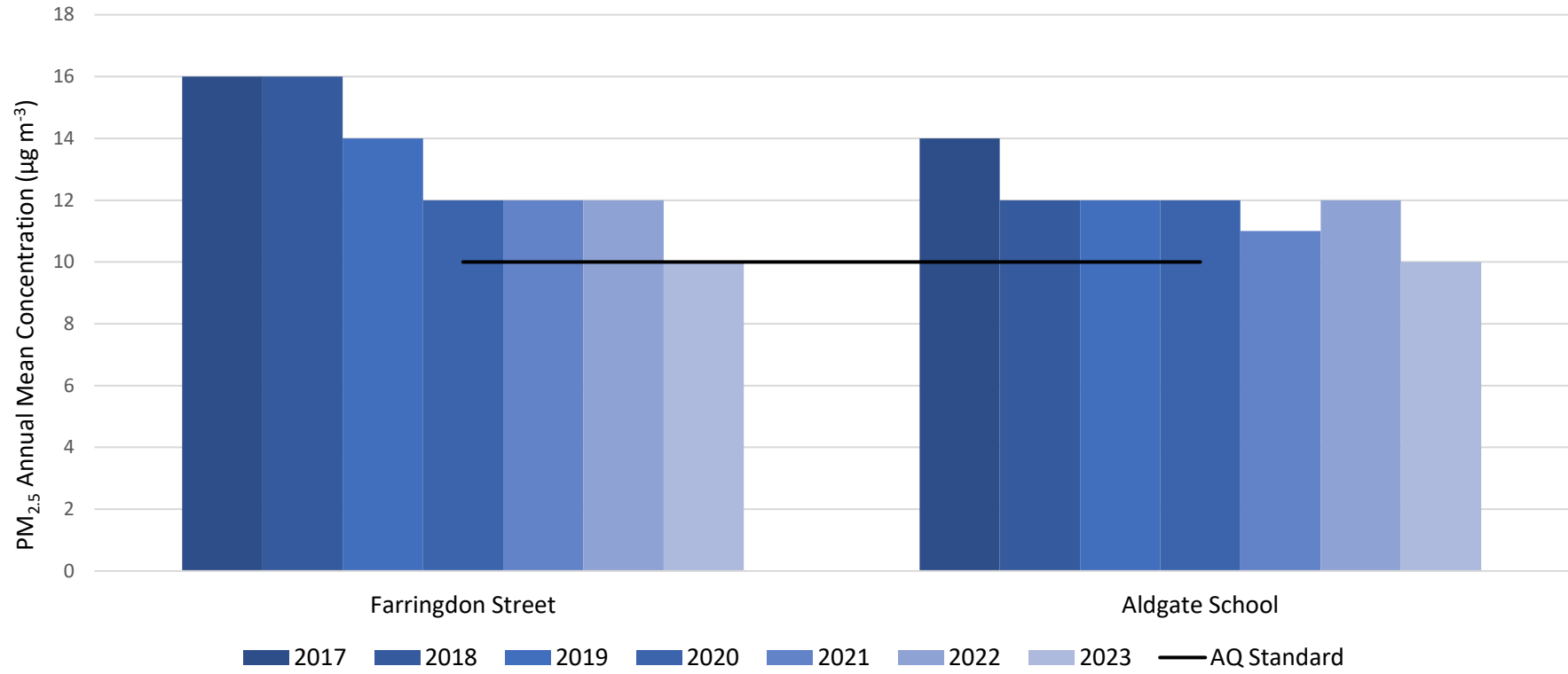
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# Annual Mean PM<sub>10</sub>



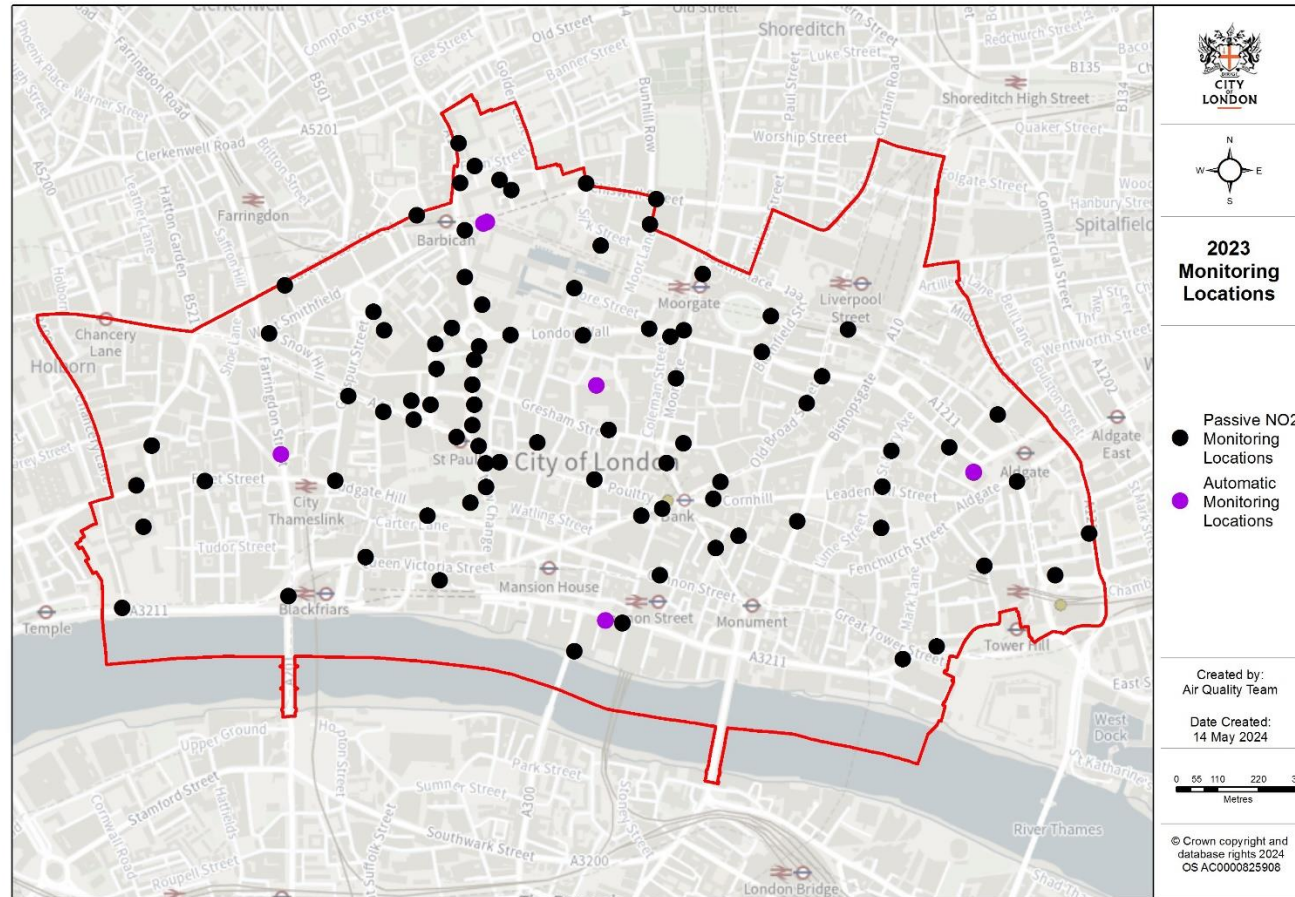
# Annual Mean PM<sub>2.5</sub>



## Air quality monitoring locations, 2023

Air quality monitoring locations are reviewed annually. Some core monitoring sites are maintained, and other sites are added and removed according to the needs of research projects, planned programmes and local investigations or concerns.

The maps below show locations where monitoring took place during 2023 using diffusion tubes, and the more accurate automatic monitoring equipment



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# Agenda Item 8

<b>Committee:</b> Port Health and Environmental Services Committee	<b>Dated:</b> 9 <sup>th</sup> July 2024
<b>Subject:</b> Business Plan 2023/24: Progress Report (Period Three: December 2023 – March 2024)	<b>Public</b>
<b>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</b>	<ul style="list-style-type: none"><li>• Providing Excellent Services</li><li>• Vibrant Thriving Destination</li><li>• Leading Sustainable Environment</li><li>• Dynamic Economic Growth</li></ul>
<b>Does this proposal require extra revenue and/or capital spending?</b>	No
<b>Report of:</b> Bob Roberts, Interim Executive Director, Environment	<b>For Information</b>
<b>Report authors:</b> Joanne Hill, Environment Department	

## Summary

This report provides an update on progress made during Period Three (December - March 2024) towards delivery of the high-level Business Plan 2023/24 for the service areas of the Environment Department which fall within the remit of your Committee, i.e.:

- The Cleansing Service
- Port Health and Public Protection

Financial information relating to this period is provided in the Chamberlain’s Revenue Outturn report which is presented separately to this Committee.

## Recommendation(s)

Members are asked to:

- Note the content of this report and its appendices.

## Main Report

### Background

1. Your Committee is responsible for the following service areas of the Environment Department:
  - The Cleansing Service
  - Port Health and Public Protection

2. The 2023/24 high-level Business Plan was approved by your Committee in March 2023. The plan set out the priority workstreams and key performance indicators (KPIs) for the year ahead.
3. To ensure your Committee is kept informed, progress made against delivery of the high-level Business Plan is reported to you on a periodic (four-monthly) basis. This approach allows Members to ask questions and have a timely input into areas of particular importance to them.
4. Please note that the full, end of year financial position is detailed in the Chamberlain's Revenue Outturn presented separately to this Committee.

### **Current Position**

5. This report provides an update on progress made against the 2023/24 high-level Business Plan during Period Three (December 2023 - March 2024) by the following service areas of the Environment Department:
  - The Cleansing Service
  - Port Health and Public Protection

### **Key workstreams**

6. The high-level Business Plan set out key workstreams that would be undertaken during 2023/24. Teams have made progress against these workstreams and a summary of each is provided at Appendix 1.

### **Key Performance Indicators**

7. Key Performance Indicators were identified in the business plan. These measures are monitored to assess the performance of each service area in providing their statutory duties and progressing their key workstreams. Details of performance to the end of Period Three 2023/24, and full year results, are provided at Appendix 2.

### **Additional performance information**

8. Cleansing Service: Appendix 3 provides infographics summarising the performance Service along with some textual updates on their work.
9. Port Health and Public Protection: Appendix 4 comprises infographics which summarise the activity and performance of each team.

### **Corporate & Strategic Implications**

**Strategic implications** – The monitoring of key workstreams and performance measures links to the achievement of the aims and outcomes set out in the City of London's Corporate Plan..

**Financial implications** – Financial implications are addressed within the separate Chamberlain’s Outturn report..

**Resource implications** – None.

**Legal implications** – None.

**Risk implications** – Risks to achieving the objectives set out in the high-level Business Plan are identified and managed in accordance with the City of London Risk Management Framework. Risk Registers are reported to this Committee on a regular basis.

**Equalities implications** – None.

**Climate implications** – The work of the Cleansing Service and Port Health and Public Protection supports the delivery of the Corporate Climate Action Strategy through its delivery of relevant workstreams; updates on progress are reported to this Committee.

**Security implications** – None.

## **Appendices**

Appendix 1 – Progress against key workstreams

Appendix 2 – Progress against key performance indicators

Appendix 3 - Cleansing Service: Additional performance information

Appendix 4 - Port Health & Public Protection Division: Additional performance information

## **Background Papers**

‘Draft High-Level Business Plans 2023/24 – Environment Department’ (PH&ES Committee, 28 March 2023)

## **Contact**

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**Progress against key workstreams**  
**Period Three 2023/24: 1 December 2023 – 31 March 2024**

Ref:	Workstream	Progress Period Three (1December 2023- 31 March 2024)
1.	<p><b>Air Quality</b>  Assess and implement requirements for meeting new air quality statutory obligations following the introduction of the Environment Act 2021.</p>	<ul style="list-style-type: none"> <li>• An application for government funding was unsuccessful, but work is still going ahead to consider what action can be taken to reduce emissions of PM2.5 associated with commercial cooking.</li> <li>• A draft Air Quality Strategy for 2025-2030 has been prepared and a revised version will be presented to the Port Health and Environmental Services Committee for decision in July 2024. The Draft Strategy includes actions to deal with PM2.5.</li> <li>• Research is underway to consider how we can assist businesses to reduce PM2.5 emissions associated with the use of standby diesel generators.</li> </ul>
2.	<p><b>Port Health/HARC</b>  Influence, prepare for and adapt to embed a new Border Operating Model for import Controls at the end of 2023, by influencing policy and guidance, and designing resilient services that are flexible and dynamic to changing risks.</p>	<ul style="list-style-type: none"> <li>• Engagement with Defra remains high following the introduction of the new border controls.</li> <li>• The secondment of an officer to Defra to assist with the embedding of new controls has been extended.</li> <li>• A Project Team has been mobilised since January 2024 to deliver new structures to enable a sustainable effective service for the new controls.</li> </ul>
3.	<p><b>Port Health</b>  Review the Port Health accommodation along the Thames to ensure that it is cost effective and meets future service demands.</p>	<ul style="list-style-type: none"> <li>• This workstream has been paused due to a change of personnel in the City Surveyor's Department. Once the new City Surveyor's Business Partner is fully inducted, we will work with them to progress the matter.</li> <li>• The plan remains unchanged: to instruct a commercial estate agent on a retainer basis in order to keep a watching brief on opportunities which may provide a long term sustainable base west of the Thames Barrier.  We are keeping the leases on our accommodation at Tilbury and London Gateway under review.</li> </ul>
4.	<p><b>Public Protection</b>  Teams will continue to assess and adapt services in reaction to the</p>	<ul style="list-style-type: none"> <li>• A Nighttime Economy Landscape study commissioning is underway.</li> <li>• We are the lead for Local Authorities' resourcing of Operation Reframe.</li> <li>• Officers are actively involved in the Anti-Social Behaviour Strategic Group.</li> </ul>

Ref:	Workstream	Progress Period Three (1December 2023- 31 March 2024)
	Nighttime Economy and Anti-Social Behaviour.	<ul style="list-style-type: none"> <li>• Officers Chair the Licensing Liaison Partnership and weekly Nighttime Economy group.</li> <li>• We utilise intelligence and data to direct services and deployments.</li> </ul>
5.	<b>Licensing Service</b> Develop a long term (10 year) strategy for the City of London on AI Fresco Dining for the City's Streets.	<ul style="list-style-type: none"> <li>• The Levelling Up and Regeneration Act was enacted on 31 March 2024. A new policy, procedures, fees, application, and other back-office systems are being prepared.</li> <li>• The new Draft AI Fresco Dining Policy will be presented to the Planning and Transportation Committee for decision in July 2024.</li> </ul>
6.	<b>Public Protection</b> Implement and embed the new Planning and Regulatory Services casework management system (CMS) to provide a modern and intelligent way of working for the future.	<ul style="list-style-type: none"> <li>• Preparation for enabling public access in the IDOX Uniform CMS is complete and the system is due to 'go live' in the next quarter. This will allow Members, residents, and the public to view and comment on live licensing applications.</li> <li>• Consumer Direct issues for Trading Standards have now been resolved following updates to the system.</li> </ul>
7.	<b>Cemetery and Crematorium</b> Monitor funeral trends and adapt to provide a variety of options relevant to the needs and preferences of customers.	<ul style="list-style-type: none"> <li>• A number of new areas for graves have been identified and work is continuing on the project to construct 20 vault graves; an option that is currently missing from our current offer to the bereaved.</li> </ul>
8.	<b>Cleansing Service</b> Embed the Climate Action Strategy and Climate Resilience mitigations into resource planning and decision making - balance reduction of energy use against cost of investment to achieve savings. Identify appropriate vehicles and equipment savings, building retrofits etc.	<ul style="list-style-type: none"> <li>• Officers are working closely with the Climate Resilience Team to deliver a Climate Adaptation Action Plan for Environment.</li> <li>• Risk and action plans have been allocated to the relevant Assistant Directors and are included in business plans.</li> </ul>

Ref:	Workstream	Progress Period Three (1December 2023- 31 March 2024)
9.	<p><b>Cleansing Service</b> Develop a combined services strategy for the Cleansing and City Gardens teams, outlining service standards and public engagement plans.</p>	<ul style="list-style-type: none"> <li>• A local plan has been developed outlining priority projects for 2024/25.</li> <li>• Investigations into service standards are ongoing with neighbouring boroughs and London-wide organisations to establish relevant benchmarking.</li> <li>• A review of social media output and public engagement has been undertaken, and a communications strategy is in place and being delivered.</li> <li>• A dedicated apprentice to coordinate volunteering is also now in place.</li> </ul>
10.	<p><b>Cleansing Service</b> Support the drafting of a revised Corporate Transport Policy.</p>	<ul style="list-style-type: none"> <li>• An updated Transport Strategy has been written and is being taken to the relevant Committee for approval.</li> </ul>
11.	<p><b>Cleansing Service</b> Deliver the Biodiversity Action Plan.</p>	<ul style="list-style-type: none"> <li>• Working groups to deliver the key objectives of the Biodiversity Action Plan are meeting, and achievement towards objectives is on track.</li> <li>• An interim update report will be taken to Natural Environment Board towards the end of 2024.</li> </ul>
12.	<p><b>Cleansing Service</b> Develop a strategic approach for the future of Walbrook Wharf and how this will affect service delivery and contracts.</p>	<ul style="list-style-type: none"> <li>• A soft market testing exercise has been completed and a report was presented to Port Health and Environmental Services Committee in May 2024.</li> <li>• Consultants have been appointed to undertake an options appraisal considering three scenarios for redevelopment of Walbrook Wharf. The outcome will be reported to Members in September 2024.</li> </ul>

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**Progress against Key Performance Indicators**  
**Period Three 2023/24: 1 December – 31 March 2024 (and full year results)**

<b>Performance Measure</b>	<b>Performance 2022-23 (full year result)</b>	<b>Target 2023-24</b>	<b>Performance Period Three 2023-24</b>	<b>Performance 2023-24 (full year result)</b>	
<b>Cleansing</b> Percentage of City land with unacceptable levels of litter, graffiti etc.	1.29%	<5%	2.33%	2.33%	
<b>Cleansing</b> Percentage of household waste sent for reuse, recycling or composting.	29.47%	<b>32% by 2025</b>	27.37%	27.37%	
<b>Cleansing</b> The number of members of the Community Toilet Scheme.	72	<b>75</b>	72	72	
<b>Air Quality</b> Percentage of the City's area that meets the health-based Unit Values and WHO Guidelines for nitrogen dioxide levels by 31 March 2024. (Ultimate target is 90% by 31 March 2025).	93% (2022)	<b>90% by 31 March 2025</b>	95% (2023)	95% *1 (2023)	
<b>Port Health</b> Percentage of imported food and feed consignments that satisfy the checking requirements cleared within five days.	a) Products of Animal Origin	79%	<b>85%</b>	94%	91%
	b) High-risk Products of Non-Animal Origin	94%	<b>85%</b>	95%	95%
<b>Port Health</b> Percentage of imported food and feed consignments (Products of Non-Animal Origin - PNAO) subjected to documentary controls within five days.	94%	<b>85%</b>	97%	96%	
<b>Heathrow Animal Reception Centre</b> Acceptance of at least 90% of airline bookings for pets.	N/A <i>new KPI for 2024/25</i>	<b>90%</b>	100%	100%	
<b>Heathrow Animal Reception Centre</b> 95% of flight collections attended within 30 minutes of the flight offloading.	N/A <i>new KPI for 2024/25</i>	<b>95%</b>	99%	98%	

**Appendix 2**

<b>Performance Measure</b>	<b>Performance 2022-23 (full year result)</b>	<b>Target 2023-24</b>	<b>Performance Period Three 2023-24</b>	<b>Performance 2023-24 (full year result)</b>
<b>Animal Health</b> All operators meet the required standards when inspected for animal activities licences: a) 80% meet minimum standards. b) 20% meet minimum <b>AND</b> higher standards.	N/A <i>new KPI for 2024/25</i>	a) <b>80%</b> b) <b>20%</b>	a) 96% b) 29%	a) 93% b) 32%
<b>Pollution Control *2</b> 90% of justifiable noise complaints investigated result in a satisfactory outcome.	100%	<b>90%</b>	95%	96%
<b>Commercial Environmental Health: Food Safety *3</b> Sustain improvement in the proportion of food establishments that are at least 'broadly compliant' (i.e., Food Hygiene Rating Scheme score of 3 or above).	Improved profile	<b>Improved profile</b>	Annual Measure	97% Improved profile
<del><b>Commercial Environmental Health: Health &amp; Safety</b></del> Sustain improvement in the proportion of premises with justifiable evaporative cooling devices found to be 'broadly compliant' for legionella control (equivalent to health & safety inspection rating of B2 to C).	N/A <i>new KPI for 2024/25</i>	<b>Improved profile</b>	Annual Measure	Improved profile
<b>Cemetery and Crematorium</b> Number of burials and cremations	3,278	<b>&gt;3,290 (Annual target)</b>	1,037	2,922

\*1 Data on the % area of the Square Mile which meets the NO2 limit value is only made available by calendar year. The most recent data available is for 2023 which was 95%.

\*2 Percentage of total justified noise complaints investigated resulting in noise control, reduction to an acceptable level and/or prevention measures; complaints may or may not be actionable through statutory action.

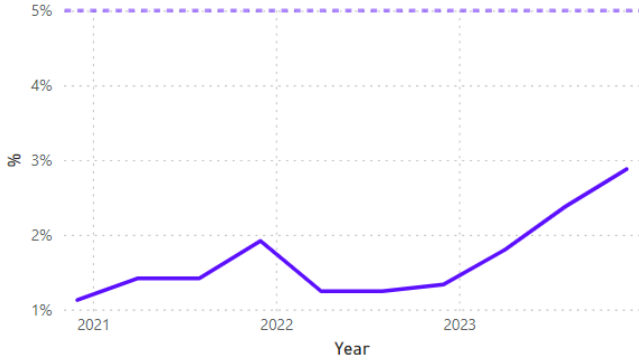
\*3 The purpose of this indicator is to show an overall improvement in the FHRS rating profile across all City food establishments by the end of the year. The target cannot be expressed as a specific percentage since any increase will indicate achievement.

# Business Plan 2023/24

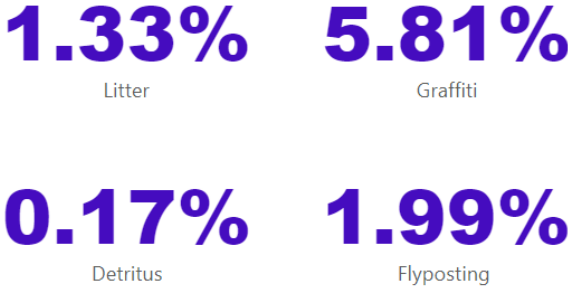
## Key performance information

### Cleansing Service Period 3: Dec 23 – Mar 24

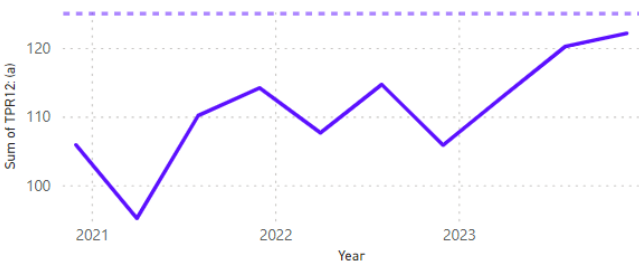
Local Environment Quality - Overall (NI195)



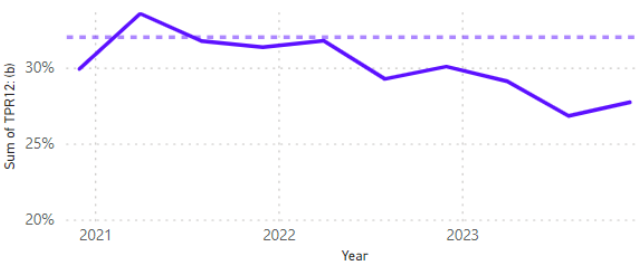
Local Environment Quality - Breakdown (NI195)



Kilograms of General Waste per Household (NI191)



Overall Recycling Rate (NI192)



Community Toilet Scheme

# 72

Members

Clean Streets Partnership

# 252

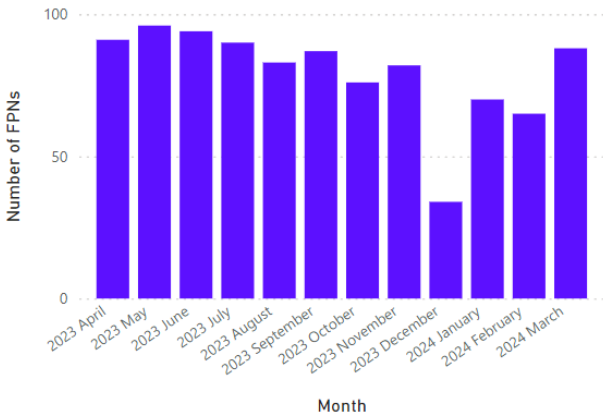
Members

Clean City Awards Scheme

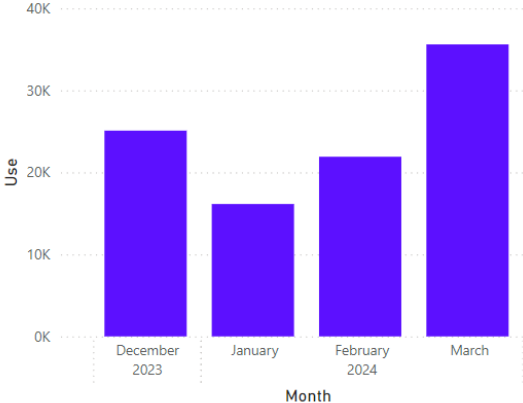
# 5

Members

Total FPNs Issued



Public Convenience Usage



### Explanatory notes and additional information

The Cleansing Service's performance against its targets is shown graphically on the previous page and should be read in conjunction with the following explanatory notes:

- NI191 (the amount of residual domestic waste per household) is performing well against target (101.23 per household against a target of 125kg per household).
- NI192 (percentage of domestic waste recycled) has missed the target for the period at 27.37% against a target of 32% by 2025. In accordance with the Mayor of London's Environment Strategy, the Reduction and Recycling Plan continues to be undertaken. Officers are identifying which areas of general waste have increased in order that directed communications can be targeted at the most needed areas.
- NI195 (measuring the amount of land with unacceptable level of litter, detritus, fly tipping and graffiti), which is independently monitored by Keep Britain Tidy, achieved the revised target (<5%) when measured in March 2024, with all elements of the survey meeting the required standards of cleanliness. Whilst the City's overall score of 2.33% for all areas is in line with the current target, it is higher than previous years.
- During this period the Street Environment Officers have issued 255 Fixed Penalty Notices in relation to environmental crime such as littering, public urination, and failure to comply with commercial waste disposal regulations. This is a reduction from Period Two (August-November 2023) during which a total of 328 FPNs were issued.
- The attended Public Convenience facilities at Tower Hill and Paternoster, which serve the main tourist attractions, have seen year-on-year increase in usage with levels returning to pre-pandemic years.
- The Community Toilet Scheme membership is at 72. Officers continue to target areas for recruiting new members where most needed as identified by previous mapping.
- There has been no change to the number of Clean Streets Partnership members. The scheme is being reviewed and will be relaunched soon, so these figures are likely to change.
- Recruitment for this year's Clean City Awards Scheme currently stands at 5.

### Contract performance

- During Period 3 (December 2023 to March 2024) of this Business Plan, the management team has continued to monitor the 12 Key Performance Indicators (KPIs) relevant to the performance of the Waste Collection and Street Cleansing contract. There have been two significant contract performance issues around sweeping standards.

# Business Plan 2023/24

## Key performance information

Period 3: 1 December 2023 - 31 March 2024

### Public Protection



# 234

food hygiene inspections conducted  
(2023/24 - Total 692)

Food Hygiene Rating Scheme:  
profile of food businesses



Require  
improvement  
(0-2 rating)

Broadly compliant  
(3-5 rating)

# 45

(3%)

# 1516

(95%)

2023/24  
Period 3



# 5

Number of  
prosecutions/legal action in relation to  
unlicensed street trading.  
(2023/24 - Total 32)



# 241

noise complaints investigated  
(2023/24 - Total 750)



# 1012

Trading Standards complaints &  
service requests received  
(2023/24 - Total 2533)

Burials

# 7%

Market Share  
(2023/24 - Total 7%)



Cremations

# 22%

Market Share  
(2023/24 - Total 22%)

### Port Health

Products of Animal Origin  
consignment checks

# 683

physical checks  
(2023/24 - Total 4037)

# 3183

documentary checks  
(2023/24 - Total 11989)



Products of Non Animal  
Origin consignment checks

# 1771

physical checks  
(2023/24 - Total 5821)

# 9748

documentary checks  
(2023/24 - Total 29509)

### Animal Health



# 112

Animal Health inspections  
carried out  
(2023/24 - Total 372)



# 3682

consignments of animals through  
Heathrow Animal Reception Centre  
(2023/24 - Total 12175)

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# Agenda Item 9

<b>Committee(s):</b> Port Health and Environmental Services Committee	<b>Dated:</b> 9 <sup>th</sup> July 2024
<b>Subject:</b> Risk Management Update	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	<ul style="list-style-type: none"><li>• Providing Excellent Services</li><li>• Vibrant Thriving Destination</li><li>• Leading Sustainable Environment</li><li>• Dynamic Economic Growth</li></ul>
<b>Does this proposal require extra revenue and/or capital spending?</b>	N
<b>Report of:</b> Bob Roberts, Interim Executive Director Environment	<b>For Information</b>
<b>Report authors:</b> Joanne Hill, Environment Department	

## Summary

This report provides the Port Health and Environmental Services Committee with assurance that risk management procedures in place within the Environment Department are satisfactory and that they meet the requirements of the corporate Risk Management Framework.

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

This report considers the key risks managed by the following service areas which fall within the remit of your Committee:

- Port Health and Public Protection
- The Cleansing Service

## Recommendation

Members are asked to:

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

## Main Report

### Background

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

### Current Position

5. This report provides an update on the key business risks that exist in relation to the operations of service areas of the Environment Department which fall within the remit of the Port Health and Environmental Services Committee:
  - Port Health and Public Protection
  - Cleansing Service

### Summary of key risks

6. The register of key risks held by the Port Health and Public Protection Division and the City Operation Division's Cleansing Service includes one corporate risk (Air Quality) and three service level risks, as summarised below. The detailed risk register is presented at Appendix 2.
7. **CORPORATE RISK CR21 – Air Quality (Current risk: Green, 3)**  
This corporate risk has been reduced to a score of Green 3 (possible; minor). A target has been set to further reduce the risk to a score of Green 2 (unlikely; minor) by the end of 2026. A new Air Quality Strategy was approved by the Port Health and Environmental Services Committee in May 2024, and is now out for public consultation until September 2024.
8. **ENV-PHPP 001 Brexit – Impact on Port Health and Animal Health (Current risk: Red, 24)**  
Phase Two of the new border checks commenced on 30 April 2024. This means that documentary, physical and identity checks are now required at the border for medium and low risk food and feed imports. The first six weeks of the regime have shown that the projected increase in throughput has been realised. The Port



Health Service continues to develop its processes and capacity to meet the new demands.

**9. ENV-CO-GC 002 - Road traffic collision caused by City of London staff or contractor who is unfit to drive while on City business (Current risk: Red, 16).**

A new automated monitoring and reporting process has now been introduced to enable easier identification of individuals who have not yet completed a required driving assessment. This will enable non-compliant individuals to be reminded and should increase compliance rates and reduce the risk.

**10. ENV-CO-GC 006 - A major incident, such as flooding or fire, makes Walbrook Wharf unusable as a depot (Current risk: Amber, 8)**

This risk remains at a score of Amber 8: unlikely, but with a major impact on the ability to deliver cleansing and waste services should it occur. A robust Business Continuity Plan is in place and is regularly updated and tested. A range of actions are in place to control the likelihood and impact of the risk.

### **Identification of New Risks**

**11. New and emerging risks are identified through a number of channels, the main being:**

- Directly by Senior Management Teams as part of the regular review process.
- In response to ongoing review of progress made against Business Plan objectives and performance measures, e.g., slippage of target dates or changes to expected performance levels.
- In response to emerging events and changing circumstances which have the potential to impact on the delivery of services, such as Brexit.
- The risk register may be refreshed over and above the stated process for review and oversight, in response to emerging issues or changing circumstances.

### **Corporate and Strategic Implications**

**12. Effective management of risk is at the heart of the City Corporation's approach to delivering cost effective and valued services to the public as well as being an important element within the corporate governance of the organisation.**

**13. The proactive management of risk, including the reporting process to Members, demonstrates that the department is adhering to the requirements of the City of London Corporation's Risk Management Policy and Strategy.**

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

## **Conclusion**

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

## **Appendices**

- Appendix 1 – City of London Corporation Risk Matrix
- Appendix 2 – Environment Department Key Risks (Port Health & Environmental Services Committee)

## **Contact**

Joanne Hill, Business Planning and Compliance Manager, Environment Department

T: 020 7332 1301

E: [Joanne.Hill@cityoflondon.gov.uk](mailto:Joanne.Hill@cityoflondon.gov.uk)



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

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

### (A) Likelihood criteria

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

### (B) Impact criteria

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

### (C) Risk scoring grid

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

### (D) Risk score definitions

<b>RED</b>	Urgent action required to reduce rating
<b>AMBER</b>	Action required to maintain or reduce rating
<b>GREEN</b>	Action required to maintain rating

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

Contact the Corporate Risk Advisor for further information. Ext 1297

October 2015

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## Environment Department Key Risks (PH&ES Committee)

Generated on: 20 June 2024

Rows are sorted by Risk Score

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
P 2024 V-PHPP Brexit - Impact on Port Health and Animal Health	<p><b>Cause:</b> The outcome of Brexit negotiations does not secure continuity of contracts, access to talent, ongoing grant funding and/or security of supply chains.</p> <p><b>Event:</b> The City Corporation services fail to prepare appropriately for the end of the Brexit transition period. Uncertainty around the potential outcomes until it is too late to react.</p> <p><b>Effect:</b> There is a range of potential impacts. The City Corporation's services are disrupted due to increases/changes in trade and as supply chains and contracts are reassessed, potentially increasing cost and reprioritisation of resources. Increased risk to public, animal and environmental health due to legislative changes. Increased risk and cost to consumers. Inadequate IT support if current EU software is replaced by bespoke UK systems that do not have sufficient functionality. Reduction in income if charging regimes are not established as part of Brexit. Potential for increased workload depending on whether agreement is reached from 'no deal' (check everything), through to no checks on EU products based and on risk via a full reciprocal arrangement (status quo).</p>	<p>Lielihood</p> <p>Impact</p>	24	<p>The phased border checks commenced on 31 January 2024 with the introduction of the need for importers to submit documentation.</p> <p>Phase Two began on 30 April 2024, meaning that documentary, physical and identity checks are required at the border for medium and low risk food and feed imports.</p> <p>The first six weeks of this new border control regime have shown that the projected throughput volumes are being realised. We have taken a pragmatic and practical approach to ensure a free-flowing border. The Service continues to develop its processes and includes additional staff to meet the new demands.</p> <p>The CoL has received Defra funding</p>	<p>Lielihood</p> <p>Impact</p>	6	31-Dec-2024	

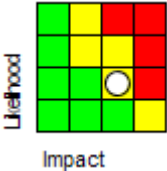
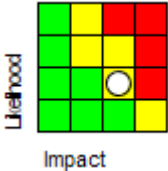
08-Nov-2016 Gavin Stedman				for Brexit readiness and Defra has confirmed funding until July 2024. <b>11 Jun 2024</b>			Reduce	Constant

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
ENV-PHPP 001c	Engage with stakeholders to assist in the identification of impacts and possible mitigations. Ensure Remembrancer and CoL departments are fully aware of the implications of Brexit on PH&PP and that they lobby accordingly.	Our previous stakeholder engagement actions have been completed. Although the BTOM has now been published, we are still waiting for further detail to enable us to plan future service provision. We will undertake further stakeholder engagement as appropriate.	Gavin Stedman	11-Jun-2024	31-Dec-2024
ENV-PHPP 001d	Respond promptly to policy decisions from the UK Government and the outcome of negotiations.	The Port Health Service will continue to respond to the government's stakeholder consultations on the implementation of the BTOM.  A Port Health Brexit Readiness Project Team has been formed to ensure smooth and effective preparations for the introduction of Phase Two on 30 April 2024 and beyond. A phased recruitment and onboarding plan is being implemented.	Gavin Stedman	11-Jun-2024	31-Dec-2024



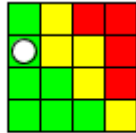


	<p>remains above 92.5%. Monitor overall completion rates for both driver check and the online training course and ensure that it remains above 92.5%. Monitor the collection and periodic monitoring of driver licence details (and, in the case of grey fleet drivers, vehicle details).</p>				
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Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
ENV-CO-GC <b>006 A major incident, such as flooding or fire, makes Walbrook Wharf unusable as a depot</b>  Page 81  27-Mar-2015 Joe Kingston	<b>Cause:</b> A major incident, such as flooding or fire. <b>Event:</b> Walbrook Wharf unusable as a depot. <b>Effect:</b> Unable to clean streets, collect waste or maintain City of London Police vehicles. City of London unable to meet its contractual arrangements with third parties who use the depot for their commercial purposes.		8	A robust Business Continuity Plan is in place and was discussed at the Quarterly Partnership Board meeting in January 2024. The next Business Continuity Exercise is being planned for September 2024, following which, we will review the outcomes and appropriate actions will be undertaken.  The Business Impact Assessment is also undergoing detailed review.  This risk has also been identified as a longer-term risk linked to Climate Change and is being addressed as part of the Climate Adaptation Action Plan.  We continue to undertake a range of actions to control the likelihood and impact of the risk, and keep it under review, but are unable to reduce the score any further at present.  <b>20 Jun 2024</b>		8	Accept	Constant

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
ENV-CO-GC 006a	Conduct annual Business Continuity Exercise.	The Business Continuity Plan was discussed at the Quarterly Partnership board meeting in January 2024 and the next Business Continuity Exercise is being planned for September 2024. Following that exercise, we will review the outcomes and appropriate actions will be	Vince Dignam	04-Jun-2024	30-Sep-2024

		undertaken.			
ENV-CO-GC 006b	Maintain fire prevention / fire safety procedures.	<p>The City Surveyor's Department has updated Mechanical and Engineering (M&amp;E) provision at Walbrook Wharf, including new fire walls, smoke cameras and sprinklers within the depot and around the electric vehicles and vehicle charging areas.</p> <p>Systems are checked and tested on a regular basis.</p> <p>This is an ongoing action.</p>	Vince Dignam	20-Jun-2024	30-Sep-2024
ENV-CO-GC 006c	Reduce the impact of potential flooding.	<p>Mitigations have been put in place for weak flood defence areas due to the close proximity of the river, but the risk of flooding remains.</p> <p>To prevent flood water ingress, an old roof is being renewed and the Climate Action Team is funding sensors for gullies.</p> <p>For our contractors, we have a Business Continuity Plan to enable them to operate from another department.</p>	Vince Dignam	20-Jun-2024	30-Sep-2024

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
<b>CR21 Air Quality</b>  Page 83 17 Oct-2015 Ruth Roberts	<b>Cause:</b> Levels of air pollution in the City, specifically nitrogen dioxide and fine particles, impact on the health of residents, workers and visitors. The City Corporation has a statutory duty to take action to improve local air quality. <b>Event:</b> The City of London Corporation is insufficiently proactive and resourced, and does not have the right level of competent staff, to be able to fulfil statutory obligations, as a minimum, in order to lower levels of air pollution and reduce the impact of existing air pollution on the health of residents, workers and visitors. <b>Effect:</b> The City Corporation does not fulfil statutory obligations and air pollution remains a problem, impacting on health. Potential for legal action against the Corporation for failure to deliver obligations and protect health. Adverse effect on ability to deliver outcomes 2 and 11 of the Corporate Plan	 Likelihood Impact	3	Air quality data collected in 2023 demonstrated that levels of particulate air pollution PM10 and PM2.5 both met the health based standards during the year. Nitrogen dioxide was measured at 86 locations, just 4 of these breached the required standard.  A new Air Quality Strategy for 2025 to 2030 was approved for consultation, the aims are to go beyond statutory obligations and work towards air quality that complies with World Health Organisation Air Quality Guidelines  <b>10 Jun 2024</b>	 Likelihood Impact	2	31-Dec-2026	  Decreasing
							Reduce	

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CR21 001i	100% of vehicles owned or leased by the CoL are electric or hybrid by 2025	The City Corporation currently has 40 fully electric and hybrid vehicles.	Ruth Calderwood	10-Jun-2024	31-Dec-2025
CR21 001m	Obtain approval for a new Air Quality Strategy 2025-30.	A draft new Air Quality Strategy 2025-30 has been approved for consultation by the Port Health and Environmental Services Committee.  The Strategy has now been published for consultation until 26 July 2024.	Ruth Calderwood	14-Jun-2024	30-Sep-2024

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# Agenda Item 10

<b>Committee(s):</b> Port Health and Environmental Services Committee	<b>Dated:</b> 9 <sup>th</sup> July 2024
<b>Subject:</b> Revenue Outturn 2023/24	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	n/a
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>N</b>
<b>If so, how much?</b>	n/a
<b>What is the source of Funding?</b>	n/a
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	n/a
<b>Report of:</b> Chamberlain Interim Executive Director Environment	<b>For Information</b>
<b>Report author:</b> Jenny Pitcairn, Chamberlain's Department	

## Summary

This report compares the revenue outturn for the services overseen by your Committee in 2023/24 with the final budget for the year. Overall total net expenditure for the year was £18.470m, whereas the total agreed budget was £15.660m, representing an overspend of £2.810m as set out below:

<b>Summary Comparison of 2022/23 Revenue Outturn with Final Budget</b>				
	<b>Original Budget £000</b>	<b>Final Budget £000</b>	<b>Revenue Outturn £000</b>	<b>Variation Better/ (Worse) £000</b>
<b>Direct Net Expenditure</b>				
Environment	(7,764)	(8,209)	(10,385)	(2,176)
City Surveyor (including Cyclical Works Programme)	(367)	(432)	(829)	(397)
<b>Total Direct Net Expenditure</b>	<b>(8,131)</b>	<b>(8,641)</b>	<b>(11,214)</b>	<b>(2,573)</b>
<b>Capital and Support Services</b>	<b>(7,170)</b>	<b>(7,019)</b>	<b>(7,256)</b>	<b>(237)</b>
<b>Overall Total</b>	<b>(15,301)</b>	<b>(15,660)</b>	<b>(18,470)</b>	<b>(2,810)</b>

The Interim Executive Director Environment has submitted a request to carry forward local risk underspendings within the Department, none of which relates to your Committee, and this will be considered by the Chamberlain in consultation with the Chairman and Deputy Chairman of Resource Allocation Sub Committee.

## Recommendation

Members are asked to:

- Note the report.

## Main Report

### Revenue Outturn for 2023/24

1. Actual net expenditure for your Committee's services during 2023/24 totalled £18.470m, an overspend of £2.810m compared to the final budget of £15.660m. A summary comparison with the final budget for the year is tabulated below. In this and subsequent tables, figures in brackets indicated expenditure, increases in expenditure or decreases in income.

<b>Summary Comparison of 2022/23 Revenue Outturn with Final Budget</b>				
	<b>Original Budget £000</b>	<b>Final Budget £000</b>	<b>Revenue Outturn £000</b>	<b>Variation Better/ (Worse) £000</b>
<b>Local Risk</b>				
Environment	(7,756)	(8,200)	(10,383)	(2,183)
City Surveyor	(353)	(418)	(362)	56
<b>Total Local Risk</b>	<b>(8,109)</b>	<b>(8,618)</b>	<b>(10,745)</b>	<b>(2,127)</b>
<b>Central Risk</b>				
Environment	(8)	(9)	(2)	7
<b>Total Central Risk</b>	<b>(8)</b>	<b>(9)</b>	<b>(2)</b>	<b>7</b>
<b>Cyclical Works Programme</b>	<b>(14)</b>	<b>(14)</b>	<b>(467)</b>	<b>(453)</b>
<b>Capital and Support Services</b>	<b>(7,170)</b>	<b>(7,019)</b>	<b>(7,256)</b>	<b>(237)</b>
<b>Overall Total</b>	<b>(15,301)</b>	<b>(15,660)</b>	<b>(18,470)</b>	<b>(2,810)</b>

2. The most significant local risk variations comprise:
  - **Environment, (£2.183m) overspend:**
    - reductions in income from:
      - Animal Health Services, (£1.938m) (see also paragraph 3 below);
      - Port Health, due to reduction in required level of enhanced checks on Brazilian meat products, (£0.788m)
    - a reduction in transfers from reserves for Street Cleansing (£0.810m), and Cleansing Management (£0.300m), together with an increase in transfers to reserves for Port Health (£0.330m)
    - an increase in bad debt provision, (£0.118m)
    - a net reduction in employee costs, £0.178m
    - an increase in grant funding and other contributions, (City Environmental Health, £ 0.164m, Port Health £0.403m)

- increases in income from:
    - o Construction / Deconstruction Levy, £0.568m;
    - o Cemetery & Crematorium, £0.330m
    - o Commercial waste, £0.157m
    - o Street cleansing, £0.125m
    - o Public conveniences, £0.093m
    - o Waste Disposal, £0.071m
  - **City Surveyor, £56,000 underspend:**
    - decreases in reactive repair works mainly at Heathrow Animal Reception Centre.
3. Whilst the income shortfall at HARC was (£1.938m), the overall net local risk position for the service was an overspend of (£1.67m) due to an underspend of £268k across expenditure budgets, which is in line with previous projections. This overall overspend for HARC was absorbed by offsetting against underspends across the wider Environment Department budget as previously advised to this Committee. The projected local risk position for 2024/25 is an overspend of (£730k) before the impact of new business or savings from vacancies are taken into account.
  4. The (£453,00) overspend on the Cyclical Works Programme (CWP) is primarily in relation to:
    - Cemetery & Crematorium, (£289,000) overspend, range of works including road resurfacing, fire alarm system upgrade, ducting renewals, staff changing facilities improvements, and drainage remediation.
    - Heathrow Animal Reception Centre, (£107,000) overspend, mainly scissor lift installation plus other works including roof and shutter repairs, and installation of commercial heaters.
    - Port & Launches, (£51,000) overspend, Denton CCTV upgrade, clearance of ditches and drainage, and replacement window.
  5. The (£237,000) overspend on capital and support services is due primarily to a review of central support services recharges carried out during 2023/24. This involved updating the basis of apportionment for all recharges following the TOM and Governance Review along with trying to make them more transparent and fairer across all services. The updated basis has led to several variations against budget across committees, but overall total recharges have remained within the total original envelope corporately (City Fund Original Budget £29.9m vs Outturn £27.9m, and City's Estate Original Budget £24.2m vs Outturn £22.9m.) Consultation has been held with areas where recharges are funded from local reserves, i.e. HRA and Police, any variation/increase in costs across other services are met from the deficit funding and have no effect on front-line services.
  6. The full recharge review has not yet been formally approved by Members as work is ongoing as to how the new basis will affect 2024/25 budgets. Once the review is fully adopted the 2024/25 budget will be reviewed and updated where necessary and the paper on the review made available.

7. Appendix 1 provides a more detailed comparison of the local risk outturn against the final budget, including explanation of significant variations.
8. Appendix 2 shows the movement from the 2023/24 original budget to the final budget.

### **Local Risk Carry Forward to 2024/25**

9. The Interim Executive Director Environment has a local risk overspending of (£2.183m) on the activities overseen by your Committee. Across the wider Environment Department the Interim Executive Director Environment had net local risk underspendings totalling £2.220m on activities overseen by other Committees, after adjusting for unspent carry-forwards from 2022/23. The Interim Executive Director Environment requested that his maximum eligible underspend of £37,000 be carried forward, none of which relates to activities overseen by your Committee.
10. Carry-forward requests will be considered by the Chamberlain in consultation with the Chairman and Deputy Chairman of Resource Allocation Sub Committee.

### **Corporate & Strategic Implications**

Strategic implications – none.

Financial implications – none.

Resource implications – none.

Legal implications – none.

Risk implications – none.

Equalities implications – none.

Climate implications – none.

Security implications – none.

### **Appendices**

- Appendix 1 – Port Health and Environmental Services Committee Comparison of 2023/24 Local Risk Revenue Outturn with Final Budget
- Appendix 2 – Port Health and Environmental Services Committee Analysis of Movements 2023/24 Original Budget to Final Budget

### **Jenny Pitcairn**

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**Port Health and Environmental Services Committee  
Comparison of 2023/24 Local Risk Revenue Outturn with Final Budget**

	<i>Original Budget</i>	Final Budget	Revenue Outturn	<b>Variation Better/ (Worse) £000</b>	Reasons
	£000	£000	£000		
<b>LOCAL RISK</b>					
<b>Environment</b>					
City Fund					
Public Conveniences	(492)	(505)	(421)	<b>84</b>	1
Waste Collection	(2,127)	(2,122)	(1,953)	<b>169</b>	2
Street Cleansing	(4,978)	(4,300)	(4,883)	<b>(583)</b>	3
Waste Disposal	(996)	(1,015)	(947)	<b>68</b>	4
Transport Organisation	(333)	(339)	(332)	<b>7</b>	
Cleansing Services Management	920	(26)	(285)	<b>(259)</b>	5
Coroner	(330)	(334)	(365)	<b>(31)</b>	
City Environmental Health	(2,032)	(2,061)	(1,325)	<b>736</b>	6
Animal Health Services	1,608	1,303	(367)	<b>(1,670)</b>	7
Trading Standards	(424)	(426)	(381)	<b>45</b>	
Port & Launches	(342)	(150)	(959)	<b>(809)</b>	8
Cemetery & Crematorium	1,770	1,835	1,835	<b>60</b>	9
<b>Total Environment City Fund</b>	<b>(7,756)</b>	<b>(8,200)</b>	<b>(10,383)</b>	<b>(2,183)</b>	
<b>City Surveyor</b>	<b>(353)</b>	<b>(418)</b>	<b>(362)</b>	<b>56</b>	10
<b>TOTAL LOCAL RISK</b>	<b>(8,109)</b>	<b>(8,618)</b>	<b>(10,745)</b>	<b>(2,127)</b>	

## Reasons for Significant Variations

Note that only variances of at least £50,000 for a service are explained below.

1. **Public Conveniences** – this underspend is mainly due to an increase of £93,000 in income from barrier conveniences.
2. **Waste Collection** – this underspend primarily relates to an increase of £157,000 in commercial waste royalty income.
3. **Street Cleansing** – this overspend is primarily due to:
  - a decrease of £102,000 in contract costs due mainly to performance deductions;
  - an increase of £125,000 in income for third-party cleansing;
  - a planned transfer from reserves that was not required, (£810,000).
4. **Waste Disposal** – this underspend is mainly due to:
  - an increase of £71,000 in income for third party waste disposal and royalties.
5. **Cleansing Services Management** – this overspend is primarily due to a planned transfer from reserves that was not required, (£300,000).
6. **City Environmental Health** – this underspend is primarily due to:
  - grant income of £79,000 for new burdens regulatory work in relation to cladding remediation of high-rise private sector buildings; and of £85,000 in relation to air quality projects
  - an increase in income of £568,000 from the Construction / Deconstruction Levy;
  - a reduction of £56,000 in employee costs as a result of vacancies;
  - an increase of (£71,000) in fees mainly in relation to grant-funded air quality projects.
7. **Animal Health Services** – this overspend is primarily due to:
  - a reduction of (£1.938m) in income;
  - a reduction in employee costs of £389,000 due to posts held vacant;
  - an increase of (£118,000) in bad debt provision.
8. **Port & Launches** – this overspend is primarily due to:
  - a reduction in income of (£788,000), this is mainly due to a reduction in required levels of enhanced checks on Brazilian meat products;
  - a net increase in transfers to reserves of (£330,000);
  - an increase in employee costs of (£114,000) due to Brexit preparations;
  - an increase of (£76,000) in sampling costs, mainly matched by increased grant funding;
  - additional grant funding for sampling of £70,000;
  - a reduction of £75,000 in business rates expenditure. This is due to the Logistics Centre offices not being added to the valuation list until 2023/24, which meant that accrued rates bills from the start of the lease in 2019 had

to be estimated. The actual bills for the period which have now been received were lower than estimated, resulting in this underspend.

- additional grant funding for Brexit preparations of £333,000.

9. **Cemetery & Crematorium** – this underspend is primarily due to:

- additional income of £330,000 from cremations, burials, sales of graves, and memorial dedications as a result of increased sales;
- an increase of (£153,000) in employee costs mainly for agency staff;
- an increase equipment, furniture and materials costs of (£70,000) mainly due to replacement of crematorium chapel chairs.

10. **City Surveyor** – this underspend is primarily due to:

- a reduction in reactive repair call-outs to Heathrow Animal Reception Centre, £45,000.

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**Port Health and Environmental Services Committee Analysis of Movements  
2023/24 Original Budget to Final Budget**

	<b>£000</b>
<b>Original Local Risk Budget (incl Cyclical Works Programme)</b>	(8,123)
Adjustments:	
Carry-forwards from 2022/23	(32)
Central funding of apprentice posts towards the corporate target	(175)
Central funding of pay award including backdated agency uplift	(826)
Changes to phasing of Cyclical Works Programme	(65)
Departmental unidentified savings allocation	
– virement to Planning & Transportation Committee	429
Allocation from central contingency for energy price increases	(81)
Transfers to capital for HARC replacement vehicles project and public convenience barrier replacement project	241
<b>Final Local Risk Budget incl CWP</b>	<b>(8,632)</b>
<b>Original Central Risk Budget</b>	(8)
Adjustments:	
Priorities Investment Pot carry-forwards from 2022/23	(1)
<b>Final Central Risk Budget</b>	<b>(9)</b>
<b>Original Capital &amp; Support Services Budget</b>	(7,170)
Adjustments:	
Decrease in recharges within fund	151
<b>Final Capital &amp; Support Service Budget</b>	<b>(7,019)</b>
<b>TOTAL Original Budget</b>	<b>(15,301)</b>
Movement in Local Risk Budget incl CWP	(509)
Movement in Central Risk Budget	(1)
Movement in Capital & Support Services Budget	151
<b>TOTAL Final Budget</b>	<b>(15,660)</b>

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