



Planning and Transportation Committee

Date: TUESDAY, 21 JANUARY 2025

Time: 10.30 am

Venue: LIVERY HALL - GUILDHALL

Members:

Deputy Shravan Joshi MBE (Chairman)	Deputy Brian Mooney BEM
Graham Packham (Deputy Chairman)	Deputy Alastair Moss
Deputy Randall Anderson	Eamonn Mullally
Ian Bishop-Laggett	Alderwoman Jennette Newman
Mary Durcan	Deborah Oliver
Deputy John Edwards	Judith Pleasance
Anthony David Fitzpatrick	Deputy Henry Pollard
Deputy John Fletcher	Alderman Simon Pryke
Deputy Marianne Fredericks	Ian Seaton
Jaspreet Hodgson	Hugh Selka
Amy Horscroft	Tom Sleight
Alderman Robert Hughes-Penney	Luis Felipe Tilleria
Alderwoman Elizabeth Anne King, BEM JP	Shailendra Kumar Kantilal Umradia
Deputy Natasha Maria Cabrera	William Upton KC
Lloyd-Owen	Jacqui Webster
Charles Edward Lord	Deputy Dawn Wright
Antony Manchester	

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Ian Thomas CBE
Town Clerk and Chief Executive

AGENDA

NB: Certain matters for information have been marked * and will be taken without discussion, unless the Committee Clerk has been informed that a Member has questions or comments prior to the start of the meeting. These information items have been collated in a supplementary agenda pack and circulated separately.

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 of the meeting held on 5 November 2024.

For Decision
(Pages 7 - 26)

4. **ANNUAL REVIEW OF TERMS OF REFERENCE FOR THE PLANNING & TRANSPORTATION COMMITTEE**

Report of the Town Clerk.

For Decision
(Pages 27 - 30)

5. **FIRST CONSIDERATION: ENHANCED BIODIVERSITY DUTIES OF PUBLIC AUTHORITIES**

Report of the Executive Director, Environment.

For Decision
(Pages 31 - 46)

6. **ENVIRONMENT DEPARTMENT HIGH-LEVEL BUSINESS PLAN 2025-30**

Report of the Executive Director, Environment.

For Decision
(Pages 47 - 72)

7. **CITY PLAN 2040 - EXAMINATION HEARINGS GOVERNANCE AND DELEGATION**

Report of the Executive Director, Environment.

For Decision
(Pages 73 - 78)

8. **PLANNING FOR SUSTAINABILITY SUPPLEMENTARY PLANNING DOCUMENT**
Report of the Executive Director, Environment.

For Decision
(Pages 79 - 280)
9. **REVENUE AND CAPITAL BUDGETS 2025/26**
Joint Report of the Chamberlain and the Executive Director, Environment.

For Decision
(Pages 281 - 294)
10. **36 CARTER LANE & 34 - 37 BARTHOLOMEW CLOSE**
Report of the City Surveyor.

For Decision
(Pages 295 - 304)
11. ***MODERNISING PLANNING COMMITTEES - GOVERNMENT CONSULTATION**
Report of the Executive Director, Environment.

For Information
12. ***NATIONAL PLANNING POLICY FRAMEWORK (NPPF), DECEMBER 2024 UPDATE**
Report of the Executive Director, Environment.

For Information
13. ***AIR QUALITY STRATEGY 2025 TO 2030**
Report of the Executive Director, Environment.

For Information
14. ***ENVIRONMENT DEPARTMENT HIGH-LEVEL BUSINESS PLAN 2024/25 – PROGRESS REPORT (MID-YEAR: 1 APRIL – 30 SEPTEMBER 2024)**
Report of the Executive Director, Environment.

For Information
15. ***MONTHLY PUBLIC LIFT & ESCALATOR REPORT - OCTOBER 2024**

Report of the City Surveyor.

For Information

16. ***OUTSTANDING ACTIONS**

Report of the Town Clerk.

For Information

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

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

19. **EXCLUSION OF THE PUBLIC**

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

For Decision

Part 2 - Non-public Agenda

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

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

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PLANNING AND TRANSPORTATION COMMITTEE Tuesday, 5 November 2024

Minutes of the meeting of the Planning and Transportation Committee held at Livery Hall - Guildhall on Tuesday, 5 November 2024 at 10.30 am

Present

Members:

Deputy Shравan Joshi MBE (Chairman)
Graham Packham (Deputy Chairman)
Michael Cassidy
Mary Durcan
Deputy John Edwards
Deputy John Fletcher
Deputy Marianne Fredericks
Amy Horscroft
Alderwoman Elizabeth Anne King, BEM JP
Deputy Natasha Maria Cabrera Lloyd-Owen
Deputy Charles Edward Lord
Eamonn Mullally
Alderwoman Jennette Newman
Deborah Oliver
Alderman Simon Pryke
Ian Seaton
Hugh Selka
Shailendra Kumar Kantilal Umradia
William Upton KC
Jacqui Webster

Officers:

Simon Owen	- Chamberlain's Department
Isobel Tucker	- City Surveyor's Department
Ian Hughes	- Environment Department
Rob McNicol	- Environment Department
Bruce McVean	- Environment Department
Aggie Minas	- Environment Department
Gwyn Richards	- Environment Department
Katie Stewart	- Executive Director, Environment
Peter Wilson	- Environment Department
Callum Southern	- Town Clerk's Department

1. APOLOGIES

Apologies were received from Ian Bishop-Laggett, Jaspreet Hodgson, Deputy Brian Mooney, Deputy Henry Pollard and Judith Pleasance.

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

No declarations were made.

3. **MINUTES**

The Town Clerk suggested the removal of the yellow highlighting on paragraph 3 of Item 8, removing Zoe Lewis and adding Blair Stringman as the clerk and adding the conclusion time of the meeting of 2:25pm. The Committee agreed to the amendments.

RESOLVED – That, the public minutes of the previous meeting held on 04 October 2024 be approved, subject to agreed amendments, as an accurate record.

Matters Arising

A Member raised concerns about lighting displayed the night before from 22 Bishopsgate as residents in the London Borough of Southwark had complained and queried whether the 24/7 noise complaint line dealt with the issue of light pollution. The Member indicated that, if it did, it needed to be advertised on the website. Officers indicated they had received similar complaints with videographic evidence and Officers were investigating it. Officers also clarified that, while the 24/7 line was there to deal with noise complaints, unusual occurrences or other disturbances should be followed-up on.

Another Member indicated that the events phonenumber and email address for the 22 Bishopsgate building was not maintained 24/7 and a number of people had complained about it the night before. Officers indicated they were meeting with representatives of 22 Bishopsgate that afternoon and assured they would raise the issues discussed.

4. **TFL LOCAL IMPLEMENTATION PLAN FUNDING APPLICATION 2025/26 - 2027/28**

The Committee received a report which covered the City of London Corporation's application for Transport for London (TfL) Local Implementation Plan (LIP) funding for financial years 2025/26, 2026/27 and 2027/28. The report sought approval to submit an application for £5.4m to TfL for LIP funding over the three-year LIP programme, which included £1.575m for the 2025/26 financial year. £480,000 was formula or base funding and a further £1,095,000 was within TfL 'discretionary' funds which required a business case to be submitted to TfL. The report also sought approval to spend the 2025/26 allocation if it was approved by TfL in March 2025.

Officers told the Committee that it was the three-year submission to TfL that would set out what the Corporation would do with the money allocated to it and there was an amount of base funding. There was also an additional pot of

money which could be bid for, particularly under road danger reduction criteria and cycling network criteria.

A Member referred to ongoing effort to combat public urination at Fann Street and queried whether public urination prevention could be built into the proposed Healthy Streets Scheme as it would be welcomed by Officers and residents alike. Officers indicated they were aware of the issues on Fan Street and were in discussions with cleansing colleagues about preventative measures.

Another Member asked whether the increasing road safety on Ludgate Hill and the public realm work planned for the junction at Old Bailey were aligned. Officers confirmed that the designs for Old Bailey/Ludgate Hill would consider anything else planned in the area so as to not undermine public realm works.

A Member expressed they were delighted with the cycling provision detailed in the report but asked what the cycling training referenced to would entail as there were regular reports of dangerous cycling and reiterated the need for cyclists to develop good behaviours. Officers stated they were actively working with the police on the road danger reduction action plan to try to target those who were not voluntarily behaving well. The training was aimed primarily at those who were willing to behave better.

The Committee heard a number of a responses from Officers in response to a Member's questions pre-Committee. The Member had asked if the cycling infrastructure on Queen Victoria Street would be compatible with the Puddledock SPD. Officers confirmed it would be. He had also asked why the funding for the micro parking had seemed low. Officers had explained that it was allocated by TfL and they were in the process of securing more funding for additional micromobility parking.

It was raised by a Member that the City had focused on training for cycle use on the road but had not discussed bike repair and maintenance and emphasised the value of it, especially as other local authorities had focused on it. Officers indicated there had been Dr Bike training provided at roadshows with the police and committed to publicising that more widely.

RESOLVED – That, Members:

- Approved the contents of the LIP funding application covering the years 2025/26 – 2027/28, as set out in Table 1 of the report.
- Approved the spend total up to a maximum of £1,575,000 for 2025/26, as set out in Table 1, subject to final allocation decision from TfL in March 2025.
- Authorised the Executive Director Environment to approve minor changes to the submission following informal feedback from TfL in January 2025.
- Authorised the Executive Director Environment to reallocate the TfL grant between the approved LIP schemes, should that be necessary during 2025/26, up to a maximum of £250,000.

5. **DOMINANT HOUSE FOOTBRIDGE FUTURE OPTIONS - GATEWAY 6 OUTCOME REPORT**

The Committee received a Gateway 6 project report which sought the closure of the project to repair a fault on City Walkway footbridge over the highway which had led to spalling on footbridge support.

Officers informed the Committee that the project had suffered time delays, partly due to poor performance of the contractor and due to the procedures in advance of works which led to a loss of TfL funding.

A Member questioned who had been burdened by the cost of the delay. Officers explained some of the cost had been pushed back to Conway, but the increase in prices and the total cost had come from the Off-Street Parking Fund.

The Member emphasised the need to push contractors hard when they fell short of completing projects and ensure they know they are expected to make reasonable compensation.

The Chairman noted there was a conscious political decision, on the City's part, for the delay as there was a projects review at the time to ensure there was a good understanding of where the City was at. A Member suggested a note be added to the paper to reflect that a decision had been taken to delay. Officers assured that they pushed back on the cost from the contractor, but the real issue was programme delays and poor management from sub-contractors. Offices confirmed they were not able to make any penalty charges as a result.

RESOLVED – That, Members approved:

- That the project was closed.

6. **BUSINESS AND PLANNING ACT 2020, AS AMENDED BY LEVELLING UP AND REGENERATION ACT 2023 - ALFRESCO DINING POLICY 2024**

The Committee received a report that sought approval of the Alfresco Eating and Drinking Policy and noted it had been out to consultation from 16 September to 13 October 2024 following a decision on 23 July 2024 by the Planning and Transportation Committee to consult with the public and responsible authorities for 4 weeks.

Officers presented the report and noted there were proposals to amend the policy as a result of the consultation in regard to the provision of free pre-application advice to applicants and noted there were some comments made by responsible authorities, including counterterrorism advisors and the City Corporation's legal advisor. Officers also noted there were issues raised around accessibility, music and noise and special areas for consideration, but they were covered in the policy.

The Chairman suggested there was a broader piece of work of alfresco dining being carried out by HM Government at the time. Officers confirmed that the Home Office had carried out a consultation looking to align pavement licensing with premises licensed for alcohol sales. Consultation responses were currently under analysis and Officers had not heard anything back yet.

A Member expressed concerns with the policy's application in residential areas where the start time and end time was 7:00am – 11:00pm as it was a narrow window for residents to get 8 hours sleep and stated that if set up of furniture occurred before 7 and the storing away of furniture after 8, the potential noise from moving furniture could eat into the 8-hour sleep window in residential areas.

A Member moved a motion to amend Appendix 1, Paragraph 3.7 on Page 43, Appendix A of Appendix 1, Paragraph 4 on Page 55, and Appendix A of Appendix 3, Paragraph 4 on Page 104.

MOTION: A Member proposed an amendment that Paragraph 3.7 on Page 43 stipulate at the end of the paragraph that “the setting up and clearing away of furniture must be carried out within the licensing hours.” The Member also proposed another two amendments on Paragraph 4 on Page 55 that read before the existing text “Furniture must not be set up on the pavement before the permitted start time of the pavement licence” and after the second sentence “Where an earlier end time is specific, the furniture must be removed from the highway before the permitted end time.” The Member also proposed another two amendments on Paragraph 4 on Page 104 that read before the existing text “Furniture must not be set up on the pavement before the permitted start time of the pavement licence” and after the second sentence “Where an earlier end time is specific, the furniture must be removed from the highway before the permitted end time.”

A Member seconded the Motion.

The Chairman opened the floor to debate the Motion.

A Member stated it was a bit of a wider issue than just residential areas as noise sensitive areas were also important and noted the consultation results indicated that 52% of respondents wanted the policy hours to remain the same while 48% wanted the policy change. The Member also highlighted that 58% of respondents thought the City Corporation could do more to prevent noise nuisance on pavement areas and 66% of respondents felt some areas of the Square Mile needed special consideration. The Member emphasised the need to balance business and residents' interests better and understood why some premises may wish to have earlier or later opening and closing hours, but stated that the current licensing policy ensured that residents had an expectation of a good night's sleep from 11:00pm to 7:00am inside the premises. The Member noted the issue was there was nowhere to store outdoor furniture in many premises unless they're out on the pavement, so whilst closing hours might be 9:00pm, that would make a racket at 11:00pm dragging these things in. The Member indicated there needed to be something

in the paper to make it clear to applicants that they would not have carte blanche from 7-11 and there should be special consideration for noise sensitive areas – given consultation responses support that change, we should be looking at that change.

The Chairman sought clarity from Officers over whether the cutoff time for serving at venues meant the furniture would have to be cleared up at the cutoff time or merely have stopped serving. Officers explained it depended on individual circumstances and there was a standard condition for all furniture to be removed by 11:00pm.

The Chairman queried if furniture could still be left outside until 11:00pm if there was a cutoff for alfresco dining of 7:00pm and whether point 3.7 of the policy would be activated in areas considered sensitive. Officers explained furniture could be left outside if there was no condition which required that condition to be brought in and confirmed the policy would be activated in areas considered sensitive.

A Member expressed caution about applying rigid rules concerning noise as there were some places in the City where permission had been given for enclaves in areas, where there were traditionally no residents, for food and beverage provision and a few residents moving to the area could change the rules which was not the same situation as areas which had traditionally always had residents.

Another Member discussed the agent of change principle and explained that if a large number of residents moved into an area and requested a long-standing business or public house be closed down early, they would not be able to do it as the agent of change principle which was called out in the Local Plan prevented that.

The Member also clarified that the alfresco policy stated that the furniture must be removed from the authorised area by the license holder by 11:00pm unless an earlier time was specified on the license and the furniture must be stored off the highway every evening and the Member felt this covered the issue of furniture being left out before 11:00pm. Officers agreed it did and explained, with regard to earlier start times, that Environmental Health was one of the consultees and they had access to all the noise complaints. If Environmental Health were aware of sensitive receptors nearby, they would comment on that and Officers would be in a position to set a condition of a later start time on the premises near a residential area or sensitive noise receptor. Officers also explained they could condition the time on when furniture would be put out or brought in for storage and that time could be set later than 7:00am or earlier than 11:00pm.

A Member indicated there was a difference between policy and the application of policy on the ground and wanted to ensure that businesses were not buying furniture without understanding that they may need to store them inside after service has stopped outside. The Member stated it needed to be made clear that there were caveats to the 7am – 11:00pm alfresco dining license related to

residential areas and sensitive areas and emphasised the need for applicants to be clear that an agreed license could have caveats.

The Member also sought clarity on policy regarding outdoor heaters and stated they were in conflict with policy and against the City Corporation's climate change agenda.

The Chairman queried whether any concerns were raised at Licensing Committee the week before on the alfresco licensing policy presented to the Committee. Officers confirmed no concerns were raised.

A Member explained, as a Member of the Licensing Committee, that they wanted to ensure Officers had as much flexibility as possible on the alfresco dining policy and felt it would produce the happiest outcome for all stakeholders.

The proposing Member sought clarity that the item was 'For Information' when discussed at Licensing Committee. Officers confirmed the report was 'For Information' when discussed at Licensing Committee.

The proposing Member indicated their proposal was to provide further clarity for residential areas and sensitive areas and ensure that, should pavement licenses be granted between 7:00am and 11:00pm, receive a clear 8 hours of rest.

The Town Clerk read out the proposed amendments made by the Member.

Having fully debated the Motion, the Committee proceeded to vote on the Motion to Amend before them.

Votes were cast as follows: IN FAVOUR – 11 votes
OPPOSED – 5 votes
There were 0 abstentions.

The Motion to Amend was therefore carried.

The Chairman brought the discussion back to the substantive item.

A Member emphasised the need for the licensing condition to be about the mutual flourishing of business and residential and, while the historic context was important, importance also had to be placed on what was happening in the present day.

Another Committee Member raised concerns and sought justification regarding free pre-application advice as it did not have funding and suggested it would be appropriate to include a fee given businesses were applying for licenses to earn revenue or, at the very least, be net neutral in terms of staff cost or actual expenditure. Officers explained it was an outcome from the consultation and pre-application advisory sessions which had led to streamlined applications. Currently, Officers did not know the cost of the service at this stage, but

committed to a full cost analysis and that would scope in how many requests had been received for pre-application advice.

The Member followed up and queried why pre-application advice should be provided at cost by the City Corporation planning team. Officers suggested the use of the word 'free' was not quite accurate and stated they were not charging up front, but the cost was scoped on a cost-recovery basis.

The Vice Chairman noted that the consultation results were not referenda, but believed that informal discussions needed to be encouraged to ensure time was not wasted on both sides, but agreed that substantive effort should not be expended on pre-application advice without charge. Officers explained that 87% of the respondents lived in the area, 74% worked in the area and only 16% had a business in the area.

The Chairman suggested he was comfortable backloading the pre-application advice cost into the actual application if Officers could confirm costs were recovered during the actual application, especially as it may encourage SMEs into the Square Mile.

A Member drew attention to a condition which required licence holders to clean the authorised area regularly to prevent staining by anything done pursuant to the licence and suggested it must be better defined what applicants had to do ensure the authorised area was clean and what the cost would be if the City did it. Officers explained it would be difficult to define as it would be different for each business, but Officers confirmed they actively engaged with licensees. Officers confirmed they would ask staining to be cleaned if found and there were some recharges back from the cleansing services which were incorporated in the cost recovery calculations.

The Member queried why small premises would be punished and why a cost for the whole service would be implemented as a result of recharges back from the cleansing services.

The Chairman sought clarification on the policy paper and indicated the generic terminology gave Officers freedom to regulate more specifically on individual applications. Another Member suggested the policy should explicitly state the need for generic terminology.

RESOLVED – That, Members:

- Noted the report, and the changes made to the Alfresco Eating and Drinking Policy (Appendix 2) having considered the comments of Responsible Authorities.
- Agreed the proposed changes, contained in the Consultation Analysis (Appendix 3), with the agreed amendments as stated in the approved Motion.
- Approved the Alfresco Eating and Drinking Policy (Appendix 1), with the agreed amendments as stated in the approved Motion.

7. PUDDLE DOCK PLANNING BRIEF

The Committee received a report which recommended that approval was granted to commence the drafting of a Planning Brief for the area known as Puddle Dock and noted that the Planning Brief would, upon adoption, constitute a Supplementary Planning Document (SPD) in line with the Local Plan 2015 and the forthcoming City Plan 2040.

A Member indicated something needed to be done in the area and highlighted it was the site of the single largest rough sleeping location in the City. The Member noted that due consideration needed to be given to this as it was a very sensitive area that needed to be recognised in any work done. Officers informed they would work cross-corporately on all solutions going forward before development commenced.

Another Member suggested it was an exciting development opportunity and emphasised the need for the planning brief to ensure the City could engage effectively with prospective developers and ensure the various needs of all the stakeholders, particularly the schools, were met.

The Committee also heard a response to a Member's question over whether there would be an emphasis on preservation and public display of any historic building remains. The Member confirmed they had been informed by Officers that was the intention.

It was suggested by a Member that Officers considered adding two explicit mentions to Paragraph 6, Page 121 of housing and culture. Officers explained that the current 2015 Local Plan had a generic Thames policy area that discussed the City's boundary with the River Thames itself and Officers indicated that Key Areas of Change had been approved by the Committee previously. Officers noted one of these was Blackfriars and policy S18 within the draft City Plan 2040 did set out the desire to promote the comprehensive redevelopment and refurbishment of existing buildings to provide new high-quality office and commercial accommodation. Officers further noted that the policy encouraged new cultural, leisure and recreation facilities and culture was very much front and centre of any plan that would complement S18 and Officers expected that to be adopted through EIP next year. Officers stated that the SPD would be complimentary to that policy if it were adopted, and it did not include housing to be delivered on the site as it was not designated as a residential area and the policy was explicit that the location was a strategic commercial and office development location.

The report was welcomed by a Member as a starting point for the future of the paddle dock and was surprised not to see reference to the possibility of relocating the City of London School for Girls to the site and suggested the current site of the Girl's School would make for a good addition to housing in an

area which was already designated for housing. The Member asked Officers to bear this in mind and also indicated there was an opportunity for sporting facilities at the paddle dock site that could be used by the schools and the general public. Officers explained the consultant would be appointed to consider a broad range of land uses within the scope of the then adopted or emerging policy and indicated they were mindful of the opportunity the site provided for a number of riverside sporting opportunities that may, or may not be, deliverable. Officers stated they could not speak for the Corporation's ambitions for the Girls or Boys school but noted the point made and suggested that the sports facilities currently at the Boys School were located next to White Lion Hill which would most likely need to be replaced through the development and could be an opportunity for the facilities to be made more public.

The Chairman declared that he was a Board Member of the City of London Girls School.

A Member indicated the Committee could confidently expect that there would be very substantial CIL (Community Infrastructure Levy) receipts which would go toward affordable housing and felt it would be a much more effective way of providing affordable housing than trying to establish affordable housing where land prices were very high. The Member stated this was the reason why the Committee should continue to look at the commercial side looking at the project. Officers explained that CIL was not used for affordable housing but affordable housing contributions were taken through Section 106 payments from commercial developments.

A Member supported the need to maximise the potential of the site and noted the area at South Bank was a successful example that had a significant cultural involvement and suggested that if housing in the area enabled the City to raise money for the provision of better-quality housing in other parts of the City, that might be a smart option.

The Chairman sought clarity to ensure anything agreed at Committee still fit within the City Plan, still recognised the areas identified for office space and housing, and was not a bypass of the Plan. Officers confirmed a policy was not being established by this decision and the policy had already been established with the Key Area of Change and the adopted Plan policy that advocated an office and commercial-led development on the site. Officers noted that some of these sites were some of the most valuable commercial office sites as they were river-facing and that was the basis of the policy agreed by the Court of Common Council.

A Member asked for a more visionary approach with regard to the office development-led sites and what else the site might be able to provide as cultural, sporting benefits or any other developments that may come forward during a planning briefing stage so opportunities were not ruled out at the early stage while acknowledging it was an office development-led approach. Officers indicated there were substantial elements of office building on the site and were aware of the potential for redevelopment and refurbishment. They also noted that the site had a number of opportunities, potentially scope to improve and

connectivity and experience of the station, and had significant vertical constraints such as valuable archaeological finds and St. Pauls heights which will drive viability of what was deliverable on the site. Officers explained that the pre-eminent opportunity was to revitalise the area through the removal, remediation or improvement of the 1970s highways works, but the brief that would go forward would align itself with the draft policy which included provision for culture, arts and public realm enhancements. Officers clarified that the policy stated it was to provide new high-quality office and commercial accommodation.

RESOLVED – That, Members:

- Approved the commencement of a draft Puddle Dock Planning Brief.

8. INFRASTRUCTURE FUNDING STATEMENT CIL/S106 2023-24

The Committee received a report which presented the City's Community Infrastructure Levy (CIL) and Section 106 (S106) planning obligations infrastructure funding statement at the end of the financial year 2023/24.

A Member indicated it was not clear in the report as to what extent there were plans for future expenditure, especially as Section 106 contributions could be claimed back if they were not used. Officers explained they were commitments to spend on, and develop, affordable housing under S106 agreements on various estates that the City Corporation owned and were happy to speak to colleagues who reported to the Community & Children's Services Committee to share information with Members.

RESOLVED – That, Members:

- Noted the content of the report and approved the infrastructure list at paragraph 19, repeated at section 4 of the Infrastructure Funding Statement, for publication on the City's website.

9. CITY FUND HIGHWAY DECLARATION: 65 GRESHAM ST, LONDON, EC2V 7NQ'

The Committee received a report which sought approval to declare a volume of City Fund owned airspace 26.16 sq ft / 2.43 sq m situated at 65 Gresham St, London, EC2V 7NQ, to be surplus to highway requirements to allow its disposal in conjunction with the consented development. The report noted that the consented development included the provision of a doorway canopy on the corner of Aldermanbury and Love Lane.

RESOLVED – That, Members:

- Resolved to declare a volume of City Fund owned airspace totalling 26.16 sq ft sq ft situated around 65 Gresham St, London EC2V 7NQ, to be surplus to highway requirements to enable its disposal upon terms to

be approved under the Delegated Authority of the City Surveyor
SUBJECT TO

- the City Surveyor and Deputy Director of Transportation and Public Realm first determining the relevant ordnance datum levels to suitably restrict the vertical extent of the leasehold airspace demise.

10. *** RISK MANAGEMENT UPDATE REPORT**

The Committee received a report which sought to provide assurance that risk management procedures in place within the Environment Department were satisfactory and met the requirements of the Corporate Risk Management Framework.

No questions were received.

RECEIVED.

11. *** ANNUAL ON-STREET PARKING ACCOUNTS 2023/24 AND RELATED FUNDING OF HIGHWAY IMPROVEMENTS AND SCHEMES**

The Committee received a report on action taken in respect of any deficit or surplus in its On-Street Parking Account for a particular financial year.

No questions were received.

RECEIVED.

12. *** FINANCE PROGRESS REPORT (Q2 JULY - SEPTEMBER) 2024/25**

The Committee received a report which provided an update on the Planning and Transportation Committee's 2024/25 local risk budget position as at the end of September 2024.

No questions were received.

RECEIVED.

13. *** TO NOTE THE DRAFT MINUTES OF THE STREETS AND WALKWAYS SUB-COMMITTEE MEETING HELD ON 01 OCTOBER 2024**

The Committee received the draft minutes of the Streets and Walkways Sub-Committee meeting held on 01 October 2024.

No questions were received.

RECEIVED.

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

A Member raised a question regarding a build-up of Lime and Forest bikes at the junction of London Wall and Bishopsgate and queried whether they were considered an obstacle. The Member also suggested a conversation needed to be had on how to deal with the obstructions and referred to actions taken by other Local Authorities who had taken them off the highway and stored them and considered whether there were existing powers for removal as there were with the removal of furniture under the pavement licensing scheme. Officers noted they appreciated the challenges of dealing with the issue of dumped bikes and reported that the legal position of the Comptroller and City Solicitors had been consistent that there was currently no statutory power to regulate dockless bike parking and, therefore, could not prevent the companies from operating. Officers explained there were other routes through statutory legislation, but measures such as prosecution through obstruction would be a magistrate's court issue and such a measure would be against an individual who had dumped the dockless bike, not the operator. Officers further explained, with reference to the street furniture enforcement process, that the process targeted the individual and, as street furniture did not tend to move, the enforcement could easily be carried out. However, by the time notice was to be given on dumped dockless bikes, they had usually been moved, and the giving of notice was not equivalent to removal. Officers stated there was room in legislation to allow for immediate enforcement if there was deemed to be a danger and removal and storage costs could be recouped, although evidence had to be gathered for that action. Officers indicated there was a question over how feasible and effective that would be and informed Members that the experience across the board from local authorities, who had tried the immediate removal approach, was that operators would not pay for the release of the bikes and would not bother to reclaim them as the scale of the fleet would be unaffected by such an operation to remove the bikes. Officers noted they had tried a similar operation before Covid which led to storage areas filling up before the operations of dockless bike operators were affected and there had been occasions where the legality of such removals had been challenged. Officers stated that Local Authorities were looking to strengthen their hand in discussions with the operators and immediate removal had only been used to deal with immediate issues and to fund an immediate removal process at the City would entail a significant cost that sat outside of the current resource allocation. Officers stated that it was also not an income generation opportunity as the City could only legally recover its own costs. Officers informed the Committee that over 20 London Boroughs were in discussions about a pan-London contract which was led by London Councils and Transport for London that would enable more control, better management and more constraints on operators. Officers discussed the expanded number of bays they had provided to address the problem, from 17 bays with 204 spaces in 2023 to 87 bays with 660 spaces currently and an additional 300 spaces would be installed by March 2025 and an extra 700 by the end of next year, with funding contributed by the operators. Officers also stated a new communications route was also going to be launched to ensure members of the public and Members could report issues which would then be reported to the operators. Officers drew attention to a recent success outside Bishopsgate Plaza where the geofencing process used

was effective and resulted in a considerable number of bikes being moved and then prevented from returning. Officers informed the Committee that a curb space review was underway and Officers were lobbying the Government for new legislation, alongside working with London Councils on the pan-London contract of which a reduction in the dockless bike fleet was key to the negotiations. Officers also stated they were pressing for more data from the operators on how they were running their systems and were looking to conduct cycle campaigns to press the need for considerate parking of cycles by users. Officers explained that they would not rule out blitzes of enforcement and were also looking at the use of environmental enforcement powers rather than obstructions to hold operators to account.

Officers emphasised the need to engage with operators as they could not enforce their way out of the problem and current legislation made it very difficult to do as it did not currently allow them to simply remove bikes off the street, store them, and then recover the costs. Officers noted that Members raising questions about the issue was ensuring operators were reminded of the issue.

The Chairman asked Officers to prioritise the actions that could be taken and set them out for approval at the Streets and Walkways Sub-Committee so Officers could move on enforcement. The Chairman also indicated the suggested actions needed to be graded in order of severity. Officers confirmed this could be done.

A Member discussed the issue of geofencing, and highlighted London's bicycle hire scheme was not a problem as there was a limited number of racks and suggested the companies had the ability to determine how many bikes could be in a particular spot and block once a limit was reached. Officers explained the City had geofenced parking areas for cycles since 2019 and the challenge was the demand far outstripped the parking available which was why it was crucial to work with operators to improve the existing parking bays available. Officers noted the systems put into place by operators did not always operate as they should do and once operators began to fine users for dumping dockless bikes, the situation would likely resolve itself. Officers suggested that bikes being required to be left in designated bays and geofencing those bays was the right basis to build upon and that would likely be the basis on which the pan-London contract would be formed. Officers stated it was important to improve the effectiveness of the fining mechanism to increase compliance and get operators to improve their response to situations rather than waiting for them to be reported.

Another Member suggested that the use of an enforcement surge may be helpful to send a clear message to operators and reassure concerned members of the public.

The Member welcomed the increase in parking bays and asked what assessment had been made, by Officers and operators, of the appropriate number of parking bays that would be needed in the City to address the problem and queried how the current and pipeline number of bays compared with such an assessment. Officers confirmed work was underway to determine

that and explained all available curb space had been examined to see where parking spaces could be provided. Officers also explained they would maximise the number of parking spaces and stated that operators would have to match the size of their fleets to the availability of parking as, currently, there was a mismatch between the two. Officers noted this would be addressed in the pan-London contract and there should be enough capacity should the parking bays planned be delivered.

It was noted by a Member that geofencing had been installed on the high walks as cycling at the Barbican was prohibited, but they still came across dumped cycles occasionally and suggested there was something that did not work quite right. Officers explained that dockless bike user could choose to end their ride wherever they wanted and may well get fined for that. If it was in the no parking area, those users would continue to be charged for a period of time. Officers noted the high walks were a good example as they had worked with operators on that, but there was always potential for bikes to be left somewhere and would either take a financial hit, or would not be aware of the restriction and would not do it again once the fine has been received. Officers indicated Bluetooth technology may be able to assist in future, but there was some drift with GPS which was why tolerances were in there and they were particular issues around certain areas of the City with taller buildings.

The Chairman questioned how much a one-off purge would cost and requested a decision be put before Members on it.

A Member requested the need for a more up-to-date approach to enforcement as, while the bikes were welcomed in themselves, were causing a significant reputational and health and safety problem and that had to change. The Member questioned whether there was an ability to use monies from the on-street parking account to support an enforcement option. Officers explained they would look at the prioritisation aspect of actions for Streets and Walkways Sub-Committee and confirmed they had estimates from contractors of what would be required and would discuss appropriate funding with the Chamberlain's Department.

Another Member stated that the initial introduction of dockless bikes into the City by providers included a limit on the number of bikes. Providers also paid for the parking bays, the bikes were restricted to ensure anything parked outside would be removed in 20 minutes or the hirer would be fined, there was geofencing, and the speed could be limited in certain areas. The Member suggested this showed that it was known what needed to be done and stated that the operator needed to understand that health and safety was important to the City. The Member suggested that when fines were imposed, the City of London could receive 50% of the amount. Officers believed the fines were inconsistently applied and were trying to identify when users were being fined.

The Member also asked for a public meeting at Guildhall with the operators after Christmas so resident and business concerns about the dumping of dockless bikes could be addressed. The Chairman indicated he and the Deputy

Chairman were meeting with operators in the following days and agreed to offer the opportunity to address concerns raised in person.

The Chairman invited a second Member to pose their question to the Officers.

A Member asked what guarantee the City had that any developer would build following approval to demolish. Officers explained the approach was set out by Government through the Planning Policy Guidance (PPG) which accompanied the National Planning Policy Framework and noted there had been a parliamentary debate on the issue in 2022 that led to a House of Commons briefing earlier in the year that dealt with this in relation to housing development. Officers further explained that, as a Local Planning Authority (LPA), the government guidance was clear that requirement of developments to be completed could not be imposed. While there were tests within the applying conditions, which also applied to planning obligations, there must be necessary, relevant to planning, relevant to development permitted, enforceable, precise and reasonable in all other respects. Officers quoted the government position which, within the PPG, stated that conditions requiring a development to be carried out in its entirety will fail the test of necessity by requiring more than is needed to deal with the problem they are designed to solve, such a condition was also likely to be difficult to enforce due to the range of external factors that can influence a decision whether or not to carry out and complete a development. Officers, therefore, stated it was not considered that the LPA had the power to impose completion conditions or covenants to compel a developer to bring forward a development's completion. Officers indicated they were a range of other measures that could be applied in terms of requirements and development benefits and there were different stages. Officers provided an example of a landowner situation, where the authority was in control, where through the development agreement and covenant, that could be applied to that agreement to require schemes to be built out and bonds had been used in large scale regeneration schemes where the Council owned substantial levels of affordable housing that would be demolished and, therefore, had to be replaced through the development agreement. Officers explained that was how the issue could be overcome and, in planning terms, legal agreements and conditions would secure a related in-kind public benefit at certain stages of the development. Officers noted that all permissions were subject to time condition and was usually three years which composed of the implementation in that period. Officers stated that the Levelling Up and Regeneration Act did require developers to provide a commencement notice to indicate expected commencement dates. However, that would require secondary legislation to be brought forward which had not happened to date. The Town and Country Planning Act, according to Officers, did allow for completion notices and these would threaten to remove planning permission after a specific period of time which was a minimum of twelve months. However, Officers noted that these were complex and there were ramifications to their implementation. Officers further explained that if there was a completion notice issued after that period of time, further work would be required to refresh permission, and further development would be unauthorised and could result in enforcement action. Officers stressed that this power was very rarely used at a national level, or in London, as Secretary of State consent was required for their issue and

compensation was likely to be payable and did not guarantee an unfinished development would be finished. Officers explained, therefore, that it would, in effect, be finished as, even if all of those things were considered acceptable at the end, the result would be the rescindment of the permission effectively, so the issue would not be resolved, and it would still end with an uncompleted development. Members were also informed by Officers that the Act did allow for cleanup works if a stalled development had an impact on the amenity of the surrounding area with powers to recover costs in that event. Officers noted there were other measures that would be coming forth in the law, including the potential to decline further determination of applications with a track record of not finishing developments or moving forward with them, but that would require secondary legislation.

The Member requested Officers impose a condition or obligation in the S106 agreement to state 'no demolition can take place unless the owner/developer provides proof of being able to carry out the permission in its entirety' and the Member understood this was done in many other countries and did not hinder development. The Member stated it was an opportunity to show leadership by acting in the interest of the City business and residential communities. Officers responded that they believed such a conditional obligation would be considered to fail the test set out by the Government Planning Guidance and would be something that would have to be addressed at a national level. The Member indicated unfinished developments at Fleet Street and Moorfields was unacceptable and was looking to establish what room there was for ensuring developments were not left unfinished.

Another Member considered whether it was worth reaching out to central government on whether such a condition or obligation in the S106 agreement, requiring proof that completion of development could be achieved, could be adopted. Officers explained this had been the subject of debate for some time and there were hurdles on how it would be enforced as it would be difficult to enforce a bankrupt developer to complete the work, but Officers indicated they would take the suggestion away and have a conversation with the Government when legislation was due. The Chairman queried whether it was the City Corporation's policy to promote this to Government. Officers indicated that could be included in further consultation with the Government if the Planning & Transportation Committee approved such a response.

The Deputy Chairman cautioned on the law of unintended consequences and suggested it may make developers cautious and may mean they will not commence with work until they were able to identify an anchor tenant. The Deputy Chairman suggested this could slow things down within the present system. Another Member suggested developers would not back away as the potential gains were so great and it would ensure they were absolutely serious about going forward.

At this point, the Chairman sought approval from the Committee to continue the meeting beyond two hours from the appointed time for the start of the meeting, in accordance with Standing Order 40, and this was agreed.

A Member questioned what was being done to promote more open green space suitable for trees in the City at the ground level, rather than roof gardens, as they indicated it had become increasingly difficult to find trees that could flourish in the City's public spaces as there was not enough priority imposed on developers to bring forward such greening. Officers explained that biodiversity net gain was important and the Government had introduced a 10% uplift which did not necessarily work in the City context, so a new policy was in place which had introduced for a requirement for three biodiversity units per hectare and had been working with consultants and colleagues to implement that policy on application schemes, but it would take full effect once the City Plan came through for full adoption. Officers further noted that trees had enormous biodiversity benefits and scored highly as biodiversity units, so that was something they sought to promote on the ground floor plain, as well as on upper stories and vertical greening. Another Officer indicated that they did not believe that the arboriculture officer was suggesting the preclusion of trees in a previous application, but indicated it was more a question of selecting the right species and suggested trees had been a significant challenge for decades due to the dense urban network of the City and the subterranean constraints. Officers further explained that creating ground floor space for greenery was the key focus of both the adopted and draft replacement policies and felt the Committee should be proud that 10,000 sqm of additional ground floor public realm in the last five years had been negotiated for and there had been an increase of thirty pedestrian routes and 120 new street trees. The Member noted it was a challenging environment and hoped there would be an announcement around the new forest at 120 Fleet Street and looked forward to other suggestions where the City could be innovative in spaces not currently being used for developments.

The Deputy Chairman noted that planning permission had been given recently for 65 Fleet Street and had noticed the signalised pedestrian crossing had been removed to create a pit lane in the front of the building which was an issue as that was a major desire line for pedestrians to cross Fleet Street and were now having to cross a street whilst avoiding HGVs. The Deputy Chairman suggested reaching out to TfL to potentially put in another signalised crossing further west toward Fetter Lane and, in the meantime, look at a pedestrian refuge as it was dangerous and needed to be addressed urgently. Officers confirmed they would look into it and follow-up with an update.

15. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

The Chairman informed the Committee that Michael Cassidy had recently retired from the Court of Common Council and wished for the Committee's appreciation to be noted. The Chairman told the Committee that Michael had been at the centre of a key moment in the evolution of the Square Mile over the last four decades, serving as a former Chairman of the Planning and Transportation Committee. In the run-up to the Big Bang, the Chairman noted Michael had recognised the need for the City to deliver large, well-serviced office spaces required by incoming US and Japanese banks, which resulted in Broadgate.

He had played a pivotal role in the evolution of the square mile over the last four decades and served as the chairman of this Committee during the run-up to the Big Bang. Michael identified that the city needed to provide large footplates and well-serviced offices required by incoming US and Japanese banks, which led to developments such as Broadgate. In response to London's growing competitiveness, Michael pushed for a reassessment of the need for tall buildings, resulting in landmarks like the Gherkin and the subsequent development of the Eastern cluster, which had become an iconic symbol of the city's ambition. The Chairman noted that Michael emphasised the importance of balancing modern development with preserving the city's historical character, establishing the City Architecture Forum to discuss the quality of new buildings. Michael was also instrumental in introducing the Ring of Steel interventions to protect the city after a series of terrorist attacks and advocated for infrastructure improvements and played a key role in delivering Crossrail in the Square Mile. Michael realised the need for the focused celebration and promotion of the City and he worked with Barry McEwan to set up the City Marketing Suite in the Guildhall, as well as engaging with overseas events like MIPIM. Michael had been instrumental in the City Marketing Suite reinventing itself as the City centre and, more recently, alongside New London Architecture, the fantastic new London Centre. The Chairman noted these achievements were evidence of Michael's deep understanding of the dynamic and perpetual change and evolution which defined the City and one could not find a more visionary, committed and passionate advocate of the City of London and Michael's legacy would endure long after he had stepped down from the Planning and Transportation Committee.

Officers provided an update on the City Plan and informed the Committee that they had been in communication with the programme officer at the Planning Inspectorate and had received an update regarding the timing of the examination hearings. Officers told the Committee that these were highly likely to take place in early Spring and the City Corporate website would be updated so that all stakeholders were aware of it. A formal notification would also be sent out closer to the time in accordance with the legislation. Officers reported it had been a slightly delayed compared with the planned time scale, but it potentially meant that the report could return to Committee by the end of the next calendar year for the adoption of the City Plan.

16. EXCLUSION OF THE PUBLIC

The Committee agreed not to exclude the public as no discussion was needed on the non-public items on the agenda.

17. NON-PUBLIC MINUTES

RESOLVED – That, the non-public minutes of the previous meeting held on 04 October 2024 be approved as an accurate record.

18. * **ANNUAL ON-STREET PARKING ACCOUNTS 2023/24 AND RELATED FUNDING OF HIGHWAY IMPROVEMENTS AND SCHEMES - APPENDIX**

The Committee received a non-public appendix of a report of the Chamberlain.

19. * **CITIGEN AND HEAT NETWORK ZONING - INITIAL DECISIONS**

The Committee received a report of the City Surveyors.

20. * **DEBT ARREARS - ENVIRONMENT DEPARTMENT**

The Committee received a report of the Executive Director, Environment.

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

No non-public questions were received on matters relating to the work of the Committee.

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

The Committee received no other business which the Chairman considered urgent.

The meeting ended at 12.38 pm

Chairman

**Contact Officer: Callum Southern
Callum.Southern@cityoflondon.gov.uk**

City of London Corporation Committee Report

Committee(s): Planning & Transportation Committee	Dated: 21 January 2025
Subject: Annual Review of Terms of Reference for the Planning & Transportation Committee	Public report: For Decision
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of:	Town Clerk
Report author:	Zoe Lewis, Member Services and Governance Manager

Summary

This report concerns the annual review the Terms of Reference of the Planning & Transportation Committee, to provide time for considering and discussion of any changes before they are submitted to the Policy & Resources Committee, in time for the annual reappointment of Committees by the Court of Common Council. The current Terms of Reference for the Planning & Transportation Committee are therefore attached at Appendix 1.

Recommendation

That the terms of reference of the Committee (**set out at Appendix 1**) be approved, subject to any comments, for submission to the Court in April 2025.

Main Report

1. The current Terms of Reference, as approved by the Court of Common Council in April 2024, are listed at Appendix 1.
2. There have been no suggestions for changes in the interim to be considered by the Committee since its last Annual Review.
3. Following consideration of any changes to the Committee's Terms of Reference, the Terms of Reference shall be approved for onward submission

to the Policy & Resources Committee, and subsequently the Court of Common Council.

Appendices

- Appendix 1 – Court Order 2024/2025 – Planning & Transportation Committee

Zoe Lewis

Governance and Member Services Manager

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PLANNING AND TRANSPORTATION COMMITTEE

TERMS OF REFERENCE

Constitution

A Ward Committee consisting of:

- four Aldermen nominated by the Court of Aldermen.
- up to 31 Commoners representing each Ward (two representatives for the Wards with six or more Members regardless of whether the Ward has sides) or Side of Ward.

Quorum

The quorum consists of any nine Members.

4. Terms of Reference

To be responsible for:-

- (a) All functions of the City as local planning authority [relating to town and country planning and development control] pursuant to the Town and Country Planning Act 1990, the Planning (Listed Building and Conservation Areas) Act 1990 and Compulsory Purchases Act 2004, the Planning Act 2008 and all secondary legislation pursuant to the same and all enabling legislation (including legislation amending or replacing the same).
- (b) Making recommendations to Common Council relating to the acquisition, appropriation and disposal of land held for planning purposes and to exercise all other functions of the local planning authority relating to land held for planning (or highways) purposes, and making determinations as to whether land held for planning or highways purposes is no longer required for those purposes, other than in respect of powers expressly delegated to another committee.
- (c) All functions of the Common Council as local highway, traffic, walkway and parking authority (other than in respect of powers expressly delegated to another committee) and the improvement of other open land under S.4 of the City of London (Various Powers) Act 1952.

- (d) All functions under part II of the City of London (Various Powers) Act 1967 including declaration, alteration and discontinuance of City Walkway (other than in respect of the promotion of works to the Barbican Podium, which shall not include any declaration, alteration or discontinuance of City Walkway ["City Walkway regulatory functions"]) in connection with such works, all City Walkway regulatory functions to remain the responsibility of Planning and Transportation Committee).
- (e) All functions relating to the construction, maintenance and repair of sewers in the City, including public sewers (on behalf of Thames Water under an agency arrangement).
- (f) All functions of Common Council as Lead Local Flood Authority in relation to the Flood and Water Management Act 2010.
- (g) All functions relating to the Stopping Up of highway (including as local planning authority and highway authority).
- (h) All functions relating to street naming and numbering under the London Building Acts (Amendment) Act 1939.
- (j) All functions relating to building control under the Building Act 1984, Building Regulations 2000-10 and London Building Acts 1930-82.
- (k) All functions and powers of the City Corporation of providing assistance to the Building Safety Regulator under Section 13 of the Building Safety Act 2022, where the Building Safety Regulator is acting as the Building Control Authority under section 91ZA and 91ZB of the Building Act 1984.
- (k) The setting of building control charges under the Building (Local Authority Charges) Regulations 2010.
- (l) Updating and approving the Planning Protocol.
- (m) Response to and resolution of dangerous structures under the London Building Acts (Amendment) Act 1939.
- (n) All functions relating to the City of London Corporation's commemorative blue plaques.
- (o) All functions relating to the Local Land Charges Act 1975.
- (p) The appointment of such Sub-Committees as is considered necessary for the better performance of its duties including a Planning Applications Sub-Committee, Streets & Walkways Sub-Committee and a Local Plans Sub-Committee.

City of London Corporation Committee Report: First Consideration – Enhanced Biodiversity Duty

<p>Committee(s):</p> <p>Planning and Transportation Committee – for decision</p> <p>Natural Environment Board – for information</p> <p>Port Health and Environmental Services – for information</p>	<p>Dated:</p> <p>21/01/2025</p> <p>06/02/2025</p> <p>20/05/2025</p>
<p>Subject:</p> <p>First Consideration: Enhanced Biodiversity Duties of Public Authorities</p>	<p>Public Report:</p> <p>For Decision</p>
<p>This proposal:</p> <ul style="list-style-type: none"> • Delivers Corporate Plan 2024-29 outcomes • Provides statutory duties 	<p>Corporate Plan outcomes:</p> <ul style="list-style-type: none"> • Leading sustainable environment • Flourishing public spaces • Vibrant and thriving destination <p>Statutory duties:</p> <ul style="list-style-type: none"> • Enhanced Biodiversity Duty • Biodiversity Net Gain
<p>Does this proposal require extra revenue and/or capital spending?</p>	<p>N/A</p>
<p>Report of:</p> <p>Executive Director of Environment, Katie Stewart</p>	
<p>Report authors:</p> <p>Gudrun Andrews, Head of Planning Policy</p> <p>Ben Bishop, Environmental Resilience Officer</p> <p>John Harte, Planning Policy Officer</p> <p>Joanna Leyden, Waste Strategy and Biodiversity Group Manager</p>	
<h1>PUBLIC</h1>	

Summary

Under the Natural Environment and Rural Communities Act 2006 (“the 2006 Act”) (as amended by the Environment Act 2021 (“the 2021 Act”)), Public Authorities who operate in England are required from time to time to consider what action the authority can take in the exercise of its functions to conserve and enhance biodiversity in England (“the Biodiversity Duty”). The 2021 Act introduced a strengthened Biodiversity Duty, requiring Public Authorities to have regard to the conservation of biodiversity and the first step in this process is to carry out a ‘First Consideration’ of the actions it can take to further the above biodiversity objective through the exercise of their relevant functions. Then, following completion of that consideration to determine policies and specific objectives and take action in light of those considered appropriate to further the conservation and enhancement of biodiversity.

In summary, Public Authorities must:

1. Consider what can be done to conserve and enhance biodiversity.
2. Determine such policies and specific objectives as it considers appropriate for taking action to further the general biodiversity objective, based on the consideration.
3. Act to deliver those policies and objectives.

This First Consideration report is intended to discharge the duty on the City Corporation by setting out what it can do to conserve and enhance biodiversity, outlining actions and objectives relevant to the authority that are to be considered and taken forward for future implementation and reporting.

This report contains the outcome of a review of the current and future actions and objectives of the City Corporation that are being delivered and considered as part of the Biodiversity Duty. It provides the background and context to these requirements.

As part of the ‘First Consideration’ this report reviews actions and objectives for the following services and activities:

- Corporate outcomes
- Planning policy
- Biodiversity Net Gain (BNG)
- Biodiversity Action Plan (BAP)
- Other relevant current and future activities

This report also outlines the wider consultation processes relevant to the City Corporation in respect of the 2021 Act, primarily the Local Nature Recovery Strategies (“LNRS”) for England.

Finally, the report notes and reviews the on-going management activities of the open spaces that are relevant to the City Corporation’s function as a public authority. These activities have already been progressed and agreed through the adoption of the BAP and other relevant plans.

Recommendations

Members are asked to:

- Note the statutory requirements and provisions placed on Public Authorities in relation to the Biodiversity Duty, as per the 2006 Act as amended by the 2021 Act.
- Note the reporting requirements of the Biodiversity Duty as set out in paragraphs 11 and 12 of this report.
- Approve this report as a record as part of the City Corporation's statutory First Consideration of the Biodiversity Duty.
- Approve the actions identified in paragraph 19 of this report that are considered appropriate to further the conservation and enhancement of biodiversity.
- Note the Environment Department's Biodiversity and Nature Recovery officer group as the cross departmental working group supporting the actions and objectives of the Biodiversity Duty.

Main Report

Background

1. The 2021 Act strengthened the existing Biodiversity Duty placed on Public Authorities under the 2006 Act. The Biodiversity Duty will contribute to Government targets for the significant improvement of the natural environment laid out in the Environmental Improvement Plan (2023).
2. By 2030 the Government has committed to:
 - Halt the decline in species abundance
 - Protect 30% of UK land.
3. By 2042 the Government has committed to:
 - Increase species abundance by at least 10% from 2030, surpassing 2022 levels
 - Restore or create at least 500,000 ha of a range of wildlife rich habitats
 - Reduce the risk of species extinction
 - Restore 75% of our one million hectares of terrestrial and freshwater protected sites to favourable condition, securing their wildlife value for the long term.
4. Under the Biodiversity Duty, Public Authorities, including the City Corporation in the exercise of its functions as a local authority and local planning authority, have a statutory obligation to 'consider' what they can do to further both the conservation and enhancement of biodiversity. This report is an initial formal step in that consideration.
5. The City Corporation is well positioned to meet these requirements. Biodiversity protection already informs many aspects of the City Corporation's work and is of

strategic importance to the achievement of corporate, planning and wider strategic and operational objectives. Biodiversity, nature conservation and restoration are key priorities of the City Corporation as the governing body for the Square Mile.

6. It is widely recognised that the delivery of biodiversity initiatives creates benefits, not only for nature, but also for residents and businesses by contributing to the City's green infrastructure network and 'ecosystem service' provision, such as cooling, shading, surface water attenuation and wellbeing.
7. Meeting the Biodiversity Duty is a responsibility that is relevant to departments, actions, and decision making that concerns the City Corporation in the exercise of its local authority and local planning authority functions. This report sets out how cross-departmental working arrangements will be utilised to meet the Biodiversity Duty, as well as to ensure effective, synergistic collaboration with non-local authority functions within the City Corporation's broader remit that already make valuable contributions to the conservation and enhancement of biodiversity (such as the City Corporation's separate role as trustee of eight open space charities).

Requirements of the Biodiversity Duty

8. The Department for Environment, Food, and Rural Affairs (Defra) have published guidance on complying with the strengthened Biodiversity Duty. The guidance states that all Public Authorities, which includes local authorities and local planning authorities, operating in England must:
 - Consider what to do to conserve and enhance biodiversity
 - Agree policies and specific objectives based on this consideration
 - Act to deliver these policies and achieve these objectives
 - Report on its Biodiversity Duty actions and outcomes.
9. The first step in this process is completion of the 'First Consideration' of what action the City Corporation can take to further the conservation and enhancement of biodiversity. The duty requires Public Authorities to consider what actions can be taken for the protection and enhancement of biodiversity within their boundaries and requires a 'first consideration' to be made by 1 January 2024. The DEFRA guidance does not mandate a specific format for the First Consideration. While this requirement has not to date been formally demonstrated through a published report, the actions and efforts already undertaken by the City Corporation are believed to satisfy the biodiversity duty requirements. This report documents the results of the review conducted by officers and is being presented now to illustrate how the City Corporation meets and shall meet its ongoing and future biodiversity duty obligations and commitments.
10. This report references ongoing work and actions that can be taken to conserve and enhance biodiversity based on this First Consideration. It sets out how a review of existing policies and objectives have identified how existing work programmes meet the Biodiversity Duty, and which additional actions are

required to be undertaken to achieve these duties but also sets out a framework for reporting actions in future Biodiversity Reports.

11. Public Authorities are also required to produce and publish a 'Biodiversity Report' which must include by law;

- A summary of the action taken, to comply with the Biodiversity Duty;
 - How it plans to comply with the Biodiversity Duty in the next reporting period; and
 - any other information considered appropriate.
- Reports from local planning authorities must also include:
- actions carried out to meet BNG obligations;
 - details of BNGs resulting, or expected to result, from biodiversity gain plans approved;
 - how BNG obligations will be met in the next reporting period; and
 - other information considered appropriate, for example, quantitative data.

12. A Public Authority's first reporting period should be no later than 1 January 2026, that being 24 months from 1 January 2024 based on the First Consideration and including outcome of mandatory BNG. The report must be published within 12 weeks of the reporting period end date. For subsequent Biodiversity Reports they must be produced within 5 years of the end date of the previous reporting period. Each report must be published within 12 weeks of the reporting end date.

13. Agreed policies and objectives must take account of the relevant LNRS. For the City Corporation this is the London LNRS, which is being produced by the Greater London Authority (GLA) for 2025, which is described in the First Consideration.

14. The Biodiversity Report may additionally include optional information that the City Corporation considers it appropriate to include, such as:

- Information about the authority
- Top achievements
- How policies and actions have helped
- Steps taken to raise awareness and community education
- Monitoring and evaluation actions
- Biodiversity highlights and challenges

15. After reviewing the current policies and strategies, it has been determined that the City Corporation's existing policies and objectives are adequate to meet the enhanced Biodiversity Duties. However, a Biodiversity Report must be produced to formally address and report on these requirements.

First Consideration

16. This section outlines the relevant outcomes, policies and objectives that have been reviewed as part of the First Consideration. The First Consideration has no specific structure mandated by Government guidance. It provides an opportunity to highlight the City Corporation's commitment to biodiversity enhancement and summarise the existing policies and objectives that achieve the Biodiversity Duty.
17. The First Consideration takes into account the Corporate Plan outcomes, existing and emerging planning policies, the BNG obligation, Local Nature Recovery Strategy consultation, existing operational plans including the Biodiversity Action Plan (BAP), other relevant strategies, internal working groups and monitoring requirements.
18. It is the conclusion of the First Consideration that the City Corporation has or will have in place the appropriate actions, objectives and policies that achieve the Biodiversity Duty, which will be reviewed when required to ensure that these are still applicable and relevant to the City Corporation's public functions.

Actions

19. This report sets the following actions to be agreed by members:
 - Undertake a regular review of relevant actions, policies and guidance to ensure they achieve the Biodiversity Duty.
 - Implement relevant plans and strategies that align with emerging strategies and frameworks including the London Local Nature Recovery Strategy.
 - Deliver the Biodiversity Report for January 2026 with 12 weeks of the reporting end date.

Primary objective

20. The City Corporation has several key policies and commitments which achieve the objective to 'conserve and enhance' biodiversity for nature and people.
21. The primary objective of the First Consideration is for a Public Authority to consider how it can further the conservation and enhancement of biodiversity in the exercise of their functions. Consideration should be had to ensure that all relevant services and functions achieve the enhanced Biodiversity Duty, aligning with wider corporate objectives. This report outlines these objectives and aligns them in response to the Biodiversity Duty, to set a direction for statutory responsibilities and the wider biodiversity objectives of the City Corporation.
22. The most significant strategies and plans are the Corporate Plan 2024-29, the adopted Local Plan 2015, emerging City Plan 2040, and the BAP 2021-26.

Corporate Objectives

23. The Corporate Plan 2024–29 sets out six key outcomes, three are directly applicable to the Biodiversity Duty of Public Authorities and wider objectives for biodiversity and nature conservation.
24. **Leading Sustainable Environment;** the plan sets out the objective to act as a leader on environmental sustainability and enhance it in all aspects of the City Corporation. Relevant actions include the requirement for increases in biodiversity from development.
25. **Flourishing Public Spaces;** the plan commits to major capital investment into the civic infrastructure of the City Corporation to secure flourishing public spaces. Relevant actions include ensuring that opens spaces are thriving, accessible and enrich people's lives.
26. **Vibrant and Thriving Destination;** the outcome focuses on attracting business and people to a dynamic location, offering a world-leading culture and leisure offering thriving destination where everyone prospers. Relevant actions include adopting the City Plan 2040 for sustainable growth and development direction and provide more space for walking and provide more space for walking and making the City's streets more accessible.

Biodiversity Net Gain (BNG)

27. BNG is a component of the 2021 Act and meeting the Biodiversity Duty. Under BNG regulations all qualifying developments (with some exemptions) must deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat.
28. From 12 February 2024 BNG became a statutory requirement, however many developments sites within the Square Mile currently have baselines of zero and therefore would be exempt from national requirements in line with the de minimis exemption. This exemption only applies to development if the following two conditions are met:
 - a. the development must not impact on any onsite priority habitat; and
 - b. if there is an impact on other onsite habitat, that impact must be on less than 25 square metres (e.g. less than a 5m by 5m square) of onsite habitat with a biodiversity value greater than zero and on less than 5 metres of onsite linear habitat (such as a hedgerow).
29. This would include all existing developments lower than 25sq.m of habitat or 5m of on-site linear habitats (such as hedgerows).
30. The Development Management Team in the Environment Department are responsible for ensuring that BNG is secured through the development process (in its role as the local planning authority) in accordance with the statutory requirements. This will be through the use of planning conditions or through the

S106 (planning obligations (Town and Country Planning Act 1990)) process. Through its monitoring processes the Planning Policy Team will check that developers meet reporting requirements upon them with a view that the habitats secured through the planning process are maintained throughout the minimum 30-year lifetime of the requirement.

31. The BNG section of the first Biodiversity Report will include:

- A summary of the actions carried out to meet BNG obligations
- Details of biodiversity gains resulting, or expected to result, from BNG
- A summary of plans to meet BNG obligations in the next reporting period
- Any other information required to be included or deemed useful for inclusion.

Planning Policy

32. The adopted Local Plan includes high-level objectives to promote biodiversity while protecting and providing for new open space. In the current adopted Local Plan (2015) the encouragement and promotion of green infrastructure is set out in various policies including Policy DM10.2 (Design of green roofs and walls) and Policy DM19.2 (Biodiversity and urban greening).

33. One of the overarching Environmental Objectives of the emerging Local Plan (City Plan 2040) is to deliver urban greening and greater biodiversity across the Square Mile. The proposed policy approach sets out city-specific requirements which go beyond the statutory requirements and will be subject to an independent examination in 2025. Several policies guide future decisions on planning applications in regard to urban greening and biodiversity.

34. To inform the development of the City Plan 2040 BNG policies, external consultants were commissioned to prepare evidence-based reports and provide advice on the most appropriate mechanisms to use when reviewing BNG proposals. A BNG Study was published in November 2023 and a further report on implementation is underway.

35. A high proportion of sites in the City have little to no biodiversity, as such the mandatory minimum 10% BNG (as described above) is not considered an appropriate mechanism for delivering meaningful biodiversity improvements in the Square Mile. Therefore, the approach of emerging City Plan Policy OS4 seeks to deliver enhanced BNG from major developments (using a rate of 3 biodiversity units per hectare, as opposed to 10%) and includes major proposals which would not have been captured under the statutory BNG processes. It is envisaged the Local Plan will be adopted by 2026.

36. The emerging Planning for Sustainability Supplementary Planning Document will include additional planning guidance on the approach to urban greening and biodiversity within developments. This includes detail on the application of the statutory requirements and the relevant policies in the adopted Local Plan 2015 emerging City Plan 2040 plan.

London Local Nature Recovery Strategy

37. The London Local Nature Recovery Strategy (London LNRS) is being delivered by the Greater London Authority (GLA) as one of the 48 'Responsible Authorities' across England.
38. The objective of the strategies is to agree priorities for nature recovery and propose actions to achieve them. This will include a local habitat map and a written statement of biodiversity priorities.
39. Responsible Authorities are required to carry out consultation with local planning authorities, in London this includes the 32 boroughs and the City Corporation in its capacity as local planning authority.
40. Responsible Authorities should also engage relevant stakeholders such as landowners and managers, government organisations, environmental charities, businesses and other community groups. To date the City Corporation has been represented in this consultation in its capacity as a local planning authority through the London Borough's Biodiversity Forum, and through stakeholder workshops.

Biodiversity Action Plan

41. The current BAP for 2021 – 2026 aims to provide a strategic focus to ensure species and habitats are understood and considered throughout the decision-making processes in the Square Mile. The BAP provides a framework to ensure all legislative requirements and regional and national targets for protecting, conserving and enhancing biodiversity are met at a local level.
42. The actions are grouped into four key areas:
- Open Spaces and Habitat Management
 - The Built Environment
 - Education and Community Engagement
 - Data Collection, Surveys and Monitoring
43. The BAP has a dedicated partnership group made up both internal and external stakeholders who are involved in various aspects of biodiversity and whose responsibility it is to progress the actions of the BAP. This group is also responsible for the review of Sites of Importance for Nature Conservation (SINC) within the Square Mile and the generation of SINC management plans is a key action of the BAP.
44. At the half-way point between commencement of the BAP and the planned end date, good progress has been made across the various actions with the overall completion level of the action plan sitting at 47%. There are two items which have been successfully completed, and progress has been made on all actions bar one. There are a number of challenges that are ongoing which are causing delays for some of the actions including elements which are outside the control of the BAP action owners such as policy documents being adopted, and London wide legislation being created.

SINC Management Plans

45. SINC are non-statutory designated sites which are afforded protection within local planning. The objective of designating SINC is to protect and enhance the best sites for nature within a local context to ensure that sites are appropriately selected and managed within the context of local and regional planning.
46. SINC of borough or local significance are adopted through the local planning process and submitted to relevant bodies for advice on selecting and confirming SINC (save in the case of sites which are of Metropolitan Importance which are designated by the Mayor of London). In London guidance and advice on selecting and confirming a SINC is provided by the London Wildlife Sites Board.
47. The Square Mile has 10 adopted SINC. Within the BAP 2021 – 26, an action includes implementing management plans to prioritise conservation as a key management objective for SINC.
48. Currently three sites have adopted management plans. The aim is to ensure all adopted and proposed SINC have active management plans which are reviewed on a regular basis. The current action applies only to sites managed by the City Corporation. However, it aims encourage existing third party management plans to demonstrate that sites are in positive conservation management.

Open spaces outside of the Square Mile

49. **Bunhill Fields and Burial Ground** is approximately 1.6 ha and is a SINC of Borough Importance in the London Borough of Islington. It is designated Grade I on the Historic England National Register of Historic Parks and Gardens.
50. The site is managed and maintained by the City Gardens team. The site is of both heritage and nature conservation importance and has adopted a 'Conservation Management Plan' which aims to conserve and enhance both the historic and ecological value of the site.
51. **City of London Cemetery and Crematorium** is approximately 81 ha and is a SINC of Borough Importance in the London Borough of Newham. It is designated Grade I on the Historic England National Register of Historic Parks and Gardens.
52. The site is managed by the Port Health and Public Protection division's Cemetery and Crematorium Team.
53. Policies and objectives for the management of these sites are attributed to the City Corporation's local authority responsibilities and are therefore subject to the Biodiversity Duty. In the Biodiversity Report specific actions taken will be reported on.

Local Nature Recovery Plan 2026 – 2031 (proposed)

54. Local Nature Recovery Plans (LNRP) are emerging plans that incorporate actions for biodiversity to restore nature. The objective of the plan is to set out 'nature recovery areas' identifying opportunities and aligning with local strategic objectives.
55. With the conclusion of the BAP 2021 – 2026, the City Corporation may seek to adopt a new plan for biodiversity within the Square Mile. Following the adoption of the London LNRS, options to develop and adopt a LNRP for the Square Mile should be reviewed.
56. The LNRP will replace the action-based approach of the BAP and focus on a strategic spatial framework supported by key actions for the Square Mile. The development of a LNRP will take into consideration the existing hierarchy of policies and strategies and requirements from regional policy such as The London Plan 2021 which requires boroughs to prepare green infrastructure strategies.
57. Work to progress this option is yet to be agreed and this is at this time a suggested activity beyond the conclusion of the City Corporation's first Biodiversity Report.

Climate Action Strategy

58. The City Corporation invested in its Climate Action Strategy in 2020, setting out four targets including 'building climate resilience'. As a result, the City Corporation invested £6.8 million in the 'Cool Streets and Greening Programme', which aims to incorporate resilience measures and greening into the Square Mile's streets and public spaces.
59. Phase 3 of the programme 'City Greening and Biodiversity' includes projects to enhance biodiversity within the Square Mile through identifying projects to establish green corridors, create new open spaces and accelerate tree planting.

Other strategies and plans

60. Other operational strategies and plans may have impacts or implications for biodiversity, such public realm, transport and lighting. These should consider and review all opportunities to enhance biodiversity within their scope and take necessary steps to implement possible actions.

Biodiversity and Nature Recovery Group

61. To coordinate duties and wider biodiversity objectives a cross-departmental officer working group has been established and formally recognised by the Town Clerk's SLT. The group is chaired by senior officers from relevant divisions and takes place quarterly.
62. The primary function of the group is to progress actions, review objectives and steer relevant work prior to formal governance and approval. The group enables

and streamlines external communication and engagement, such as the on-going consultations with Responsible Authorities delivering LNRS.

63. The group is comprised primarily of officers from the Environment Department including representation from Planning & Development, City Operations, Natural Environment and Port Health and Public Protection. Other services are also engaged and relevant officers are invited to support wider Corporate objectives for biodiversity.
64. The group provides wider benefits of collaboration across different teams to support developmental opportunities and knowledge dissemination.

City of London Corporation Natural Environment Open Spaces

65. The City Corporation holds and manages 4400 ha of open space in its capacity as charity trustee of eight charities. These responsibilities are separate to the City Corporation's public authority functions and so are not included within the First Consideration.
66. As a landowner and manager the City Corporation has been consulted on relevant LNRS including London, Essex, Buckinghamshire and Milton Keynes and Surrey. These are all delivered separately by the relevant Responsible Authorities.
67. Through the Biodiversity and Nature Recovery Group, officers have coordinated communications through the City's Consultation on relevant biodiversity strategies for London and the Southeast including the LNRSs.

Monitoring

68. As set out above, the reporting of quantitative data is an optional component of the Biodiversity Report, but should be included where considered appropriate. To address the Biodiversity Duty, and accurately review progress on agreed policies and actions, biodiversity metrics associated with BNG and other objectives will be tracked and monitored in accordance with national guidance. The City Corporation will robustly monitor planning applications which fall under the statutory BNG requirements. When applicable, it will also monitor the outcomes and requirements of the emerging City Plan policy. To do so most effectively it is also exploring appropriate software on how best to do this moving forward.
69. The BAP is creating a structured approach to monitoring biodiversity within the Square Mile. This approach will be supported by the work of the BAP Partnership Group, volunteer groups, university led research and innovative technologies in order to capture a range of information. This will enable a better gauge of the biodiversity within the City and highlight areas that need greater attention.

70. The adoption of management plans for SINC's and improvements will be monitored and those which include monitoring as part of the management objectives will be incorporated into the emerging monitoring framework.
71. Actions and objectives implemented as a result of the Biodiversity Duty and first consideration will be tracked to monitor the progress of the City Corporation's Biodiversity Duty. This will be included in the Biodiversity Report and help inform future action for biodiversity within the Square Mile.

Corporate & Strategic Implications

Strategic implications

72. There are no expected strategic implications. Meeting the Biodiversity Duty as an organisation should support the Corporate Plan outcomes, specifically: Leading Sustainable Environment; Flourishing Public Spaces and Vibrant Thriving Destination.

Resource implications

73. At present there are no additional resource implications, the following paragraph's outline the current and expected resourcing as a result of the relevant activities.
74. In its capacity as a local planning authority, the City Corporation engages constructively, actively and on an ongoing basis on strategic matters in plan-making, including sustainable development, land use and strategic infrastructure. Officers from the Environment Department regularly attend for example seminars and workshops on biodiversity matters including those delivered by the Planning Advisory Service (PAS) and the London Borough's Biodiversity Forum (LBBF).
75. The LBBF brings together local authority ecologists and planners from across London Boroughs, and includes representation from the Greater London Authority (GLA) and GiGL – the capital's environmental records centre.
76. Current officer resource within the City's local authority services includes:
- Head of Planning Policy responsible for the team delivering relevant policies;
 - A Planning Policy Officer responsible for City Plan policies on urban greening and biodiversity;
 - Waste Strategy and Biodiversity Group Manager responsible for the Square Mile BAP its actions and progression
 - An Environmental Resilience Officer with a background in ecology and greening whose role is to promote biodiversity measures in relation to environmental resilience.
77. The City Corporation's senior leadership has endorsed the adoption of an officer working group focusing on Biodiversity and Nature Recovery at a meeting of Town Clerk's SLT on 15 October 2024. The group is a cross-departmental

working group which aims to support wider biodiversity objectives and actions, including the enhanced Biodiversity Duty.

78. The City Corporation should continue to review the resource implications relevant to the Biodiversity Duty and wider biodiversity objectives. BNG and wider strategic objectives for biodiversity may in future require additional resource, to ensure that the duties outlined in the 2006 Act are met. Other activities may include coordinating and ensuring a wider organisational approach is taken to address biodiversity impacts under other functions of the City Corporation.

Policy Implications

79. Policy implications are addressed and listed in the **Planning Policy** section of this report. Policies have taken into account the revisions to relevant legislation as a result of the Act 2021 Act.

Financial implications

80. There are currently no expected financial implications. As the local planning authority for the square mile the City Corporation currently receives an annual figure of c.£26,000 from Defra to cover expenditure incurred in delivering BNG.

Legal implications

81. The 2021 Act introduces mandatory BNG and provides for a strengthened Biodiversity Duty for Public Authorities. The legal implications of the Biodiversity Duty and the mandatory minimum 10% BNG (where applicable) are set out in this report. The requirement for the BNG uplift will be secured by a condition which is automatically applied to a planning permission by virtue of the Town and Country Planning Act 1990. This condition and any supplementary conditions and planning obligations, secured in connection with the uplift, can be enforced by the local planning authority through the planning regime.

82. Once adopted the City Plan 2040 will form the starting point for decisions taken on planning applications within the City of London, as decisions must be taken in accordance with the development plan unless material considerations indicate otherwise. The Sustainability SPD in particular (and other policy documents referred to herein) will be material considerations in the decision making process.

Risk implications

83. Not applicable.

Equalities implications

84. Due regard has been given to potential equality implications which includes taking into consideration any impact on groups with protected characteristics. After consideration it has been concluded there will be no detrimental impact to any group or protected characteristic as outlined in the Equalities Act 2010 or the Public Sector Equality Duty

(PSED) and all duties (including that of section 149 Equalities Act 2010-PSED) in this regard have been appropriately executed with no further action required at this time.

Climate implications

85. Climate change and ecological collapse are interlinked. The strengthened Biodiversity Duty, BNG and the wider efforts to restore nature across London and the Southeast will deliver multiple co-benefits of climate adaptation and resilience and support nature recovery.

Security implications

86. Not applicable.

Conclusion

87. This report outlines the duty on and the current position of the City Corporation in relation to the expectations of Public Authorities under the 2006 Act and the 2021 Act and related activities.

88. The requirement for the 'First Consideration' requires the City Corporation to consider what action it can properly take, consistent with the proper exercise of its functions, to further the general Biodiversity Objective. In line with this duty this report sets out the relevant policies and objectives that City Corporation has in place (and those which are being progressed/updated) and considers appropriate for taking action to further the general biodiversity objective, and the actions the City Corporation are taking in light of those policies and objectives, to further that objective. The City Corporation are required to report on these activities by January 2026. Activities included in this report are already being progressed and are resourced, including the development of the City Plan 2040 policies, the progression of the Biodiversity Action Plan and other relevant projects.

Appendices

- Appendix 1 – 'None'

Background Papers

Planning and Transportation Committee For information, Report entitled 'Biodiversity and Ecology' dated 18 July 2023.

Biodiversity Net Gain Study published in November 2023 (Greengage Environmental – commissioned by the City of London).

Biodiversity Action Plan 2021-2026 Progress Review Sept 2024 (NEB for information Oct 2024)

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Agenda Item 6

Committee(s): Planning and Transportation Committee	Dated: 21/01/2025
Subject: Environment Department high-level Business Plan 2025-30	Public report: For Decision
This proposal: <ul style="list-style-type: none"> • delivers Corporate Plan 2024-29 outcomes • provides statutory duties • provides business enabling functions 	Corporate Plan Outcomes: Providing Excellent Services; Vibrant Thriving Destination; Leading Sustainable Environment; Diverse Engaged Communities; Dynamic Economic Growth; Flourishing Public Spaces Statutory duties: Local authority statutory duties/regulatory functions. Business enabling functions: Business Planning; Resource allocation and management; Risk Management; Health and Safety; EEDI.
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of:	Katie Stewart, Executive Director Environment
Report author:	Joanne Hill, Environment Department

Summary

This report presents for approval the high-level Business Plan for the Environment Department for 2025-30. Due to the size and scope of the department, the priority workstreams, performance measures and financial information have been divided into three sections, one for each of our three key Committee 'clusters'. The front and back pages of the Plan contain information which relates to the whole of the Environment Department and these pages are being presented to all Committees along with the relevant Committee-specific workstream section.

The plan presented in this report (Appendix A) contains Section A which provides a strategic overview of activity of all service areas which fall within the remit of the Planning and Transportation Committee. Once approved, the Plan will be adopted from April 2025.

Recommendation

Members are asked to:

- i. Note the factors taken into consideration in compiling the Environment Department's high-level Business Plan 2025-30; and
- ii. Approve, subject to the incorporation of any changes sought by this Committee, Section A of the Environment Department's high-level Business Plan 2025-30 (presented at Appendix A), which covers the service areas for which the Planning and Transportation Committee is responsible.

Main Report

Background

1. In recent years, every department has produced a standardised single-year high-level Business Plan, in alignment with the corporate business planning process. However, the organisation is now intending to transition to five-year high-level Business Plans, aligned with the Corporate Plan 2024-29 and associated strategies. The Environment Department is one of two pathfinder departments which have developed five-year high-level Business Plans commencing in 2025/26, with others due to follow from 2026/27.
2. The Environment Department's high-level Business Plan 2025-30 sets out the priority workstreams for the department for the next five years and the detailed actions for 2025/26. The Plan will be reviewed and refreshed annually to include details of the following year's deliverables and actions.
2. The high-level Business Plan 2025-30 aligns to our Corporate Plan 2024-2029 and demonstrates how the department's work supports delivery of the Corporate Plan outcomes. It also indicates the estimated funding and people resources associated with each priority workstream. As a high-level plan, this document does not capture the granularity of departmental work but gives an overall picture of departmental activity, trends where applicable and direction of travel.

Environment Department high-level Business Plan for 2025-30

3. This report presents, at Appendix A, the draft high-level Business Plan for 2025-30 for the services of the Environment Department which fall within the remit of the Planning and Transportation Committee, ie:
 - Planning and Development
 - District Surveyor's Office
 - Highways, Transportation and Parking.
4. Please note that the Business Plan includes the SME Delivery Team. However, as that Team reports to Policy and Resources Committee, the content of the Business Plan which relates to it (i.e. workstream h) does not need to be considered by Planning and Transportation Committee.

5. As a pathfinder for a wider organisational transition from 2026/27, the Environment Department has moved to a five-year high-level Business Plan. The Plan sets out the priority workstreams for 2025-30 and the actions that will be undertaken in 2025/26 to deliver them. The Plan will be reviewed and refreshed annually to detail the actions for the following year.

Prioritisation and alignment to Corporate Plan 2024-29

6. The priority workstreams for 2025-30 were identified by the Environment Department's Senior Leaders and their management teams, in consultation with other members of staff. The establishment of these core workstreams enables management teams to set appropriate objectives and action plans to achieve the overarching goals during the years ahead.
7. The workstreams were selected to reflect key strategic links. They demonstrate how the department supports delivery of the Corporate Plan 2024-29 outcomes and other cross-cutting strategies, programmes and priority projects, such as Destination City and the Climate Action Strategy, as well as the statutory duties of the services. However, due to the high-level nature of the Plan, the workstreams do not include all elements of the teams' work; there is a significant amount of 'business as usual' activity that will continue alongside the priority workstreams.

Resources utilised

8. As part of a pilot prioritisation exercise which began in 2024/25, every City Corporation department has again been required to include an estimation of the budget and people resource associated with each workstream. These figures are expressed as percentages of the overall revenue budget and Full-Time Equivalent (FTE) staff.
9. It has not been possible to determine accurate allocation of financial or people resources for each workstream; very few are discrete projects with specific budgets, and very few members of staff spend specific proportions of their time on one workstream. Therefore, the figures shown in the Business Plan are very much estimates. Should this exercise be repeated in future years, accurate methodology will need to be designed and applied to ensure consistency across and within departments.

Performance measurement

10. Progress made against priority workstreams is measured by monitoring key performance indicators and achievement of milestones. Performance is reviewed regularly by Directors and their Management Teams and is reported to your Committee every six months to enable Member scrutiny. The Town Clerk's Executive Leadership Board also regularly reviews the progress of every department's Business Plan workstreams and performance measures.
11. In addition, the priority workstreams identified in this high-level Business Plan flow through local team management plans and the individual performance plans

of members of staff, which provide further methods of assessing progress. This also enables individual officers to fully understand how their work feeds into divisional, departmental and corporate activities, aims and objectives.

Synergies and combatting silos

12. Workstreams have been linked to corporate priorities wherever possible. Direct links to Corporate Plan performance measures are shown in bold font; other corporate strategies, programmes and projects are referenced throughout.
13. The front and back pages of the Plan contain information which relates to the whole of the Environment Department and these pages are being presented to all Committees along with the relevant Committee-specific workstream section.
14. Colleagues across the department are working collaboratively to identify synergies and break down siloed working practices. As a key enabling function, the Department's Business Services Division works to align common processes and procedures to achieve consistency. This Division leads cross-departmentally on areas including business planning; risk management; health and safety; workforce planning; Equality, Equity, Diversity and Inclusion; communications and engagement; information and data management; and GIS mapping.

Departmental Operational Property Assets Utilisation Assessment

15. The Environment Department's staff are based across 25 sites throughout London and the south-east. The Department holds approximately 340 physical assets, almost 270 of which are at its Natural Environment sites.
16. As part of the Corporation's Operational Property Review Programme, the Department has undertaken a detailed utilisation assessment of all allocated operational property assets beyond Guildhall. A separate detailed utilisation of accommodation allocated to the Environment Department within the Guildhall complex was undertaken over a four-week period in November/December 2024. The results of both exercises have been returned to the City Surveyor's Department.
17. Over the coming year, a departmental Asset Plan will be produced to enable effective management and development of these assets to ensure they add value to the organisation and the natural environment charities while being fit for purpose, well maintained, and safe for our staff and service users.

Corporate and strategic implications

Strategic implications - The Environment Department's high-level Business Plan is aligned to Corporate Plan 2024-20 outcomes and several of the department's performance measures are included in the Corporate Plan (shown in bold font). There are common themes woven throughout the Department's high-level Business Plan which highlight its contribution and commitment to the delivery of the Corporate Plan, Destination City, the Climate Action Strategy, the People Strategy and other key cross-cutting programmes and

projects. Any new strategies will be reviewed as they are approved, and consideration given as to how the services can and will support their delivery.

Security implications - None

Financial implications - The high-level Business Plan has been produced in liaison with Chamberlain's Department and takes into consideration opportunities to reduce expenditure and increase income to make necessary savings.

Equalities implications - The Department has an established Equality, Equity, Diversity and Inclusion (EEDI) Working Group. The Group has developed a Departmental EEDI Plan which aligns with the Corporate EDI Plan. Members of the group lead on a range of EEDI actions, including those set out in the Business Plan, to ensure compliance with the PSED across the department.

Resourcing implications - Any changes to resources will be brought to the relevant Committee(s).

Risk Implications – 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. Risk management is an integral factor in the business planning process: the Environment Department's risk register includes risks to the achievement of its priority workstreams, and the actions being taken to address those risks.

Climate Implications - The work of the service areas for which your Committee is responsible, supports the delivery of the Corporate Climate Action Strategy through delivery of relevant workstreams; updates on progress are reported to this Committee.

Conclusion

This report presents, for approval, the high-level Business Plan for 2025-30 for the services of the Environment Department which fall within the remit of the Planning and Transportation Committee. Once approved, the Plan will be updated in line with any changes requested by this Committee and will be adopted in April 2025.

Appendices

- Appendix A – Environment Department high-level Business Plan 2025-30

Joanne Hill

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ENVIRONMENT DEPARTMENT HIGH-LEVEL BUSINESS PLAN 2025-2030

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Live, Work, Learn, Explore

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Executive Director's introduction

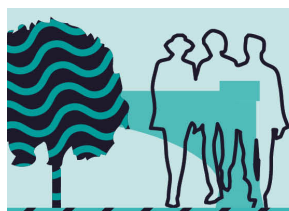
The Environment Department is the largest and most complex department in the Corporation with over 800 staff working in 25 locations, providing key front-line services to the City and beyond. The work of the department is overseen by more than eight Committees.

Over the next five years, the Department will deliver **world-class places and infrastructure** across the Square Mile – where it plays a **key role in supporting growth and investment** – as well as the many assets it manages beyond the City's boundaries.

In doing so, the Department – still relatively new in being a single Department, at three years on – will continue to build its approach to **stronger, more robust management of its services**, with the aim of providing a **model for delivering excellent services sustainably and in a way that is more open and engaging** with its service users, partners and stakeholders.

The Department will become an **increasingly proactive and constructive corporate partner**, developing a reputation for working across siloes and contributing as positively to the direction of the Corporation as to its own aims.

Katie Stewart, Executive Director Environment



Live, Work, Learn, Explore

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About us: Our purpose, aims and impacts

The Environment Department *Shaping future environments and protecting current ones.*

Our aims:

- Deliver transformative, high profile, and strategic infrastructure and public realm schemes, that will result in major economic, social and cultural benefits.
- Encourage the construction of high quality, safe and inclusive buildings.
- Provide spaces for businesses to grow, improve transport and maintain our unique historic environment.
- Create an inclusive, accessible and healthy Square Mile with clean streets and air.
- Support and advise businesses, including SMEs and licensed premises, to enable them to thrive and to protect consumers.
- Protect and promote public, animal and environmental health, including at the borders.
- Protect and enhance the Corporation's green and open spaces and celebrate local heritage.
- Address long term issues such as climate resilience to deliver sustainable built and natural environments.

Our achievements, impacts and outcomes in 2024/25

During 2024/25 our teams continued to work in partnership with internal and external partners to fulfil their statutory duties and deliver excellent services, adapting to the requirements of new and changing legislation and government demands. Progress against key workstreams and performance measures remained on track with targets consistently achieved or exceeded.

We developed and delivered strategies, policies, and actions which will have positive impacts on the environment, the public, consumers and businesses, including:

- Progressed the City Plan 2040 through the next stages of development.
- Published the SME Delivery Strategy and Circular Economy Framework.
- Gained approval for a new Air Quality Strategy and a revised Transport Strategy.
- The Licensing Team refreshed and published several policies which will support businesses, including SMEs, to thrive in the City.
- Played a key role in delivery of Destination City, the Climate Action Strategy and other key Corporate strategies and programmes.
- Began to implement the Natural Environment Division strategies to protect and improve our natural habitats, and ensure they are more accessible, sustainable, and preserved for public benefit.



Live, Work, Learn, Explore

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Our key objectives and priority workstreams and major projects

Priority workstreams 2025/30

Although each of our workstreams is specific to relevant Committees, there are common themes woven throughout that highlight our contribution and commitment to the delivery of the Corporate Plan, Destination City, the Climate Action Strategy and other key strategies and programmes.

City development and economic growth: We will seek to facilitate growth through our planning policies which aim for office development of the highest quality, ensuring that offices are designed to provide sustainable, flexible floorspace that meets the varied needs of occupiers.

Excellent local authority services: We will continue to provide excellent statutory and regulatory services to ensure a safe and clean built environment and public realm, and protect and promote public, animal and environmental health and consumer protection.

Climate and environment: We will provide a climate resilient and environmentally enhanced city through the protection and enhancement of the biodiversity of our open spaces; delivery of Climate Action Strategy programmes and our Air Quality Strategy; consideration of sustainability, carbon emissions and biodiversity as part of planning decisions; and the promotion of Circular Economy principles.

Business support: The implementation of the SME Strategy will aid start-up businesses and SMEs to scale and grow, helping to maintain London's position as the leading global financial and professional services centre. We will support licensed premises to thrive, while balancing their needs with those of residents and visitors, helping to deliver the Destination City vision.

Healthy and inclusive environment: The facilities and services at our open spaces will be further developed to offer welcoming places that visitors from all backgrounds and abilities are comfortable to explore. City streets will be well maintained with increased accessibility delivered through streets and spaces projects. New planning advice and guidance will be published to improve inclusivity and accessibility, and the City of London's Access Team will be reformed and expanded to increase engagement with disabled people based on lived experience.



Operational capability and interdepartmental collaboration

As we continue to develop the Department over the next five years, we will take the opportunity to exploit the advantages of our size and extensive remit: we deliver a vast range of services and have the largest workforce of all city departments, but this also means we have a vast range of skills, knowledge and expertise among our staff. We will look for synergies and opportunities to work together; we will focus on our similarities as well as celebrating our differences.

Our people: We will support delivery of the People Strategy and build 'Brilliant Basics'. Health and safety will be embedded in all our decisions, processes and actions, and we will ensure compliance with the Corporate Health and Safety Framework. Our staff survey action plan, People Plan, EEDI activities and focus on learning and development will help us to understand and meet the needs of our staff and enable our talent to grow. We will promote a departmental culture that ensures staff feel valued, supported through change, and respected by their managers and colleagues. By helping individuals to understand how their work contributes to that of the wider department, and Corporation, we aim to enhance job satisfaction and staff retention.

Our corporate partners: Officers will continue to work collaboratively with colleagues across other corporate departments, as intelligent clients, to break down silos and realise efficiencies. We liaise closely with the City Surveyor's Department to review, assess and progress essential repairs and maintenance to the approximately 340 physical assets we hold. Through production of a departmental Asset Plan, we will manage and develop these assets to ensure they add value to the charities and organisation while being fit for purpose, well maintained, and safe for our staff and service users.

Our external stakeholders: We will continue to communicate with our stakeholders appropriately and take their feedback into consideration when shaping our services. This will include formal consultation on new policies and strategies; planning applications; proposed changes to the public realm; and regular communication of news to local groups and customers.

Our finances: By developing financially sustainable business models, we will ensure we consistently deliver high quality services. We will achieve this through proactive budget management, prioritisation and seeking value for money and opportunities for income generation. Across the department, we will seek ways to improve what we do and how we do it; embracing change, enhancing our use of data and adopting new ways of working and technologies that will make us more efficient and cost effective.

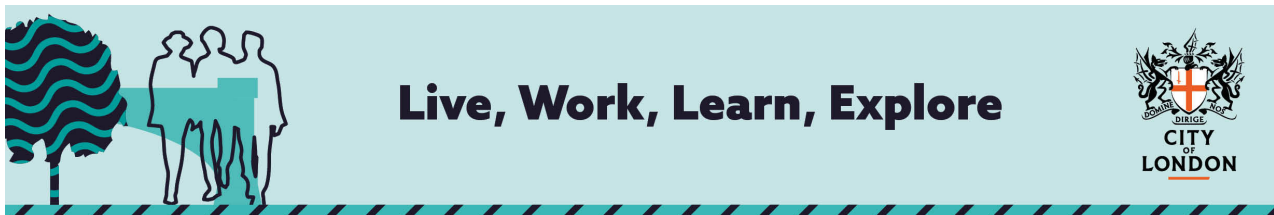


**SECTION A:
Planning and Transportation Committee**

This section covers the service areas which fall within the remit of the Planning and Transportation Committee and includes the SME Delivery Team:

Priority workstream and key 2025/26 deliverables	Funding allocation approx.%*	People resource approx.%*	Corporate Plan 2024-2029 Outcomes	Outcome focused Performance measures	Outcomes / Impacts
a) Power a growing, vibrant and competitive economy, with over 1.2m sqm of additional office floorspace delivered by 2040.					
1. Adopt the City Plan 2040. <ul style="list-style-type: none"> City Plan Inspectors' Report: Q1/Q2 2025/26 Adoption: Q2 2025/26 2. Put in place the environment to deliver a high quality strategic office floorspace for the Square Mile. <ul style="list-style-type: none"> Review the Office Use Supplementary Planning Document (SPD). Q4 2025/26 Review the Planning Obligations SPD. Q4 2025/26 Publish regularly updated digital monitoring of development statistics and contextual data. Q4 2025/26 3. Engagement and coordination with the newly established City Business Investment Unit.	2.5%	2%	Dynamic economic growth Vibrant thriving destination Diverse engaged communities	<ul style="list-style-type: none"> Increased provision of office space in the Square Mile, decreasing empty office floor space (vacancy rates). (CP 2024-29 KPI) 	<ul style="list-style-type: none"> Raise the profile of the City as a place to invest and locate. More office floorspace developed in the Square Mile. Increased jobs in the City, and more employment, skills and training opportunities. Maintain the City of London's position as the leading global financial and professional services centre.

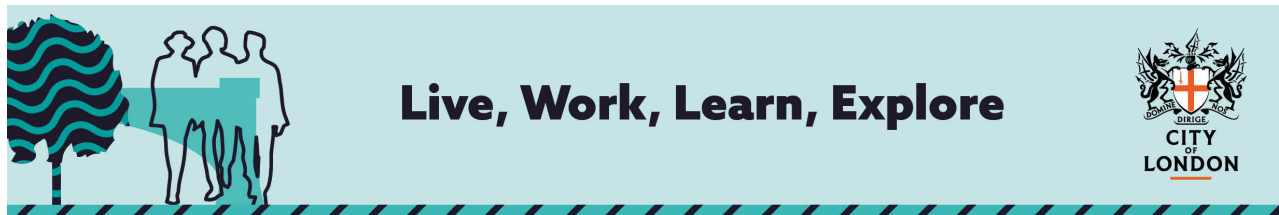
* Funding allocation and people resource %s are estimates. Funding is shown as a percentage of the total Planning and Transportation Committee 2025/26 revenue budget. People resource is shown as a percentage of the total people resource (FTE) of the services within remit of the Planning and Transportation Committee.



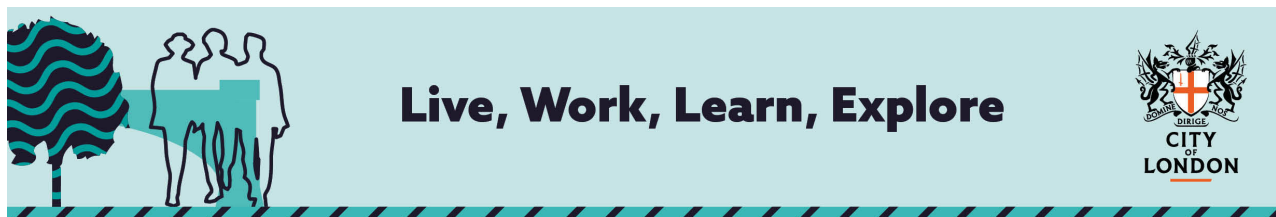
Priority workstream and key 2025/26 deliverables	Funding allocation approx. %	People resource approx. %	Corporate Plan 2024-2029 Outcomes	Outcome focused Performance measures	Outcomes / Impacts
b) Transform the Square Mile into a 7-day-a-week cultural and leisure destination for everyone.					
<p>1. Adopt the City Plan 2040 with its policies on cultural and leisure space, heritage preservation and celebration, public realm enhancement, fast track change of use of non-strategic office stock for supportive uses.</p> <ul style="list-style-type: none"> • <i>City Plan Inspectors' Report: Q1/Q2 2025/26</i> • <i>Adoption: Q2 2025/26</i> <p>2. Adopt the Cultural SPD and implement its guidance and requirements through development decisions.</p> <ul style="list-style-type: none"> • <i>Emergence of Corporate Cultural Strategy. Q4 2025/26</i> • <i>Complete and adopt Cultural Matchmaking programme. Q4 2025/26</i> <p>3. Continue to work with the Destination City Team to develop, and deliver against, implementation plans for each of the Destination City objectives. Ongoing</p>	2.5%	2%	<p>Diverse engaged communities.</p> <p>Dynamic economic growth.</p> <p>Vibrant thriving destination.</p> <p>Flourishing public spaces.</p>	<ul style="list-style-type: none"> • Number of Free to Visit cultural and other destinations secured through Planning Permissions. • Number of visitors to cultural attractions that are negotiated through planning permissions • Quantity and uplift of public realm. 	<ul style="list-style-type: none"> • Increased economic prosperity through improved footfall, spend and activity. • A net increase in high quality, inclusive public realm. • The City will become a destination of choice for all age groups, particularly children, young people and families 7 days a week. • Greater number of Free to Visit attractions in the City 7 days a week. • Vibrant retail; food and beverage; leisure and cultural sectors, as a result of greater office occupancy.

Priority workstream and key 2025/26 deliverables	Funding allocation approx. %	People resource approx. %	Corporate Plan 2024-2029 Outcomes	Outcome focused Performance measures	Outcomes / Impacts
c) Celebrate our heritage while re-shaping those parts of the City that have the most potential for growth and regeneration.					
<p>1. Adopt the City Plan 2040 with its policies on celebrating heritage and archaeology and delivering growth.</p> <ul style="list-style-type: none"> • <i>City Plan Inspectors' Report: Q1/Q2 2025/26</i> • <i>Adoption: Q2 2025/26</i> <p>2. Publish (and consult on) a new 'Views' SPD to provide updated guidance on strategic and local view protection policies to facilitate the operation of the City's tall building strategy. Q4 2025/26</p> <p>3. Draft Draft 'Celebrating our Heritage' (final title TBC) SPD to set out the City's heritage strategy. Q4 2025/26</p> <p>4. Further Further develop the Heritage Significance workstream to produce Statements of Significance to facilitate the positive management of the City's listed buildings.</p> <ul style="list-style-type: none"> • <i>Secure a minimum of two new Heritage Significance commissions by Q4 2025/26.</i> 	2%	1%	<p>Dynamic economic growth.</p> <p>Vibrant thriving destination.</p> <p>Flourishing public spaces.</p>	<ul style="list-style-type: none"> • Number of heritage-led Free to Visit cultural and other destinations negotiated through Planning Permissions. • Number of enhanced (as opposed to merely preserved) designated heritage assets negotiated through planning permissions. 	<ul style="list-style-type: none"> • Ensure that the City's historic environment fully supports the City's strategic economic and cultural objectives. • Transform the perception of the historic environment from a constraint to an opportunity, particularly in the areas of accessibility and sustainability.

Priority workstream and key 2025/26 deliverables	Funding allocation approx. %	People resource approx. %	Corporate Plan 2024-2029 Outcomes	Outcome focused Performance measures	Outcomes / Impacts
d) Ensure an environmentally enhanced City which is a highly sustainable place to do business, achieving a net zero Square Mile by 2040.					
<p>1. Adopt the City Plan 2040 with its policies on retrofit first, whole lifecycle carbon, environmental resilience, sustainable transport.</p> <ul style="list-style-type: none"> • <i>City Plan Inspectors' Report: Q1/Q2 2025/26</i> • <i>Adoption: Q2 2025/26</i> <p>2. Review Carbon Options Guidance. Q3 2025/26</p> <p>3. Deliver high quality, resilient projects in public realm and continue to embed Climate Action Strategy goals in projects and services.</p> <p>Ongoing</p> <p>4. Progress Climate Action Strategy workstreams, including:</p> <ul style="list-style-type: none"> • <i>Report on the Cool Streets and Greening Programme 'Lessons Learned'. Q4 2026</i> • <i>Identify opportunities and develop proposals for implementing the Square Mile Local Area Energy Plan. Q4 2026</i> • <i>Participate in the UK Government's Advanced Zoning Programme and potentially procure a heat zone developer for the Square Mile (subject to Member approval). Q4 2026</i> 	7%	10%	<p>Leading sustainable environment</p> <p>Vibrant thriving destination</p> <p>Flourishing public spaces</p>	<ul style="list-style-type: none"> • Proportion of development proposals and office floorspace delivered through retrofit schemes. • Increase in biodiversity units secured through Planning Permissions. • Number of schemes that incorporate SuDS. • Number of trees planted. • Area of climate resilient public realm and open space enhanced (sqm). • Number of CAS 'Square Mile' projects completed. • Number of engagement sessions with Square Mile stakeholders. 	<ul style="list-style-type: none"> • City development will minimise carbon, increase biodiversity and meet the highest standards for sustainability. • Improved energy efficiency through retrofitting buildings and using renewable energy. • A climate resilient City with reduced risk of overheating and flooding. • A net zero Square Mile by 2040.



Priority workstream and key 2025/26 deliverables	Funding allocation approx. %	People resource approx. %	Corporate Plan 2024-2029 Outcomes	Outcome focused Performance measures	Outcomes / Impacts
<p>e) Create an inclusive, accessible and healthy Square Mile where everyone feels welcome.</p>					
<p>1. Adopt the City Plan 2040 with its policies on inclusivity, accessibility and wellbeing.</p> <ul style="list-style-type: none"> • <i>City Plan Inspectors' Report: Q1/Q2 2025/26</i> • <i>Adoption: Q2 2025/26</i> <p>2. Publish new and updated Planning advice and guidance to improve inclusivity and accessibility, including:</p> <ul style="list-style-type: none"> • <i>Inclusive City SPD. Q4 2025/26</i> • <i>Safety of Women Planning Advice Note. Q4 2025/26</i> • <i>Updated version of the City's Wind Guidelines to address accessibility considerations. Q2 2025/26.</i> <p>3. Provide well maintained and accessible streets and sufficient, accessible parking facilities.</p> <p><i>Retain accessibility during construction and street works and increase accessibility through streets and spaces projects. Ongoing</i></p> <ul style="list-style-type: none"> • <i>Review building site and utility contractor guidance including Considerate Contractor scoring and Accessibility Award. Q3 2025/26</i> • <i>Project development and design, project processes, design checks and guidance. Q4 2025/26</i> <p style="text-align: right;"><i>Contd...</i></p>	<p>12%</p>	<p>15%</p>	<p>Diverse engaged communities.</p> <p>Vibrant thriving destination.</p> <p>Flourishing public spaces.</p>	<ul style="list-style-type: none"> • Amount of s106 contributions for skills and training secured through Planning Permissions. • Number of new pedestrian routes secured through Planning Permissions. • CoLSAT (City of London Street Accessibility Tool) and Healthy Streets Check scores. • Diversity data for highways and transportation consultations. 	<ul style="list-style-type: none"> • The City will be a welcoming and inclusive place for all communities and backgrounds irrespective of economic background. • A wider range of voices will be heard through engagement and consultation. • A more consistent approach to considering accessibility across highway maintenance and new projects. • Reduced barriers to independent travel.

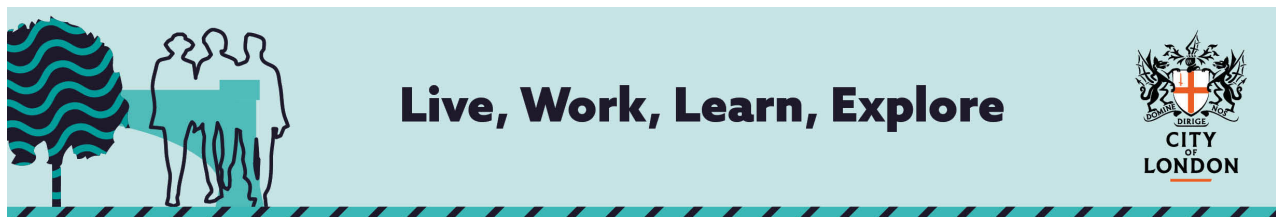


Priority workstream and key 2025/26 deliverables	Funding allocation approx. %	People resource approx. %	Corporate Plan 2024-2029 Outcomes	Outcome focused Performance measures	Outcomes / Impacts
<p>4. Increase engagement with disabled people based on lived experience.</p> <ul style="list-style-type: none"> • <i>Reform and expand the City of London’s Access Team to more adequately integrate accessibility into divisional and departmental responsibilities. Q3 2025/26</i> • <i>Review strategy and project consultation processes to address the need for wider engagement. Q2 2025/26</i> 					

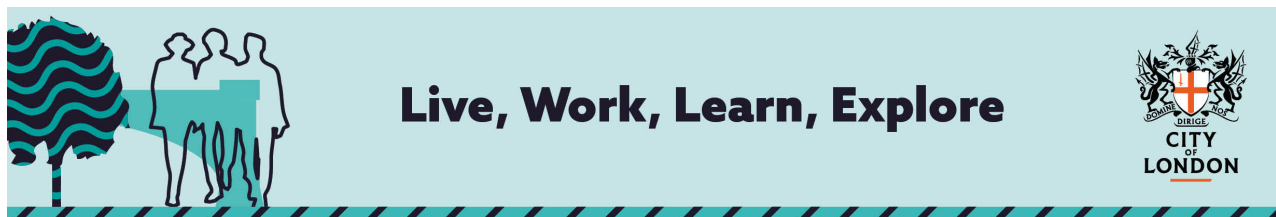
Priority workstream and key 2025/26 deliverables	Funding allocation approx. %	People resource approx. %	Corporate Plan 2024-2029 Outcomes	Outcome focused Performance measures	Outcomes / Impacts
<p>f) Maintain a safe built environment.</p> <ol style="list-style-type: none"> Continue to discharge statutory building control functions. <ul style="list-style-type: none"> <i>Maintain an appropriate number of Registered Building Control Surveyors with the Building Safety Regulator. Ongoing</i> <i>Provide 24/7 dangerous structure call out service. Ongoing</i> Work with City Bridge Foundation Board to develop a new model for the provision of engineering services. <ul style="list-style-type: none"> <i>Complete review of engineering service provision for City Bridge Foundation. Q3 2025/26</i> <i>Complete procurement of consultant for City Bridge Foundation structures (Q3 2025/26) for commencement in Q1 2026/27.</i> Inspect and maintain the highway structures and the Corporation’s reservoirs in accordance with approved schedules. <ul style="list-style-type: none"> <i>Complete procurement of consultant for highway structures (Q3 2025/26) for commencement in Q1 2026/27.</i> <i>Complete review of Reservoir Panel Engineer performance. Q1 2026/27.</i> 	<p>5%</p>	<p>5%</p>	<p>Flourishing public spaces.</p> <p>Providing excellent services.</p> <p>Vibrant thriving destination.</p>	<ul style="list-style-type: none"> Submission of statutory returns to Building Safety Regulator by their deadline. Full plans assessed (or extension of time agreed) within 5 weeks. 	<ul style="list-style-type: none"> City maintains a safe built environment for people to move around. Building Control services that meet statutory requirements to provide services to the construction industry, driving economic growth. Highway and bridge structures continue to provide infrastructure network to help the economy. Maintained reservoir safety.

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Priority workstream and key 2025/26 deliverables	Funding allocation approx. %	People resource approx. %	Corporate Plan 2024-2029 Outcomes	Outcome focused Performance measures	Outcomes / Impacts
g) Provide safer streets and spaces.					
<ol style="list-style-type: none"> 1. Deliver safer car parks through OSPR-funded investment. <ul style="list-style-type: none"> • <i>London Wall car park fire safety project. Q3 2025/26</i> • <i>Minorities structural surveys (operational property review). Q3 2025/26</i> 2. Deliver safer streets and behaviour change activities through the Vision Zero programme. <ul style="list-style-type: none"> • <i>Vision Zero Programme (incl. Aldgate High Street, Ludgate Hill/Old Bailey and Aldersgate Street/Long Lane). Q3 2027/28</i> 3. Deliver safer streets during temporary construction, highway and utility works. <ul style="list-style-type: none"> • <i>Review Considerate Contractor Scheme Code of Practice. Q4 2025/26</i> 4. Improved compliance with traffic restrictions for safety improvement and congestion reduction. 5. Implement additional dockless cycle hire measures and pursue the development of a pan-London contract. Q4 2025/26 	19%	22.5%	<p>Flourishing public spaces.</p> <p>Providing excellent services.</p> <p>Vibrant thriving destination.</p>	<ul style="list-style-type: none"> • Parking contract management – adherence across all five contracts. • Numbers of KSIs (Killed/Serious Injuries). (CP 2024-29 KPI) • Reduction in Highway-related insurance claims. • Processing efficiency for challenges and appeals of Penalty Charge Notices (PCN). • Dockless cycle bay capacity. (CP 2024-29 KPI) 	<ul style="list-style-type: none"> • A safer car parking environment. • Fewer collisions, casualties and injuries on-street. • Safer on-street authorised activities with reduced risk to the public, staff and contractors.















Priority workstream and key 2025/26 deliverables	Funding allocation approx. %	People resource approx. %	Corporate Plan 2024-2029 Outcomes	Outcome focused Performance measures	Outcomes / Impacts
h) SME support and economic development. <i>(N.B. This workstream is outside the remit of the Planning and Transportation Committee)</i>					
<p>1. Help start-up businesses and SMEs to scale and grow through implementation of our SME Strategy.</p> <ul style="list-style-type: none"> Define ‘affordable workspace’ (as part of the Office Use SPD review). Q2 2025/26 Define what the targeted support for SMEs will be, based on key recommendations from the Occupier and Investment study. Review and enhance SBREC as national leading incubator hub. <p>2. Establish a team to focus on attracting and supporting investment and occupiers to the Square based on the findings of the Occupier and Investment study.</p> <ul style="list-style-type: none"> Scope the approach to develop an outward facing concierge, promotion and engagement function. 2025/26 Establish and strengthen cross corporate working partnerships including point of contact within Planning and Development; City Surveyor’s; Innovation and Growth; and Destination City. Create and adopt an interim software solution for end-to-end relationship mapping and monitoring. 2025/26 	<p>n/a: SBREC budget is held separately as it reports to Policy and Resources Committee.</p>	<p>n/a: SBREC people resource is not included in Planning & Transportation Committee totals.</p>	<p>Dynamic economic growth</p> <p>Vibrant thriving destination</p> <p>Diverse engaged communities</p>	<ul style="list-style-type: none"> Increase in the number of SBREC members who are business founders from underrepresented groups (ethnicity; gender; age). Growth in SBREC membership numbers. Attendance at SME events. 	<ul style="list-style-type: none"> Maintain the London’s position as the leading global financial and professional services centre. Greater number of start-up businesses in target sectors. The City will attract high growth SMEs looking to scale their business and locate in the Square Mile.



SECTION A: Planning and Transportation Committee

Our timeline planner of priority workstream activities and milestones

Key	
	Duration of activity
	Milestone

	2025/2026												Beyond 2025/26		
	Quarter 1			Quarter 2			Quarter 3			Quarter 4			2026/2027	2027/2028	
	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar			
Adopt the City Plan 2040.	Adoption by end of Q2 2025/26														
Review Office Use SPD.	Completion by end of Q4 2025/26														
Review the Planning Obligations SPD.	Completion by end of Q4 2025/26														
Adopt Cultural Matchmaking Programme.	Completion by end of Q4 2025/26														
Support Destination City Growth Strategy.	Ongoing														
Publish (and consult on) a new 'Views' SPD.	Completion by end of Q4 2025/26														
Draft 'Celebrating our Heritage' SPD.	Completion by end of Q4 2025/26														
Review Carbon Options Guidance.	Completion by end of Q3 2025/26														
Progress Climate Action Strategy workstreams.	Ongoing until 2027														
Reform and expand CoL Access Team.	Completion by end of Q3 2025/26														
Review Engineering Services for CBF.	Completion by end of Q3 2025/26														
Review Reservoir Panel Engineer performance.	Completion by Q1 2026/27														

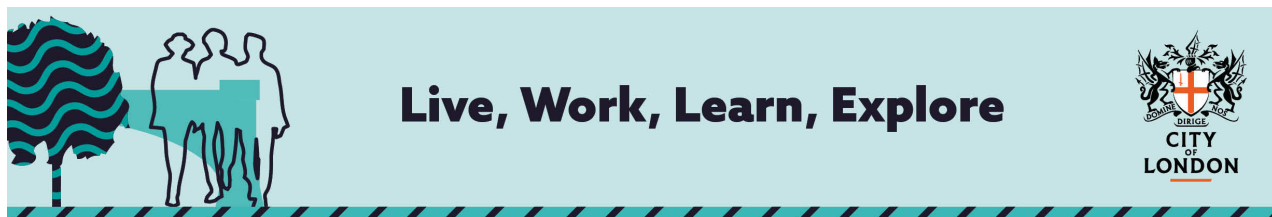


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	2025/2026												Beyond 2025/26	
	Quarter 1			Quarter 2			Quarter 3			Quarter 4			2026/2027	2027/2028
	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar		
London Wall car park fire safety project.	Completion by end of Q3 2025/26									◆				
Review Considerate Contractor Scheme CoP.	Completion by end of Q4 2025/26									◆				
Implement additional dockless cycle measures.	Completion by end of Q4 2025/26									◆				
Implement the SME Strategy. *	Ongoing													
Establish team to focus on economic development. *	Establish by end Q4 2025/26									◆				

* N.B. These workstreams are outside the remit of the Planning and Transportation Committee.



SECTION A: Planning and Transportation Committee

Finance 2025/26

Planning and Transportation Committee Estimated budget 2025/26 (£000)	
Local risk net expenditure	(14,546)
Central risk	6,694
Recharges	(10,878)
Total net expenditure	(18,730)

Unfunded Medium Term Plans

What Medium Term action is required? (e.g. New legislation, services, projects, automation)	When? 2026/27	When? 2027/28
Air Pollution and Wind Modelling	✓	
Pedestrian Permeability modelling	✓	
Enhanced Access service (2x Grade E posts)	✓	
City Operations Contract Review/Expiration dates 2027/28.	✓	
Minorities Car Park future use (options being considered 2025/26, impact in 2026/27 and 2027/28).	✓	✓
Transport Strategy delivery.	✓	✓

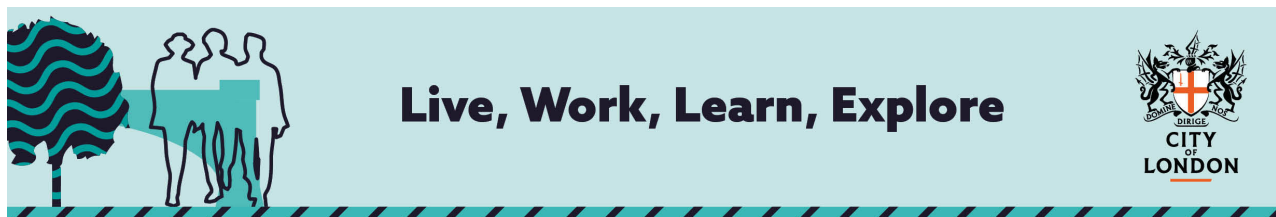
Our key risks*

Our business risks are managed in accordance with the Corporate Risk Management Framework. Risks are regularly reviewed and updated by management teams in consultation with risk owners. Committees receive regular updates on the risks held by the services within their remit to provide them with necessary assurance that risks are being managed and mitigated effectively, and to enable Members to fulfil their oversight and scrutiny role.

Our highest risks for the Planning and Development Division, and the Highways and Transportation services are listed below.

Risk Title	Score
Road safety	RED, 24
Car Parks: Fire safety	RED, 16
Car Parks: Repairs and maintenance	AMBER, 12
Transport and public realm projects not delivered due to lack of funding	AMBER, 12
The District Surveyor's (Building Control) Division becomes too small to be viable.	AMBER, 12
Inspecting dangerous structures (Building Control)	AMBER, 8
Working in service/pipe subways (confined spaces)	AMBER, 8

*Risk details were correct at November 2024 but are subject to continual review and change.



ENVIRONMENT DEPARTMENT ENABLERS

N.B. the information on this page relates to the Department as a whole.

Business Services Division

The Business Services Division, led by the Chief of Staff, enables the Department as whole to deliver its aims and objectives, by ensuring a consistent, compliant and joined-up approach. Across this large and diverse department, the teams provide a central hub of expertise, advice and guidance on themes, duties and responsibilities which are common to all, and act as a conduit between divisions and the corporate centre.

Working with management teams across the Department, and with key links throughout the organisation, the Business Services Division leads cross-departmentally on areas including business planning; risk management; health and safety; workforce planning and talent management; work environment; Equity, Equality, Diversity and Inclusion; communications and staff engagement; information and data management; and Geographical Information System (GIS) mapping.

Vital to its success is the development of strong, reciprocal working relationships between officers within the Division and their colleagues across the Department and wider Corporation. Officers work collaboratively to build a cohesive department with a unified identity, and which recognises and celebrates the achievements of individuals and teams.

Corporate Risks and Red Departmental Risks

Due to the size and wide remit of the Environment Department, the majority of its operational risks are specific to individual divisions and reported regularly to their respective Service Committees. Those risks are managed at Service-level and the key ones are reported in the relevant Committee’s section of this Business Plan.

The Environment Department currently holds NO Corporate Risks.

The Department’s Senior Leadership Team manages four Departmental-level risks, of which one is scored ‘Red’ (as below).

Risk Title	Score
ENV-SLT 001 Maintenance and renewal of physical assets	16

Operational Property

To fulfil the requirements of Standing Order 56, the Environment Department has undertaken a detailed utilisation assessment of all allocated operational property assets beyond the Guildhall.

A separate detailed utilisation assessment of accommodation allocated to the Environment Department within the Guildhall complex was undertaken over a four-week period in November/December 2024.

The results of both exercises have been returned to the City Surveyor’s Department.



People

The Environment Department has 771 members of staff (737 FTE) as of 31 October 2024

Average length of service: 10 years (*corporation-wide average: 8 years*)

Average age: 45 years (*corporation wide average: 44 years*)

Equity, Equality, Diversity and Inclusion (EEDI)

- The Environment Department is committed to creating an environment of collaboration and equality of opportunity where everyone recognises the positive contribution a diverse workforce and community can make.
- The Department is committed to EEDI in our service provision and for all our employees. Creating a workplace aligned to these values is a strategic business priority that fosters fair and equal access, innovation and connection to the communities and stakeholders we serve.
- The Department has an EEDI Working Group which consists of representatives (Champions) from across the department and is chaired by a member of the Senior Leadership Team (SLT). Working with the SLT, the group is responsible for developing and implementing the Departmental EEDI Action Plan.
- Our Departmental EEDI Action Plan 2024/25 was launched in May 2024 and aligns with the CoL's Corporate Equality Objectives. Progress will be monitored and the Action Plan refreshed for 2025/26.

The top three priorities of our Departmental EEDI Action Plan 2024-25 are to ensure that:

1. Our staff have a clear understanding of the Equality Act 2010, particularly the PSED, and how it applies to them both in terms of service provision and working with colleagues. We will achieve this by having EEDI as a standard agenda item on our departmental and divisional meetings; all employees having equality objectives with effect from the 2024-25 appraisal year; and ensuring staff complete mandatory training and other relevant training, including EQIAs and briefing workshops.
2. Our services are accessible for all. We will achieve this by undertaking a review of our functions, services and facilities in terms of accessibility; undertaking EQIAs with results taken into consideration when making decisions on service delivery; and hosting quarterly accessibility workshops for employees to develop their knowledge and understanding on how to produce information and communications in accessible formats.
3. There is improved support for our public facing employees and contractors facing EEDI challenges and issues. We will provide clear protocols for reporting and dealing with incidents; produce dashboards for analysis of data; and escalate issues into respective Divisional Management Teams (DMTs) and SLTs for monitoring and implementing appropriate actions.



Staff survey 2024

Engagement score: 62%

Survey Action Plan

Groups of staff from across the department have worked together to review the survey results and propose a list of actions which were subsequently approved by the Senior Leadership Team. We will:

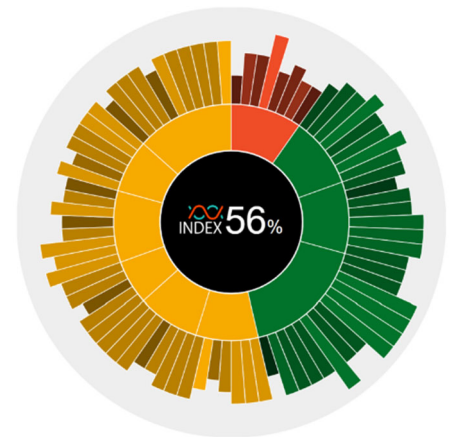
- Undertake staff ‘stress audits’ to recognise and identify stress levels to improve stress levels and reduce stress-related sickness absence.
- Increase visibility of the EEDI Working Group and associated Action Plan. All recruiting managers will understand EEDI policies and processes to enable them to make reasonable adjustments to support staff.
- Collaborate with the Deputy Town Clerk on Officer/Member Charter review to enable staff to feel more supported with Officer/Member relationships.
- Review departmental internal communications to improve their effectiveness.

Health and Safety

Recent Safe 365 audits in each of our divisions to assess health and safety maturity, have provided a departmental score of 56%. The exercise has identified key areas for enhancement and the results have informed our 2025/26 Health and Safety Action Plan. We will continue to support the corporate Health and Safety Team as we implement these actions and aim to increase our maturity score to achieve, or exceed, the Executive Leadership Board’s target of 62%.

Our top three health and safety priorities for 2025/26 are:

- Front line worker safety.
- Embed new corporate Health and Safety Framework.
- Risk Assessments and Method Statements (RAMs) centralisation and audit.



Agenda Item 7

Committee(s)	Dated:
Planning and Transportation Committee	21/01/2025
Subject: City Plan 2040 - examination hearings governance and delegation	Public
This proposal: - delivers Corporate Plan 2024-29 outcomes	All
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	n/a
What is the source of Funding?	n/a
Has this Funding Source been agreed with the Chamberlain's Department?	n/a
Report of: Katie Stewart, Executive Director of Environment	For Decision
Report author: Gudrun Andrews, Head of Planning Policy	

Summary

The City Plan 2040 is currently under examination by the Planning Inspectorate and formal public hearing sessions are scheduled for late March 2025. At these sessions officers will need to further explain the plan's policies but are also likely to be asked to verbally agree changes to the plan based on feedback at the sessions.

The Planning and Development Director is therefore seeking delegated authority from the Planning and Transportation Committee to agree to changes during hearings, subject to later Committee approval. Once the hearings and consultation on proposed modifications to the plan have been concluded, the City Plan will then be brought to Committee for adoption, which is anticipated around January 2026.

Recommendation

Members are asked to:

- Delegate authority to the Director of Planning and Development to suggest potential main and minor modifications to the City Plan during the local plan examination hearings
- Agree that the main and minor modifications be brought back to Planning and Transportation Committee, Policy and Resources Committee and Court of Common Council for formal approval prior to consultation.

Main Report

Background

1. The City Plan was submitted to the Secretary of State for Housing, Communities and Local Government on 29 August 2024. From this date onwards the plan is under examination, undertaken by the Planning Inspectorate (PINS).
2. Formal public examination hearings are scheduled for the weeks of 24 and 31 March 2025. To enable the efficient running of the hearings both members and officers need to be clear of process and expectations. This paper highlights the next steps and seeks formal approval for the process.

Examination process

3. The purpose of the examination process is for the Inspectors to determine whether the submitted City Plan is 'sound', legally compliant, and meets the duty to cooperate, as defined by the National Planning Policy Framework.
4. The formal examination hearings are scheduled for the weeks starting 24 and 31 March 2025. Each session will focus on various city plan topics such as office floorspace, heritage, and tall buildings. The sessions will be chaired by the Inspectors, who will invite those stakeholders who have responded to the Plan to present their arguments for and against City Plan policies.
5. The plan is likely to be deemed sound with the inclusion of some Main and Minor Modifications. Main Modifications (MMs) address the plan's soundness, while minor modifications involve typographical errors or minor updates that do not affect the plan's soundness.
6. For process reasons, from submission onwards, any modifications need to be formally recommended by the Inspector to the City Corporation. The final list of modifications is likely to include the changes proposed at submission (approved under delegated authority, in accordance with the decision by the Court of Common Council at the meeting of 7 March 2024, and the preceding decisions of the Planning and Transportation Committee and Policy and Resources Committee).
7. It is anticipated that new modifications will be discussed during the examination process. During the hearing sessions the Inspectors may ask officers to agree changes to the Plan, or to negotiate potential amendments with other parties at very short notice (e.g. overnight). Given the tight timescales, it would not be possible to seek Committee approval immediately. Therefore, delegated authority is requested to allow officers to confirm agreement to modifications at the hearings, while making it clear to the Inspectors that any changes agreed to are those that officers believe are likely to be considered acceptable by the City Corporation, but that they would be subject to formal Committee approval at a later date.

Approval process

8. As the hearing sessions will take place in the weeks immediately after the ward elections it is proposed that all members are kept informed of the hearings as below:
 - At the start of each week, members will receive a briefing note for each session of the examination. This note will set out the representors attending and will highlight the key matters for discussion.
 - At the end of each week, members will be directed to the examination hearing log available on the website and provided with a brief overview of any changes that officers have agreed (subject to future approval by Committee).
9. Following the hearing sessions, officers will agree with the Inspectors a timetable for any further work. This may involve drafting of further MMs or additional Sustainability Appraisal (SA) and/or Habitats Regulations Assessment (HRA) in response to those MMs.
10. For the reasons set out above, delegated authority is now sought from Planning and Transportation Committee to the Director of Planning and Development to enable officers to answer specific questions and draw conclusions on the acceptability of suggested changes and amendments at the hearing sessions in March/April 2025.
11. All proposed modifications (e.g. Main and Minor) will be brought back to members for formal approval at Planning and Transportation Committee (potentially 8 July 2025), Policy and Resources and then Court of Common Council. The Main and Minor modifications will then be subject to a formal six-week consultation period.

Next Steps

12. The Inspectors will need to consider the outcomes of the consultation and any further SA work before they can make recommendations on the soundness of the City Plan in their Report.
13. The first stage in the reporting process will be an initial 'Fact Check' report which will be exclusively available to the City Corporation for the purpose of checking for inaccuracies. The Final Inspectors' report will follow 2-3 weeks later which will formally recommend the MMs required to make the plan 'sound'. This report will be made publicly available and the City Corporation will be free to adopt the plan through the relevant statutory and committee processes.
14. The adoption of the City Plan would be taken to Planning and Transportation Committee, Policy and Resources Committee and Court of Common Council. Depending on dates, it is most likely this would be in December/January 2026.

Corporate & Strategic implications

15. The City Plan 2040 has been prepared to contribute to corporate objectives, in particular the Corporate Plan.

Financial implications

16. None

Resource implications

17. None

Legal implications

18. To manage any legal implications, legal representatives, including counsel for some topics, will be in attendance at the formal hearing processes.

Risk implications

19. None.

General implications

20. There are not considered to be any financial or resource implications relating to the content of the proposal.

Equalities implications

21. There are no equalities issues raised as a result of protocol. Officers are working collaboratively across the organisation to ensure equalities issues are fully considered in preparation for the examination hearings. The Public Sector Equality Duty is an ongoing requirement and will be taken into account by officers throughout the examination as well as due regard being paid to its requirements as decisions on modifications are made at the appropriate time by committee.

Climate implications

22. None

Security implications

23. None

Conclusion

24. The report sets out the format of the City Plan examination processes and proposes how members will be kept informed of the main matters and outcomes.

It seeks delegated authority to enable officers to confirm agreement to modifications to the plan, subject to formal Committee approval at a later date.

Appendices

- None.

Report author

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Head of Planning Policy

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Agenda Item 8

Committee(s): Planning and Transportation Committee	Dated: 21/01/2025
Subject: Planning for Sustainability Supplementary Planning Document	Public
This proposal a) delivers Corporate Plan 2024-29 outcomes (see list below) b) provides statutory duties c) provides business enabling functions	
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	£0
What is the source of Funding?	n/a
Has this Funding Source been agreed with the Chamberlain's Department?	n/a
Report of: Katie Stewart, Executive Director Environment	For Decision
Report author: Kerstin Kane, Principal Planning Officer (Sustainability), Environment Department, Policy & Strategy	

Summary

This report presents the Planning for Sustainability Supplementary Planning Document (SPD).

The purpose of the Planning for Sustainability SPD is to provide guidance on how applicants should approach environmental sustainability in their developments through the planning application process. It provides detail and guidance on how to fulfil policies of the current Local Plan, as well as emerging policies such as the City Plan 2040. Specifically, it:

- Sets out the key approaches the City of London Corporation is targeting on different sustainability themes.
- Identifies a list of key actions.
- Provides guidance on what, how and when relevant sustainability aspects should be considered during the planning application process.
- Provides a collation of relevant recommended standards, certifications and guidelines.

Following approval by this committee in December 2023, a public consultation exercise was conducted from March to May 2024. A number of responses were received, all of which have been considered by officers. Most responses welcomed the Planning for Sustainability SPD and supported its aims. The SPD has been updated in response to comments received and is now presented to this committee for adoption.

Recommendation(s)

Members are asked to:

- Approve the adoption of the Planning for Sustainability SPD attached at Appendix 1.

Main Report

Background

1. The City of London Climate Action Strategy (CAS), approved by the Court of Common Council in October 2020, includes a Square Mile Built Environment workstream with high level actions of which Action 7.4 refers to the tightening of standards for new buildings through planning guidance.
2. The London Plan 2021 and the City Corporation Local Plan 2015 (the Development Plan) contain policies on sustainable development, circular economy, climate resilience and greening and biodiversity. The emerging City Plan 2040 sets out further, more ambitious policies that drive environmental sustainability.
3. The Planning for Sustainability SPD was drafted with the support of Buro Happold. It seeks to support these policies with further guidance and recommendations. It has been informed by extensive experience with applications in the Square Mile, drawing on industry best practice, and extensive consultation with a wide range of stakeholders. It builds on and complements other City Corporation policies and strategies, such as the CAS, Carbon Options Guidance Planning Advice Note (PAN), Biodiversity Action Plan (BAP), Local Area Energy Plan (LAEP), and the Circular Economy Framework.
4. The City Corporation in collaboration with Buro Happold carried out preliminary engagement in May 2023 with key stakeholders, including statutory authorities like Historic England and Greater London Authority, Business Improvement Districts, and environmental industry experts. This engagement was conducted to seek views and ensure that the SPD was focussed on the most important and relevant sustainability issues.
5. The draft Planning for Sustainability SPD was approved by the Planning and Transportation (P&T) Committee for public consultation on the 12 December 2023. Formal public consultation was conducted from Monday 18 March to Friday 17 May 2024.
6. Further informal engagement with expert stakeholders was conducted from August to December 2024 to finalise technical detail in the draft SPD in response to feedback received in the formal consultation period.
7. The SPD has been developed alongside the City Plan 2040, the City Corporation's emerging new Local Plan, which will replace the Local Plan 2015 upon its adoption. The guidance and approaches set out in the Planning for

Sustainability SPD have been carefully shaped to ensure that they support the implementation of both the adopted Local Plan and the emerging City Plan (upon its adoption). The SPD is clear that it applies to the adopted Development Plan.

8. The SPD has been updated to reflect changes to the NPPF made on 12 December 2024

The Planning for Sustainability SPD

9. The draft Planning for Sustainability SPD has been informed by internal and external consultation. It applies to all major and minor applications for new buildings, refurbishments and retrofits. It provides detail and guidance for applicant teams on how to fulfil sustainability policies in the Development Plan.

10. The draft SPD is divided into five thematic chapters that focus on the environmental sustainability of the City's built environment. The five topic chapters are:

- Retrofit and reuse
- Greenhouse gas emissions and energy use
- Circular economy
- Climate resilience
- Urban greening and biodiversity

11. Each topic chapter:

- Sets out the key approaches the City Corporation is targeting on different sustainability themes.
- Identifies a list of required and recommended key actions.
- Provides guidance on what, how and when relevant sustainability aspects should be considered during the planning application process.
- Provides a collation of relevant recommended standards, certifications and guidelines.

12. In addition to guiding applicant teams, this SPD is also for the use of City Corporation officers, decision makers and stakeholders.

Public Consultation

13. Formal public consultation was conducted from Monday 18 March to Friday 17 May 2024 in accordance with the City Corporation's Statement of Community Involvement. This is a longer timeframe than the statutory consultation period for a SPD of four weeks, as required by The Town and Country Planning (Local Planning) (England) Regulations 2012.

14. During the consultation period a range of engagement methods were used, including publication on the website, physical copies were available in City libraries, and consultation was promoted through social media channels, emails to the Local Plan Consultation Database, Climate Action Bulletin, and City

Resident Newsletter.

15. A 'Planning for Sustainability SPD' webpage was set up on the online engagement platform 'Commonplace' to share contents on the SPD and provide an opportunity for the public to submit feedback.
16. Two public consultation events were held in March (online and in person), two in person expert roundtable workshops were held in May, and two in person meetings with the CPA were held in June and August 2024.
17. Approximately 39 responses were received from organisations and individuals. This is in addition to comments collected at consultation events.
18. The responses support the preparation of the SPD and its ambition to support sustainable growth in the City. The draft SPD was considered to align with both NPPF and London Plan policies. Further detail about the consultation methods, consultation events, and consultation responses are included in Appendix 2 – Consultation Statement.
19. All public consultation responses have been reviewed by officers. Consultation responses informed a thorough review of the document to ensure clear and consistent language. Amendments were made to all sections. Further engagement with industry experts was conducted to inform technical detail in key areas of the SPD.
20. Key areas of changes, as raised by public consultation responses, include:
 - Ensuring requirements and recommendations are clearer. The SPD was reviewed to ensure that requirements referenced as 'must' are mandatory as required by the Development Plan (City Plan 2040 upon its adoption/London Plan 2021). Requirements referenced as 'should' are strongly recommended, as applied on case-by-case basis where they constitute a significant opportunity to drive sustainability. These requirements are outlined in Chapter 1. The key actions in each topic chapter were revised to clearly demonstrate what key actions are required to positively address the City Corporation's policy framework, and what key actions are strongly recommended to develop exemplary schemes.
 - A revised retrofit definition. In Chapter 3, the definition of retrofit is updated to 'the upgrading of a building in relation to the installation of new building systems or building fabric to improve efficiency, reduce environmental impacts and/or adapt for climate change. A retrofit should retain and reuse at least 50% of the existing building(s)' superstructure (by mass). The SPD includes revised definitions of 'light retrofit', 'deep retrofit', 'retrofit with new build' and 'new build'.
 - Clarification on the NABERS UK 5* minimum target to major applications. NABERS is a performance-based rating scheme that measures the energy consumption of a building. The challenging NABERS UK 5* target rating requirement will be applied to new major office developments, while retrofitted

office buildings will be required to achieve a 4* rating. The guidance aligns the planning application process with the NABERS UK Design for Performance agreement and the ongoing reporting process.

Further guidance on operational energy reporting for non-office developments is also included in Chapter 4 to capture developments that are not required to achieve NABERS certification.

Further consultation was conducted with industry experts to ensure the technical detail on NABERS is implementable.

- Introduction of embodied carbon benchmarking as recommended by industry experts. Embodied carbon benchmarks, aligning to GLA whole life-cycle carbon benchmarks, are introduced in Chapter 4. It was determined that introducing benchmarks in the SPD would offer a softer approach than targets, which could be considered in the future. Developments are already required to report against these benchmarks in Whole Life-Cycle Carbon Assessments, therefore, the introduction of embodied carbon benchmarks won't require further reporting. A third-party review is recommended to confirm consistency in the application of the benchmarks.

Further consultation was conducted with industry experts to ensure the technical detail on embodied carbon benchmarks is implementable.

- Introduction of wider environmental benefits in Chapter 4. All high carbon impact developments will be expected to provide wider environmental sustainability benefits if they do not achieve the GLA embodied carbon benchmark at planning stage. These benefits should be proportionate to the level of carbon impact and take advantage of any opportunities of the site for contributing to substantial sustainability improvements in the locality. This could include implementing priorities of the LAEP, supporting sustainable transport modes, developing material passports, implementing climate resilience measures and/or urban greening infrastructure in the local area.

Further consultation was conducted with industry experts to confirm the environmental benefits approach is implementable.

- Further guidance on pre-redevelopment audits and pre-deconstruction audits. Consultation feedback requested further guidance and templates for pre-redevelopment and pre-demolition audits to improve consistency. Pre-demolition audits were reframed to pre-deconstruction audits to reflect the focus on retention and reuse. The draft guidance, included in Chapter 5, draws upon GLA Circular Economy Statement guidance and introduces City-specific and best-practice guidance. The guidance encourages developments to embed circular economy principles and reuse opportunities into early design concept to create an improved basis for retention and reuse.

Further consultation was conducted with industry experts to confirm the pre-redevelopment audit guidance and pre-deconstruction audit guidance is implementable.

Strategic Environment Assessment (SEA) and Habitat Regulations Assessment (HRA) Screening Opinions

21. LUC, on behalf of the City Corporation, drafted the SEA and HRA Screening Opinions. The SEA Screening Opinion considered whether a Strategic Environment Assessment (SEA) should be undertaken for the SPD. It concluded that the SPD is unlikely to have significant environmental effects and that a full SEA is therefore not required. The HRA Assessment Screening concluded that the SPD would not adversely affect any 'European Site' in accordance with the Habitat Regulations (HR) 2017.
22. To meet the requirements of the SEA and HR Regulations, the views of three statutory consultees (Natural England, Historic England and the Environment Agency) were sought during a five-week consultation period between 27 February and 2 April 2024. All statutory consultees note the findings of both the SEA and HRA Screening Opinions, and that a full SEA and HRA is not required.
23. Further information about the SEA and HRA Screening consultation is included in Appendix 2 – Consultation Statement. The SEA Screening Opinion is included as Appendix 4 and the HRA Assessment Screening is included as Appendix 5.

Corporate & Strategic Implications

24. Strategic implications – the Planning for Sustainability SPD is in line with the aims and objectives of the Corporate Plan 2024-2029. The SPD supports the delivery of the 'diverse engaged communities' outcome as a meaningful public consultation process was conducted with resident and worker communities to inform the delivery of this SPD. This SPD delivers the 'leading sustainable environment' outcome by encouraging developments to support the delivery of the CAS square mile net zero target, embed circular economy principles, and deliver climate resilience and biodiversity measures.
25. Financial implications – none
26. Resource implications – none
27. Legal implications – the Planning for Sustainability SPD has been developed in accordance with the requirements of Town and Country (Local Planning) (England) Regulations 2012 and other relevant legislation.
28. Risk implications – none
29. Equalities implications – the Planning for Sustainability SPD will contribute to the delivery of the City Corporation's Public Sector Equality Duty 2010. An updated Equality Impact Assessment (EqIA) screening of the final SPD was undertaken to evaluate the implications for people with protected characteristics. The EqIA screening concluded that a full Equality Impact Assessment is not necessary because none of the nine protected characteristics demonstrated a negative or adverse impact resulting from the implementation of the proposed Planning for Sustainability SPD. The EqIA screening is attached as Appendix 3.

30. Climate implications – the Planning for Sustainability SPD is an output of the Climate Action Strategy. It supports the delivery of CAS commitments in the Square Mile to achieve net zero by 2040 and improve the City’s climate resilience measures.

31. Security implications - none

Next steps

32. An adoption statement will be prepared in line with the Town and Country Planning Regulations.

33. It is expected that the SPD will be adopted within a few weeks of the decision date of Committee, and the final SPD and adoption statement will be made publicly available.

Conclusion

34. The City Corporation is grateful to all internal and external consultees, individuals and organisations for their responses to the draft SPD. The various comments and feedback were invaluable in the development of the final SPD.

35. This report presents and updates the Committee on the draft Planning for Sustainability SPD including setting out the purpose, themes and structure of the SPD. It details the formal public consultation exercise undertaken between March – May 2024 and how this has informed the latest version of the SPD. The Planning for Sustainability SPD has been broadly welcomed during the public consultation and is recommended for approval.

36. If approved by the Planning and Transportation Committee, the SPD will be adopted, published and will become a material consideration in the determination of planning applications.

Appendices

- Appendix 1 – Planning for Sustainability Supplementary Planning Document
- Appendix 2 – Planning for Sustainability SPD - Consultation Statement
- Appendix 3 – Planning for Sustainability SPD - Equality Impact Assessment
- Appendix 4 – Planning for Sustainability SPD - SEA Screening Opinion
- Appendix 5 – Planning for Sustainability SPD - HRA Screening

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Planning for Sustainability



PLANNING FOR SUSTAINABILITY

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ABBREVIATIONS

Abbreviation	Definition
AEP	Annual Exceedance Probability
ASHP	Air Source Heat Pump
AZP	Advanced Zoning Programme
BAP	Biodiversity Action Plan
BGI	(Urban) Blue-Green Infrastructure
BGP	Biodiversity Gain Plan
BIM	Building Information Metric
BM	Biodiversity Metric
BSI	British Standards Institution
BNG	Biodiversity Net Gain
BREEAM	Building Research Establishment Environmental Assessment Method
BU	Biodiversity Unit
CCAS	Clean City Awards Scheme
CCRSS	Climate Change Resilience Sustainability Statement
CE	Circular Economy
CFD	Computational Fluid Dynamics
CIBSE	Chartered Institution of Building Services Engineers
CIL	Community Infrastructure Levy
CLT	Cross-Laminated Timber
CoLC	City of London Corporation
DEFRA	Department for Environment Food and Rural Affairs
DFP	Design for Performance (NABERs UK)
DHW	Domestic Hot Water
DSY	Design Summer Year
EA	Environmental Agency

EAF	Electric Arc Furnace
EASIN	European Alien Species Information Network
ECAP	Embodied Carbon Action Plan
ERIC	Eliminate, Reduce, Isolate, Control
ESG	Environmental, Social and Governance-based investing framework
EUI	Energy Use Intensity
EV	Electric Vehicle
GGBS	Ground Granulated Blast-furnace Slag
GHG	Greenhouse Gas
GiGL	Greenspace Information for Greater London
GLA	Greater London Authority
GWP	Global Warming Potential
HMMP	Habitat Management and Monitoring Plan
HVAC	Heating, Ventilation, and Air Conditioning
INNS	Invasive Non-Native Species
LAEP	Local Area Energy Plan
LEED	Leadership in Energy and Environmental Design (rating system)
LEMP	Landscape and Ecological Management Plan
LERC	Local Environment Records Centre
LETI	Low Energy Transformation Initiative
LFRMS	Local Flood Risk Management Strategy
LISI	London Invasive Species Initiative
LLFA	Lead Local Flood Authority
LNRS	Local Nature Recovery Strategy
LPG	London Plan Guidance
MEP	Mechanical, Electrical and Plumbing
MI	Management Information

NABERS UK	National Australian Built Environment Rating System (UK Version)
NPPF	National Planning Policy Framework
PAN	Planning Advice Note
PAS	Publicly Available Specification
PTAL	Public Transport Accessibility Level
PV	Photovoltaic
RIBA	Royal Institute of British Architects
RICS	Royal Institution of Chartered Surveyors
SINCs	Sites of Importance for Nature Conservation(s)
SPD	Supplementary Planning Document
SuDS	Sustainable Drainage Systems
TFND	Taskforce on Nature-related Financial Disclosures
TM54	Technical Memorandum (CIBSE) Evaluating operational energy use at the design stage
TSE	Treated Sewage Effluent
UGF	Urban Greening Factor
UHI	Urban Heat Island
UKBGC	UK Building Green Council
UKNZCBS	UK Net Zero Carbon Building Standard
UKPN	UK Power Network
UTCI	Universal Thermal Climate Index
WBCSD	World Business Council for Sustainable Development
WELL	Building standard - measures attributes of health and wellbeing
WHO	World Health Organisation
WLC	Whole Life Carbon
WLCA	Whole Life-Cycle Carbon Assessment

INTRODUCTION TO THIS DOCUMENT

01

1. INTRODUCTION TO THIS DOCUMENT

City of London context

The City of London (the City) is one of the world’s leading international financial and professional services centres and a driver of the UK economy, continually innovating and developing new business areas and flexible ways of working. The quantity and quality of new development, particularly office-led development, will need to meet growing business needs, supporting and strengthening opportunities for the continued collaboration and clustering of businesses that is vital to the City’s operations. The demand for additional office floorspace and high land values within the Square Mile have resulted in a high-density and rapidly changing townscape. This presents challenges and opportunities in ensuring that the right amount of development is delivered in suitable locations.

The future growth of the City needs to take place in an economically, socially and environmentally sustainable and inclusive way, incorporating the principles of Good Growth set out in the London Plan 2021. These principles ensure that London remains resilient to our changing climate and is green and healthy; with clean air, easy access to green space and more efficient buildings supplied by cleaner energy.

The emerging Local Plan, called City Plan 2040, sets out the City of London Corporation’s (City Corporation) vision, strategy and objectives, providing a framework for future development in the Square Mile. This framework outlines priorities for our people, businesses, places, and spaces until 2040 and beyond.

This Supplementary Planning Document (SPD) focusses on the environmental sustainability of the City. In the context of widespread climate action, the City Corporation has adopted an ambitious Climate Action Strategy (CAS) which sets out how the organisation will achieve net zero, build up climate resilience and champion sustainable growth. It has also identified climate-related risks that are likely to affect the City in the future, including flooding, overheating, water stress, biodiversity losses, pests and diseases, and disruption to infrastructure.

A sustainable and more resilient City will contribute to reducing the impact on the climate and mitigating future risks. However, it will also enhance the quality of the environment for residents and occupiers by improving air quality, thermal comfort, natural amenities, public realm quality, and accessibility. Developments should support, contribute to, and enhance the quality and sustainability of the environment throughout their life-cycle, including deconstruction, construction, operation and end-of-life.

Furthermore, a sustainable and more resilient City will appeal to landowners and commercial occupiers who are increasingly focused on high environmental, social and governance (ESG) standards to ensure that risks and opportunities affecting their buildings are managed effectively and in the long term.



Both images: City of London Corporation

1. INTRODUCTION TO THIS DOCUMENT

The aim of this SPD

The purpose of this SPD is to provide guidance on how applicants should approach environmental sustainability in their developments through the application process.

It has been prepared to provide additional detail and guidance on how to fulfil policies of the adopted Local Plan 2015, as well as emerging policies within the City Plan 2040. It sits within a wider suite of policies, strategies and action plans to address key sustainability issues in the local, national and global context. Specifically, this SPD:

- sets out the key approaches that the City Corporation is targeting on different sustainability topics
- identifies a list of key actions to be considered throughout the design process and provides details specific to the City for each sustainability topic
- provides guidance on what, how and when relevant sustainability aspects should be taken into consideration during the planning application process and sets out submission requirements throughout the development process, from pre-application to post-completion stage
- provides a collation of relevant recommended standards, certifications and guidelines.

Applicant teams should work through all topics to maximise co-benefits and reach the best-balanced design package for their site.

The SPD provides further detail on how to interpret policies and is a material consideration in determining planning applications. The SPD sets out guidance about what planning officers expect to see addressed through the proposed design in applications.

The SPD references policy and document requirements applied through the planning process. Requirements referenced as:

- 'must' are mandatory, as required by the Development Plan (Local Plan 2015 until the adoption of City Plan 2040 and the London Plan)
- 'should' are strongly recommended, as applied on case-by-case basis where they constitute a significant opportunity to drive sustainability. Application will be determined by City Corporation planning officers during the pre-application process



1. INTRODUCTION TO THIS DOCUMENT

This SPD is particularly for the use of applicant teams, City Corporation officers and decision makers. The content of this document applies to all major and minor applications for new buildings, refurbishment and retrofitting of existing buildings, extension and alterations, works to open spaces and landscaped areas on sites, and relate to all types of land uses. Specific requirements apply to major developments only, where the floorspace to be created by the development is 1,000sqm+, the site is 1 hectare or more, a residential development of 10+ dwellings, or a residential development on a site of 0.5 hectares or more. For minor developments that include substantial works (e.g. major retrofit, extension etc), detailed sustainability information may be requested in the planning application to demonstrate policy alignment.

Requirements of this SPD will be applied to applications submitted after its adoption. It is recognised that sustainability is an evolving field and that flexibility to allow for future learning and innovations must be applied. The document is expected to be reviewed and updated as and when relevant changes to overarching policy frameworks, strategies and technologies and processes require this.

This document recognises that the guidance contained within it should consider the implications for people within the protected characteristics under The Public Sector Equality Duty set out in the Equality Act 2010. Regard should be given to the principles of inclusive and accessible design in all developments and initiatives, and consideration given to vulnerable groups, including the elderly and children, whenever climate change mitigation and adaptation measures are implemented.

Many of the case studies featured in this document relate to planning applications approved by the City Corporation. The details of these case studies reflect the information submitted by applicants at planning stage, and it is acknowledged that more recent omissions or amendments implemented later on in the design process may not be fully captured in the details displayed. There are also case studies showing a range of completed developments and public realm works.

Structure and themes of the SPD

This SPD is divided into thematic chapters, each with subtopics identified as key sustainability considerations for all development proposals within the City. Despite this separation, it is important to consider the inter-linkages between elements, which can include positive synergies (such as nature-based sustainable urban drainage systems (SuDS) supporting biodiversity), as well as trade-offs between different sustainability issues that need to be balanced. As an example for the latter, high performing thermal insulation materials improve energy efficiency, however, they could contribute to the embodied carbon intensity of a building.

The City Corporation seeks a holistic approach to development and its thorough integration into the strategic sustainability aims of the local and wider context. Opportunities and constraints will vary for each site and schemes should balance all facets of sustainability with the needs of applicants, tenants, residents and the public and local ecosystem.

Chapter 1 – INTRODUCTION

Introduces the overall purpose and structure of this document, how to use the information contained.

Chapter 2 – ENVIRONMENTAL SUSTAINABILITY POLICY FRAMEWORK

Explains the current policy context and provides an overview of the current strategies adopted by the City Corporation to address climate change mitigation and adaptation. It also introduces the sustainability themes identified as key to the City.

Chapter 3 – RETROFIT AND REUSE

Outlines the City Corporation’s aspiration to achieve sustainable development through the retrofit and reuse of the existing building stock. It provides guidance on light retrofit, deep retrofit and retrofit with new-build.

Chapter 4 – GREENHOUSE GAS EMISSIONS AND ENERGY USE

Whole Life-Cycle Carbon (WLC) - provides guidance on how to reduce or mitigate the carbon emissions resulting from the construction and use of a building over its entire life, including its demolition and disposal.

Operational Emissions and energy use - examines how to reduce the emissions generated from the day-to-day operation of a development, which are principally driven by energy use and efficiency.

Chapter 5 - CIRCULAR ECONOMY

Circular Economy in Construction - provides guidance on how to shift from a linear to a more circular construction model, where a long-life, loose-fit, low-energy approach is taken to all new and existing buildings and materials.

Operational Circular Economy - focuses on reducing waste produced by occupants, and how to ensure waste that is produced is sorted, stored and treated appropriately.

Chapter 6 – CLIMATE RESILIENCE

Flood Risk and sustainable drainage systems - sets out how flood risk management and sustainable drainage systems should be approached for developments within the City.

Water Resource Management - outlines considerations for City developments to reduce water use.

Building and Urban Overheating - provides guidance on preventing overheating in a dense and urbanised environment such as the City.

Pests & Diseases – provides guidance on how to manage the threat of pests and diseases which could be raised by milder, wetter winters and warmer summers.

Infrastructure Resilience - outlines key considerations for designing efficient and resilient infrastructure for a building and its interface with the context.

Chapter 7 – URBAN GREENING AND BIODIVERSITY

Urban greening - provides guidance on how to connect green spaces and increase biodiversity and amenity value of urban greening in the City.

Urban Greening Factor - defines the Urban Greening Factor and describes the approach needed to achieve the desired outcomes.

Biodiversity – provides guidance on how developments can enhance biodiversity and support the City Corporation’s Biodiversity Action Plan.

Biodiversity Net Gain - advice on the application of emerging BNG policy in the City context including how to meet and exceed statutory and policy targets.

Chapter 8 – KEY CONSIDERATIONS AND REQUIREMENTS

Key considerations, recommendations and submission requirements for all stages of the planning process.

APPENDICES

A list of standards, certifications, guidelines and guidance that could help developments drive further sustainability outcomes.

ENVIRONMENTAL SUSTAINABILITY POLICY FRAMEWORK

02

2. ENVIRONMENTAL SUSTAINABILITY POLICY FRAMEWORK

Introduction

In transforming the built environment, it is fundamental to adapt to and mitigate the impacts of climate change and achieve sustainable development.

In 2020, 67% of London’s direct carbon emissions were attributable to buildings¹ (not accounting for indirect ‘embodied’ emissions). Embodied carbon makes up an increasing percentage of the total direct and indirect emissions in buildings. Due to the role of the City as a financial and professional services centre and its high-density nature, commercial buildings have a major impact on whole life-cycle emissions.

This chapter outlines key sustainability planning policies and guidance that applies to City developments after the adoption of this SPD. As policies, guidance and certifications are updated and/or new versions are released, it is expected that the current version is applied when referenced in this SPD (unless specifically noted).

National policies

The National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) set out the government’s planning policies for England and how these should be applied. The NPPF reiterates that the purpose of the planning system is to ‘contribute to the achievement of sustainable development’, acknowledging the role planning can play in securing radical reductions in greenhouse gas emissions and adapting to climate change. The NPPF states that ‘The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks, and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure’.

The NPPF states that plans should take a proactive approach to mitigating and adapting to climate change, in line with the objectives and provisions of the Climate Change Act 2008.

Under the Environment Act 2021, all planning permissions granted in England (with a few exemptions) have to deliver a Biodiversity Net Gain (BNG). The City Corporation’s BNG approach is set out in Chapter 7 with further detail confirmed in the City Plan 2040 upon its adoption.

¹ London Assembly (2020) Emissions from Buildings.

Local policies and key guidance

The London Plan 2021 and London Plan Guidance (LPG) published by the Greater London Authority (GLA) will be used alongside the City Corporation’s policies when determining planning applications. This SPD has been produced in conformity with the policies and guidance of the London Plan, which are referenced throughout the document where relevant.

For applications referable to the Mayor, this document should be interpreted as supplementary to the submission requirements set by the GLA. For non-referable schemes, this document should be interpreted as primary guidance on how to achieve sustainable development in the City.

The London Plan 2021 is committed to ensuring the capital leads the way to tackle the impacts of climate change by making London a net zero-carbon city by 2030. To support this goal, the GLA expects that new homes are environmentally sustainable and meet emissions targets. The London Plan introduces circular economy principles, with a focus on reducing waste, material reuse and recycling throughout the whole life-cycle (WLC) of a development. It requires developments to achieve an Urban Greening Factor (UGF) score, and for major schemes to demonstrate that they are ‘Air Quality Neutral’ developments. The London Plan introduces and promotes the Mayor’s ‘healthy streets’ agenda, with a focus on walking and cycling, freight consolidation and green infrastructure.

The City Corporation’s Local Plan, adopted in 2015, is the strategy for planning the City. It sets out the vision for shaping the Square Mile up to 2026 and contains policies which guide planning decisions within the City. The Local Plan is currently under review and will be replaced by the emerging City Plan 2040 once it is adopted.

The emerging City Plan 2040, is a plan for the future development of the City of London, setting out what type of development the City Corporation expects to take place and where. It sets out the City Corporation’s vision, strategy and objectives for planning up to 2040, together with policies that will guide future decisions on planning applications. This includes the introduction of the ‘Retrofit First’ approach. Climate change mitigation and adaptation are key priorities and threaded throughout policies in the plan.



Source: City of London Corporation

2. ENVIRONMENTAL SUSTAINABILITY POLICY FRAMEWORK

Connectivity and the City of London Transport Strategy

The City of London is very well-connected, with sustainable transport modes, to surrounding London boroughs and the wider regional context. It has the highest possible Public Transport Accessibility (PTAL) level of 6b. The Department for Energy Security and Net Zero states in its 2021 Local Authority and Regional Greenhouse Gas Emissions Report that “London has the lowest emissions per capita of any region due to the urban nature of the transport system, a high population density and its lower level of large industrial facilities than other regions”. The City of London is named as one of the local authorities that had the largest decreases in greenhouse gas emissions since 2005, mostly due to decreases in the commercial electricity sector. The correlation between high levels of sustainable connectivity, the concentration of mixed commercial activities and associated commuting, contributes to the carbon efficiency of the Square Mile and supports a compact, high density, built environment in designated areas of the City.

People walking and cycling make up more than two-thirds of all observed travel activity in the City, whilst cycles made up a greater proportion of traffic than cars and private hire vehicles counted on our streets in 2022.

The City Corporation’s Transport Strategy 2024 addresses transport and mobility challenges and opportunities presented by a growing and evolving City. With regard to sustainable development, the strategy provides the framework for continuously improving connectivity between places and accessibility of the City’s public realm. This is subject to detailed negotiations with applicants, in particular to:

- Improve the quality and permeability of City streets and spaces to enhance inclusion and accessibility, connectivity between transport modes and enable more people to choose and enjoy walking, wheeling and cycling as part of the Healthy Streets Approach
- Create new pedestrian routes through buildings and development sites, where feasible, and respect, maintain and restore the City’s characteristic network of accessible buildings, streets, courts and alleyways
- Identify opportunities to create new public spaces by reallocating carriageway space to more sustainable uses
- Identify opportunities for temporary public realm improvements to renew and rejuvenate spaces in advance of permanent change. This could include temporary planting and greening, art installations, or seating

- Increase the amount of formal and informal seating on-street and in squares, public spaces and parks to maximise opportunities for social interaction
- Identify opportunities to integrate exercise and play into the public realm
- Achieve publicly accessible ground floors and external amenity spaces for improved pedestrian movement, where feasible
- Design inclusive, attractive and convenient building entrances, including for cyclists, and other forms of active travel
- Ensure that adequate cycle parking for visitors is provided
- Reduce detrimental impacts, such as severance of amenity spaces, public realm and pedestrian routes, through servicing access to buildings, by incorporating flexible and innovative servicing solutions for the design of the public realm
- Ensure that our streets and public spaces are safe, feel safe, are shaded and sheltered, cleaner and quieter. This includes designs that are climate resilient, durable and that minimise carbon emissions.

Applicants in the City of London will be required to provide design solutions for improving connectivity, accessibility and the quality of public realm. In particular, measures that increase the use of sustainable transport modes by occupiers and visitors will support the transition to net zero carbon.

The topic chapters of this SPD include key actions, measures and recommendations to improve connectivity and accessibility of developments, including the public realm and private open spaces and their relationship with buildings.

Image: Festival Gardens
Source: Clive Totman, 2023 ©



2. ENVIRONMENTAL SUSTAINABILITY POLICY FRAMEWORK

Climate Action Strategy 2020-2027

The City Corporation has long been a champion of air quality, open space provision, sustainability and, more recently, green finance, recognising that a healthy environment is critical to business and personal wellbeing.

In 2020, the City Corporation adopted a radical Climate Action Strategy (CAS) which breaks new ground and sets out a pathway to achieving net zero emissions for both the City Corporation's activities and the wider activities of businesses and residents in the Square Mile. In adopting the strategy, the City Corporation has committed to:

- Achieve net zero carbon emissions in its own operations by 2027
- Achieve net zero carbon emissions across its investments and supply chain by 2040
- Support the achievement of net zero for the Square Mile by 2040
- Climate resilience in our buildings, public space and infrastructure

The City Corporation is investing £68m between 2020-2027 to support these goals of which £15m is dedicated to preparing the Square Mile for extreme weather events.

The CAS and the actions outlined in the document will help enable the Square Mile to achieve net zero carbon by 2040, tackle climate change, and create opportunities while transitioning to a low-carbon economy.

The City Corporation is enacting a variety of further measures to support the implementation of the CAS

These include:

- A Local Area Energy Plan which sets out the road map to achieve a net-zero energy system in the City by 2040, to be delivered in partnership with our key stakeholders.
- A programme of transport measures to introduce further pedestrian priority and pavement widening across the Square Mile as well as freight consolidation.

- The Cool Streets and Greening Programme which is introducing climate resilience measures to the City's streets and public spaces. The measures include sustainable urban drainage systems, integrated water management, climate resilient greening and enhancements to biodiversity.
- Guidance and case studies on building refurbishment in the City as a way of incentivising retrofit within the construction sector.
- A Heritage Building Retrofit Toolkit to support the adaptation of the 600+ listed buildings, and many more non-listed historic buildings, in the City.
- As the local planning authority, the Corporation has adopted the Carbon Options Guidance Planning Advice Note which seeks to reduce the operational and embodied carbon emissions of schemes in the City.
- An Embodied Carbon Action Plan to reduce the embodied carbon of the built environment in the Square Mile.
- The Skills for a Sustainable Skyline Taskforce established by the Corporation recently reported on its finding to ensure we have the skills, capacity and capability to deliver on our net-zero goals.
- Smart lighting upgrades to the City Corporation's buildings

The City Corporation seeks to use the planning process to implement a range of resilience measures in the Square Mile including green roofs, urban greening, landscaping interventions, flood resilience and climate resilient new buildings. Chapter 6 of this document provides an expanded range of guidance.

Local Area Energy Plan 2023

The City Corporation Local Area Energy Plan (LEAP) sets out the details of what the future collective energy system could look like in the Square Mile with a view to achieving Net Zero across the Square Mile and City Corporation's operations by 2040. It combines robust technical analysis with stakeholder engagement to develop priority action areas.

The LEAP sets out actions that need to be taken by key actors in the Square Mile, including the City Corporation itself, local and national government, energy providers, regulators, industry and residents. Further details are set out in the Operational Energy Use section of this SPD.

Embodied Carbon Action Plan

The City Corporation is developing an Embodied Carbon Action Plan (ECAP) which provides a focus on better understanding the scale of embodied carbon in the Square Mile and developing innovative collective actions to reduce these emissions as part of our Climate Action Strategy. The Plan aims for a 40% reduction target in embodied carbon emissions for all new buildings, infrastructure and renovations in the Square Mile by 2030, in line with World Green Building Council recommendations. The Plan is focused on four main action areas:

- Develop evidence-based targets
- Build for longer-term carbon value
- Build efficiently with the right resources
- Learning and collaboration

Air Quality Strategy 2025-2030 (draft)

Twenty years ago, levels of air pollution across the Square Mile were almost three times what they are today. Over that time, the City Corporation has been taking focussed action through a series of action plans and strategies to improve the quality of the air within the Square Mile and across London. Working collaboratively within the City Corporation, and with external partners and stakeholders, the City Corporation works to reduce ambient concentrations of nitrogen dioxide (NO2) and particulates (PM10 and PM2.5). The variety of pollutant sources require a diverse suite of measures including regulation, enforcement and planning control. Aligning the requirements of this SPD with the Air Quality Strategy ensures cohesion across emission source within development.

The Air Quality Strategy 2025-2030 builds upon continual learning of previous strategies to outline the actions required to achieve compliance with national pollutant standards and to provide a pathway towards meeting 2021 World Health Organisation (WHO) air quality guidelines.

RETROFIT AND REUSE

03

3. RETROFIT AND REUSE

Introduction

New development has a high impact on the environment, due to the embodied carbon associated with the extraction, transportation, and production of new materials, energy required for the construction and demolition work itself, and from the building waste materials that need to be transported off the site and processed. A retrofit scheme is likely to result in less upfront embodied carbon emissions than a new-build scheme.

It is critical to retrofit large amounts of existing building stock in the City in order to meet the UK's net zero carbon target. Retrofit also offers opportunities for improving energy efficiency, climate resilience, amenity, health and wellbeing for occupiers.

It is recognised that new developments can provide enhanced opportunities for accessibility, connectivity, density, and sharing of space, facilities and services by a large number of occupiers, residents and visitors. However, retrofitting existing buildings is a principal way of reducing waste and carbon emissions in the construction industry and the Square Mile, whilst maintaining or introducing a characteristic and vibrant mix of building types and uses within them. Different levels of retrofit can help strike the right balance between a low-carbon project and one that works for final users.

Opportunities to retain and retrofit existing buildings, following GLA guidance on WLC assessments and Circular Economy statements, must be fully explored and prioritised before a project team considers demolition of any kind, ideally at concept stage for maximum impact. This is supported by the emerging City Plan 2040's Strategic Policy S8 which, upon its adoption, requires applicants to take a "retrofit-first" approach, prioritising the retention and retrofit of existing buildings, informed by an appraisal of the development options. This approach will contribute to future-proofing and transitioning the Square Mile to a net zero carbon city by 2040.

Key approaches for the City

In the City of London context, retrofitting existing buildings contributes to preserving and enhancing the sensitive character of conservation areas and heritage assets, creating an architecturally innovative environment, and contributing towards making the City a leading leisure and culture destination. The City Corporation will welcome applications that set strong precedents in this regard and promote new ways of thinking about repurposing buildings as an effective way to drive down carbon intensity and create a unique sense of place. Thus, retrofit and reuse respond to developers' and occupiers' wishes to

create, live or work in the most sustainable environment possible. The City Corporation strongly supports the creative shift of focus of architects, engineers and designers to the transformation of existing buildings into sustainable, characterful and interesting architecture. Imaginative adaptations of buildings can contribute to the humanity of spaces and improve the creativity of people and their enjoyment of work or life in them.

Adopting a retrofit approach which reduces waste and disturbance to the surrounding context during construction also helps support these aims. The most important actions for achieving success in retrofit projects generally, and in heritage contexts, are outlined on the next pages.

The earlier the potential for retrofitting is discussed, the more likely it is to be a success. Retrofitting measures should aim to maximise building retention (or minimise new work), improve energy efficiency and introduce other sustainability benefits, such as improved climate resilience, enhanced health and wellbeing of the occupants, contribution to biodiversity and urban greening, and reduction in water use.

Further retrofit guidance including institutional guidance based on best practice set out by LETI is provided in Appendix A and B.

Key policies and guidance

Table 3.1 Retrofit and reuse key planning policies

London Plan 2021

- D3 Optimising site capacity through the design-led approach
- S12 Minimising greenhouse gas emissions
- GLA Circular Economy Statement Guidance

Local Plan 2015

- CS15: Sustainable Development and Climate Change
- CS17: Waste
 - DM17.2 Designing out construction waste

Emerging City Plan 2040

- S4: Offices
 - OF1: Office Development
 - OF2: Protection of Existing Office Floorspace
- S8: Design
 - DE1: Sustainable Design
- S11: Historic Environment
 - HE1: Managing Change to Historic Environment

Additional Guidance

- Carbon Options Guidance Planning Advice Note
- Heritage Building retrofit toolkit (CoLC)
- Embodied Carbon Action Plan (CoLC)
- Adapting Historic Buildings for Energy and Carbon Efficiency: Historic England Advice Note 18

Case Study: St Magnus House

Use: Offices and mixed-use

Retrofit



Visual of St Magnus House following a deep retrofit. Source: Design and Access Statement

Key facts:

- Improved thermal performance achieved by replacement of the existing ribbon windows and the addition of internal insulation to the rear of retained cladding panels
- Waste minimised through high levels of retention across the existing fabric, and reuse of deconstructed materials

Additional Features:

- Utilisation of a heat pump system to provide the building's annual space heating and DHW demands, and a PV array to generate renewable electricity
- Low WLC emissions and high levels of energy efficiency
- Replacement and upgrade of HVAC systems, to all-electric plant with heat recovery
- New external lift to access the public terrace - negotiated through the pre-application process

3. RETROFIT AND REUSE

CONTENTS

Key actions to develop an exemplar City scheme

The following key actions are required to positively address the City Corporation's policy framework and should be discussed at pre-application stage. Applicants should clearly present the relevant information in the application documents.

- Adopt a retrofit first approach that is informed by a carbon optioneering assessment in accordance with the Carbon Options Guidance Planning Advice Note
- Consider whether a staged approach starting with light retrofit before advancing to deep retrofit (and new build if applicable) would be feasible to push back high carbon impacts in the short term.
- Consider the optimal use of an existing building and the arrangement of the interior that would enable a retrofit approach while supporting strategic land use policies
- Ensure that retrofit schemes achieve the highest possible level of energy efficiency, climate resilience, health and well-being, and occupier amenity.

Optioneering requirements are set out in detail in the City Corporation's Carbon Options Guidance. In addition, the GLA's pre-redevelopment audit approach must be followed to demonstrate that the lowest feasible upfront carbon and deconstruction waste option is pursued for development. This includes considering an appropriate change of use that would enable building elements to be retained and adapted, and that would be likely to result in overall lower upfront carbon emissions compared to a new build option. In this case, retrofit projects involving a change of use away from office would not need to be justified by a viability assessment (emerging City Plan 2040 Policy OF2.2b Retrofit fast track).

Other opportunities to reduce embodied carbon emissions in the short term, to address the 2050 Paris agreement target of limiting global warming to 1.5 degrees C above pre-industrial levels, should be considered, such as pushing higher upfront carbon development back until lower carbon solutions become available, and starting with a light retrofit approach. Subject to the retrofit approach, successful schemes should demonstrate holistic sustainability benefits beyond carbon emission reduction to future-proof the City of London's built environment.

The following key actions are strongly recommended to develop an exemplary scheme that achieves the best balance of planning benefits for the City. Measures should be discussed at pre-application stage and highlighted in the application to support the proposals

- Engage creative architects, engineers and designers that focus on the opportunities of existing buildings and transform the exterior and interior to the highest environmental and design quality
- Define the sustainability aspirations for the site and its context to develop the best practice circular economy and low carbon solutions
- Seek specialist heritage expertise for historic buildings to identify sensitive solutions for retrofit.

Successful retrofit case studies in London demonstrate a high level of creativity, flexibility, collaboration and innovation. In addition to considering site specific conditions for retrofit, applicants should seek to employ creative structural and architectural designers who focus on the opportunities and merits of the existing building, townscape, urban grain and local area context and apply innovative thinking about potentials for environmental synergies and wider improvements. This could relate for example to urban greening and climate resilience measures or sharing of resources, or it could strengthen historic character and create a positive sense of place for the local area with wider benefits for the City's communities. In addition, collaboration with specialist heritage advice should be sought for historic buildings to achieve long term successful solutions.

It is recognised that the noise emitted from the deconstruction and construction can be more disruptive in particular in retrofit schemes. Early engagement is encouraged to ensure the best available mitigations are in place.

Case Study: Museum of London (including Grade II Listed Poultry Market)

Use: Museum and ancillary uses including offices and retail
Refurbishment, Retrofit, and Extension



Visualisatiois (above, left) of the new Museum of London.
Source: Design and Access Statement

Key facts:

- High proportion of retention of substructure, superstructure, façades and roof (varying between buildings)
- Incorporation of upgrades to windows, roofs and walls and a high level of reuse of salvaged historic deconstruction material
- Utilisation of natural ventilation and thermal mass to maintain required conditions

Additional Features:

- 72% reduction of carbon emissions over Part L 2013, the majority of which is achieved through energy efficiency measures, 9% through energy provided by nearby district heat network, 1% through PV panel installation on roofs
- Embodied carbon intensity targeted to meet and exceed the GLA standard benchmark
- Installation of green roofs and biodiverse landscaping on roofs and incorporation of rainwater harvesting

3. RETROFIT AND REUSE

Retrofit first approach

Initial considerations about the extent of retrofit should be based on the opportunities and challenges of a site using design approaches that consider circular economy principles and whole life-cycle carbon impact. Ideally, this process commences at the concept stage and includes:

1. Undertaking optioneering to establish whether existing buildings, structures and materials can be retained, refurbished, or incorporated into the new proposal. Guidance on optioneering is included in Chapter 4 and Chapter 5.
2. Considering whether the current structures and buildings can be developed to suit the evolving requirements of the site and the needs of the site and surrounding area. This involves the consideration of three key strands:
 - i. The development plan, heritage matters, and sustainability drivers for the whole area (e.g. Local Plan and public consultation)
 - ii. The development and sustainability aspirations for the site (e.g. developer brief, pre-app engagement, project sustainability brief)
 - iii. Resulting circular economy and low WLC carbon development opportunities identified for the site.
3. Undertaking a pre-deconstruction audit to identify salvageable materials for reuse and recycling. This could be developed in the form of a "reuse schedule" with more in-depth considerations about how materials can be reused at their highest values. This should be supported with salvage/ demolition drawings from the architects, deconstruction drawings from structural engineers, information about materials brokers/reuse platforms, and potential storage options. Guidance on the development and content of pre-deconstruction audit is included in Chapter 5 – Circular Economy. When not practical at planning application stage, supporting information can be triggered by conditions.

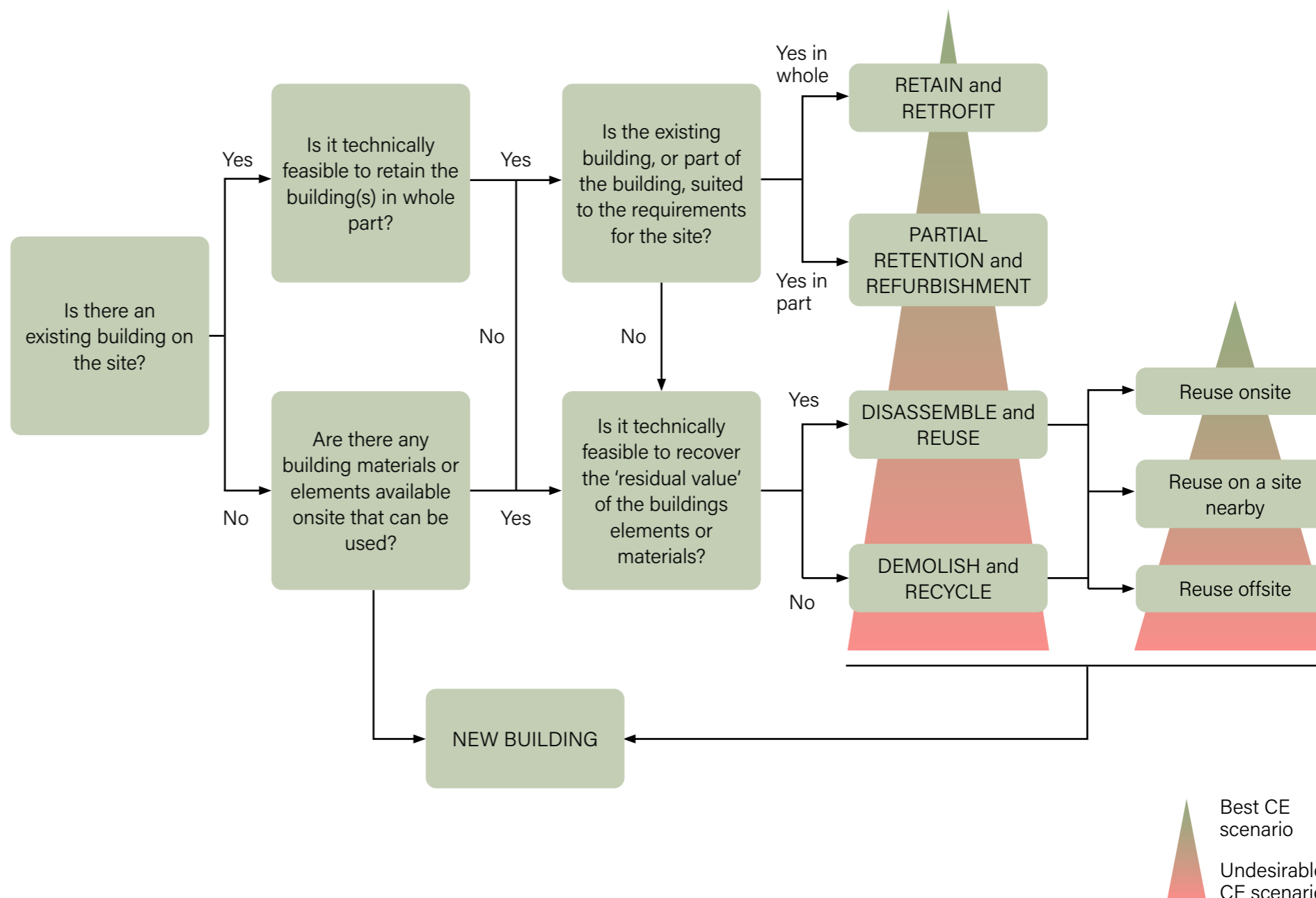


Figure 3.1 Decision Tree to inform decision making on retrofit vs redevelopment. Source: GLA (2022) Circular Economy Guidance.

3. RETROFIT AND REUSE

Defining retrofit

Retrofit is defined as the upgrading of a building in relation to the installation of new building systems or building fabric to improve efficiency, reduce environmental impacts and/or adapt for climate change. A range of interventions may be deployed, from 'light retrofit' to 'deep retrofit'. The City Corporation considers that a retrofit should retain and reuse at least 50% of the existing building(s)' superstructure (by mass).

The following definitions have been adapted from the LETI Climate Emergency, UKGBC Guidance Delivering Net Zero: Key Considerations for Commercial Retrofit, and UK Net Zero Carbon Buildings Standard Pilot Version.

Light retrofit

- Involves energy performance optimisation through basic fabric improvements, replacement or adaptation of existing building elements. Usually minimally invasive.
- Typically focusses on individual building components.
- Often carried out in conjunction with energy efficiency surveys and stakeholder need assessments to further increase the efficiency or maintain good performance of a building.
- Example interventions include: upgrades to heat source and ventilation systems, improving insulation and sealing gaps, lighting upgrades, installing building service monitoring and optimisation technologies. These may be accompanied by 'low/no cost' interventions such as fine tuning and behaviour change measures.

Deep retrofit

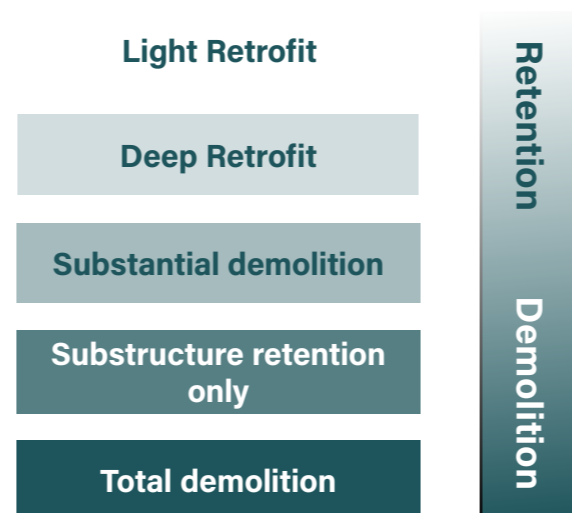
- Retention and reuse of the majority of the existing building(s). Can involve a collection of light retrofit measures and/or works of a more significant size or scale that result in a fundamental change to the building structure or services.
- Long term efficiency gains of deep retrofit are significant, and the approach is likely to result in less embodied carbon emissions than a new build alternative.
- Example interventions may include: adapting the structure to facilitate alterations and changes such as to cores or basements to include end of trip facilities, changes to the building envelope including glazing, openings, façade and roof elements, central MEP upgrades including creating new locations for plant, consolidation of roof areas to facilitate amenity terraces and urban greening.

Retrofit with new build

- A combined approach integrating deep retrofit and new-build elements. In this case, works go beyond extensive refurbishment of existing structures.
- Typically pursued where additional floor space or amenity is sought or the existing building is unfit for its new use.
- The end result usually combines partial retrofit with demolition and new build or extension, such as the construction of additional floors.
- Can be significantly more intrusive and carbon intensive than light or deep retrofits but can enable a marked increase in capacity and quality whilst delivering substantial carbon savings overall compared to complete demolition and rebuild.
- Example interventions include: Adapting the structure and substructure/foundations to facilitate extensions and alterations, new strengthening or transfer structures and relocation or changes to cores, changes to the building envelope, central MEP upgrades including creating new locations for plant, creation of terraces of amenity, urban greening, biodiversity and climate resilience measures.

New build

- The removal, deconstruction or demolition of more than 50% of the existing building's substructure and superstructure (by combined mass).
- Façade retention only is not considered to be a carbon reduction measure due to the carbon impact of temporary works.



Case Study: 1 Appold Street

Use: Office and retail

Retrofit and extension



Source: Planning Application, Circular Economy Statement

Key facts:

- Retention of a minimum of 55% of the existing basement and 8-storey structure
- Insertion of new core, designed to allow retention of primary beams without trimming
- Mechanically fixed façade that can be easily deconstructed and replaced in parts
- Targeting the use of 20% of recycled and reused building materials by value
- Minimising material consumption and incorporating future flexibility in the structure and configuration of internal spaces
- Material passports created to meet the client brief requirements

Additional features:

- Low embodied whole life-cycle carbon intensity due to level of reuse (life-cycle modules A1-A5: 415kgCO₂/m², modules A-C exclusive B6/B7: 621kgCO₂/m² -compared to 970kgCO₂/m² GLA Aspirational Benchmark)

3. RETROFIT AND REUSE

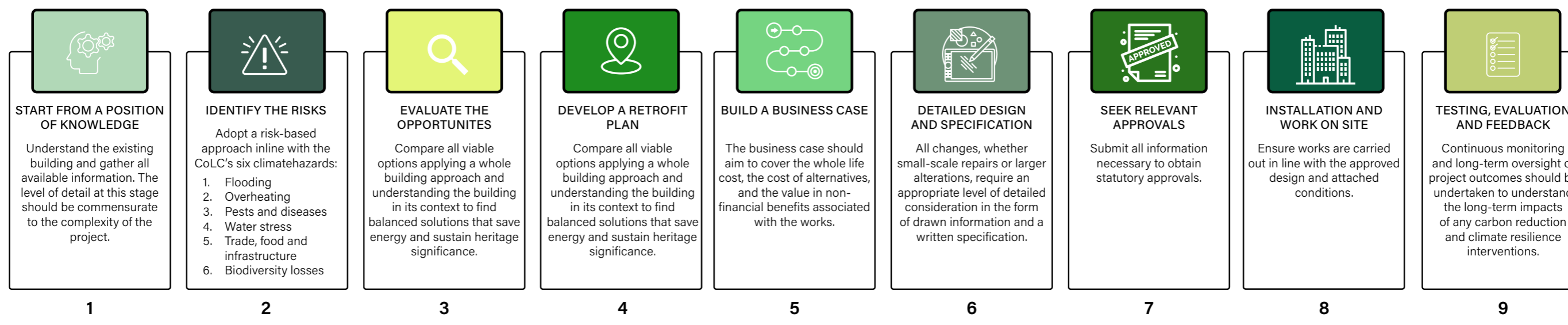
Retrofit Plan

A whole building retrofit plan is encouraged to ensure developments can facilitate future retrofit, adaptive reuse and emerging technologies. The plan should determine the most appropriate retrofit option, or series of retrofit options that could be stages over several years. It should consider what retrofit option achieves the optimum carbon balance in reducing embodied and operational carbon, and what option immediately minimises upfront embodied carbon. Deep retrofit options could be delayed until building technologies can offer lower carbon solutions. However, a whole building approach is recommended to ensure each phase is considered as part of the wider objectives, potential risks are managed, and ensuring one retrofit option doesn't affect the outcomes or performance a future option. It is recommended this plan is based on 'medium-term improvement plans' in the retrofit standard PAS 2038.

Retrofit Standards

Introduced in September 2021, PAS 2038 serves as the UK Standard for energy efficiency and retrofit of non-domestic buildings. It provides a structured framework designed to ensure a comprehensive and systematic approach to retrofitting, covering all stages from initial assessment to final evaluation. It is expected that government schemes will require professionals to follow PAS 2038 to access funding.

Figure 3.3: Heritage Retrofit Roadmap. Source: City of London Corporation (2024)



Retrofit in historic buildings

The City is home to many non-designated and designated heritage assets including over 600 listed buildings and 27 conservation areas. The City's unique historic environment is of exceptional richness and significance and makes a vital contribution to its commercial and cultural vibrancy.

In the case of historic buildings, the Planning (Listed Buildings and Conservation Areas) Act will need to be considered, particularly in relation to certain building fabric and thermal performance improvements. Work should not harm the special architectural or historic significance of a building or increase the risk of long-term deterioration to the fabric or fittings.

In many cases, it is possible to make energy and water efficiency improvements without detriment to the heritage significance of a historic building with the support of expert advice. In fact, it is important that heritage properties are subject to regular building repair, maintenance and cleaning pre and post retrofit to conserve and enhance a building's heritage significance.

The City Corporation has released a Historic Building Retrofit Toolkit to provide clear and actionable guidance for owners, occupiers and caretakers of historic and listed buildings, to help them take steps to reduce carbon and build climate resilience in their heritage buildings whilst maintaining their significance.

The toolkit aims to collate and signpost best practice principles and examples, providing a resource that will allow building owners to confidently start the process of responsible retrofit, build a business case and deliver the adaptations necessary.

The Toolkit includes a Heritage Retrofit Roadmap comprising nine defined steps for undertaking a successful retrofit project in the Square Mile - see graphic below.

The Toolkit is available on the *Supporting the Square Mile Achieve net-zero* page of the City Corporation's Climate Action Strategy webpages.

Climate change adaptation and greening interventions to historic parks, gardens and open spaces can offer valuable ecosystem services, flood and urban heat island alleviation, and habitat creation. However, any intervention should follow a significance-led approach to avoid harm to the significance of these heritage assets. More detail on climate resilience and urban greening and biodiversity measures are included in Chapters 6 and 7.

Figure 3.2: Render of the Baltic Exchange post retrofit. Source: MATT Architecture



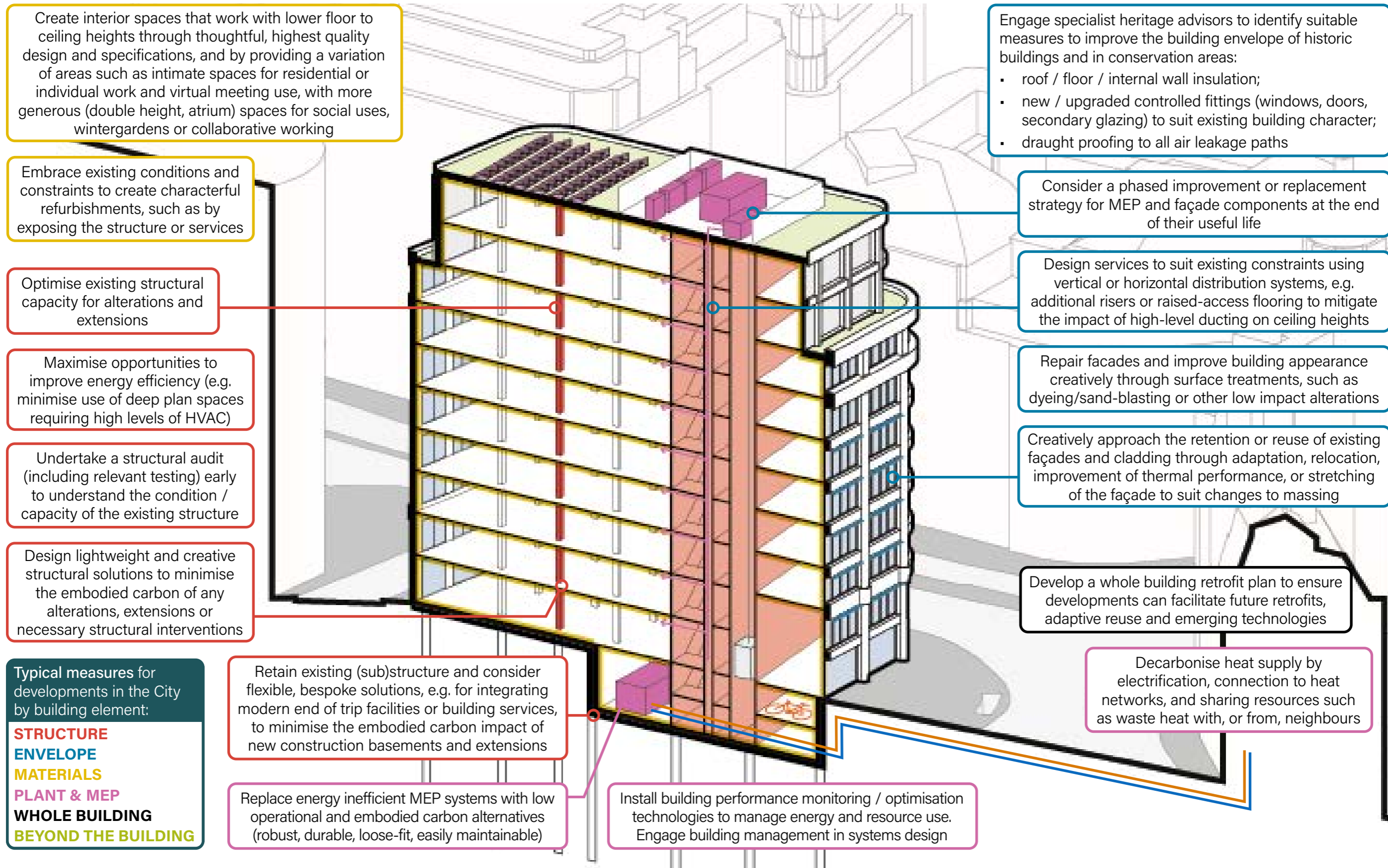
3. RETROFIT AND REUSE

KEY MEASURES FOR CITY DEVELOPMENTS

This infographic provides a list of potential measures, which is not exhaustive. Applicants are encouraged to propose innovative measures that drive best practice. All measures to be agreed on a case-by-case basis.

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GREENHOUSE GAS EMISSIONS AND ENERGY USE

04

4. GREENHOUSE GAS EMISSIONS AND ENERGY USE

Introduction

Greenhouse gas emissions are a principal driver of climate change. With 25% of the UK's total emissions directly attributable to the built environment it is essential to tackle emissions associated with the construction, use and operation of buildings as a matter of urgency.

The City is a very dense and intensely used area with a high overall level of emissions, largely as a result of the energy needed to serve over 600,000 daytime users. A significant amount of CO2 emissions also arise from the deconstruction and construction of new buildings, including upfront embodied carbon associated with the production, transportation and disposal of products and materials.

Key approaches for the City

As buildings become more energy-efficient and the grid decarbonises, the share of embodied carbon will become a more significant element of whole life-cycle carbon emissions. Low carbon design and construction measures as well as efficient and robust building services systems need to be employed to drive down whole life-cycle carbon emissions. Innovation, new insights and technologies evolve continually and should be considered throughout all stages of the planning and design process, to allow for improved outcomes overall.

Approaches to minimise carbon emissions include the reuse of existing buildings, designing new build with exemplary whole life-cycle carbon reduction, including material retention, sharing of resources, use of low-carbon materials and modular construction methods. All developments must employ circular economy principles (see Chapter 5) and maintain and reuse as many building components as possible in accordance with the Development Plan.

Major developments are required by the Development Plan to aim for net zero operational carbon dioxide emissions (and other emissions). This can be achieved through retrofitting existing buildings or designing new builds with a high energy efficiency, heat and transport electrification, and connections to local heat networks.

Key policies and guidance

Table 4.1 Greenhouse gas emission and energy planning policies

London Plan 2021
SI 1: Improving Air Quality
SI 2: Minimising greenhouse gas emissions
SI 3 Energy Infrastructure
T2: Healthy Streets
GLA Whole Life-cycle Carbon Assessment Guidance
GLA Energy Assessment Guidance
Mayor's Transport Strategy & Healthy Streets Approach
Local Plan 2015
CS15: Sustainable Development and Climate Change
DM15.1 Sustainability requirements
DM15.2: Energy and CO2 emissions assessments
DM15.3 Low and Zero Carbon Technologies
DM15.4 Offsetting of carbon emissions
DM15.5 Climate change resilience and adaptation
DM15.6 Air quality
DM15.7 Noise and light pollution
Emerging City Plan 2040
CR1: Overheating and Urban Heat Island Effect
DE1: Sustainability Standards
DE8: Daylight and sunlight
DE9: Lighting
S1: Healthy and inclusive city
HL2: Air Quality
S10: Active Travel and Healthy Streets
AT1: Pedestrian Movement, Permeability, and Wayfinding
AT2: Active Travel including Cycling
Additional guidance
Carbon Options Guidance Planning Advice Note (CoLC)

Case Study: 115-123 Houndsditch

Use: Office and retail

New build



Entrance to 115-123 Houndsditch. Source: Design and Access Statement.

Key facts:

- Overall reduction of carbon emissions by 44% over Part L 2013, with 17% achieved through energy efficiency measures including improved envelope performance, solar shading, thermal mass of exposed concrete slabs, passive ventilation and extensive urban greening on roofs and terraces to provide cooling
- Embodied carbon intensity of 1020 kgCO₂e/m² meets the GLA standard benchmark of <1400 kgCO₂e/m² and is close to GLA aspirational benchmark of <970 kgCO₂e/m²
- Waste heat storage and export of heat to a neighbouring residential estate

Additional Features:

- Ambitious circular economy strategy incorporating partial retention of basement, utilising low carbon materials with high recycled content, prioritising prefabricated products
- Adaptable to future needs with flexible floorspace layouts and bolted structural connections (designed for eventual deconstruction)
- Use of green leases to achieve energy efficient tenant space fit-out and operation
- Targeting a BREEAM 'outstanding' rating, and commitment to highest scores in WELL and LEED standards
- Reduction of water demand through rainwater recycling and harvesting systems

4. GREENHOUSE GAS EMISSIONS AND ENERGY USE

Key actions to develop an exemplar City scheme

The following key actions are required to positively address the City Corporation's policy framework and should be discussed with planning officers at pre-application stage. Applicants should clearly present the information in the relevant application documents.

- Develop the lowest whole life-cycle carbon solution that optimises the social, economic and environmental sustainability of a scheme through undertaking a carbon options appraisal
- Prioritise retrofit over redevelopment solutions upon adoption of the City Plan 2040. Where the GLA WLC (standard) benchmark is not achieved, mitigate high upfront carbon emissions by incorporating substantial wider environmental sustainability benefits into the proposal's design
- Enable attractive, comfortable and inclusive access to, and connectivity between public realm, private open spaces and buildings to encourage active and sustainable transport patterns
- Ensure that all public and open spaces are designed with low carbon, preferably reused, repurposed and robust materials
- Develop a bespoke and optimised energy strategy for a development, including considering links to energy networks, focussing on adaptability, robust and low embodied carbon building services, floorspaces and building envelopes

An options appraisal should be undertaken in all cases where substantial new build elements are proposed. Generally, all major developments, as well as minor applications with more than 50% demolition, should follow the requirements of the Carbon Options Guidance Planning Advice Note (PAN). This methodology is designed to identify the lowest carbon solutions, evaluate their wider sustainability potential, and support the retrofit first approach (when required by the Development Plan).

If the proposed upfront carbon emissions (life-cycle modules A1-A5) of any major development are higher than the GLA standard benchmark, applicants should seek to provide significant environmental sustainability benefits onsite beyond policy

requirements, or beyond the site's boundary when required by the Development Plan (see page 23 in this document for relevant examples).

Public realm design, integration and interfaces are core considerations to improve access, connectivity and amenity in the Square Mile. Thoughtful designs in this regard will encourage active and low energy transport patterns and strengthen the City's position as a sustainable location in the region in accordance with the City of London Transport Strategy.

City occupiers and residents are particularly concerned about the operational energy performance of buildings, and bespoke energy strategies are sought to achieve optimal solutions for the building type and context of a development, ensuring longevity and flexibility of the proposed design.

The following key actions are strongly recommended to develop an exemplary scheme that achieves the best balance of planning benefits for the City. Measures should be discussed at pre-application stage and highlighted in the application as sustainability benefits to support the proposals.

- Pursue best practice and transformative solutions in low carbon design and construction principles
- Develop innovative approaches to low carbon servicing and servicing access of buildings
- Seek wider environmental sustainability benefits incorporated into the design of proposals or beyond the site to contribute to the wider sustainability of the Square Mile where opportunities can be identified.

Throughout the planning process, from pre-application stage to the discharge of conditions stage, applicants will be challenged by planning officers and City communities to demonstrate best practice sustainable designs and ensure that development is future-proof and contributes to the sustainability of the Square Mile as a whole. Proposals that are pathfinders for low carbon design approaches and that share resources in relation to the construction, operation and servicing of City building types will be supported. Interaction and synergies between development processes, buildings and their contexts are encouraged as the collaboration and sharing of resources will be most successful at scale. Applicants are expected to utilise opportunities to impact positively on sustainability beyond their development and site boundary.

Case Study: 65 Crutched Friars

Use: Student accommodation and museum

New build



Ground floor view of 65 Crutched Friar.
Source: 65crutchedfriars.co.uk 2023

Key facts:

- Operational carbon emissions reduction of 70% beyond Part L 2021 including savings provided by renewable and low carbon technologies including air source heat pumps and PV panels
- Upfront whole life-cycle carbon emissions (693kgCO₂/m²) exceed GLA's standard benchmark

Additional Features:

- Wastewater heat recovery from 770 bedrooms and bathrooms
- Natural ventilation through openable panels in each bedroom
- BREEAM "Outstanding" rating

4. GREENHOUSE GAS EMISSIONS AND ENERGY USE

WHOLE LIFE-CYCLE CARBON

What is whole life-cycle carbon?

Whole life-cycle carbon (WLC) is the total carbon equivalent emissions resulting from the construction and use of a building over its entire life, including its construction, deconstruction and disposal. It captures a building's operational carbon emissions (both regulated and unregulated energy use), as well as embodied carbon emissions - that is, emissions associated with raw material extraction, the manufacture and transport of building materials, the construction process, and the emissions associated with maintenance, repair and replacement, as well as dismantling, deconstruction, demolition and eventual material disposal.

Key measures

Whole building

Refurbishment and retrofit should be prioritised where feasible to reduce carbon emissions, especially in the short term. Reducing embodied carbon emissions helps limit global warming caused by construction activities. Applications should therefore demonstrate how adaptation of the building (and maximising reuse) rather than demolishing and rebuilding has been fully considered.

Generally, all major developments, as well as minor applications that do not retain the majority of substructure and superstructure (by mass) must undertake a carbon options assessment, in line with the City Corporation's Carbon Options Guidance PAN. Optioneering should be conducted early in the pre-application stage in collaboration with City Corporation officers. It's recommended that the guidance is used to establish the most sustainable and suitable approach for the site. The options should include retention and retrofit, as relevant to the site, to ensure that the retrofit first approach has been thoroughly applied and evaluated. The optioneering process and outcome should be presented in planning application documents, such as in the Design and Access Statement, to clearly demonstrate the rationale for the proposed development.

When required by development plan policy, all major developments must submit a Whole Life-Cycle Carbon (WLC) Assessment that complies with GLA WLC Assessment Guidance (as current at the time at the time of application submission) including using assessment tools. Proposals should achieve the GLA 'WLC benchmark' ('standard' benchmark) as a minimum for upfront carbon emissions (life-cycle modules A1 – A5). Proposals should target the GLA 'aspirational WLC benchmark' for all

embodied carbon emissions (life-cycle modules A – C). Any deviation from the aspirational benchmark should be justified in the WLC Assessment. Until relevant benchmarks are available, hotels and student accommodation should agree an appropriate benchmark with City Corporation Officers (residential or office) to apply on a case by case basis.

All WLC Assessments should include operational energy use (life-cycle module B6) using a predictive energy modelling method, following guidance such as CIBSE TM54 or NABERS UK Design for Performance (as detailed in the operational emissions section). The in-use embodied carbon emissions (life-cycle modules B-C) should be reported using the assumptions for replacement of building elements in accordance with RICS WLC Assessment Professional Standard.

All major applications submitted after 2030 should achieve the GLA 'aspirational WLC benchmark' as a minimum for all embodied carbon emissions (life-cycle modules A–C), to align with the World Green Building Council's (WGBC) target of 40% reduction in greenhouse gas emissions by 2030.

Where the standard benchmark is not achieved (or aspirational from 2030), high embodied carbon impacts of development proposals should be mitigated by providing substantial environmental sustainability benefits, either beyond policy requirements onsite or beyond the site boundary, as required by the Development Plan and detailed in the 'Beyond the building' section below.

The City Corporation encourages applicants to target and meet more ambitious industry standards (e.g. UK Net Zero Carbon Buildings Standard) wherever possible.

The carbon options assessment and WLC Assessments should be independently reviewed to ensure consistency, accuracy and quality assurance in reporting. The reviews will be arranged by City Corporation planning officers.

Planning stage WLC Assessments include assumptions in advance of subsequent design and procurement stages of the proposed development. Estimated carbon emissions may change due to design development, market availability, available carbon data etc. This may result in an embodied carbon gap between planning stage and practical completion. To manage this process more constructively in collaboration with applicants, major applications will be conditioned to submit RIBA Stage 4 and RIBA Stage 6 WLC Assessments. The updated WLC Assessments should include details and information that explain

Case Study: One Exchange Square

Use: Commercial office

Retrofit and Extension



View of the proposed main entrance.
Source: Design and Access Statement

Key facts:

- 90% retention of existing structure including foundations, and retention and restoration of the existing granite façade elements
- Cantilevering 11-storey extension to rear and of upper levels with new façades designed to be replaceable in component parts
- Structural grid and elements of the extensions designed to be adaptable and flexible

Additional Features:

- 62.2% reduction in carbon emissions over Part L 2013 overall, of this 45.5% through energy demand reduction
- Aspiring to BREEAM 'outstanding' rating and engagement with NABERS UK benchmarking
- Embodied carbon intensity of 984 kg CO₂e/m² meets the GLA standard benchmark of <1400 kg CO₂e/m² and is close to meeting the GLA aspirational benchmark of <970 kgCO₂e/m²
- Incorporation of extensive landscaping on the ground-floor and roof including the provision of wildlife habitats

4. GREENHOUSE GAS EMISSIONS AND ENERGY USE

WHOLE LIFE-CYCLE CARBON

changes to the reported carbon emissions. The RIBA Stage 6 submission should include details of data validation in line with section 2.7 of the GLA's WLC Assessment guidance (Materials and products) including the 'Acceptable sources of carbon data for materials and products' section.

Aspects of WLC emission reduction are covered by certification schemes such as BREEAM and NABERS, as detailed in the Operational Energy section below.

Creative thinking and innovation for achieving sustainability best practice is encouraged in planning submissions.

Beyond the building

Large scale new development will result in considerable environmental impacts on the quality of the local context and beyond, including on the amenity and quality of the public realm, on the urban heat island effect, microclimatic conditions and overall embodied carbon. All new developments are expected to assess their impact beyond the site boundary and utilise opportunities to positively impact sustainability in the wider area.

Given the high number of concurrent developments in the Square Mile and Central London, synergies with nearby developments to share services, facilities, technologies and materials should be sought out to increase efficiency and reduce carbon emissions during construction and operation. These synergies could facilitate measures at greater scale and efficiency, and benefit neighbouring local schools, churches, community facilities and the quality of public realm, as well as support sensitive historic buildings to improve their sustainability and competitiveness in a property market that is increasingly driven by energy performance and sustainability credentials.

Where the standard benchmark for upfront emissions (life-cycle modules A1-A5) is not achieved at planning stage, especially if this is due to competing planning policy priorities, applicants should seek to provide significant environmental sustainability benefits onsite beyond policy requirements, or beyond their site's boundary when required by the Development Plan. The nature and extent of environmental sustainability benefits should be proportionate to the carbon impact caused by the proposed development and could include, but are not limited to:

- implementing priorities of the City of London Local Area Energy Plan (LAEP), including the creation or extension of

local energy networks and the use of waste heat sources (example: London Wall West)

- facilitating heating and cooling exchange with nearby developments (example: 115-123 Houndsditch)
- supporting sustainable transport modes, with a climate resilient, green and low carbon design of the public realm around the site (example: 65 Gresham Street)
- testing innovative measures (e.g. low carbon/reused materials, energy generation, storage technologies etc) to drive best practice in sustainable development for example sharing space by integrating a service lift into the public realm
- creating climate resilience, urban greening infrastructure and cool routes in the local area (see Climate resilience chapter) (example: New Change Garden)
- providing detailed deconstruction material information or passports to facilitate efficiency of reuse (example: 100 Fetter Lane material passport)
- including a sustainable construction skills centre for City of London building types or a facility to showcase sustainable practices
- providing opportunities for meanwhile uses that provide environmental or social benefits.

Suitable measures are subject to pre-application discussions, based on the nature of the site and the proposal, and opportunities identified in the context of the development. If a development is expected to exceed the standard benchmark for upfront emissions, it should integrate environmental sustainability benefits in the early design phase. However, all development proposals are encouraged to assess the opportunities for environmental improvements in the context of the site and respond to these in the design of the proposals.

Case Study: Ibox House (Grade II listed)

Use: Offices, retail and cultural space

Refurbishment and Extension



Visual illustrating the new steel Crittal windows to match original style. Source: Design and Access Statement.

Key facts:

- Gradual phasing out of gas boilers and incorporation of a high-performance electric plant
- Achieves a 35.9% carbon emissions reduction over Part L 2013

Additional Features:

- Minimal demolition predominantly comprised of internal modern partitions and plant installations
- Replacement of balustrades and previous replacement windows with new steel Crittal windows
- Restoration of original fabric and matching repairs
- Installation of green roofs on new built ground level extensions and at upper floor levels

4. GREENHOUSE GAS EMISSIONS AND ENERGY USE

KEY MEASURES FOR CITY BUILDINGS - WHOLE LIFE-CYCLE CARBON

This infographic provides a list of potential measures, which is not exhaustive. Applicants are encouraged to propose innovative measures that drive best practice. All measures to be agreed on a case-by-case basis.

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Specify new materials with lower carbon emissions, such as steel from electric arc furnaces (EAF), concrete products with cement replacement (GGBS, calcium sulphate), aluminium from hydroelectrically-produced billets

Prioritise long-lasting, adaptable components and materials which use bolted connections

Consider testing innovative production and construction methods, e.g. 3D printing construction with materials such as concrete, steel, and rubber

Prioritise salvaged, recycled, low carbon, natural, and bio-based materials and components, e.g. reclaimed steel beams, recycled aluminium, or natural insulation

Consider a wider use of timber in hybrid structural solutions, such as mass timber or Cross Laminated Timber (CLT)

Limit areas of CAT B standard fit-out works (for marketing purposes) to avoid material waste associated with changes made to meet tenant specific fit-out requirements

Reduce embodied carbon impact of façade systems through careful material choices and selection of façade systems that are adaptable and replaceable in parts

Investigate lightweight façade options to support structural efficiency

Demonstrate approaches to massing and loading that prioritise the retention of existing structures, minimal use of new material, modularity, and offsite construction, disassembly, reuse and refurbishment.

Design for innovative, efficient and hybrid-material structural solutions with high material efficiency e.g. non-timber floors for fire compartmentation

Avoid over-specification of structures and services e.g. lifts. Design for typical (rather than extreme) use, with a strategy to upgrade if required.

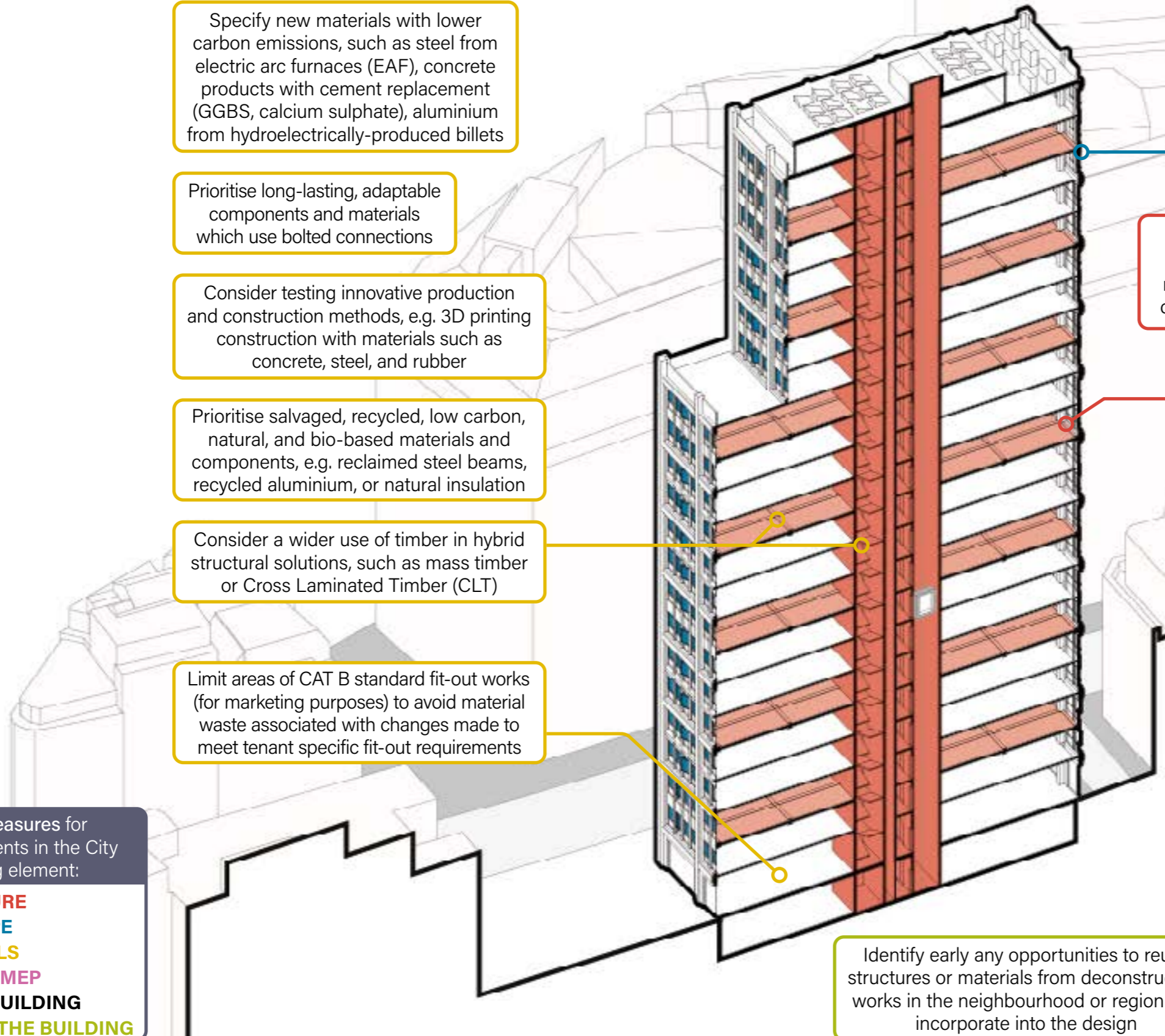
Choose all electric heating/cooling systems which use low levels of refrigerant or refrigerant types with low global warming potential

Prioritise accessible, robust and long-lasting MEP systems with adaptable/replaceable parts to drive longevity

Explore leasing options for MEP and floorspace fit-out to minimise embodied carbon emissions and ensure easy replacement/upgrade

Identify early any opportunities to reuse structures or materials from deconstruction works in the neighbourhood or region and incorporate into the design

Identify synergies with neighbouring developments to share plant, services, facilities, technologies, or materials, or to exchange thermal load for heating/cooling



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Typical measures for developments in the City by building element:

- STRUCTURE**
- ENVELOPE**
- MATERIALS**
- PLANT & MEP**
- WHOLE BUILDING**
- BEYOND THE BUILDING**

4. GREENHOUSE GAS EMISSIONS AND ENERGY USE

OPERATIONAL ENERGY USE

What are operational emissions?

Operational emissions are those generated from the operation of a development once it has been constructed. This includes both the emissions of electricity from the National Grid as well as emissions generated onsite via gas-burning boilers, refrigeration and other emitting processes. Operational emissions are largely a result of energy consumption (life-cycle module B6) while a small proportion of these emissions result from operational water use (life-cycle module B7). There will be increasing demand for electric power as fossil fuels are phased out in favour of electric heating, vehicles and other technologies. The type of energy technologies and the use of energy in buildings will be considered in planning applications. Proposals need to develop a strategy to reduce energy use through passive energy efficiency measures and low carbon and renewable energy technologies, including for back-up technologies both for emergencies and fluctuations in grid supply. Water efficiency measures can also reduce operational energy demand, due to reduced Domestic Hot Water demand. The Climate Resilience chapter includes a topic on water resource management with details on water efficiency in development proposals.

Key measures

Whole building

In accordance with the GLA's energy hierarchy, development in the City will need to be designed to achieve highest possible efficiency levels and provide the lowest possible Energy Use Intensity (EUI). Progressive and innovative measures should be incorporated to reduce carbon emissions as soon and significantly as possible.

For refurbishments and retrofits, the existing energy performance could benefit from an assessment prior to the design of any interventions and alterations. The incorporation of all electric or low-carbon energy technologies can help refurbishment schemes improve energy performance requirements, as regulation, policy and user expectations become more stringent in the future. In accordance with the Development Plan, the level of energy efficiency should be optimised and is encouraged to meet future expectations from other drivers such as the Carbon Risk Real Estate Monitor (CRREM) decarbonisation pathways and the Net Zero Carbon Building Standard (NZCBS).

For historic buildings (with or without statutory listing), heritage significance will need to be considered alongside any impacts of energy efficiency interventions and impacts should be positively

balanced to achieve heritage, energy efficiency and health benefits.

The most effective way to reduce operational carbon (and other GHG) emissions is to reduce energy demand and - where possible - move to systems powered by electricity or low-carbon alternatives. This includes considering connecting buildings to local heat and cooling networks. If a site is not covered by an existing network, the provision of a future connection point is required by the Development Plan. Large developments may be able to facilitate new locations for heat and cooling networks (see 'Beyond the building' section).

Regarding emergency supply or managing expected fluctuations in grid supply, diesel power backup generators will be discouraged due to high carbon and air quality impacts. Major developments should explore alternatives such as dual diversified electrical supply from different sub-stations and secondary power supply through connections into energy networks where feasible. Innovative solutions, such as battery storage, generators using low carbon and low air polluting fuels, or sharing emergency power with other developments nearby will be encouraged where feasible.

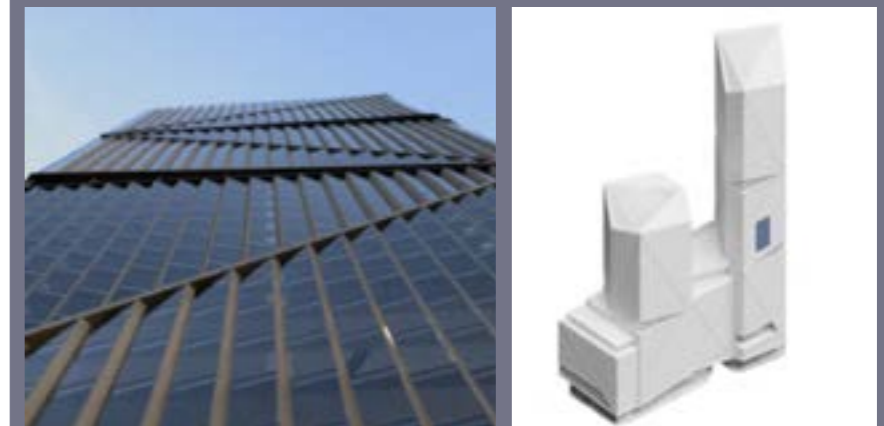
All major developments should conduct predictive energy modelling in accordance with CIBSE TM54 methodology (Technical Memorandum) or a more thorough approach (e.g. NABERS UK Design for Performance) at planning stage and commit to an ambitious industry target for the respective building type. In-use operational energy data for the whole building must be disclosed to the GLA through 'Be Seen' reporting upon completion of the first year of occupation and on the following four anniversaries of that date. Applicants are expected to use the TM54 methodology and provide a copy of the report to the City Corporation. If a development does not achieve the target committed at planning stage, a report should set out the reason why, and detail a strategy for how it will be achieved in the following reporting period.

In addition, to address the performance gap often experienced between the design and as built performances, climate clauses are encouraged for inclusion into building management agreements and leasing documents. Guidance is available from the Better Buildings Partnership and other sources.

Case Study: 2-3 Finsbury Avenue

Use: Office, retail, and open learning hub

New build



Detail of tower façade with glazed and ventilation panels

Source: Energy Strategy

Key facts:

- Passive design to include a building envelope balancing heat loss, solar gains / glare, maximising daylight, achieving a 17.3% reduction in operational carbon emissions from energy efficiency measures alone and exceeding the GLA's target of 15%
- Incorporation of natural ventilation through openable panels to facilitate night purges, reducing energy use and operational emissions by a further 3%

Additional Features:

- Operational carbon emissions reduction of 47% beyond Part L 2013 overall
- Utilisation of heat recovery and air source heat pumps
- Highly efficient water saving fixtures, fittings and appliances, along with low-water irrigation system and water metering will be incorporated to achieve at least 50% water reduction

4. GREENHOUSE GAS EMISSIONS AND ENERGY USE

OPERATIONAL ENERGY USE

Certifications

Operational carbon emission performance prediction is included in certification schemes such as BREEAM and NABERS UK Design for Performance.

Major developments are required to carry out a BREEAM assessment that demonstrates a minimum rating of 'Excellent' and the pathway to an 'Outstanding' rating (with the final rating to be confirmed after practical completion). Developments should maximise the achievement of credits in the City Corporation's priority categories Energy, Materials, Water, Pollution and Waste. It is acknowledged that an 'Excellent' rating for non-office uses such as retail and leisure uses (shell and core) can be challenging. Strong justification should be provided if an alternative BREEAM rating is targeted in agreement with City Corporation planning officers.

Major office developments must commit to a minimum NABERS UK Energy rating (base-build) of 5 stars for new build projects or 4 stars for retrofit projects, when required by the Development Plan, unless otherwise agreed with planning officers. In the planning application, applicants of major developments are encouraged to provide a written commitment to pursue a Design for Performance (DfP) route to a target rating, setting out the actions and measures to be pursued in order to achieve this. A formal registration for a DfP could be included at planning application, or this will be required by condition by RIBA stage 4 at the latest. The planning application and RIBA stage 4 submission should set out how the design intent for energy performance will be maintained from design through to occupation and formal rating. Estimated tenant consumption must be reported separately in addition to the base-build NABERS UK targets to provide a whole building consumption Energy Use Intensity (EUI). Alternatively, if the occupiers or tenants are known, a whole building DfP could be provided.

The final certification and NABERS assessment should be submitted after the first or second 12-month rating period, as conditioned. If a development does not achieve a 5 stars certification (or 4 stars for retrofit), a report should set out the reasons why, and detail a strategy for how the development will achieve its target certification.

NABERS UK is an evolving rating scheme that currently only applies to office buildings. When and if it is made available for other building types, an appropriate NABERS target should be

agreed at pre-application stage. In the interim, application of other industry benchmarks such as CRREM and the NZCBS are encouraged.

Beyond the building

All development proposals, new builds and retrofits alike, should support sustainable, low energy transport patterns by ensuring attractive, inclusive and safe connectivity between the public and private realm. This includes building entrances, cycle entrances, and open spaces. The public and private realm interface should avoid forming or manifesting barriers but create opportunities and wider benefits such as providing amenity and space for social interaction, shade and shelter, safe and accessible routes, trees and urban greening. Servicing strategies should have particular regard to using low emission servicing vehicles and processes, innovative service access solutions that prioritise high quality public realm and the efficient use of land and floorspace.

The City's Local Area Energy Plan (LAEP) sets out a map and actions to transition the Square Mile energy system to net zero by 2040. Actions include:

- Ensuring high energy-efficiency of new buildings and the use of low-carbon technologies
- Incorporating connections to existing and planned energy networks
- Facilitating the installation of an energy centre for areas consisting of several development sites
- Providing locations for network extensions
- Heat capture through circular systems to enable cooling heat recovery and reuse either onsite or recovered into energy networks
- Support the development of EV charging infrastructure (where needed), modal shift and freight consolidation
- Maximising photovoltaic panel installations in all feasible locations in combination with urban greening and façade and roof cladding
- Supporting the uptake of flexibility technologies through demand management, smart systems and energy storage, to deliver resilient energy systems.

Case Study: London Wall West

Use: Office and mixed-use

New build



Visual of London Wall West. Source: Design and Access Statement

Key facts:

- A1–A5 (excl. sequestration) WLC emissions of 560 kgCO₂e/m², a significant improvement on the GLA's aspirational benchmark of 600 kgCO₂e/m²
- B–C (excl. B6 & B7) WLC emissions of 248kgCO₂e/m², a significant improvement on the GLA's aspirational benchmark of 370kgCO₂e/m²
- Provision of an energy centre with air source heat pumps and electric chillers for the extension of the local energy network. Supply of waste heat to the energy network

Additional Features:

- Commitment to a 5* NABERS UK rating
- Targeting an 'outstanding' BREEAM rating for the proposed main use (office space)
- Significant public realm improvements and urban greening
- New trees are designed into the public realm, for more comfortable public spaces as well as for wind mitigation. The provision of shade for thermal comfort has also been incorporated in the public realm
- Vertical fins are included in the "Husk" facades of the Bastion House and Rotunda buildings to reduce solar gain. Overhanging planters along the "Inner" facades of the buildings also provide shade

4. GREENHOUSE GAS EMISSIONS AND ENERGY USE

OPERATIONAL ENERGY USE

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City of London Potential Heat Network Clusters Map

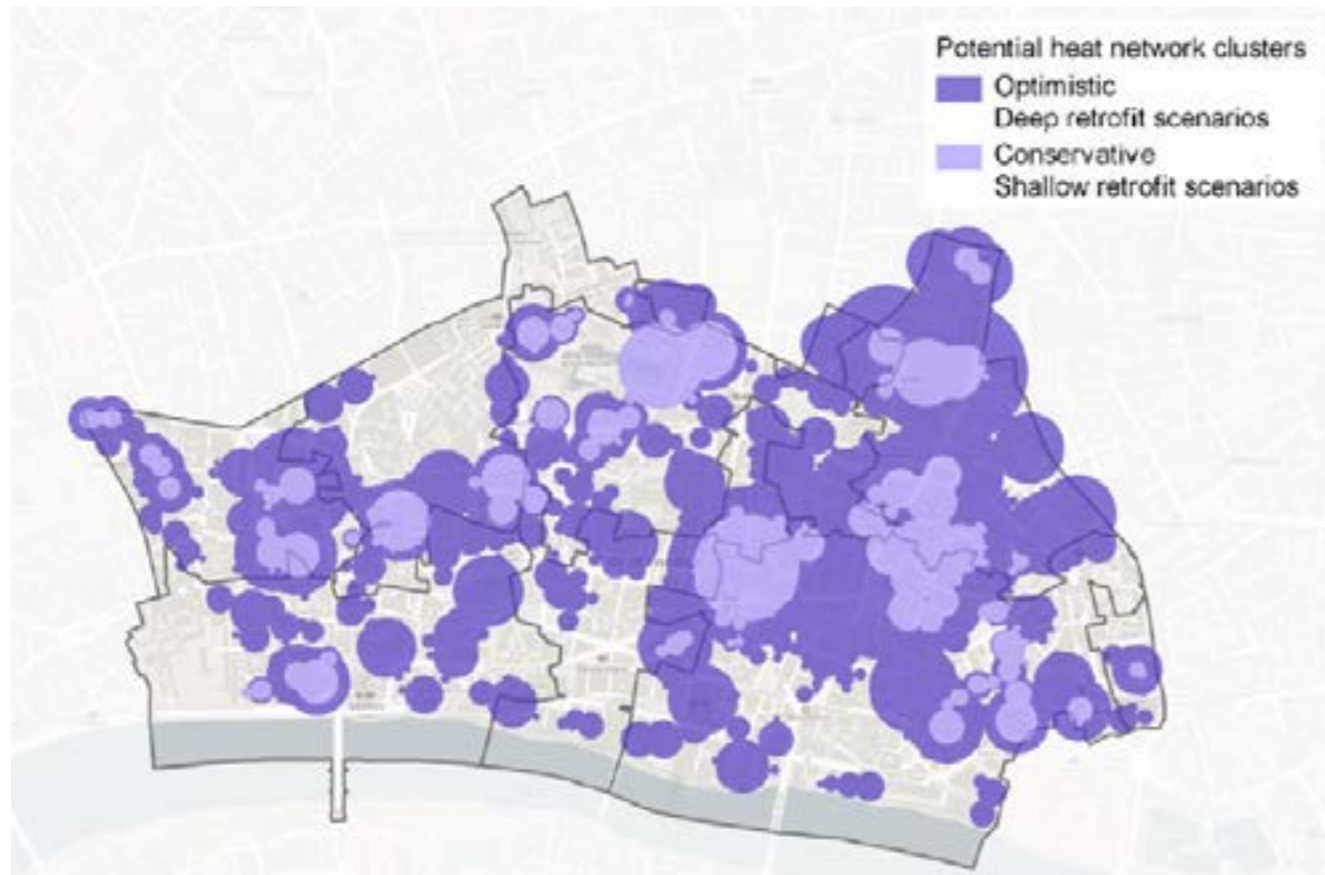


Figure 4.1 Optimistic and Conservative potential heat network clusters.
Source: City of London Local Area Energy Plan

The 'Optimistic' layer is based on multiple blended scenarios, all of which involve deep retrofit, varying degrees of future building growth and demand changes. The 'Conservative' scenario assumes only shallow retrofit, along with high growth of future buildings. Modelling has shown that heat networks could supply 75% of heat in the Optimistic scenario, but only 34% in the Conservative scenario.

City of London Waste Heat Opportunities

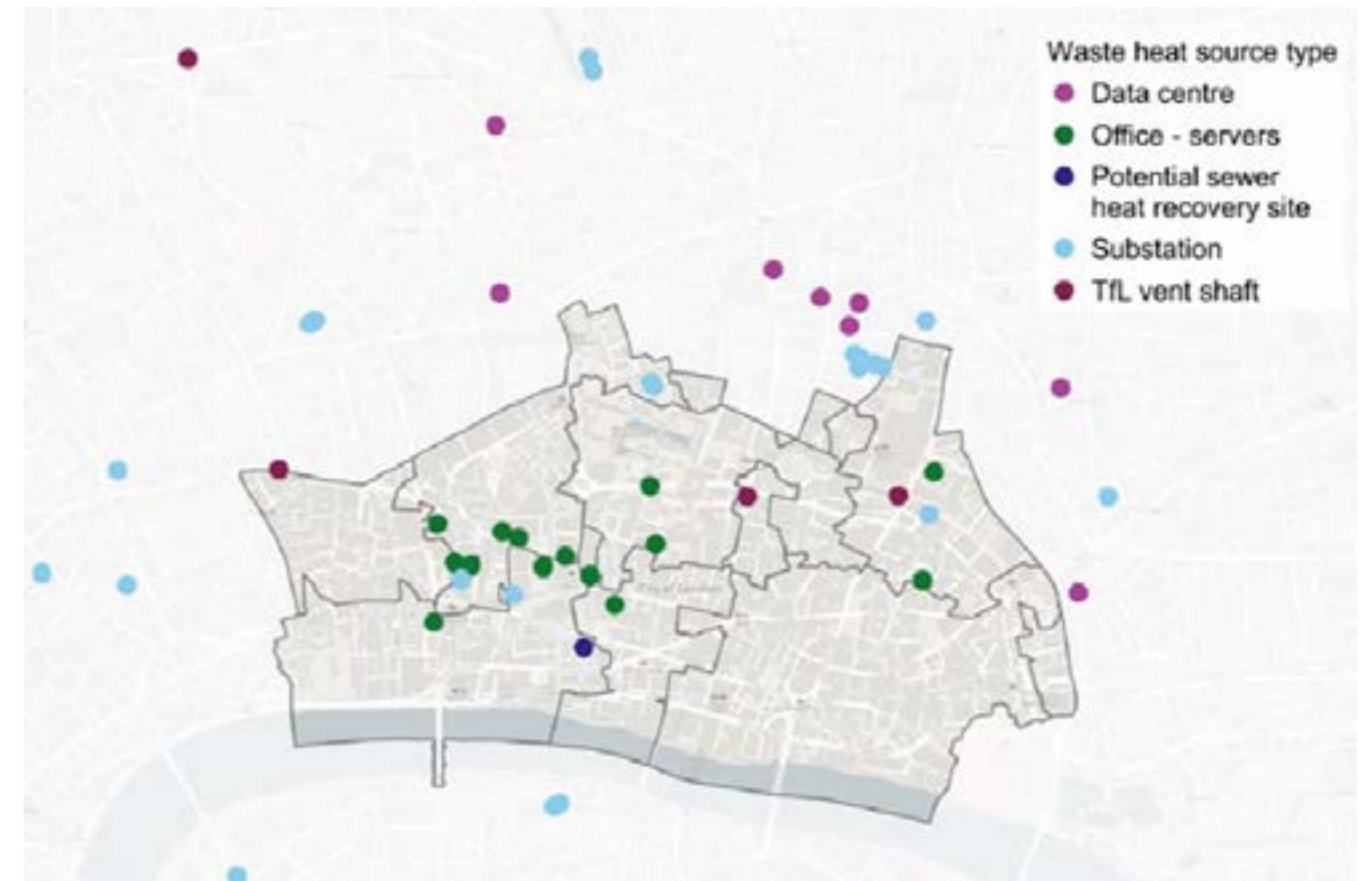


Figure 4.2 Map of potential waste heat sources.
Source: City of London Local Area Energy Plan

Waste heat from sources indicated on the map could be captured, reused and shared between buildings by both building level or network scale systems.

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A heat network supplies heat to a building from a local network, and any waste heat is fed back to the network. The UK Government considers heat networks an essential component of clean and cost-effective decarbonisation of UK heat, supporting its net-zero goals. It is introducing heat zoning regulations which will designate areas where heat networks are expected to offer the lowest-cost solution for decarbonising heat. A Zone Coordinator will be designated to support management, data collection, delivery and stakeholder engagement. The forthcoming regulations are expected to significantly influence future heat network supply options and will set minimum standards for existing and new networks.

Heat network development is identified in the LAEP as a central route to meeting the City's ambition of a net zero Square Mile by 2040. The City Corporation is participating in the Government's Advanced Zoning Programme (AZP) and the Square Mile is expected to be a priority zone for heat networks. Phase 1 of the AZP has produced a high-level masterplan for a Square Mile Heat Zone. As referenced in the London Plan Guidance, connection to local existing or planned heat networks, and the use of zero-emission or local secondary heat sources, are key criteria of the heating hierarchy for new developments.

4. GREENHOUSE GAS EMISSIONS AND ENERGY USE

OPERATIONAL ENERGY USE

Applicants for new development in the City are strongly advised to consider the implications of UK government heat network regulations. It is likely that all future new developments and major refurbishments will be required to connect to a nearby heat network within a defined timeframe. To prepare in advance, the City Corporation is encouraging new developments to assess the cost and carbon advantages of heat networks, and to mitigate any future risks of mandated connection (with respect to any future necessary re-design or change of heating/cooling strategy). The City Corporation strongly encourages applicants to take a pro-active approach by:

- Incorporating a heat network connection into their development
- Designing in flexibility solutions including smart systems and energy storage technologies
- Engaging with the City Corporation and district network providers to facilitate extensions to and new networks.

Other opportunities for heat sharing with neighbouring buildings and nearby infrastructure should be investigated. Major developments may have the potential to share resources and plant installations with neighbouring historic buildings. This could improve their energy efficiency whilst relieving historic buildings from modern plant installations and interventions that are detrimental to their heritage value.

Meeting the increased electricity demand due to growth and a shift to electrified transport and heat is likely to require electrical infrastructure network upgrades. This is identified as a priority action within the LAEP to allow new local renewable assets to connect to the electricity grid. The City Corporation will continue to engage and coordinate with UK Power Network (UKPN) to understand the implications of growth and electrification on the electricity infrastructure and to work collaboratively to deliver additional capacity where required.

To minimise the need for further grid infrastructure and to deliver a resilient energy system to businesses and residents, the LAEP encourages the uptake of flexibility technologies including demand side response and smart appliances, thermal/battery storage and vehicle-to-grid technologies. The City Corporation will look to embed flexible technologies in their own assets and developers should review opportunities to provide energy storage and demand management to tie in with local and national energy security priorities.

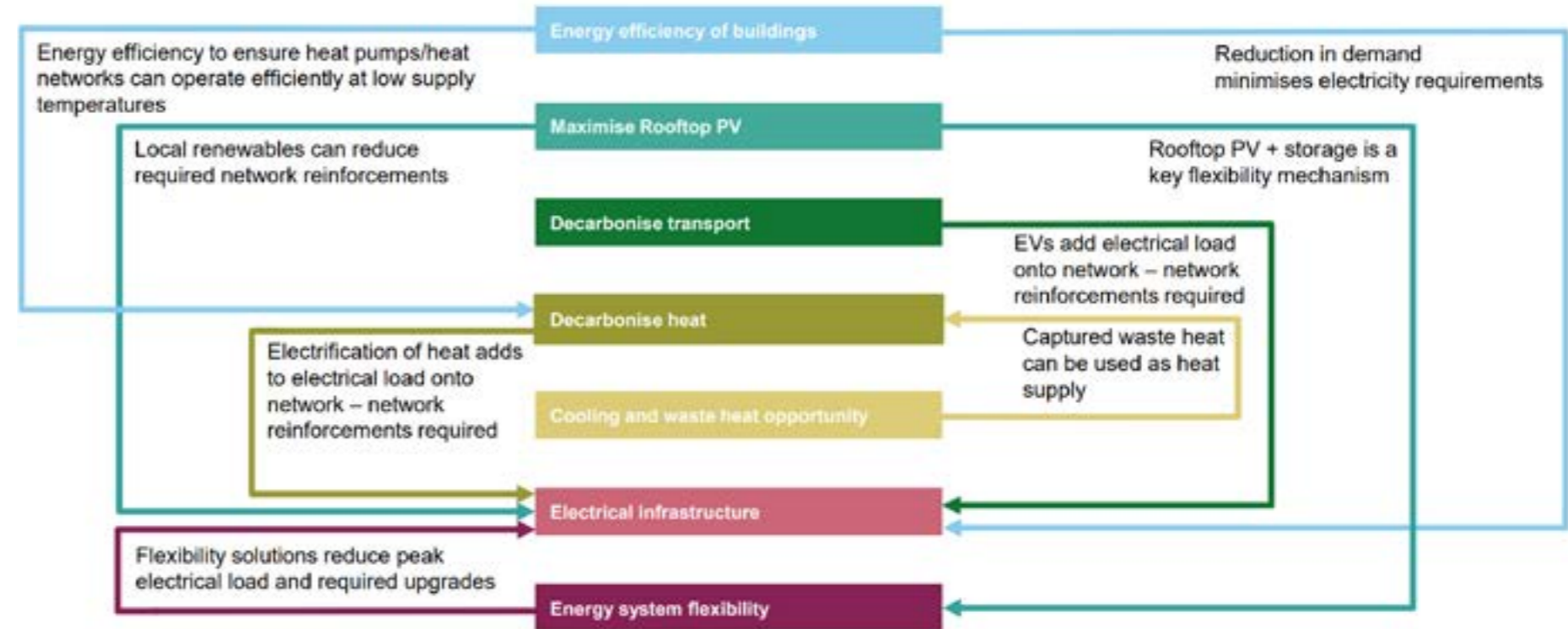
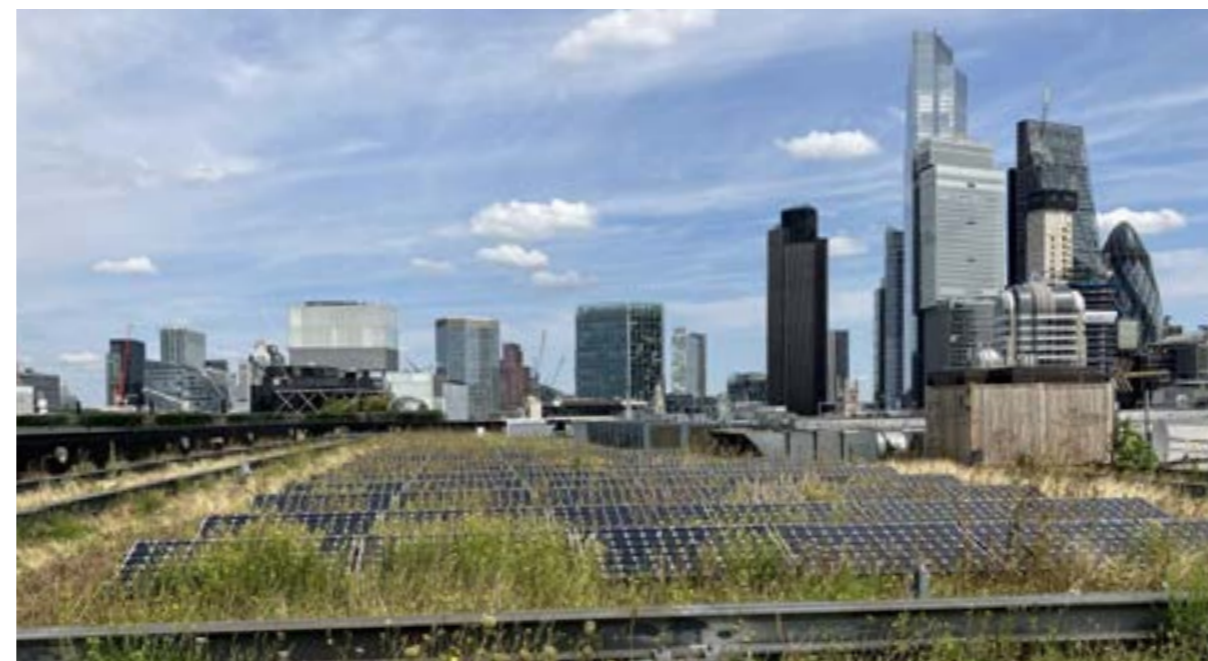


Figure 4.3 Diagram mapping interdependencies across Local Area Energy Plan priority intervention areas
Source: City of London Local Area Energy Plan

Image: Biosolar roof installation at Watermark Place
Source: City of London Corporation

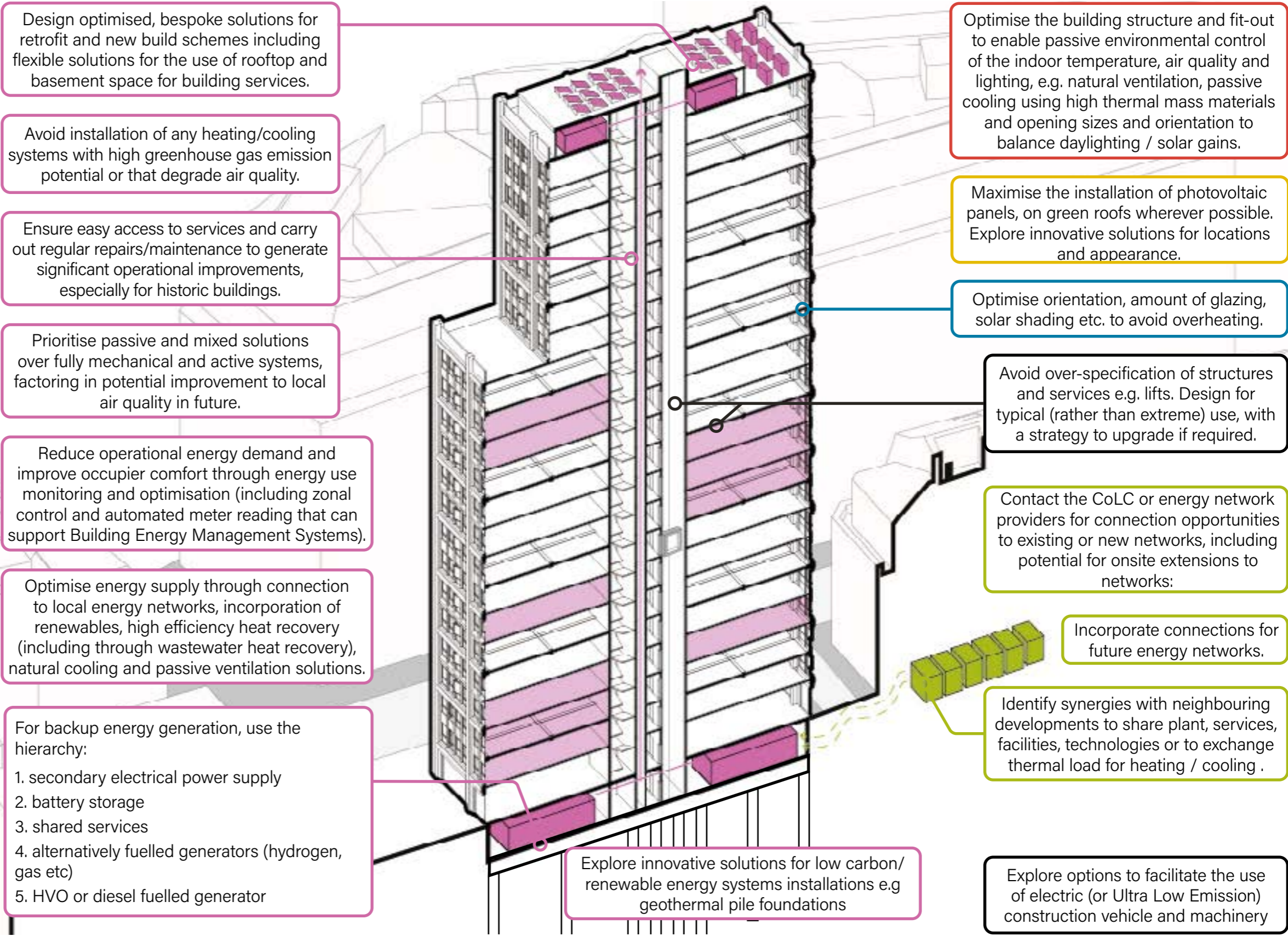


4. GREENHOUSE GAS EMISSIONS AND ENERGY USE

KEY MEASURES FOR CITY DEVELOPMENTS - OPERATIONAL ENERGY USE

This infographic provides a list of potential measures, which is not exhaustive. Applicants are encouraged to propose innovative measures that drive best practice. All measures to be agreed on a case-by-case basis.

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Design optimised, bespoke solutions for retrofit and new build schemes including flexible solutions for the use of rooftop and basement space for building services.

Avoid installation of any heating/cooling systems with high greenhouse gas emission potential or that degrade air quality.

Ensure easy access to services and carry out regular repairs/maintenance to generate significant operational improvements, especially for historic buildings.

Prioritise passive and mixed solutions over fully mechanical and active systems, factoring in potential improvement to local air quality in future.

Reduce operational energy demand and improve occupier comfort through energy use monitoring and optimisation (including zonal control and automated meter reading that can support Building Energy Management Systems).

Optimise energy supply through connection to local energy networks, incorporation of renewables, high efficiency heat recovery (including through wastewater heat recovery), natural cooling and passive ventilation solutions.

For backup energy generation, use the hierarchy:

1. secondary electrical power supply
2. battery storage
3. shared services
4. alternatively fuelled generators (hydrogen, gas etc)
5. HVO or diesel fuelled generator

Optimise the building structure and fit-out to enable passive environmental control of the indoor temperature, air quality and lighting, e.g. natural ventilation, passive cooling using high thermal mass materials and opening sizes and orientation to balance daylighting / solar gains.

Maximise the installation of photovoltaic panels, on green roofs wherever possible. Explore innovative solutions for locations and appearance.

Optimise orientation, amount of glazing, solar shading etc. to avoid overheating.

Avoid over-specification of structures and services e.g. lifts. Design for typical (rather than extreme) use, with a strategy to upgrade if required.

Contact the CoLC or energy network providers for connection opportunities to existing or new networks, including potential for onsite extensions to networks:

Incorporate connections for future energy networks.

Identify synergies with neighbouring developments to share plant, services, facilities, technologies or to exchange thermal load for heating / cooling .

Explore options to facilitate the use of electric (or Ultra Low Emission) construction vehicle and machinery

Explore innovative solutions for low carbon/ renewable energy systems installations e.g geothermal pile foundations

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Typical measures for developments in the City by building element:

- STRUCTURE**
- ENVELOPE**
- MATERIALS**
- PLANT & MEP**
- WHOLE BUILDING**
- BEYOND THE BUILDING**

CIRCULAR ECONOMY

05

5. CIRCULAR ECONOMY

Introduction

The London Plan 2021 defines a circular economy as ‘one where materials are retained in use at their highest value for as long as possible and are then reused or recycled, leaving a minimum of residual waste.’ It is a move away from the current linear economic model, where materials are mined, manufactured, used and discarded.

In the built environment, this means keeping buildings, products and materials in use for as long as possible through redesign, refurbishment, repair, recycling and other systems. This includes minimising construction waste throughout a building’s life-cycle, as well as operational waste while the building is in use.

Key approaches for the City

Construction and deconstruction form a significant proportion of the emissions and waste generated in the City due to high levels of redevelopment. The process of circular economy and designing out waste should begin early in design development and include all parties involved throughout planning and construction stages. In the Square Mile and Greater London, materials designated for removal from site should be deconstructed, salvaged, reused and shared between projects wherever possible to reduce waste and the need for new materials.

Developments should identify synergies between waste reduction and whole life-cycle carbon reduction, transitioning towards zero waste construction sites. Where new buildings are constructed, they should prioritise reused materials and materials with high recycled content, be built in layers (for ease of maintenance and replacement), modular, durable, flexible, adaptable, and designed for disassembly.

Development and refurbishment projects within the City should follow the GLA’s Circular Economy Hierarchy for Building Approaches (see policy D3 of the London Plan 2021). This prioritises use of existing assets and efficient use of materials, followed by use of low carbon alternatives.

New developments in the City should be designed with the aim of being zero-waste in operation. Internal systems should be adaptable to new reuse, recycling and waste collection systems and categories that may be introduced in the future.

The GLA’s Circular Economy Guidance encourages applicants to ‘identify opportunities for the use of reused or recycled materials; and aim for at least 20 per cent recycled or reused content, by value, for the whole building.’ Applicants are encouraged to go beyond GLA targets, particularly where new build or high carbon

development is proposed. Targets are expected to increase as procurement and supply chains develop.

When required by development plan policy, all major applications must submit a Circular Economy Statement aligned with London Plan Guidance (Policy SI7). This statement should be updated in line with the stages of the development process. In order to support this process constructively in collaboration with applicants, major developments will be required to submit updates to the Circular Economy Statement at detailed design (RIBA Stage 4) and post-completion (RIBA stage 6). This will be secured by condition attached to the planning permission. Post-completion Statements must include retention figures for substructure, superstructure (by mass) and facade (m2).

Key policies and guidance

Table 5.1 Circular Economy key planning policies

London Plan 2021
D3: Optimising site capacity through the design-led approach
D4: Delivering good design
SI 7: Reducing waste and supporting the circular economy
SI 8: Waste capacity and net waste self-sufficiency
GLA Circular Economy Statement Guidance
Local Plan 2015
CS17: Waste
DM: 17.1 Provision for waste in development schemes
DM 17.2 Designing out construction waste
Emerging City Plan 2040
CE1: Sustainable waste facilities and transport
S8: Design
DE1: Sustainable Design
S16: Circular Economy and Waste

Reuse: To use a material, product or component parts, either for their original purpose or for a new one, without significant alteration. For example, repairing or repurposing items instead of discarding them.

Recycling: The process of converting waste materials into new products, preventing the waste of useful resources. It is important to assess whether the quality of the resource is maintained (e.g. it can be used for same purpose again) or if it will be cycled to a lower quality (downcycled) during the process e.g. bricks being downcycled for use as hardcore.

Case Study: 100 Fetter Lane

Use: Office and retail

New build



Visual of proposal for 100 Fetter Lane. Source: Design and Access Statement

Key facts:

- Use of recycled materials, including for the primary façade (rammed concrete with recycled aggregates or bricks to form façade panels)
- Minimisation of material consumption and incorporating future flexibility in the structure and configuration of internal spaces
- Selection of materials that are easy to install and durable, with low wastage rate and less energy use in manufacture, as well as requiring less maintenance and replacement cycles
- Piloting of material passports (Circuland) to facilitate future materials reuse with information, such as a 3D model, contractor’s records, products’ specifications and certificates, held in a database.

5. CIRCULAR ECONOMY

Key actions to develop an exemplar City scheme

The following key actions are required to positively address the City Corporation's policy framework and should be discussed at pre-application stage. Applicants should clearly present the relevant information in the application documents:

- Demonstrate maximum retention and reuse of existing buildings and materials through a pre-redevelopment audit, including any options explored
- Incorporate reuse items and recycled materials into the design of any new development, and support material efficiency by optimising the structure, floorspace arrangement, and the finishes and fit-out design, in accordance with circular economy principles
- In cases of demolition, identify reuse potentials through a pre-deconstruction audit*. Prepare detailed information for a minimum of 5 key materials, components or fittings to enable reuse through materials markets as early as possible
- Demonstrate principles of flexibility, adaptability and ease of repair and maintenance in the proposed design to support future adaptive reuse and to extend the useful life of the building in response to evolving working and living patterns
- Prepare building material data (i.e. material passports) for a minimum of 5 carbon intensive new materials, components or fittings; set up an end-of-life strategy that incorporates as-built information management with ongoing updates, for the lifespan of the development

The key actions clarify the City Corporation's priorities, set out in the Development Plan policy, for how in-depth circular thinking should be applied to the design of City developments from the onset. The GLA's Circular Economy Statement guidance provides details of the content that should be included in an applicant's circular economy strategy. This includes a pre-redevelopment audit that incorporates pre-application stage optioneering relating to circular economy opportunities. It is recommended the same options as the carbon options assessment are used. Pre-deconstruction audit and end-of-life data are expected to become more detailed over time. It is recommended that applicants contribute to driving the reuse process by providing further details of at least 5 key deconstruction and 5 key proposed materials to facilitate reuse opportunities.

New build proposals in the City are expected to demonstrate creative ideas for the reuse of materials from site and from material marketplaces, and how deconstruction material can be reused at its highest value onsite or elsewhere, including for public realm works.

Flexibility and adaptability to increase the longevity of buildings are important qualities of circular design in the City's predominantly commercial property market where quality standards are subject to frequent change, due to quickly changing commercial building specifications. The provision of high-quality material data is key to supporting adaptive reuse of buildings as well.

The following key actions are strongly recommended to develop an exemplary scheme that achieves the best balance of planning benefits for the City of London: Measures should be discussed at pre-application stage and highlighted in the application as environmental benefits to support the proposals:

- Where removal of a building is necessary, use deconstruction methods rather than demolition to maximise the quantity and types of items and materials that can be salvaged. Deconstruction method statements should be provided for key materials and elements.
- Seek coordination opportunities with nearby development sites and public realm works to increase opportunities for material reuse and exchange
- Seek partnerships with specialist manufacturers for works to modify, recertify and store materials for reuse from an early stage

The adoption of circularity in the use of materials is particularly important in areas of high construction activity like the City. Exemplary efforts to deconstruct, record and reuse materials, the efficient use of material exchange markets, and coordination and cooperation with other development sites, manufacturers and tenants (on construction, material strategies and fit-out choices) are sought to reduce waste and carbon emissions from development.

* The term pre-deconstruction audit is used in place of pre-demolition audit to drive recovery and reuse.

Case Study: Salisbury Square

Use: Courts, police station, retail, and office
New Build



Salisbury Square east elevation.
Source: Design and Access Statement

Key facts:

- Stone cladding on façades used for external public paving, and excess stone crushed and used as an aggregate in terrazzo mix for planters
- A large portion of reclaimed materials sourced from Fleetbank House. Many other materials sourced from properties on Fleet Street, Whitefriars, Salisbury square, and the courtyard area
- Material reclamation written into contractual requirements of the Demolition Contractor
- The existing 2-7 Salisbury Court basement to be retained as the basement for the refurbished building, avoiding the need for excavation
- Use of 70% GGBS cement replacement to all the vertical structures (columns, walls, core), firm secant piles and concrete blinding and 50% GGBS cement replacement to all other concrete elements

5. CIRCULAR ECONOMY

CIRCULAR ECONOMY IN CONSTRUCTION

Circular economy in construction

Developments should follow the Circular Economy hierarchy (Figure 5.1) to maximise reuse of existing materials and components and minimise use of new materials. Materials, structural elements and spaces should be designed for adaptability and flexibility (to extend a building's useful life), whilst weighing up the impact of any additional carbon emissions incurred as a result.

Based on GLA Guidance, these terms are defined as:

- **Adaptability:** how well a building or development accommodates change with the primary goal being to support longevity of the building. Adaptable design allows for long-life elements to be retained, while short-life elements can easily be reworked, re-organised or rebuilt as needs change – e.g. the spatial layout and services may need to be changed and replaced over time, usually in response to changes in use/needs.
- **Flexibility:** the design of spaces to accommodate more than one use e.g. multiple uses at the same time, or various uses throughout the day, week, or year (seasonally). This principle can be applied to both indoor and outdoor spaces.

Key Measures

Whole building

Applicants for all major developments are expected to undertake a pre-redevelopment audit to understand to what extent existing buildings, structures and materials can be retained, refurbished, or incorporated into the new proposal. The purpose of the pre-redevelopment audit is to conduct a strategic assessment of reuse opportunities at concept stage and embed circular principles into the design. The pre-redevelopment audit should be submitted as part of the Circular Economy Statement at planning application stage.

Where substantial demolition is proposed, a pre-deconstruction audit is expected to be provided for all planning applications to maximise opportunities for the reuse of materials. Alternatively referred to as a 'pre-demolition audit', the City Corporation uses the term pre-deconstruction audit to encourage deconstruction and material reuse over demolition and waste. The purpose of the pre-deconstruction audit is to provide a quantitative and qualitative record of materials to support the pre-redevelopment audit. The pre-deconstruction audit should be updated as conditioned through the planning process to gather evidence

and insights into how the reuse process is managed and implemented, for the benefit of all stakeholders.

The following tables builds upon the GLA Circular Economy Guidance for pre-redevelopment and pre-deconstruction audits, and recommends further actions and detail that are considered to improve reuse opportunities of deconstruction materials in the City. Exemplary developments are encouraged to incorporate as many best-practice aspects as possible.



Images: Salvaged materials being processed on site at 75 London Wall
Source: City of London Corporation



Case Study: 75 London Wall

Use: Office and retail

Retrofit and Extension



Visual of the proposed New Bridge Street elevation
Source: Planning Application Circular Economy Statement

Key facts:

- High levels of retention of the existing building including 100% of substructure, 77% of superstructure, and retention of facade on lower levels
- New steelwork to be designed with bolted rather than welded connections in order to aid their de-mountability and potential reuse
- Diversion of 98% of demolition waste materials from landfill

Additional features:

- A1–A5 (excl. sequestration) WLC emissions of 437 kgCO₂e/m², a significant improvement on the GLA's Aspirational Benchmark of 600kgCO₂e/m²
- A–C (excl. B6 & B7) WLC emissions of 816kgCO₂e/m², a significant improvement on the GLA's Aspirational Benchmark of 970kgCO₂e/m²
- Targeting an 'Outstanding' BREEAM rating

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CIRCULAR ECONOMY IN CONSTRUCTION

Pre-redevelopment audit guidance

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GLA Guidance	City Corporation Guidance	Best-Practice Guidance (City Corporation Guidance +)
<p>Context and existing site analysis</p> <ul style="list-style-type: none"> Outline an explanation of the existing buildings on the site and brief description of state of their repair. Details should include: the building's age, key materials, photos of typical internal spaces and facades, and site plans. 	<p>Context and existing site analysis</p> <ul style="list-style-type: none"> Analysis of the site context, existing built form, heritage matters and identification of opportunities for reuse. A material review to inform optioneering and the materials assessment (as outlined below). Review relevant surveys: structural and façade, building services and fit-out. Include a description of their current state and conduct intrusive investigations if possible. The site analysis and material review should be informed by and include details from a site visit. 	<p>Context and existing site analysis</p> <ul style="list-style-type: none"> Incorporate detailed modelling, BIM or digital twin models. Consider construction sequencing and storage opportunities.
<p>Optioneering</p> <ul style="list-style-type: none"> Analysis that fully explores options for retaining existing structures, materials and the fabric of existing buildings into the new development; and the potential to refurbish buildings before considering substantial demolition. 	<p>Optioneering</p> <ul style="list-style-type: none"> Include a strategic assessment of retention and development scenarios that align with the carbon options assessment appraisal (where provided). Optioneering must be evaluated according to whole life-cycle carbon (in the carbon options assessment), circular economy (in the pre-redevelopment audit) and other relevant sustainability criteria. Assess how each option would embed circular economy principles. 	<p>Optioneering</p> <ul style="list-style-type: none"> Provide opportunities for, or estimates of retained, reused, remanufactured, diverted, recycled materials would apply to each development scenario.
	<p>Early materials considerations and assessment</p> <ul style="list-style-type: none"> Include a review of existing materials onsite including estimated types and quantities, as informed by a site visit. Include a material reuse catalogue for a minimum of 5 key items, materials, components and fittings for reuse. This should: <ul style="list-style-type: none"> Include a qualitative assessment of the material properties Identify opportunities that maximise resource recovery in line with the circular economy hierarchy (Figure 5.1) and prioritise retention/reuse onsite above offsite relocation, repurposing or recycling Include visuals, photographs, diagrams where helpful and inspiring for the design process. The qualitative assessment of material properties could consider: <ul style="list-style-type: none"> can it be disassembled? what are the fixings? is there a take-back scheme? testing and supply chain considerations manufacturer warranties fire resistance toxicity. 	<p>Early materials considerations and assessment</p> <ul style="list-style-type: none"> Include a material reuse catalogue for the majority of key items, materials, components and fittings for reuse. Investigate material passport and exchange platforms to understand the material reuse process and information required. Include case studies where helpful and inspiring for the design process. Assess the materials and waste impact of temporary structures which support construction.

5. CIRCULAR ECONOMY

CIRCULAR ECONOMY IN CONSTRUCTION

Pre-redevelopment audit guidance (continued)

GLA Guidance	City Corporation Guidance	Best-Practice Guidance (City Corporation Guidance +)
<p>Development of the pre-redevelopment audit</p> <ul style="list-style-type: none"> The audit should be carried out early on (at pre-application stage) and should inform the design. Applicants should complete and submit a pre-redevelopment audit as supporting evidence to their CE. 	<p>Development of the pre-redevelopment audit</p> <ul style="list-style-type: none"> Establish measurable targets for the preferred scenario of retained, reused, remanufactured, diverted, recycled materials, and opportunities for embodied carbon savings. Identify any limitations in the findings and results of the audit (e.g. limited access to site) and/or risk in its delivery (e.g. contractor buy-in). Propose how these limitations will be addressed, and risks managed throughout the design stages. Map and engage key stakeholders, partner organisations, and/or materials platforms that will deliver the pre-redevelopment audit. Each stakeholder should attend the initial site visit. Detail how the pre-redevelopment audit will be managed and reported throughout design development. Identify a key stakeholder/s to manage and champion this process. 	<p>Development of the pre-redevelopment audit</p> <ul style="list-style-type: none"> Outline collaboration, information and coordination sharing opportunities within a portfolio. Consider collaboration, information sharing, and coordination opportunities with other developments. Demonstrate how design-decisions have been influenced by re-use opportunities.

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Material Glass Banding Summary

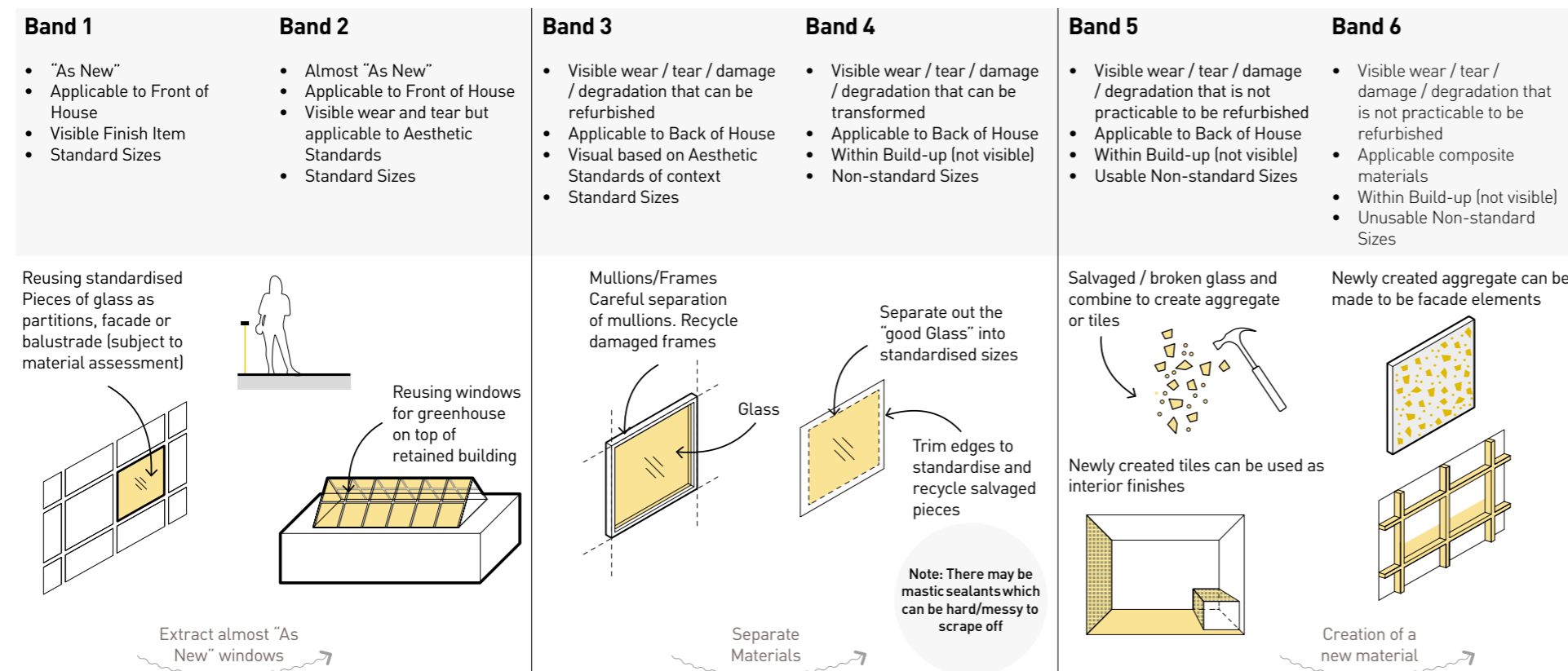
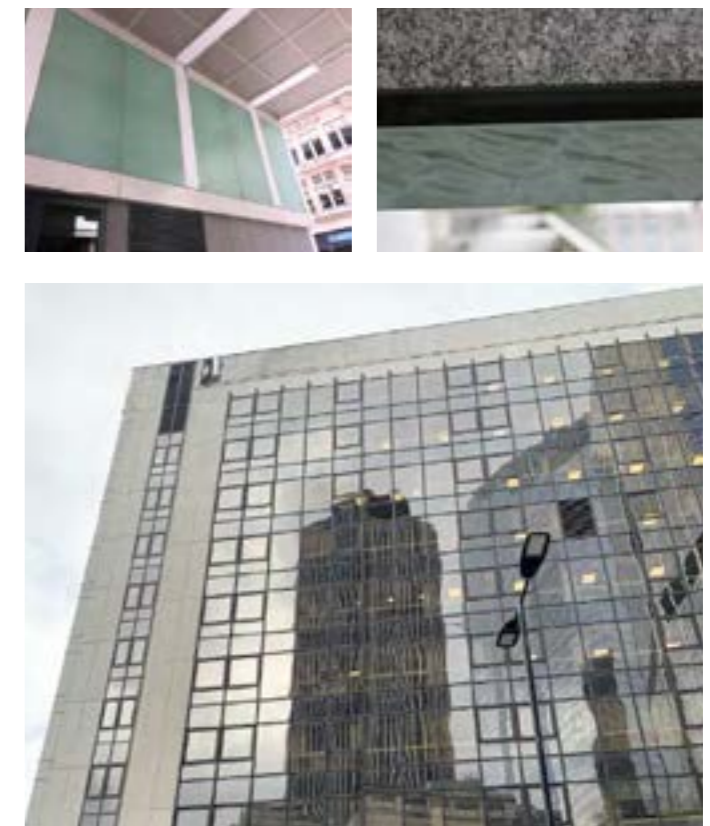


Figure 5.1 - 55 Old Broad Street - Material Reuse Audit Submitted as part of the Circular Economy Strategy this example demonstrates an in-depth analysis of existing materials and opportunities for reuse



5. CIRCULAR ECONOMY

CIRCULAR ECONOMY IN CONSTRUCTION

Pre-deconstruction audit guidance

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GLA Guidance (for Pre-Demolition Audit)	City Corporation Guidance	Best-Practice Guidance (City Corporation Guidance +)
<p>A pre-demolition audit is a detailed inventory of the materials in the building that will need to be managed upon demolition.</p> <p>It should include:</p> <ul style="list-style-type: none"> • A summary of the key components and materials present in the existing buildings, with an estimate of the quantities and associated embodied carbon and whether they are suitable for reclamation. • An explanation and drawings that show the extent of the proposed demolition and whether any parts of the building are being considered for retention. • Opportunities for reuse and recycling either within the proposed development or offsite nearby/locally or further afield. • Reasons for adopting less preferred approaches or moving down the hierarchy of CE design approaches. 	<p>The pre-deconstruction audit is a detailed quantitative and qualitative data inventory of existing materials onsite, including retained and deconstructed materials.</p> <p>In addition to the GLA guidance, it should include:</p> <ul style="list-style-type: none"> • The type and quantities of materials present. • Quantities and value of building elements and materials that can be recovered, including identification of priority deconstruction products for reuse. • Associated embodied carbon savings should be cross-referenced with the WLC assessment. • Any associated programme impacts for reuse onsite, reuse offsite, recycling options. 	<p>The collection of quantitative and qualitative data should work towards developing material passport-type information. Provision of this information in an excel spreadsheet is encouraged for use on a materials platform or easy data sharing.</p>
<p>Where possible, the following best practice information should also be included:</p> <ul style="list-style-type: none"> • How the value of existing building elements or materials can be recovered. • The amount of demolition waste. • A schedule of practical and realistic providers who can act as brokers for each of the reclaimed items. • Target reuse and reclamation rates. 	<p>A material reuse schedule for a minimum of 5 key items, materials, components and fittings for reuse. This schedule should add detail to the material reuse catalogue (in the pre-redevelopment audit) and outline targets and commitments:</p> <ul style="list-style-type: none"> • Include quantitative data (e.g. number and type). • Include a qualitative assessment of condition and properties (from the pre-redevelopment audit). • Establish targets that maximise resource recovery in line with the circular economy hierarchy (Figure 5.1) and prioritise retention/reuse onsite above offsite relocation or repurposing. • Include visuals, photographs, diagrams where helpful and inspiring for the design process. 	<p>A material reuse schedule for the majority materials (e.g. timber) / elements (e.g. doors) onsite including a qualitative assessment of relevant material properties and considerations.</p> <p>Include case studies where helpful and inspiring for the design process.</p>

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Designing for circularity

The following key principles are central to circular design

- **Multi-use layers** (long-life elements): design long-life structural elements to be adaptable for a variety of uses, this can include incorporating generous floor-to-floor heights, clear spans, non-structural partitioning.
- **Deconstructability** (short-life elements): design systems and elements, particularly shorter life-elements (furniture, fittings, joinery, space layout/partitioning, services, façade elements) for disassembly so they can be reused on other projects.
- **Ease of accessibility:** consider the accessibility of spaces for different user groups and activities when testing different layouts. Consider ease of access to components for servicing and replacement.
- **Modular construction:** consider standardised components or building layers, to reduce construction waste and make it easier to adapt the building. Modular approaches may still be carbon intensive. Therefore, prioritise take-back and standardised modular schemes that use low carbon materials.
- **Flexible programming:** integrate flexible spaces into the masterplan which can change use at different times of the day or year, e.g. a gallery space that can double up as a workshop or collaboration area.

The GLA's Circular Economy Guidance recommends that all new construction should be designed and built considering layers. If each building layer functions as a separate system, shorter life layers can be replaced and adapted without impacting the use and integrity of longer life layers. This involves designing and determining a realistic lifespan for independent layers of the building.

As part of the access and maintenance strategy usually prepared by the design team for the developer, it is recommended that deconstruction is included as a key consideration (especially for building elements that require more frequent replacements, such as façade elements, building services, fit-out), as the reusability of materials depends on ease of disassembly and on how well they are maintained during the building life-cycle. To demonstrate best practice, an access, maintenance and deconstruction strategy is encouraged to be submitted with the detailed Circular Economy Statement.

Data and Information Management

It is recommended that design and construction teams compile and record information on materials and construction methods in a single accessible format, including clear as-built drawings (by the architects) and deconstruction drawings (by the contractor).

Alterations that occur within the building's life should be regularly monitored and added to the building's record or passport to ensure that information is up-to-date for future building managers, and at the end-of-life stage.

Newer systems, such as materials passports, are likely to become established practice in the near future and should be considered during later stages of design and construction, particularly for materials used in new developments. Passport information should be accessible to building owners, building managers, and occupiers as necessary, so that it can be updated throughout the building's life-cycle.

During the design phase, it is best practice to anticipate and test additional future functions of the building which may include changes to technologies or building flexibility, and redundancy if deemed appropriate (this should be informed by relevant studies, area development plans, consultation findings).

Proposals should also consider current and future resource scarcities and address these issues through loose fit in design, construction and operational approaches e.g. use of water audits to support material specification during design or application of rainwater harvesting to support net water positivity on site (see Chapter 6 - Water Resource Management).

Digitisation may be an opportunity to replace hardware with software which does not require material/physical modification and can typically be updated digitally as new tools and requirements emerge.

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Figure 5.2 - Circular Economy Hierarchy
Building Revolutions (2016) D. Cheshire, RIBA Publishing

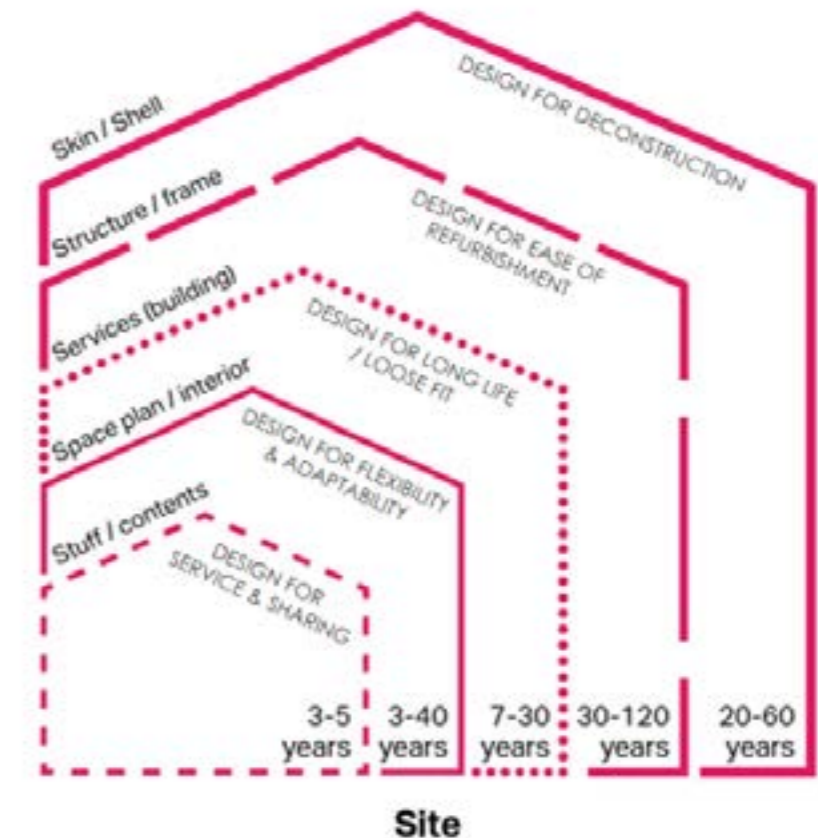


Figure 5.3 - Building layers and their indicative lifespans
Frank Duffy's 'Shearing Layers' concept described in
How Buildings Learn (1994) S. Brand.

5. CIRCULAR ECONOMY

CIRCULAR ECONOMY IN CONSTRUCTION

Beyond the building

It is recognised that there is limited space to store recycled or reusable building items and materials in the City generally or on construction sites, however, the City Corporation welcomes proposals that consider opportunities to share materials with other ongoing construction and public realm projects in the Square Mile or Greater London. Alternative material storage opportunities should be explored offsite, or with demolition contractors, material suppliers and exchange platforms.

Applicants with multiple sites in London are encouraged to explore storage opportunities across their portfolio. Alternatively, materials should be advertised on material reuse platforms as early as possible to maximise the opportunities for offsite reuse.

Developments should consider facilitating meanwhile use of sites awaiting vacancy or construction such as affordable workspace, cultural or community space, pop-up commercial or green space. Meanwhile use has the potential to drive economic outputs, increase positive environmental impacts and deliver social value³ to the public, local businesses and the developer, for both the short and long term.

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Case Study: City Place House, 55 Basinghall Street

Use: Office and retail

New build



*Visual of City Place House entrance.
Source: Design and Access Statement*

Key facts:

- Optimising the structural design to minimise quantity of materials and enable pre-fabrication and modularisation
- Materials with high recycled content, confirmed by a Sustainable Procurement Plan, such as aluminium with 50% recycled content, cement replacements in concrete, 97-100% recycled content for steel reinforcement bars, recycled steelwork and mineral wool insulation
- Use of refurbished raised access flooring
- Designing for ease of disassembly, e.g. through bolted steelwork connections
- Existing steelwork from site confirmed to be reused in a different project

Case Study: Fleet House, 8-12 New Bridge Street

Use: Office and retail including public house

Retrofit and extension



*Visual of the proposed New Bridge Street elevation
Source: Planning Application Circular Economy Statement*

Key facts:

- Optimisation of the structural design to maximise retention with 72% of the existing basement and superstructure to be retained
- Modular façade design to enable offsite manufacture and waste minimisation
- Minimising material usage and optimising the design to achieve durable and adaptable spaces
- Adaptable and flexible MEP systems to suit low floor to floor heights

Additional features:

- Maximised green infrastructure compared to existing site, including addition of public realm planters and greenery on roof terraces and integrated into facades

5. CIRCULAR ECONOMY

OPERATIONAL CIRCULAR ECONOMY

Operational circular economy

The application of circular economy principles during the operational period of a building's life-cycle includes anticipating future occupant needs to help reduce waste generation, designing for flexibility to facilitate the sharing of assets, and the consideration of maintenance and repair requirements during the life of the building.

It also involves the design of site-level waste management systems that encourage circularity such as conveniently placed recycling facilities.

The City runs the Clean City Awards Scheme (CCAS) to drive sustainability amongst member businesses in key areas related to waste, such as communication and engagement, resource efficiency and circular economy practices, and reducing plastic waste.

Key measures

Whole building

Waste reduction needs to be considered from the outset of the operational stage of the building's life-cycle. When occupants consider office refurbishments, focus should be placed on repairing over replacing, choosing elements for longevity and flexibility.

After reducing waste production as far as possible, it is important to ensure that adequate space is made for the separation and storage (for a convenient period) of dry recycling and food waste from the outset. This includes the provision of segregated disposal, in alignment with the major waste streams generated in all bin locations, with clear signage. For example, if collecting residual, dry mixed recycling, organics, ensure all three bins are in all waste locations.

In developments with kitchens that are likely to produce large volumes of organic waste, the design proposal should allow for the accommodation of food waste digestion or composting technologies, reducing the need for transportation of food waste and associated carbon emissions.

Waste stores should be constructed using materials that are robust, secure, and non-combustible, with a water outlet for bin washdown, a foul drainage connection, as well as adequate lighting and ventilation. The temperature of waste management spaces should be considered to reduce the risk of odours and vermin based on the nature of the proposed activities, volume and length of waste storage. The servicing areas need to be

designed for waste vehicles, which typically require a clear height of 5.5m.

Waste bins within the waste store should be arranged so that they are easily accessible without obstruction. Waste storage areas should be located so that occupiers and waste operatives should not have to transport waste for a distance greater than 30m. Equally, occupiers and waste operatives should not have to move bins along a gradient steeper than a 1:12 slope (although this limit may be exceeded if the lengths are not excessive, and the slope is not part of a series of slopes)*. In commercial buildings with high waste outputs, separate units for different recyclable goods and waste compactors should be considered to allow for efficient transportation.

Developments should include provision of shared storage space, shared appliances or a 'library of things' (tools and other equipment) between different tenants, to reduce the need for purchasing them individually. Spaces should be designed with a culture of reuse rather than disposal, for example, designing storage space for mugs/glasses and providing a sink or dishwasher. Developments should provide space for the deposit of unwanted or bulky items in preparation for reuse or recycling in a convenient location - especially for the many commercial spaces in the City which may experience frequent refitting for new tenants. Where reuse of equipment is not possible, signpost or provide onsite recycling opportunities for complex waste items (such as electrical equipment).

In-building waste management and storage solutions should be well integrated with the collection systems used by the contractor serving the development. Developers should be mindful that collection systems may change over time due to new collection contracts or changing legislation. Systems that rely on hard infrastructure may not be resilient to these types of change.

Solutions that facilitate the collection and reporting of Management Information (MI) on the amount and type of waste generated by waste stream is encouraged for both commercial and residential use. MI can be used to identify performance issues and evaluate impacts of additional interventions.

Proposed waste management systems should encourage a sense of personal responsibility for the correct segregation of waste and use of waste management service/infrastructure. This could include linking use of the service to individuals, households, or businesses via technology (e.g. smart bins) and/or monitoring (via CCTV and care-taking staff).

To raise awareness of the onsite waste management service and to encourage desired recycling behaviours, clear multi-channel communication and signage for commercial and residential use need to be in place. Signage needs to reflect what the appropriate contractor collects (this may evolve over time).

Freehold, leasehold and rental conditions should include clear obligations on commercial tenants/residents to use waste management facilities in the correct way and employ building caretaker(s) with a clear waste management role which includes the engagement of residents and businesses to encourage good recycling behaviours, possibly through incentives. Occupiers should prioritise the use of multiple-use over single-use products, and suppliers with packaging take-back or refill schemes.

Occupiers should be encouraged to incorporate requirements for using recycled goods into procurement contracts (considering waste that is produced across the whole supply chain), and for following the waste hierarchy.

*Refer to Building Regulations Approved Document H for further information.

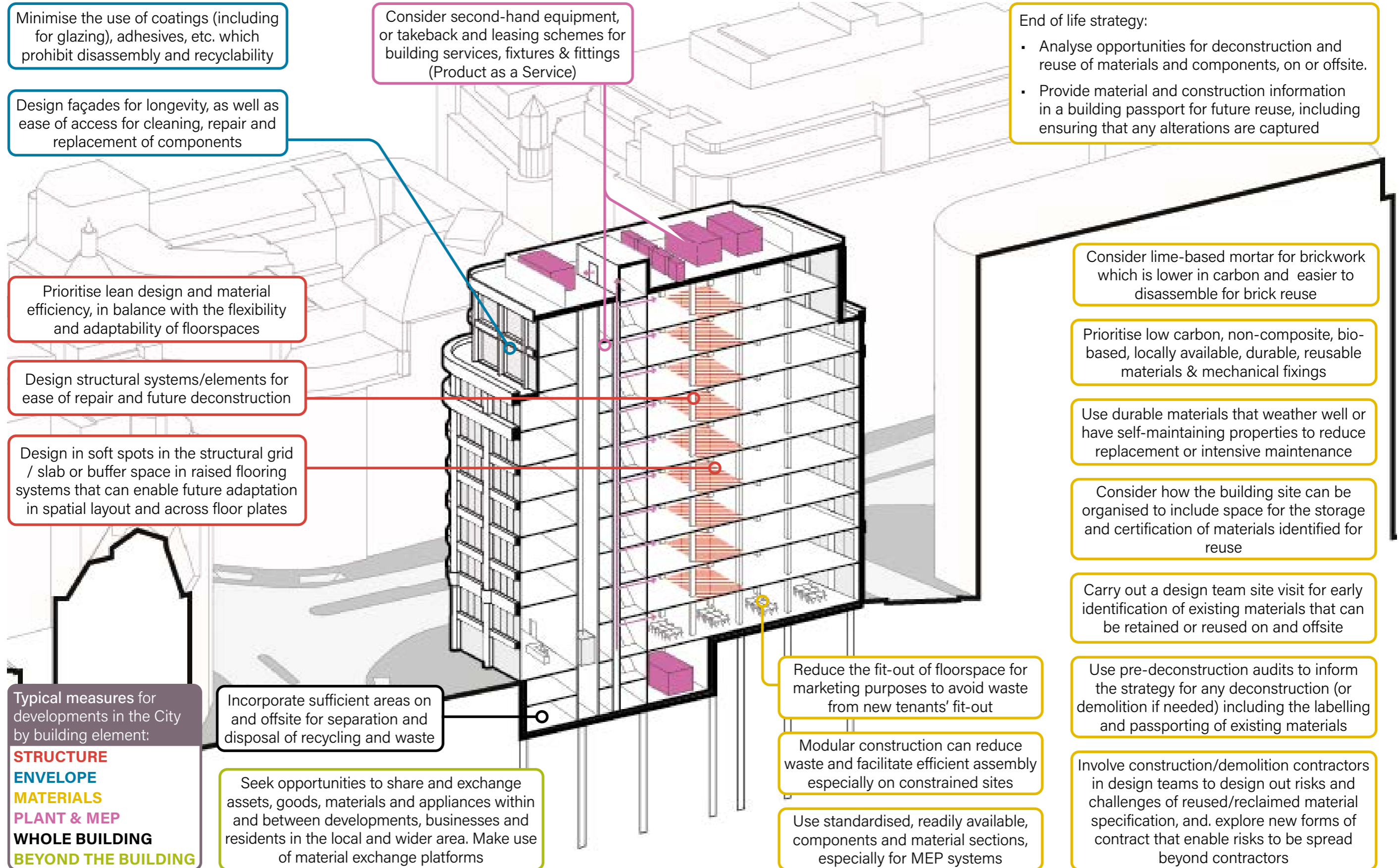
5. CIRCULAR ECONOMY

KEY MEASURES FOR CITY DEVELOPMENTS

This infographic provides a list of potential measures, which is not exhaustive. Applicants are encouraged to propose innovative measures that drive best practice. All measures to be agreed on a case-by-case basis.

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Minimise the use of coatings (including for glazing), adhesives, etc. which prohibit disassembly and recyclability

Design façades for longevity, as well as ease of access for cleaning, repair and replacement of components

Consider second-hand equipment, or takeback and leasing schemes for building services, fixtures & fittings (Product as a Service)

End of life strategy:

- Analyse opportunities for deconstruction and reuse of materials and components, on or offsite.
- Provide material and construction information in a building passport for future reuse, including ensuring that any alterations are captured

Prioritise lean design and material efficiency, in balance with the flexibility and adaptability of floorspaces

Design structural systems/elements for ease of repair and future deconstruction

Design in soft spots in the structural grid / slab or buffer space in raised flooring systems that can enable future adaptation in spatial layout and across floor plates

Consider lime-based mortar for brickwork which is lower in carbon and easier to disassemble for brick reuse

Prioritise low carbon, non-composite, bio-based, locally available, durable, reusable materials & mechanical fixings

Use durable materials that weather well or have self-maintaining properties to reduce replacement or intensive maintenance

Consider how the building site can be organised to include space for the storage and certification of materials identified for reuse

Carry out a design team site visit for early identification of existing materials that can be retained or reused on and offsite

Reduce the fit-out of floorspace for marketing purposes to avoid waste from new tenants' fit-out

Use pre-deconstruction audits to inform the strategy for any deconstruction (or demolition if needed) including the labelling and passporting of existing materials

Involve construction/demolition contractors in design teams to design out risks and challenges of reused/reclaimed material specification, and. explore new forms of contract that enable risks to be spread beyond contractors

Typical measures for developments in the City by building element:

- STRUCTURE**
- ENVELOPE**
- MATERIALS**
- PLANT & MEP**
- WHOLE BUILDING**
- BEYOND THE BUILDING**

Incorporate sufficient areas on and offsite for separation and disposal of recycling and waste

Seek opportunities to share and exchange assets, goods, materials and appliances within and between developments, businesses and residents in the local and wider area. Make use of material exchange platforms

Modular construction can reduce waste and facilitate efficient assembly especially on constrained sites

Use standardised, readily available, components and material sections, especially for MEP systems

5. CIRCULAR ECONOMY

CASE STUDIES

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Case Study: 1 Broadgate

Use: Office and retail

New build

Key facts:

- British Land awarded a BREEAM innovation credit for the UK's first large-scale use of a materials passport
- 27% of materials reclaimed from demolition were reused either onsite or within the Broadgate campus
- Additionally, 139 tonnes of steel are being reused in two other developments in Southwark

Additional features:

- Generous terraces and balconies provide over 4,000 sqm of amenity and green space
- First NABERS UK Design for Performance registered building
- BREEAM Outstanding and WELL Platinum target ratings



Visualisation of the proposed 1 Broadgate development
 Source: Design and Access Statement

Together with architects GXN, British Land began working with Madaster at the start of 2021 to use their materials data platform. Throughout the development, the project team will update the platform with information on the quality, origin and location of materials and products that will be used in the structure, façade and MEP of the building, thereby creating its materials passport.

The development approach acknowledges circularity as a crucial part of real estate's future; ensuring materials and products are kept in use for as long as possible, extracting the maximum value from them while in use, then recovering and regenerating them when they reach their end of service life.

Case Study: 55 and 65 Old Broad Street

Use: Office and retail

New build

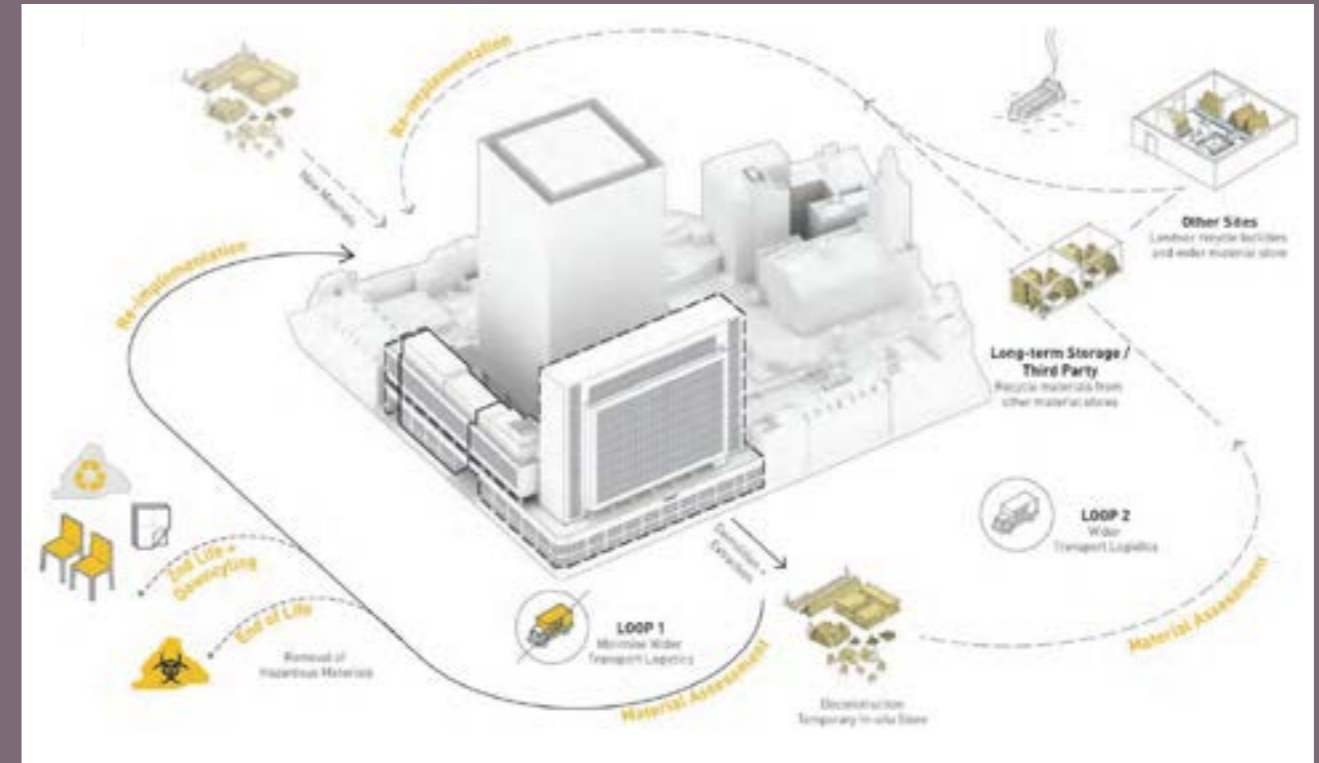


Diagram showing circular flows of materials to and from the development site.
 Source: Planning Application Circular Economy Statement

Key facts:

- Materials, components and furnishings in the existing building have been catalogued, creating an extensive material passport database that will allow their reuse
- Materials assessed according to a set of specification metrics including condition and how visible they will be in their next use, to inform decisions on their processing and reuse/recycling. Material quantities and embodied carbon are key factors
- Modular façade designed for disassembly
- The proposal aims to use primarily mechanical fixings for structural components (steel and CLT), except for the lower level transfer truss structure where heavy loads limit suitability

Additional features:

- Natural ventilation and passive solar shading will reduce operational energy use
- Targeting an 'Outstanding' BREEAM rating

5. CIRCULAR ECONOMY

CASE STUDIES

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Case Study: 47-50 Mark Lane

Use: Office, retail, and cultural learning centre

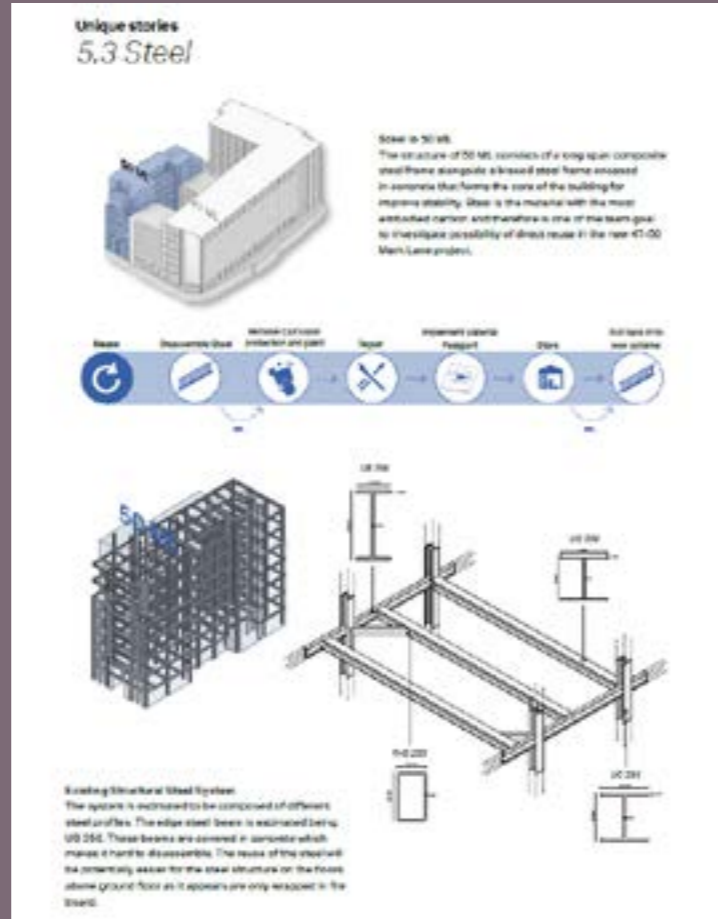
New build

Key facts:

- Worked closely with the appointed demolition contractor and Excess Materials Exchange (EME) to find suitable reuse partners for soft strip materials
- Soft strip materials have been made available on the EME platform until final demolition
- 75% retention of the existing basement which decreases the amount of excavation waste
- Standardised dimensions of the grid and facade to allow for further standardisation of building elements in the internal layout
- The team produced an Upcycling Catalogue, a comprehensive material reuse strategy for materials

Additional features:

- Over 1000sqm of green roof
- Targeting BREEAM 'Outstanding', NABERS 5*, and WELL platinum ratings



'Unique stories' an exploration of potential ways to reuse steel
Source: Planning Application Circular Economy Statement

Right from the start, architects GXN, led a comprehensive assessment of the potential for transformation. An interactive digital model was created using Matterport, 3D scanning tools and software. By scanning real-life spaces, the team could revisit and measure in real-time, analyse and tag objects for review, and plug components into tools that quantify and organise the information.

Visual surveys, plans and survey drawings were used to identify Key Demolition Products to maximize reuse and recycling and aid decision-making for the Stage 2 proposal. An Upcycling Catalogue outlined potential pathways for each product as well as several unique stories based on direct reuse and up-cycling within the proposed scheme.

GXN worked with prospective deconstruction contractors to identify the materials to be retained, rethink innovative methods of deconstruction, and design efficient workflow.

Case Study: 1 Golden Lane (Grade II Listed)

Use: Office with ground floor community space

Retrofit and extension

Key facts:

- Various products and materials including ceiling / floor finishes and light fittings have been made available on reuse marketplace Globechain, with purchasing priority given to developers working within the City
- Utilisation of standardised units in regard to windows, doors and façade panels to allow for easy replacement and adaptation
- Close to 100% of the products and materials specified for the project are derived from recyclable or re-usable sources
- 86% retention of the structural frame

Additional features:

- Plentiful green terraces, window boxes and a planned green wall on the southern façade
- Targeting BREEAM 'Outstanding' rating



View showing the retained grade II listed facade
Source: Planning Application DAS

Working with the client team (Castleforge, Hawkins Brown and G&T), London Structures Lab established a world-first methodology for the deconstruction, re-fabrication and recertification of steelwork to deliver reuse within the same development site.

Innovative steel cutting work enabled a 40% increase in the reusable tonnage over standard reuse techniques. The process also means that the structural zone across the floorplate could be regularised, giving a consistent service zone and ceiling line, producing the high-quality office space expected.

Sophisticated analysis techniques also allowed steel bracing and historic masonry to be assessed as a single system, avoiding the need for any foundation enhancement even with the increased massing.

CLIMATE RESILIENCE

06

6. CLIMATE RESILIENCE

The City's climate resilience risks.

The City's Climate Action Strategy and Adaptive Pathways study identified six key risks to the Square Mile as a result of climate change: flooding, water stress, overheating, new and emerging pests and diseases, disruption to food trade and infrastructure, and impacts to biodiversity.

This chapter addresses these climate-related risks and contains guidance to ensure climate resilience principles are embedded within the design process of each development in the City.

Flooding

The risk: It is anticipated that London will experience a change in both the frequency, intensity and season variability of rainfall in the future, which will put pressure on our drainage system.

The 'Flood risk and sustainable drainage systems' section provides guidance on the management of flood risk through water retention and flow control.

Water stress

The risk: Changes in rainfall patterns will impact London's capacity to meet its water demand and lead to drought. Droughts are expected to get longer and occur more frequently, with double the number of days of drought predicted in 2050 compared to 2020.

The 'Water resource management' section provides guidance on effectively managing and optimising the use of available water resources.

Overheating

The risk: Increasing temperatures as well as the frequency and length of heatwaves will be made worse in the City due to the urban heat island effect. This is when dense urban areas remain significantly warmer than the surrounding countryside, due to roads and buildings absorbing and retaining heat in the day and re-emitting it at night.

The 'Building and urban overheating' section provides guidance on preventing overheating in a dense and urbanised environment.

Pests and diseases

The risk: Changing seasonal conditions and global patterns will influence the spread of new and emerging diseases, while pests and invasive non-native species may also increase in number and range in a warmer, wetter atmosphere.

The 'Pests and diseases' section provides guidance on managing the threat of pests and diseases which could be raised by milder, wetter winters and warmer summers.

Trade, food and infrastructure

The risk: Weather-related impacts, geopolitical changes and altered climate conditions are likely to negatively impact major infrastructure, such as the power grid and transport network, as well as disrupting food production and trade on a domestic and international scale.

The 'Infrastructure resilience' section provides guidance on designing efficient and resilient infrastructure for a building, its external plot interface with the city and the wider impacts to supply chains.

Biodiversity losses

The risk: Changes to the climate can fundamentally alter natural trends and cause decline and loss within ecosystems. This includes disruption to fundamental ecological processes such as pollination, carbon storage capacity and our dependence on the natural environment for our well-being and resources.

See Chapter 7 Urban Greening and Biodiversity for guidance that addresses this risk.

Key approaches for the City

It is important developments are designed for future climate scenarios with built-in resilience and adaption to these changes and disruptions. All developments are encouraged to assess future weather data sets (e.g. CIBSE TM49) and design for these future scenarios, rather than just meet current building regulations. Many of these solutions can simultaneously deliver a range of wider co-benefits which address climate change mitigation, local acoustic and air pollution levels, enhance biodiversity and improve health.

Proposals within the City should consider this guidance from an early stage of the design and use it to determine site-specific risks and mitigation measures. The guidance should inform reports submitted in a planning application and/or during any pre- and post-application discussions with the City Corporation.

All developments should provide a Climate Change Resilience Sustainability Statement (CCRSS) to demonstrate the proposal is resilient and adaptable to predicted climate conditions during the lifetime of the development. For minor developments, this could be included in the Sustainability Statement or Design

and Access Statement. Major development applications should submit a standalone report that includes details of applicable climate risks and adaptation measures that have been considered. The CCRSS should demonstrate how the proposed adaptation measures will be managed and maintained through the life of the development.

Major developments should achieve the BREEAM Wst 05 credit for 'Adaptation to climate change'. This should include a systematic risk assessment that includes the following:

- Hazard identification
- Hazard assessment
- Risk estimation
- Risk evaluation
- Risk management

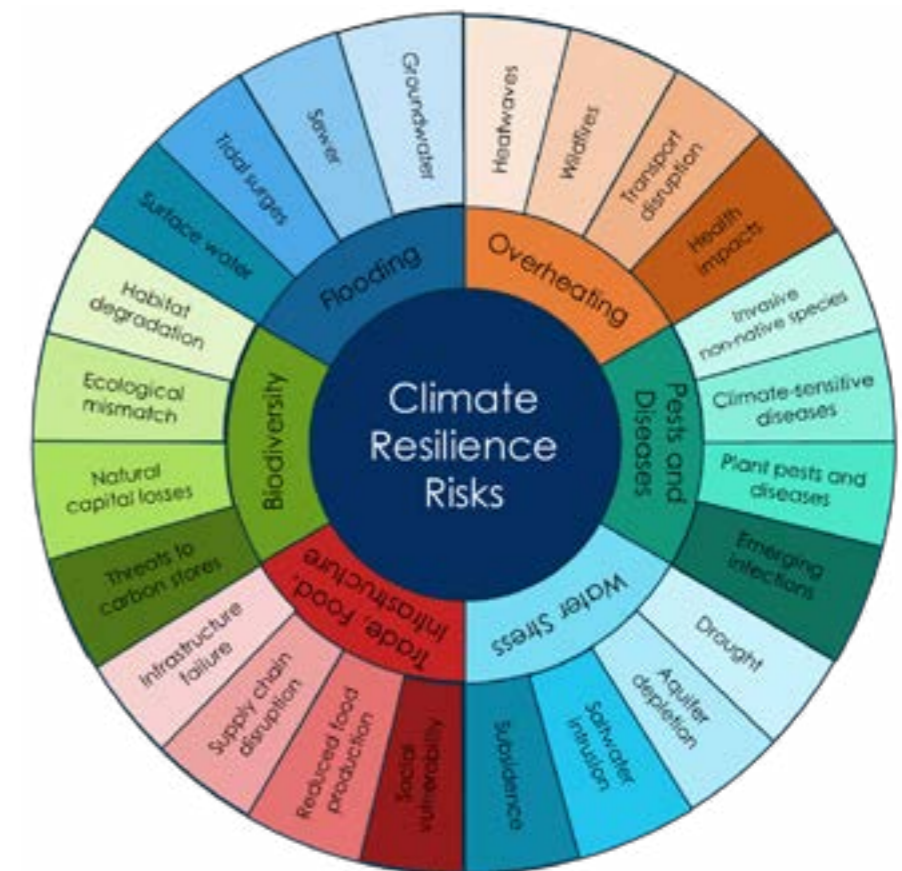


Figure 6.1 City of London Climate Resilience Risks wheel
Source City of London Corporation

6. CLIMATE RESILIENCE

Key policies and guidance

Table 6.1 Climate resilience key planning policies

London Plan 2021

- D6: Housing quality and standards
- D11: Safety, security and resilience to emergency
- GG6: Increasing efficiency and resilience
- SI 4: Managing Heat Risk
- SI 5: Water Infrastructure
- SI 6: Digital Connectivity Infrastructure
- SI 12: Flood Risk Management
- SI 13: Sustainable drainage

Local Plan 2015

- CS10: Design
 - DM10.2: Design of green roofs and walls
 - DM10.4: Environmental enhancement
- CS15: Sustainable Development and Climate Change
 - DM 15.2: Energy and CO2 emissions assessments
 - DM 15.5: Climate change resilience and adaptation
- CS18: Flood Risk
 - DM 18.1: Development in the City Flood Risk Area
 - DM 18.2: Sustainable drainage systems (SuDS)
 - DM 18.3 Flood protection and climate change resilience

Emerging City Plan 2040

- S7: Infrastructure and Utilities
 - IN1: Infrastructure provision and connection
- S14 Open space and green infrastructure
- S15: Climate Resilience and Flood Risk
 - CR1: Overheating and Urban Heat Island Effect
 - CR2: Flood Risk
 - CR3: Sustainable drainage systems (SuDS)
 - CR4: Flood protection and Flood Defences

Other Guidance

- Riverside Strategy 2021 (CoLC)
- Strategic Flood Risk Assessment (CoLC)
- Local Flood Risk Management Strategy 2021-2027 (CoLC)

- Mayor's Transport Strategy & Healthy Streets Approach
- Thames Estuary 2100 Plan (Environment Agency)

Thames river basin district river basin management plan 2022 (Environment Agency)

Water Framework Directive (European Union)

Key actions to develop an exemplar City scheme

The following key actions are required to positively address the City Corporation's policy framework and should be discussed at pre-application stage. Applicants should clearly present the relevant information in the application documents.

- Reduce the risk of all types of local flooding, including by attenuating water onsite and controlling the run-off rate
- Raising of flood defences at riverside sites in line with the Thames Estuary 2100 plan
- Incorporate an integrated water management approach to minimise potable water demand
- Combat urban heat island effect through the design of the building envelope, building services and public realm. Reducing the risk of overheating in the building by incorporating passive solar shading and minimising the need for active cooling
- Design green spaces, building spaces and services with a focus on nature, health and well-being countering the risk of emerging pests and diseases becoming an issue

The development plan requires all major developments to manage rainwater onsite and reduce discharge rates to the public sewer.

Water resources are becoming increasingly sparse in certain weather conditions. Water demand in the operation of a building, including irrigation of urban greening, needs to be minimised as much as possible.

High density environments contribute to the urban heat island effect, mostly from building surfaces re-radiating heat after sun exposure and also through the emission of waste heat from building services. The urban heat island effect can have negative impacts on human health, air quality and energy costs through changes in the microclimate and therefore buildings

must be designed to avoid overheating internally and raising the temperature on the outside.

Open spaces and building surfaces should be designed for the highest proportion of urban greening that is natural, climate resilient and suitable for the location's microclimate - appropriate conditions for planting and habitats to thrive, including shade, water, quiet and dark spaces. Biodiversity and amenity should be balanced and integrated sensitively into public and private realm.

Case Study: 20 Giltspur Street



Giltspur Street facade showing extensive greening. Source: Design and Access Statement.

Key facts:

- Reduction of potable water consumption by 40% over the BREEAM baseline via water efficient sanitary fittings
- Targeting 'Outstanding' BREEAM rating

Additional features:

- High levels of retention of existing building
- Innovative floor jacking strategy to maximise reuse of existing building structure

6. CLIMATE RESILIENCE

FLOOD RISK MANAGEMENT AND SUSTAINABLE DRAINAGE SYSTEMS

Flood risk

The term 'flood risk' refers to the probability of flooding within an area and the associated consequences. The likelihood is based on historical and forecast data.

In the City, the primary sources of flood risk are fluvial/tidal flood risk along the riverside and surface water/sewer flooding in the surface water hotspots identified around Farringdon Street and New Bridge Street areas.

Flood risk management

Flood risk management identifies how the risk of flooding can be reduced and managed sustainably. The Thames Estuary Plan 2100 Plan (TE2100) and the City Corporation's Riverside Strategy 2021 outlines how flood defences along the Thames will be maintained and enhanced. Proposed development on riparian sites should maintain flood defences in line with these flood management policies.

As a Lead Local Flood Authority, the City Corporation has the responsibility to develop, maintain, apply and monitor a strategy for local flood risk management in the area. In the Local Flood Risk Management Strategy 2021-2027 (LFRMS), the City Corporation sets out commitments to achieve flood risk mitigation objectives, these include:

- Implementing procedures to maximise the use of Sustainable Drainage Systems (SuDS) in new public realm works and new developments
- Identifying all historic assets in the Square Mile at risk of flooding and working with building owners to adopt resilient design
- Working with utilities providers and infrastructure owners to create a public register of assets at risk of flooding and supporting owners to take action
- Producing guidance specific to retrofitting flood resistance and increasing resilience in commercial buildings.

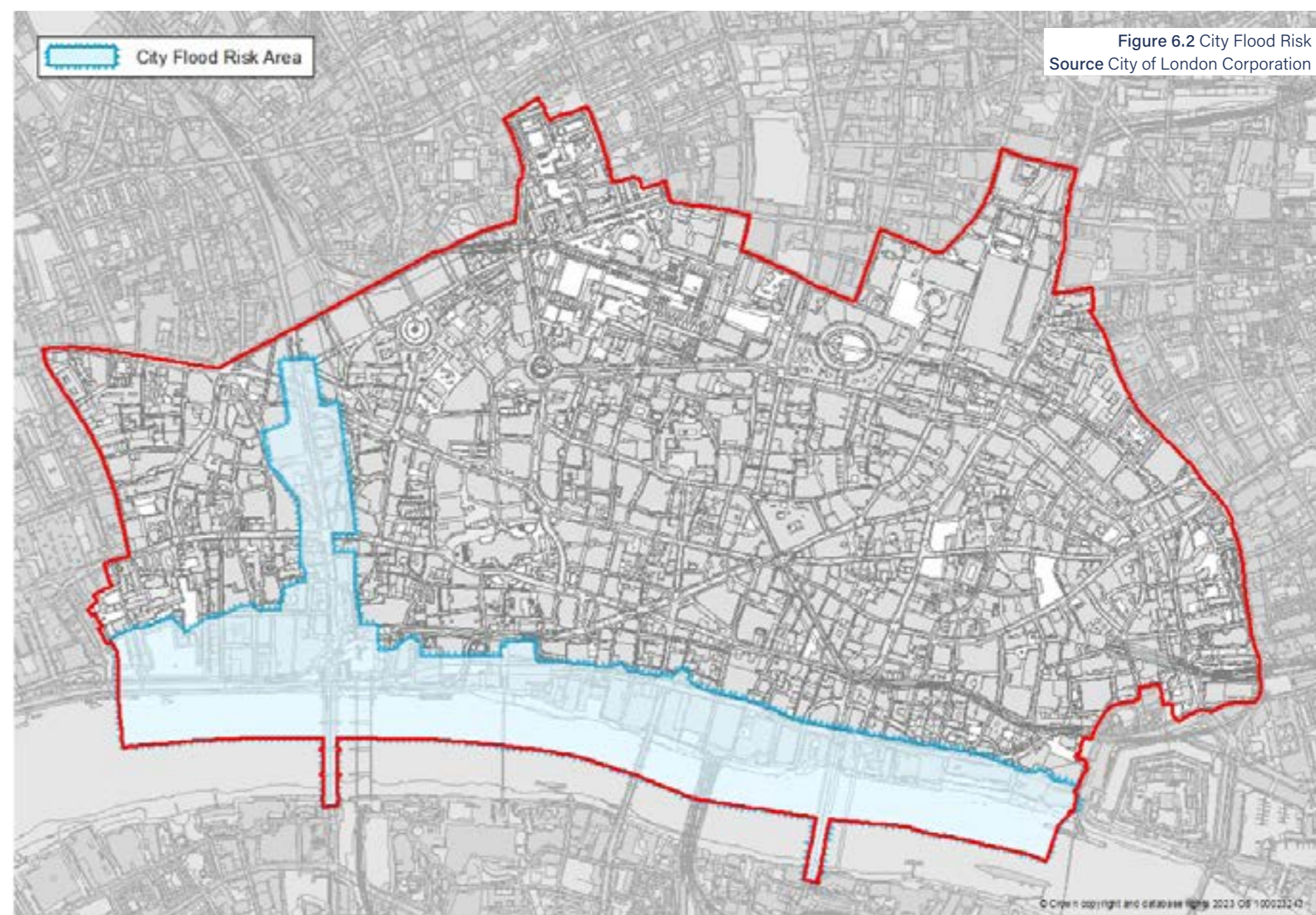
Flood zone categorisation

Flood risk is defined for all areas of London and shown on the Environment Agency (EA) "Flood risk maps" and "Flood maps for planning." The flood zone associated with the development will dictate the building types/usages permitted by the EA. Depending on a site's location within a flood zone and its proposed use, a development might need to pass the Exception Test.

More information on applying the Exception Test and tidal breach mapping is available in the City Corporation's Strategic Flood Risk Assessment. The flood zones are:

- Flood Zone 1 has a low probability of flooding (Annual Exceedance Probability (AEP) <0.1%) and is appropriate for all land uses
- Flood Zone 2 has a medium probability of fluvial (0.1% <AEP> 1%) and coastal (0.1% < AEP > 0.5%) flooding. This prohibits highly vulnerable developments. Designs should consider measurements to minimise the risk and impact of flooding

- Flood Zone 3a has a high probability of fluvial (AEP > 1%) and coastal (AEP > 0.5%) flooding. It should be noted that large areas of London are within this flood zone. All land uses may be permissible within this zone, provided that flood risk has been assessed fully and appropriate mitigation provided. Mitigation measures may include, but not be restricted to, raising flood defences in accordance with Thames Estuary 2100 Plan, ensuring no critical infrastructure or sleeping accommodation is located at basement level or below breach levels, ensuring podium levels are set above breach levels, and setting in place a Flood Emergency Plan.



6. CLIMATE RESILIENCE

FLOOD RISK MANAGEMENT AND SUSTAINABLE DRAINAGE SYSTEMS

- Flood Zone 3b categorises the functional floodplain (AEP > 5% or designed to flood in an extreme event). Only water compatible development is permitted within this zone to ensure that there is no impact on the functionality of the floodplain

It is vital that the information within and the limitations of the EA maps are fully understood.

Sustainable Drainage Systems (SuDS)

SuDS are designed to manage surface water volumes and local pollution risks by mimicking natural processes as far as practicable. SuDS should result in reduced runoff, improved water quality, amenity benefits and enhanced biodiversity and habitat.

Key Measures

Whole building

Flood risk should be assessed on a site-specific basis. All development should ensure that the risk of flooding is managed sustainably, taking into consideration the evolving impacts of climate change on flood risk throughout the project's lifetime, while minimising impact on the natural environment. To achieve this, proposals should:

- Ensure that the development is suitable for the flood zone it is situated in and its defined land use vulnerability
- Assess all sources of flood risk to the site. A risk assessment of each flood source should identify the location, speed and consequence of flooding on a site
- Establish a risk threshold. This should be done with reference to relevant flood risk policy and in conjunction with interested parties including future occupants
- Mitigate the risks. This could include moving vulnerable uses to less vulnerable areas, maximising the use of green-blue infrastructure, utilising SuDS to manage flood volumes throughout the development, or further flood resistance and flood resilience measures
- Respect the inherent flooding pathways and make space for water within the proposed development as far as practicably possible. Make use of available public realm to accommodate stormwater, improve water quality and provide amenity
- Ensure that the development does not increase flood risk offsite and, if possible, achieve a reduction in this risk

- Ensure the safety of building occupants, prepare in advance for the consequence of flooding and develop procedures to enable recovery. Safe egress and access should be provided in the event of a flood event, ideally to a safe area offsite. A Flood Emergency Plan can be implemented in order to notify site users of a flood event, provide a safe and efficient route away from danger and ensure the flooded site can return to functional use as soon as possible. As the Lead Local Flood Authority (LLFA), the City Corporation requires a Flood Emergency Plan for most buildings in Flood Zone 2 or Flood Zone 3

Developments within the City Flood Risk Area should undertake a site-specific Flood Risk Assessment. Developments on riparian sites are responsible for the maintenance of flood defences, and works that occur within 16 meters of any part of the flood defence will require a flood risk activity permit from the Environment Agency.

Proposals should consider solutions that combine sustainability and flood risk management measures. Blue roofs (attenuation tank at roof or podium level) store rainwater and reduce flood risk while green roofs (layer of growing medium and plants at roof or podium level) offer minimal rainwater storage but promote biodiversity. At suitable sites, sustainability benefits can be maximised through the combination of blue-green roofs as the attenuated water can be used to irrigate the green roof. Other co-benefits with flood risk management measures include solar panel placement on blue, green and blue-green roofs, as well as greywater reuse and de-paving where possible to transition green-grey roofs to green roofs.

Where space or other constraints mean that urban blue-green infrastructure is not feasible, water may need to be attenuated in more traditional tanked systems. Where these are unavoidable, intelligent rainwater management systems should be utilised to enable rainwater to be stored and then used onsite.

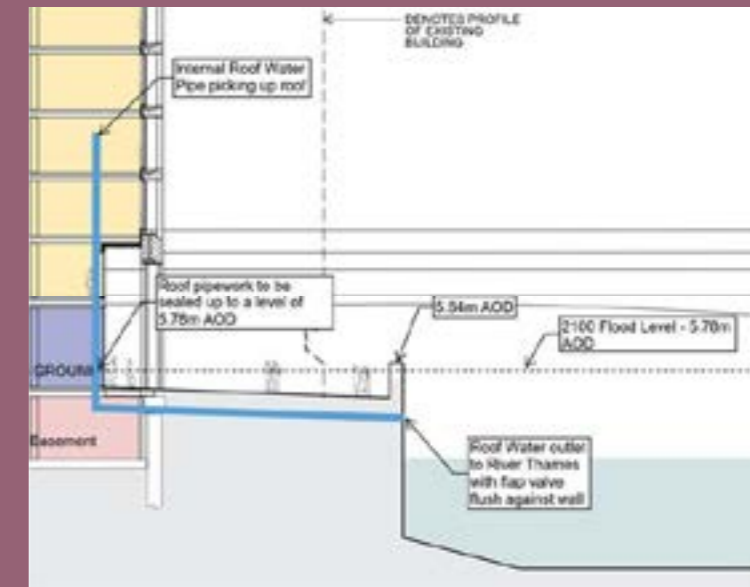
Drainage for all developments should have separate foul and surface systems. As far as practicable the systems should not be reliant on pumping. If pumping is required, such as from basements, then appropriate backup systems should be provided. Positive pump devices can be used in developments located in areas at risk of sewer surcharge.

All infrastructure and sensitive equipment that is critical to the functioning of a building, such as heating and lighting, should be flood-proofed and situated above anticipated flood levels. This includes risks associated with breach events.

Case Study: Seal House

Use: Office and retail

New build



Roof Water Strategy. Source: Planning Application, Flood Risk Assessment and Outline Drainage Strategy

Key facts:

- Internal north-south access designed to ensure that safe egress and access is provided in the event of a breach in the Thames Tidal Defences
- Less vulnerable land uses are located on the ground and basement floors
- Levels slope away from the building, so that surface water flows away from the asset
- Green roofs are provided, which reduce runoff, create habitat and visual amenity
- Attenuation is provided that takes account of tide- lock to surface water discharge from the site
- Surface water is discharged direct to source (River Thames) in accordance with the SUDs hierarchy

6. CLIMATE RESILIENCE

FLOOD RISK MANAGEMENT AND SUSTAINABLE DRAINAGE SYSTEMS

Careful substation and plant positioning in relation to flood risk from overland flow, rising river or groundwater as well as tanking measures and raised threshold positions can enhance resilience.

Beyond the building

SuDS and urban blue-green infrastructure (BGI) are effective measures to manage and reduce flood risk and should be integrated into the public realm or open spaces within the development where possible. The design of these spaces can include planters, tree planting, swales, natural detention basins, or soakaways and can play a key role in supporting the urban ecosystem. SuDS systems should follow the drainage hierarchy included in London Plan Policy 5.13 - Sustainable Drainage.

These solutions can:

- Reduce runoff and flood risk - impervious surfaces in urban developments increase run-off volumes and often overwhelm drainage networks/sewers
- Restore the natural water balance - by reducing impervious surfacing, SuDS/BGI promote natural infiltration and encourage aquifer recharge
- Support biodiversity by restoring natural habitats
- Provide carbon reduction benefits - through sequestration and as an alternative to grey infrastructure with higher embodied carbon
- Increase health and well-being in the urban realm - SuDS/BGI can help to reduce the Urban Heat Island effect and improve air quality
- Improve ecology - SuDS and BGI can prevent the deterioration of, and improve the ecological status of the Thames Middle Water Framework Directive water body and/or its associated elements.

For developments along or near the riverbank, surface water should be discharged directly to the Thames, provided the required permissions are secured. This can present an opportunity to incorporate elements from the Estuary Edges guidance therefore also contributing to marine/terrestrial biodiversity.

The City Corporation Resilient Planting Catalogue includes advice on planting species best suited to the City's future climate conditions and to help alleviate flood risk.

Ground infiltration

It is important to understand that opportunities for discharge to ground in the City can be limited due to two reasons:

1. Many areas of London are built over contaminated land. Discharging to ground can result in the mobilisation of these contaminants, which can then enter watercourses;
2. For large parts of the City the underlying geology is not sufficiently permeable to enable the volume of discharge to ground required.



Stone planters designed as benches © Clive Totman, 2018



Source: City of London Corporation

6. CLIMATE RESILIENCE

WATER RESOURCE MANAGEMENT

Water resources

Water resources are the various types of water which are used or pass through a development. These include potable supply from utilities systems, rainwater and greywater sources.

Water resource management

Water resource management is the effective and optimised use of available resources.

Key measures

Whole building

Water resources should be reliable, sustainable, secure and safe. To achieve this, a development should consider and incorporate the following measures where possible:

Measures for the management of potable water

- Achieve an 'excellent' BREEAM rating (or equivalent) in the WAT 01 category (for major developments)
- Ensure supply network has sufficient capacity
- Forecast supply and demand to avoid inefficiencies. 'Actual water' consumption calculations should be provided at planning submission
- Measure and record usage in order to identify water and energy saving opportunities. Actual water consumption should be reported during operation
- Ensure that distribution is efficient and effective throughout the development by optimising systems and minimising leaks
- Use leak detection technology to improve the performance of networks and reduce wastage
- Use water saving technologies within the building such as low flow taps and aerated showers
- Use timed-release systems to reduce usage
- Where possible, make use of alternative water sources, such as incorporating rainwater and greywater recycling to reduce the demand of potable water
- Recycle water sources, including treated sewage effluent (TSE) and greywater to reduce potable water demand. Regenerative water systems should be considered as standard to recycle water.

- Achieve water consumption of 105 litres of potable water per person per day (pp/pd) in residential developments. This includes a limit for external use of 5L/pp/pd.

Measures for the management of wastewater

- Ensure a network has sufficient capacity
- Minimise volumes of water required to be treated, e.g. ensuring effective flushing
- Consider the use of recycled water for toilet flushing. In a large development, capturing water from one third of a building's showers could meet the toilet flushing demand of the entire development
- Minimise sewage outflow through efficient flushing, this prevents obstructions and helps avoid overwhelming the sewage systems.

Measures to reduce water demand in plant and MEP systems:

- Improve the supply and demand efficiency of plant and MEP systems by ensuring distribution networks are operating effectively and are regularly maintained
- Make use of recycled water in heating and cooling systems
- Create a more efficient supply and use system, such as separating the supply of potable and non-potable water (use of greywater for non-potable and a blend of recycled and utility water for potable water)
- Consider resource scarcity management systems that might need to be instituted to manage periods of water stress, drought, or during extreme weather events.

Case Study: 100 Liverpool Street

Use: Office, retail and leisure

Retrofit and extension



100 Liverpool Street, view from the Circle towards the northern office entrance. Source: Planning Application: DAS

Key facts:

- Water demand partially met through rainwater harvesting and greywater reuse
- Drought resistant planting
- 40% reduction in water consumption against BREEAM defined baseline in 2016

Additional features:

- Targeting BREEAM rating 'Outstanding' and WELL Standard 'Gold' rating
- Associated public realm improvements undertaken to improve accessibility to Liverpool Street station
- The energy strategy seeks to incorporate solar photovoltaic system for zero carbon energy generation, and infrastructure for future connection to district heating

6. CLIMATE RESILIENCE

WATER RESOURCE MANAGEMENT

Beyond the Building

- To lower the need for potable water for irrigation in the public realm, explore opportunities to harvest and reuse rainwater in the public realm or collected from a building nearby. Opportunities to combine SuDS with water recycling should also be considered.
- Reduce water demand through the use of climate resilient planting types.
- These measures will help to maintain the quality of urban greening during periods of water shortage. The drought in summer 2022 had a significant impact on existing trees and planting in the Square Mile. Silver birches appear to have been particularly effected, but many trees displayed 'false autumn' characteristics due to stress.
- Interconnected neighbourhood systems should be considered with buildings of different roof size and demand profiles, right-sizing of onsite storage, and shared storage facilities.

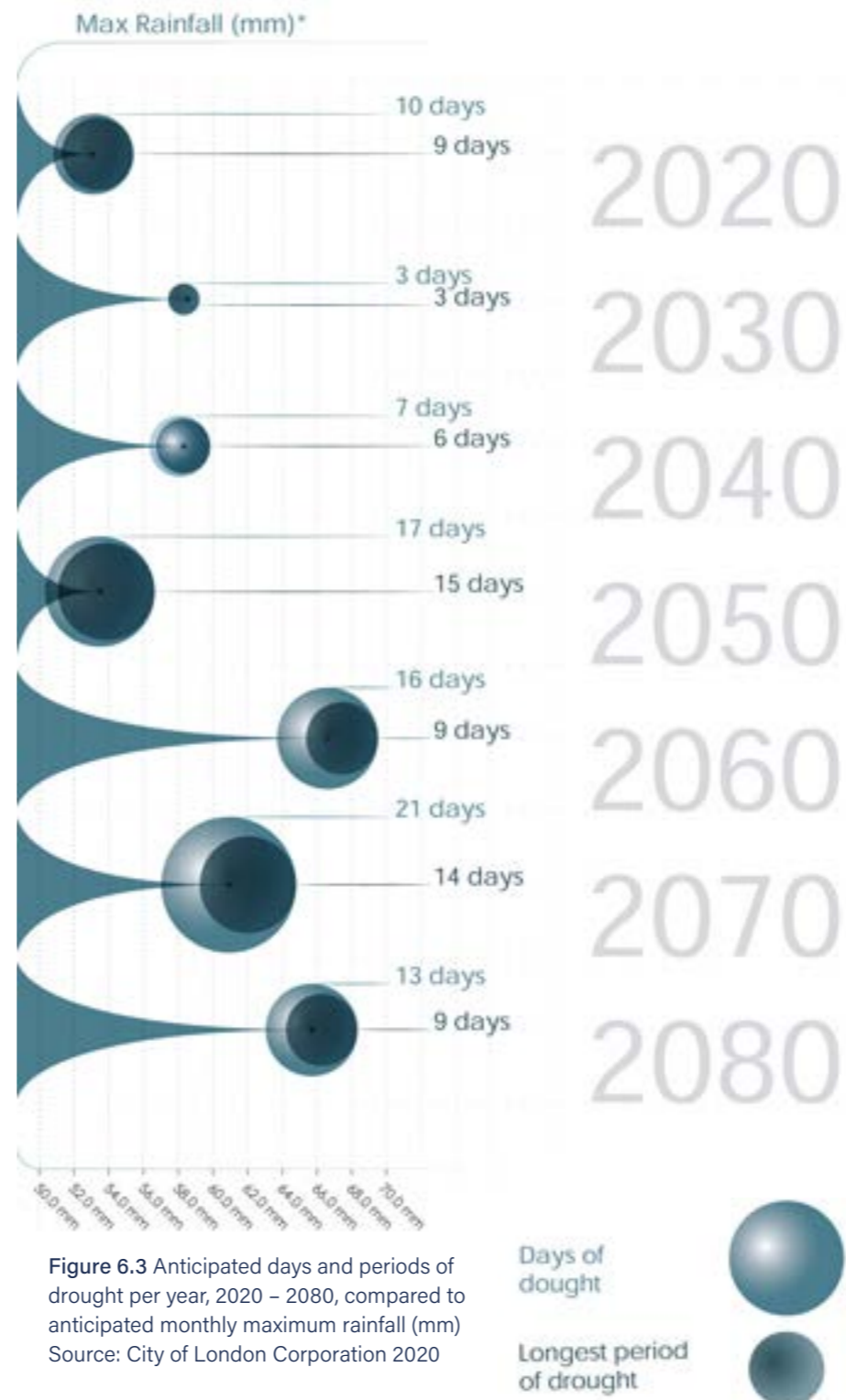


Figure 6.3 Anticipated days and periods of drought per year, 2020 - 2080, compared to anticipated monthly maximum rainfall (mm)
Source: City of London Corporation 2020

*Note that drought is defined at 15 days or more with less than 0.2mm of rainfall. Periods less than 15 days are listed here since the analysis involves calculating predicted days of drought, using this definition, for 12 separate models under UKCP18. The final number shown here is the average of the models' results. Since some models predict 0 days of drought, this may give a result which is smaller than 15 days.

Case Study: 100 Fetter Lane

Use: Office and retail
New build



Visual of proposal for 100 Fetter Lane.
Source: Design and Access Statement

Key facts:

- Blue roof with 'smart' attenuation tank, to collect rainwater for use in WC flushing and irrigation, supplemented by grey water from showers and wash basins
- Specification of low water consumption sanitary ware
- 50% improvement over baseline building water consumption
- Smart tank water to be supplemented by greywater from shower areas

6. CLIMATE RESILIENCE

BUILDING AND URBAN OVERHEATING

Overheating

Overheating occurs when temperatures inside buildings and in the public realm reach levels that are uncomfortable for humans, animals and plants. This can cause health issues, disrupt infrastructure and damage ecosystems and biodiversity. In the City, key drivers of overheating include the increase in heatwaves, increase in average daily temperatures and the urban heat island effect. It is important to consider the impact of overheating on building fabric and how this in turn impacts internal conditions during overheating events. Consideration should be given to stresses and shocks on materials to avoid infrastructure failure.

The overheating map, Figure 6.5, shows areas that will be affected by the highest average heatwave temperatures as well as distribution of key public spaces that may support impact mitigation by providing cooling (green spaces) or shelter from heat. Temperature data is drawn from the Heat Wave Average Max Temperatures taken from the GLA 2016 study on the London Urban Heat Island Effect.

The Urban Heat Island Effect

The Urban Heat Island (UHI) effect refers to an urban area that is significantly warmer than its surrounding areas. This is most commonly a result of intensive land use, trapping of heat in materials with low reflectivity and a high thermal mass (e.g. concrete), discharge of waste heat from building systems and heat generated by other human activities. The UHI effect can cause night-time temperatures to be 4°C+ higher than outside the centre of London.

Heatwave

In London, a heatwave is defined as 3 or more days with maximum daily temperatures above 28°C. Under Regional UCKP18 projections 'high emissions scenario' the Square Mile is set to see an increase in the maximum daily air temperature, the annual number of days of heatwaves and the period of consecutive days of heatwave. By 2080 the number of heatwave days will have increased to 56 days per year compared to 14 days in 2020, with heatwaves lasting up to 22 days and a maximum daily air temperature of 39°C.

At 27°C indoor temperatures in well-insulated homes can result in overheating, at 30°C some commercial buildings will be vulnerable to power outages and at 35°C healthy adults can begin to experience heat stroke risk.

Thermal comfort

Thermal comfort takes into account a range of environmental and physiological factors to determine a comfortable temperature range. Computational Fluid Dynamics (CFD) modelling can be undertaken to inform the location and massing of buildings as well as landscaping. Best practice entails assessment of the Universal Thermal Climate Index (UTCI) which considers metrological parameters and physiological effects on comfort.

The City Corporation is using a one-to-one virtual model of the City, a 'digital twin', to simulate the impacts of extreme heat events and guide placement of green roofs. This model is being integrated with the City Corporation's Thermal Comfort Guidelines which enhances understanding of microclimatic qualities in the City's public spaces (by merging wind, sunlight, temperature and humidity data). The guidelines include a methodology to assess the potential impact of new developments and can serve as an additional reference to help mitigate overheating risk.

Key measures

Whole building

The City's dense and urbanised environment is at high risk of extreme heat.

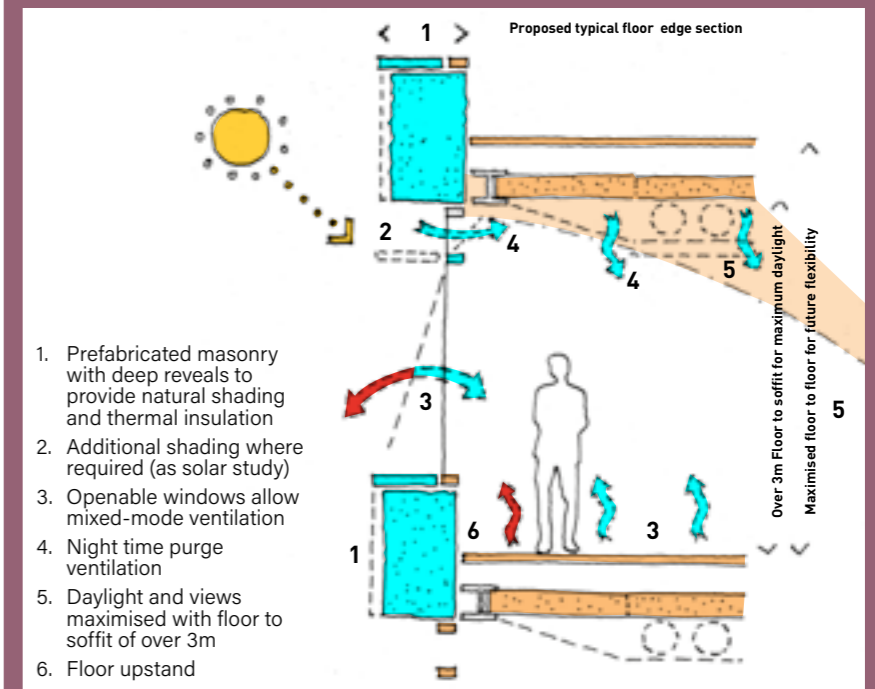
All developments should assess current and future weather scenarios to consider overheating impacts over the development lifespan. A future weather file portrays a location's anticipated annual weather stream in 10, 25, 50, 80, and 100 years into the future. Based on projections derived from global climate models for scenarios of greenhouse gas emissions, future weather files should be utilised in building energy modelling and building performance analysis, to get insights into future energy requirements. The design approach for any development in the City should take into consideration future weather files and their impact, as recommended by BREEAM 2018 Hea 04: Thermal Comfort. As well as the City Corporation's Thermal Comfort Guidelines, developments should consider the following weather files (as updated):

- TM49 CIBSE Design Summer Year (DSY)
- TM52 CIBSE
- TM59 CIBSE

Case Study: 100 Fetter Lane

Use: Office and retail

New build



Typical floor edge section explaining strategy to mitigate overheating. Source: Design and Access Statement

Key facts:

- Exposed soffits to allow cooling
- Deep reveals in the building fabric to create shade
- Mixed mode ventilation that combines natural ventilation and automated windows to enable night purging

Additional features:

- Landscaping to include multiple green terraces with edge planting at eight different levels and a shaded sunken garden open to the public

6. CLIMATE RESILIENCE

BUILDING AND URBAN OVERHEATING

All developments should outline adaptation measures and demonstrate how the design minimises the risk of overheating, actively contributes to reducing the UHI effect and improves thermal comfort within the Square Mile. Design measures could include:

- Improvements to building fabric 'U' values (insulation) and 'G' values (glazing)
- Improvements to air tightness to reduce leakage and manage ventilation
- Choosing façade materials that minimise their contribution towards the UHI effect
- Designing façade fixings allow for fluctuations in thermal expansion
- Optimising window-to-wall ratio and aspects
- Using solar shading techniques to prevent solar gain, such as specified glazing, internal blinds, recesses in facades and external structures that provide shading
- Urban greening measures such as green-blue roofs
- Passive ventilation including natural cross ventilation, stack ventilation, automatic ventilation, and mixed-mode systems.

Ventilation and cooling strategies should be underpinned by thermal modelling with best practice utilising CFD modelling. Strategies could also consider potential future changes of building use.

Materials for landscaping and site access routes should be selected accounting for increasing temperatures, such as using high albedo surfaces. Specifications for asphaltic surfaces should include appropriate non-toxic additives to reduce chances of failure and deformation in high temperatures. Wider or more frequent jointing may be necessary to allow for increased movement of susceptible surfaces or bases such as hard paving caused by wider temperature ranges and cycles.

Beyond the Building

All developments should actively contribute to reducing the UHI effect and improving thermal comfort within the City. Developments should avoid the expulsion of waste heat into the environment. Expulsion of waste heat could be minimised by connections to local heat networks, as discussed in Chapter 3.



Figure 6.4 Thermal comfort map
Source City of London Corporation 2020

Usage Category	% of hours with acceptable UTCI	Description
All Season	≥90% in each season	Appropriate for use year-round (e.g. parks).
Seasonal	≥90% spring-autumn AND ≥70% winter	Appropriate for use during most of the year (e.g. outdoor dining).
Short Term	≥50% in all seasons	Appropriate for short duration and/or infrequent sedentary uses (e.g. unsheltered bus stops or entrances) year-round.
Short Term Seasonal	≥50% spring-autumn AND ≥25% winter	Appropriate for short duration and/or infrequent sedentary uses during most of the year
Transient	< 25% in winter OR <50% in any other season	Appropriate for public spaces where people are not expected to linger for extended period (e.g. pavements, cycle paths)



6. CLIMATE RESILIENCE

BUILDING AND URBAN OVERHEATING

The City Corporation is implementing a Cool Streets and Greening Programme, involving the planting of designated tree-shaded cool routes that aim to offer a comfortable pedestrian experience. Cool routes prioritise the growth of biodiversity and the provision of shading (preferably by trees). In some cases, cool routes have reduced air temperatures between 3-8°C during heatwaves.

Applicants are encouraged to integrate and support the expansion of these cool routes by:

- Maximising street level greening in both onsite and offsite public realm to provide natural shade and connect green pockets
- Designing for comfortable microclimatic conditions informed by the analysis of wind, pressure, humidity, and temperature. This analysis should incorporate future climate scenarios using weather files and climate predictions
- Developing a comfort framework in collaboration with the City Corporation, which could be used for extreme higher temperatures
- Choosing appropriate materials for external surfaces, informed by their influence on (e.g. heat absorption, reflection), location (proximity to pedestrians) and resilience (e.g. risk of deformation in high temperatures) in microclimatic conditions
- The resilience and suitability of the proposed planting scheme, in particular trees (access to rainwater, drainage of tree pits, canopy sizes and soil volumes)
- Consideration of the ability to provide future 'cool spaces' within the development
- Opportunities to continue greening across the buildings via balconies and terraces that help create biodiversity corridors for important species, such as wild bees
- Continued microclimatic monitoring to determine the impact and success of the cool routes, and to inform lessons learnt that will support further development.

If cool routes are a key focus area of the development, it is strongly recommended that a stand-alone 'Cool Routes Report' is submitted in the application documentation. The report should include evidence, analysis, and assessment of the considerations outlined above.

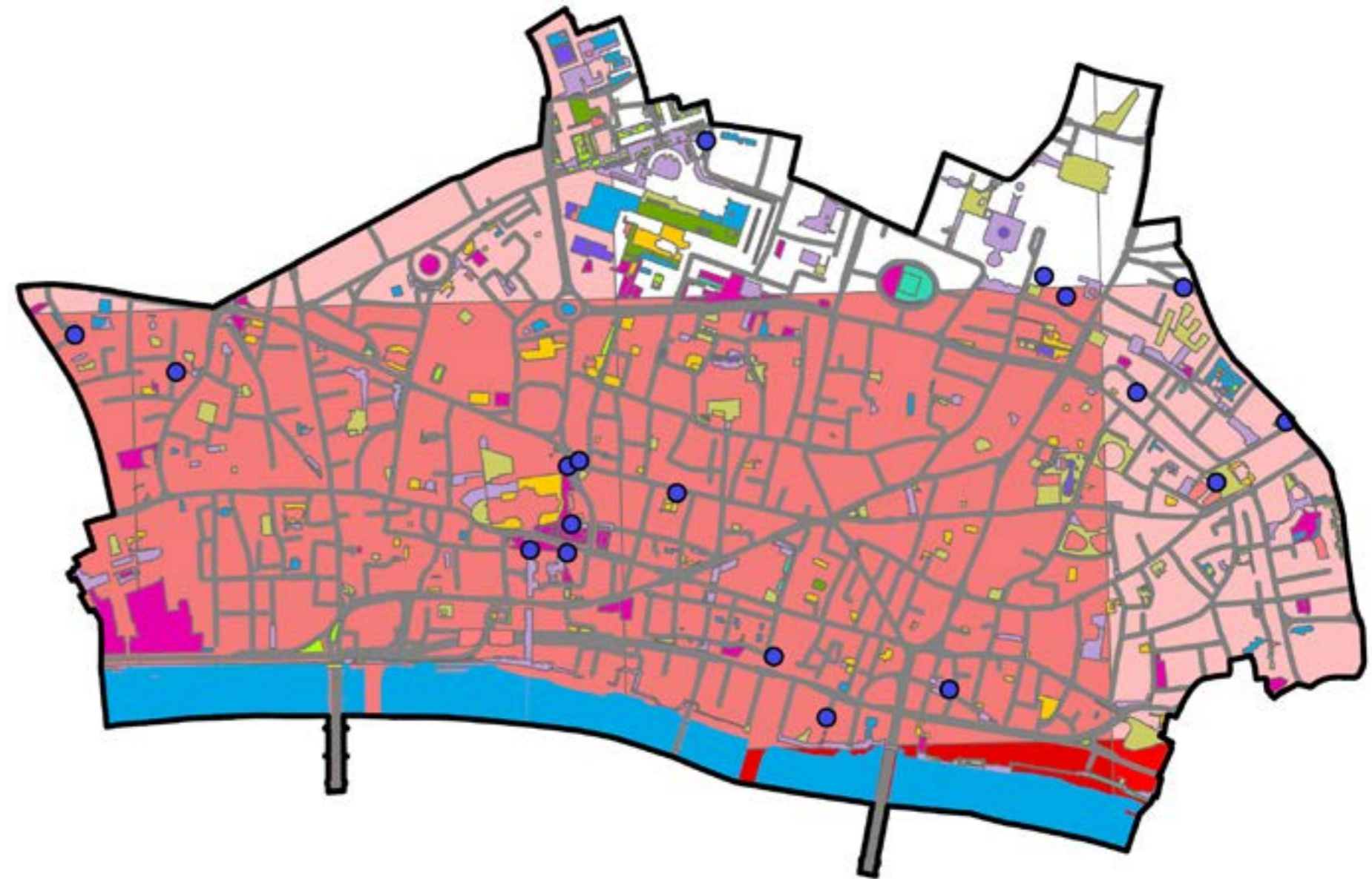


Figure 6.5 Overheating map with public space & drinking fountain distribution
 Source City of London Corporation 2020

**Heat Wave Average
 Max Temperatures (°C)**

- 29.4 - 29.5
- 29.5 - 29.6
- 29.6 - 29.7
- 29.7 - 29.8
- 29.8 - 29.9

Public Space by type

- Drinking Fountain
- Amenity Greenspaces
- Cemeteries & Churchyards
- Green Corridors
- Natural & Semi-natural Green Spaces
- Other or Private Under Construction
- Outdoor Sports Facilities
- Parks & Gardens
- Primary Civic Squares
- Provision for Children & Young People
- Secondary Civic Spaces

6. CLIMATE RESILIENCE

PESTS AND DISEASES

Pest and Diseases

In an urban context, pests can include non-native, established wildlife and invasive plants which can affect the health of people, flora and fauna. Diseases can include human, animal, and plant infections that can be spread through zoonotic, airborne, waterborne and contact based transmission.

Warmer, wetter winters and hotter, drier summers will significantly raise the threat of pests and diseases in the UK, with these conditions facilitating the spread and emergence of vectors like ticks, mosquitoes and rats, and increase both transmission rates and overwinter survival rates.

The UK is currently free of many pests and diseases that afflict plants overseas. However, increasing international movements risk the introduction of new pests and diseases. In urban environments this risk and impact can be greater. Urban trees, which are of significant value to climate change adaptation in urban areas, are at particular risk of new pathogens and pest outbreaks.

The increase in prolonged periods of heat stress and risk of flood events also poses a significant threat to the spread of waterborne and communicable disease.

Key measures

Developments should increase the levels of urban greening and take a landscape-based approach to planting within the development site and the adjacent public realm. Measures to manage the risks of pests and diseases should protect biodiversity, not constrict the growth and management of biodiversity.

Applicants should consider and address biosecurity risk within landscaping proposals, including the selection, procurement and management of a diverse range of resilient species.

For landscaping and public realm interventions, informed decision-making on the selection of species will help develop resilient habitat networks that can help tackle risk of biodiversity loss and spread of ecosystem pests. Species should be diversified and selected for their ability to cope with extreme weather conditions and adapt to the urban landscape. Where possible, native/naturalised species with high biodiversity value, and species not yet affected by pests and diseases in the UK should be prioritised. Species or genera that could be vulnerable to any new diseases that may be introduced in the future should be avoided. The UK Plant Health Database should be consulted during the design process to determine species and genera of higher risk.

Landscaping proposals should not include Invasive Non-Native Species (INNS) listed in Schedule 9 of the Wildlife and Countryside Act 1981 (as amended), the Non-Native Species Secretariat of Great Britain and Ireland, and the London Invasive Species Initiative (LISI). It is illegal to plant Schedule 9 species in the wild, developments should not become a pathway for further spread of these specimens into London's green spaces. Developments should seek to enhance biosecurity through actively taking steps to reduce the spread and impacts of INNS on habitats and species, including water bodies. This should follow the guidance of the Great Britain INNS Strategy, meeting objectives of the National 25-year Environment Plan.

The procurement of trees, plants and other green infrastructure grown in reputable nurseries in the UK should be a priority. Where plants need to be imported, all the relevant biosecurity protocols and import checks should be adhered to. The potential for species to become invasive needs to be assessed by referring to the European Alien Species Information Network (EASIN) notification system for early detection in Europe.

Consideration should be given to how landscaping design, programme and management will reduce biosecurity risk, including future impacts of pests and diseases to occupiers and green infrastructure. Maintenance of green infrastructure should be implemented as necessary for each habitat to ensure that no non-native invasive species settle and spread. Submitted management and maintenance plans should include a process that 'alerts' responsible authorities of any pest or disease outbreaks within new and established green infrastructure.

Case Study:

City of London Emperor House, 35 Vine Street

Public realm planting



*London Wall Place planting palette.
Source: Design and Access Statement*

Key facts:

- Included two species (*Zelkova serrata* and *Koelreuteria paniculata*) that are fast growing and resistant to a range of tree pests and diseases. Once grown, these will provide shade from canopy cover for pedestrians and cyclists along Vine Street to combat street level overheating

6. CLIMATE RESILIENCE

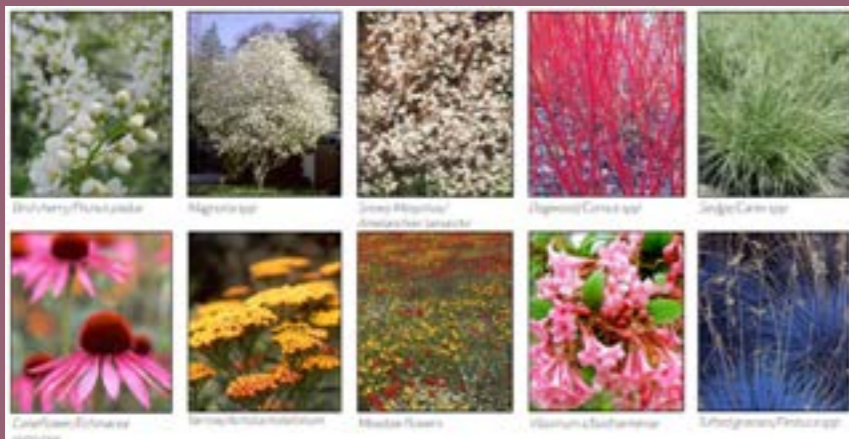
PESTS AND DISEASES

Climate resilient planting

The City Corporation Climate Resilient Planting Catalogue provides guidance on the design of public realm and planting selection including species tolerances, response to pests and diseases and to extreme heat (and other weather events). The function of species (ecosystem services, biodiversity enhancement, cooling, interception, sequestration) and the planting environment (site types and conditions) are also important criteria to be considered.

Case Study: London Wall Place

Public Realm Planting



London Wall Place planting palette. Source: Design and Access Statement

Key facts:

- Use of native species for planting, including silver birch trees, bird cherry and cornelian cherry, hellebore, fern, and foam flowers

Considerations for health and well-being

Management of facilities and open spaces within the development should consider risks to public health through design and relevant protocols. These can include:

- Minimising touch points throughout the design of the building
- Ensuring facilities meet cleaning protocols such as clear desk policies where possible
- Ensuring adequate ventilation and air quality within the building and reducing other respiratory stresses (see BREEAM Hea 02 Indoor Air Quality)
- Ensuring all plant, HVAC and water systems negate the risk of bacterial, viral or fungus growth. Particular consideration should be given to legionnaires disease and the supply of potable water. Applicant teams should plan for future climate scenarios in terms of temperature and humidity ranges, refer to regulation of these systems and ensure there are multiple methods to maintain conditions and reduce contamination risk
- Consider the capacity to provide 100% fresh air and hourly volume charge and air circulation paths from floor to soffit
- Use of CO2 monitoring to control systems
- Planning for effective pest management in the operation of the building, including operational waste, to reduce risk of pests and disease vectors (see BREEAM Wst 03 Operational Waste)
- Providing active transport end of journey provision
- Provision of 'wellbeing' spaces within a development.



London Wall Place. Source: City of London Corporation

6. CLIMATE RESILIENCE

INFRASTRUCTURE RESILIENCE

Infrastructure Resilience

At a wider level, infrastructure resilience is defined as the ability of infrastructure such as utilities, transport, and digital networks to withstand the potential shocks or stresses faced during its design life, including those that London will experience owing to the inevitable effects of climate change.

At a developmental level, buildings within the City will need to consider how to minimise disruption to building operation during extreme events of flooding, overheating and drought. The aim is to ensure that a building is designed to operate safely and effectively throughout its design life whilst minimising its loads and impact on the City network as a whole.

A risk assessment should determine the level of investment in resilience measures, taking into account climate risks as one set of factors that may affect the asset's performance. Investment in more costly resilient measures may not be justified immediately, and so timing along with any complimentary additional benefits should be weighed in the assessment. To evaluate climate risk consistently across all aspects of the development, resilience-based measurement frameworks and reporting standards should be used. This will enable confidence in adaptive business strategies that are based on robust future scenario modelling of likely climate impacts.

Key measures

Whole building

Buildings should be designed to maintain basic functioning and safety during adverse events wherever possible, but the more critical the function of the building the higher the level of protection should be considered.

Demand reduction for utilities such as water and power will have the triple effect of reducing running costs and operational emissions, as well as reducing the peak strain on the wider city infrastructure networks. Reduced demand from alternative sources or onsite back-up storage will ultimately improve the resilience of the building through an increased level of self-sufficiency.

Multiple and diverse connection points to City networks should be provided, ensuring buildings maintain well-considered back-up supply for critical loads, whilst maximising the level of onsite renewable generation options available. This will ensure the building has a higher level of function during shock events.

Data infrastructure resilience measures should be considered and include: dual connections; careful data centre and plant room positioning in relation to flood risk from overland flow, rising river or groundwater; tanking measures and raised threshold positions as well as the incorporation of cooling plant. Tanked basements that are water and gas-tight should be considered.

Beyond the building

Even within the City, risks will vary with location. Proposals should include an assessment of localised risks to recognise areas of vulnerability and put in place appropriate measures. These could include early warning systems, maintaining evacuation pathways, and establishing community protocols and emergency response plans for extreme climate events such as emergency hubs that would provide access to safe space and services during extreme weather events.

Any building is part of a greater set of networks, so it is crucial that designers consult with all relevant stakeholders (Thames Water, Greater London Authority, Environment Agency, UK Power Networks etc) to understand how the design of the building and its surrounding environs coordinate with, complement and build on city-wide planning that is continuously evolving.

The City is a very dense and highly connected area, so opportunities should be sought to establish local resilience measures between buildings and assets to provide backup power, water or data connectivity beyond plot boundaries during widespread disruption events.

Case Study: 115-123 Houndsditch

Use: Office and retail

New build



*Typical floor edge section explaining strategy to mitigate overheating.
Source: Design and Access Statement*

Key facts:

- Rainwater harvesting and attenuation tanks, with water to be reused for non-potable purposes, basement tank to discharge into public sewer and demarcation chambers suspended from ground floor as high as possible rather than the basement to avoid flooding from sewers
- Exploration to incorporate blue roofs of up to 1,265m²
- Building Management System for water metres and water consuming plant to double up as leak detection
- SUDs to mitigate local flooding

Additional features:

- Waste heat storage and export of heat to the neighbouring residential estate
- Two intake rooms for data connections in the building's basement

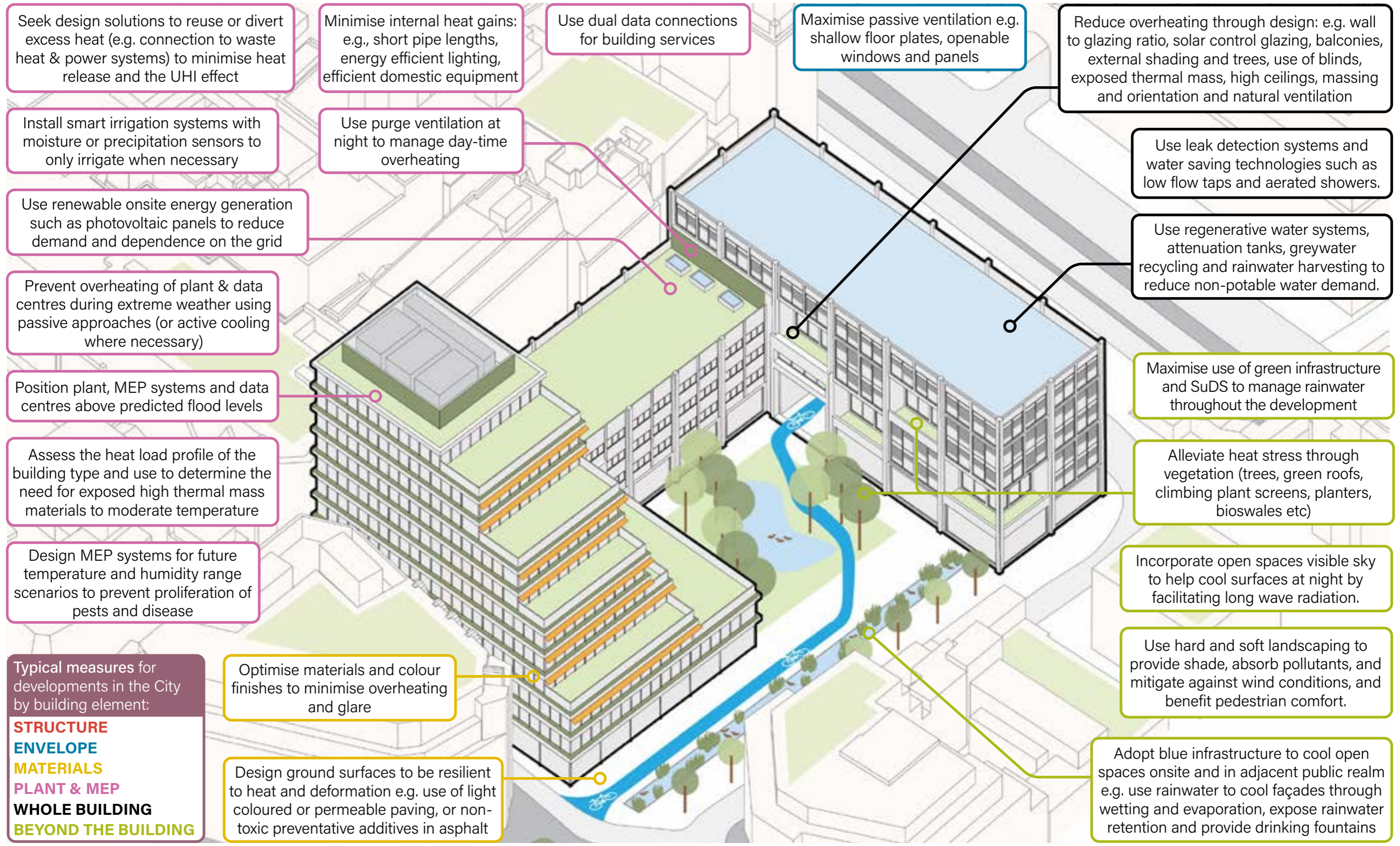
6. CLIMATE RESILIENCE

KEY MEASURES FOR CITY DEVELOPMENTS

This infographic provides a list of potential measures, which is not exhaustive. Applicants are encouraged to propose innovative measures that drive best practice. All measures to be agreed on a case-by-case basis.

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Typical measures for developments in the City by building element:

- STRUCTURE**
- ENVELOPE**
- MATERIALS**
- PLANT & MEP**
- WHOLE BUILDING**
- BEYOND THE BUILDING**

6. CLIMATE RESILIENCE

CASE STUDIES

CONTENTS

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Case Study: 65 Gresham Street

Use: Commercial office

Refurbishment and extension



*Visualisation of the urban greening at 65 Gresham Street
Source: Design and Access Statement*

Key facts:

- Enhancement of existing green canopy along Aldermanbury to contribute to a wider network of green corridors and cool routes within the City
- Existing tree canopy to be complemented and enhanced through ground level soft landscaped interventions where currently only hard landscaped exists
- Extrusion of raised planters from the ground plane to shape the public realm, increase the areas of soft landscape and biodiversity, and provide seating and gathering spaces
- Increased soil depths integrated into landscaping to allow additional small trees and multistems to be planted. Together with evergreen shrubs, this will create pocket shelter spaces to locally improve thermal comfort levels, encourage longer term occupation and promote a more climate resilient City
- Promotion of biodiversity through a large percentage of native species, as well as variety in the type of plants proposed

Case Study: New Change Garden

Use: Public space

Relandscaped public garden



*New Change Garden
Source: City of London Corporation*

Key facts:

- Formerly known as the Sunken Garden, the area has been transformed into an accessible and greener place, with a 25% increase in planting for enhanced biodiversity and climate resilience
- New permeable paving lets rain drain freely into the ground, storing it for trees to use later, and reducing pressure on the sewer system
- New plant species have been selected with local wildlife in mind, combining a range of pollinator-friendly species to help biodiversity and create interest all year round
- Over 150-year-old granite stones salvaged from the Thames River Wall were used to create the new benches, with recycled timber from fallen London Plane trees for the backrests
- Retention of the two existing onsite legacy trees including de-paving around shallow roots to enable their longevity and continued contribution to air quality and shade provision
- Drainage design tailored to site constraints with attenuation chosen over a rain garden approach to protect the legacy trees' roots

URBAN GREENING AND BIODIVERSITY

07

7. URBAN GREENING AND BIODIVERSITY

CONTENTS

Introduction

This chapter provides guidance on how to protect, conserve and enhance biodiversity, habitats, and green infrastructure in the Square Mile, and support Greater London urban greening initiatives. The chapter advises on how to meet and exceed policy targets set out for the London Urban Greening Factor (UGF) and Biodiversity Net Gain (BNG) requirements. It provides suggestions for interventions that can be used in a development and relevant to the City's urban setting.

Key approaches for the City

The City of London has just under 33 hectares of open space, most of which consists of pocket parks smaller than 0.1 hectares. Although small, these spaces are used intensively and provide an important resource for biodiversity in the Square Mile. Given limited space on the ground, building surfaces such as rooftops and walls are becoming an increasingly important space for cultivating a variety of flora and fauna through interventions such as terrace planting, green roofs and walls.

Proposals should provide high quality greening in open spaces and on buildings within the site to meet policy requirements. UGF is a requirement in the London Plan. BNG is mandated by the Environment Act (2021) for development assessed under the Town & Country Planning Act 1990 and for Nationally Significant Infrastructure Projects. The BNG is a statutory requirement since February 2024 and the City Corporation is introducing a policy requirement with a target score of three Biodiversity Units per hectare (BU/ha)

Improving the connectivity and biodiversity value of green spaces, diversification of habitats, and protection of priority species are the focus of the City Corporation's Biodiversity Action Plan (BAP) and should be considered from the outset of the design process.

Proposals submitted for development in the City should strive for best biodiversity outcomes on individual sites while showing consideration for the wider urban environment. Urban greening and biodiversity key actions and measures should be considered and integrated early in the design development. Applicants should engage with City Corporation officers before, during and after planning application submission to address:

- Context-specific urban greening and biodiversity risks and opportunities

- How high-quality greening, considered and meaningful space for biodiversity can be provided onsite
- How the site connects to wider green infrastructure and nature networks
- How the scheme responds to the BAP, policy, and other biodiversity objectives
- How the scheme can achieve and ideally exceed UGF and BNG requirements
- Ongoing maintenance and management considerations

A biodiversity and ecological survey and report should be included in the planning submission. It should include a survey of existing biodiversity onsite, an assessment of impacts, and proposed measures to protect and enhance biodiversity and greening. An Ecological Impact Assessment is required when a proposal has a potential impact on either protected or priority species, or designated sites and priority habitats.

Key policies and guidance

Table 7.1 Biodiversity & green infrastructure key planning policies

London Plan 2021

- G1: Green infrastructure
- G5: Urban Greening
- G8: Food growing
- GG2: Making the best use of land
- SI 14: Waterways
- SI 17: Protecting and enhancing London's waterways
- Mayor's Transport Strategy & Healthy Streets Approach

Local Plan 2015

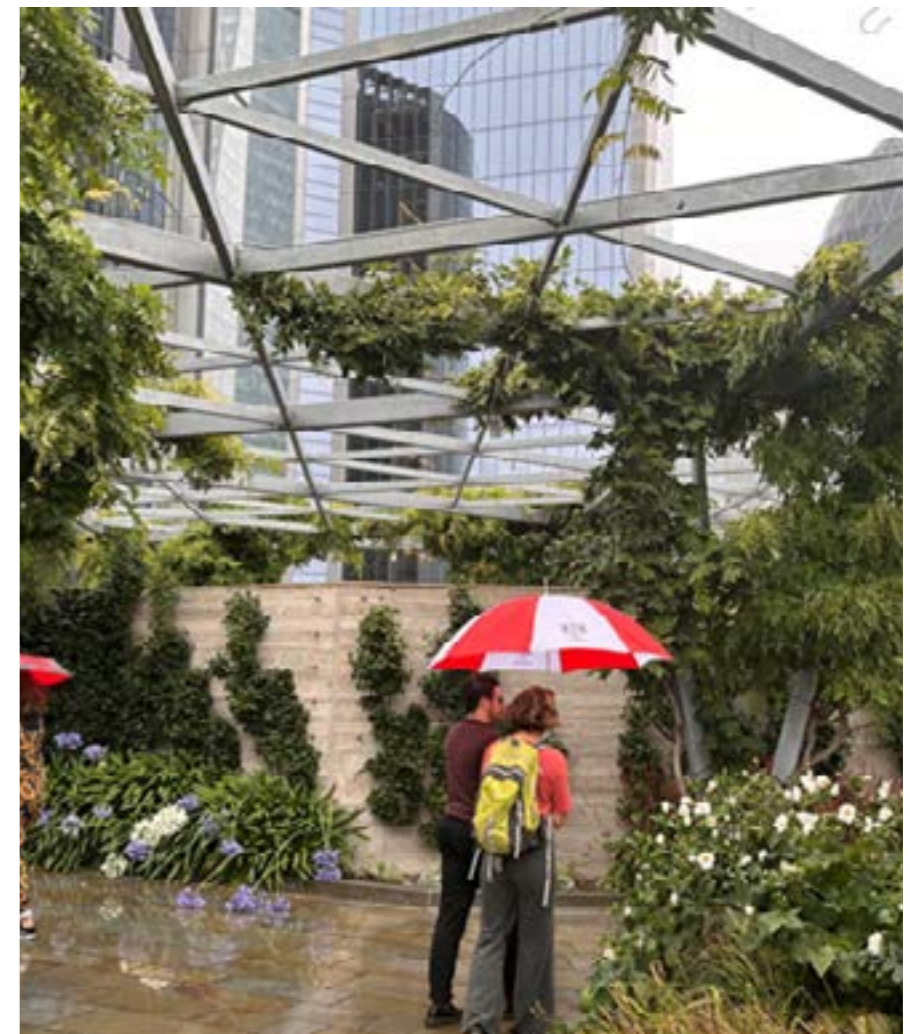
- DM 10.2: Design of green roofs and walls
- DM 10.4 Environmental enhancement
- CS15: Sustainable Development and Climate Change
 - DM 15.5: Climate change resilience and adaptation.
- CS19: Open Spaces and Recreation
 - DM 19.1: Additional open space
 - DM 19.2: Biodiversity and urban greening

Emerging City Plan 2040

- S8: Design
 - DE3: Public Realm
 - DE5: Terraces and Elevated Public Spaces
- S14: Open Spaces and Green Infrastructure
 - OS1: Protection and provision of open spaces
 - OS2: Urban Greening
 - OS3: Biodiversity
 - OS4: Biodiversity Net Gain
 - OS5: Trees

Other Guidance

- Riverside Strategy (CoLC)
- Sustainable Development Framework (Transport for London)



7. URBAN GREENING AND BIODIVERSITY

Key actions to develop an exemplar City scheme

The following key actions are required to positively address the City Corporation's policy framework and should be discussed at pre-application stage. Applicants should clearly present the relevant information in the application documents.

- Develop a strategy that maximises the extent and quality of urban greening and biodiversity on a site, complying with, and aiming to go beyond the requirements of the Urban Greening Factor and Biodiversity Net Gain
- Adopt a strategic approach to urban greening and biodiversity enhancements by linking with existing biodiversity corridors, surrounding pockets of green space and cool routes
- Create an urban greening scheme that is resilient to the changing climate and conditions in the City and contributes to the climate resilience of the site and wider context
- Promote the use of native and non-native species that are recognised for their benefit to UK pollinators and climate resilient species planting
- Target priority species set out in the Biodiversity Action Plan (BAP)

Development sites in the City tend to have small footprints, often with densely arranged and stacked building elements. Applicants are therefore challenged to integrate urban greening creatively to achieve the required UGF and BNG.

Experienced landscape practices should be employed to create a design with planting that responds positively to the widely varying conditions on sites relating to shade, noise, wind, altitude, type of ground or building surface and type of open space use. The site context should be assessed to ensure that proposed urban greening links to and extends greening and biodiversity corridors for improved movement of pollinators and other species.

For a successful design, including longevity and reduction in resources and maintenance, urban greening needs to be resilient to the current and predicted climate patterns.

The following key actions are strongly recommended to develop an exemplary scheme that achieves the best balance of planning benefits for the City. Measures should be discussed at pre-application stage and highlighted in the application as sustainability benefits to support the proposals.

- Incorporate nature-based solutions in the development that provide co-benefits for both humans and biodiversity
- Balance amenity requirements with biodiversity benefits in response to the location, development type and use of a site

Nature-based solutions can have effective co-benefits for sustainability and health and well-being, such as cooling, shade, shelter, improved air quality, and biosolar roofs that successfully combine green energy technology with urban greening and cooling on building roofs. Nature-based solutions such as SuDS will contribute to the climate resilience of sites, by providing rainwater attenuation and protecting buildings and open spaces from overheating, and therefore should be prioritised over decorative, ornamental and architectural planting schemes.

Urban greening should be designed to create both amenity and biodiversity focused spaces, and separate or combine them where appropriate to create conditions for biodiversity to thrive while ensuring that users of green spaces can enjoy their well-being benefits.



7. URBAN GREENING AND BIODIVERSITY

URBAN GREENING

What is urban greening?

Urban greening includes all landscaping, planting, trees and other natural features vital to the sustainability of any urban area. This includes planting in planters, roofs, walls, biodiverse roofs, amenity spaces, green balconies, and terraces. Ideally, all urban greening should be integrated into a network of green infrastructure that forms biodiversity corridors to support diversity and natural habitats.

There are many benefits to green infrastructure including the provision of shade, street cooling, improved air quality, contribution to carbon storage and sequestration and the enhancement of amenity places for residents and visitors alike. A green network will also create walking and cycling routes through the City that are protected from overheating, pollution and noise.

Key measures

Whole building

Urban greening can be incorporated in a variety of ways into buildings, open spaces and public realm, to develop valuable habitats to support biodiversity. Urban greening and biodiversity benefits need to be incorporated into the design concept stage of a project to ensure the highest quality outcome. To incorporate good quality urban greening features, developments should integrate a range of green infrastructure features where possible within the building envelope, including green roofs, terraces and green walls.

Opportunities to integrate urban greening into any type of development should be taken, both on external ground and upper-level surfaces of a building. The location and extent of green spaces within a site should be considered with the end-users in mind to incorporate aspects such as visual amenity, access and maintenance.

Urban greening measures should integrate a diverse range of planting types including, where possible, standard trees, multi-stem trees, shrubs, hedging, flower-rich perennial planting and ground cover planting. Planting should be climate resilient and wildlife friendly.

Urban greening can be positioned to form stepping stones for wildlife and is key for the movement of wildlife across the City landscape. Brownfield sites may not at first glance appear to offer much value to wildlife, however they can develop important

habitats on roofs and walls for species such as black redstart and pollinators including bumblebees and solitary bees.

Beyond the building

The City Corporation has a series of area-based public realm strategies that target key green infrastructure locations and climate resilient street greening. It is also implementing a 'Cool Streets and Greening Programme' which involves the planting of designated tree-shaded cool routes, enhancing the climate resilience of the City so that it is better equipped to deal with issues such as overheating, flooding, and new pests and diseases. This strategic approach priorities biodiversity and targets green connectivity around the City.

New developments will be key in expanding the City's green network that allows flora and fauna to flourish. Applicants should actively engage in contributing to the development of green infrastructure, and are encouraged to connect into public realm strategies, integrating and expanding these cool routes. Applicable measures should be discussed and agreed at pre-application stage.

Case Study: 55 Bishopsgate

Use: Office, retail, and cultural and community space including public viewing gallery

Green Wall (New Build)



*Visualisation showing the green wall.
Source: Design and Access Statement*

Key facts:

- Incorporation of a modular seeded living wall system between the proposed two towers, designed to comply with fire regulations
- Benefits include: mitigating air and noise pollution, capturing CO2 while releasing O2, combating the heat island effect, improving biodiversity
- Additional benefit to making the public realm more attractive and improving the well-being of people
- Targeting a BREEAM 'outstanding' rating and a WELL 'platinum' rating

7. URBAN GREENING AND BIODIVERSITY

URBAN GREENING FACTOR

What is the urban greening factor?

The Urban Greening Factor (UGF) is a tool that evaluates and quantifies the amount and quality of urban greening that a scheme provides. To ensure schemes contribute to the greening of the City, when required by the Development Plan, major developments must submit an UGF calculation demonstrating how the development will meet the City's target UGF score of 0.3.

The UGF should not be viewed as the sole method of assessing green infrastructure proposed as part of a development scheme. It is not a tool to measure the ecological and biodiversity benefits of greening proposals, and not all urban greening may be inherently good for wildlife. In addition, although the UGF metric increases greening which contributes to biodiversity, certain habitat features and renewables would not contribute towards the UGF target score. BNG is a separate requirement which addresses habitat creation, and it is detailed in a following section.

The emerging City Plan 2040 introduces an adjusted UGF score of 0.3 for all major developments, in comparison to the GLA UGF scores of 0.4 for residential developments and 0.3 for commercial buildings. This is suited to the City's specific context and development typologies. This scoring framework prioritises tree planting and the establishment of high-quality green roofs and green walls. The target scores should be considered as a minimum requirement and seen as part of a wider ecological approach to development.

Key measures

Whole building

The aim for City development is to incorporate high UGF scoring surfaces such as intensive green roofs, trees, extensive green roofs, flower-rich perennial planting and rain gardens wherever possible. Development proposals should demonstrate how different types of urban greening (from water features and green roofs to flower-rich planting), their quality and permeability (for water to filter into the ground or blue infrastructure), have been integrated into the design of buildings and public realm. In consultation with City Corporation officers, landscape experts should lead the valuation of greening options to inform the earliest stages of the design process, accommodate the specification and meet the UGF target score.

Major applications should submit a UGF assessment and a landscape plan in the planning submission, which includes details of species of trees and shrubs, sizes, numbers and densities. An operation and maintenance plan detailing how the greenery will be maintained throughout the building's life-cycle is also required. It's recommended that applicants refer to the City Corporation Urban Greening Factor evidence base study conducted in 2018.

Ground level greening should be maximised. However, underground utilities and tunnels constrain the depth needed for substantial planting. These factors all have a bearing on what can be planted and grown in developments in the City.

In spatially constrained urban environments green roofs are an effective solution to provide co-benefits for people and biodiversity offering enhanced amenity, habitat and food for wildlife, helping attenuate roof run-off, reduce urban heat island effect, and insulate buildings. Green roof proposals should be Green Roof Organisation (GRO) compliant to maximise the benefits delivered.

Where intensive green roofs and green walls require irrigation, it should be provided with the most efficient, water resource saving and low carbon equipment to future proof the installation.

Heavy planting features such as trees may require additional structural support which should be balanced against the associated embodied carbon impact. Maintenance of small-scale food growing and/or public realm greening could be facilitated by a community of volunteers or building occupiers.

Any planting which is fully enclosed and not exposed to the natural elements should not be included in the UGF calculations.

Case Study: 81 Newgate Street

Use: Office and retail

Retrofit and extension



Visual of the extensive greening at 81 Newgate street.

Source: Design and Access Statement

Key facts:

- Extensive landscaping and greening, achieving an urban greening factor of 0.397, above the target 0.3 of the London Plan
- 4,928m² of planting, including intensive and extensive green roofs, a rooftop wildflower meadow, terraces with trees in planters, as well as clipped yellow hedges, and trees planted directly into soil at the ground level
- A permeable decking area with draining stones to support rainwater attenuation will cover 722m²
- The green roofs will also be publicly accessible, while much of the planting will also be visible from the street, creating social and health benefits for direct users as well as passers-by and contributing to the overall amenity of the neighbourhood

7. URBAN GREENING AND BIODIVERSITY

URBAN GREENING FACTOR

Green roofs types

Table 7.2 Green roof types, descriptions and specifications (The GRO Green Roof Code (2021))

Green roof type	Description	Weight	Substrate depth	Maintenance	Public Access	Vegetation	UGF Factor	BNG distinctiveness
Extensive green roof	Planted with low maintenance, drought tolerant sedum, grasses, mosses and wildflower species. Can include: <ul style="list-style-type: none"> Sedum-only roofs which are drought tolerant, able to withstand extremes in climate and can grow on relatively shallow substrates. Wild and meadow flower roofs which provide taller plants and flowers suitable for pollinator invertebrates and other insects. 	Light weight (typically <250kg/m2 saturated density)	Shallow substrates (80-150mm)	Low maintenance (1-3 visits per annum)	Generally not	Hardy and drought tolerant – sedums and other succulents, wildflowers, small herbs, bulbs, alpines, grasses, as well as mosses, fungi, and lichens.	0.7	Low
Biodiverse extensive roof	Form of extensive roof but designed specifically for habitat creation to aid biodiversity. They have taller features, varied substrate topography, and features such as pebbles, boulders, gravels, sands, branches and logs.	Light weight (typically <250kg/m2 saturated density)	Varied shallow substrates (typically varied from 80 to 150mm)	Generally low maintenance (1-3 visits per annum) but dependent on requirements	No	<p>'Green' biodiverse roofs would be planted with wildflowers, sedums and grasses. A wider range of plants can be included, including shrubs and woody plants.</p> <p>'Brown' biodiverse roofs are not purposefully planted and allows natural colonisation to a chosen growing medium.</p>	0.7	Medium
Intensive green roof	Principally designed to create recreational and amenity spaces for people and tend to mimic ground-level parks with landscaping including shrubs, trees, lawns, paving and water features, intended for use as a recreational space. They have a deeper substrate, irrigation systems and more frequent maintenance visits	Heavier in weight (typically >250kg/m2 saturated density)	Deeper substrates (>150mm and up to 1000mm)	High maintenance (regular visits), including regular irrigation	Yes	Wider range of vegetation types with shrubs, hedging and trees.	0.8	Low
Blue-green roof	Designed to attenuate rainfall at roof level, releasing it more slowly to reduce pressure on the urban drainage system, typically installed under a green roof.							
Bio-solar roof	A system where the mounting system for photovoltaic (PV) panels is integrated into the green roof.							

In 2020/21 in the Square Mile, approximately 60% of green roofs were categorised as extensive, 30% intensive and 10% a combination of both.



Figure 7.1: Types of greenroofs

Source: Imperial College London/Science Graphic Design

7. URBAN GREENING AND BIODIVERSITY

BIODIVERSITY

Biodiversity in the City

Biodiversity Action Plan

There are many opportunities to protect, conserve and enhance biodiversity in the highly urbanised area of the Square Mile. Any enhancements should be in line with the City Corporation Biodiversity Action Plan 2021-2026 (BAP) which outlines target species and habitats for the City and identifies the locations of designated Sites of Importance for Nature Conservation (SINCs).

Target habitats in the City

There are two target habitats for the City that offer an opportunity to create or enhance space for biodiversity within new or existing green spaces or the built environment:

- Open mosaic habitat on previously developed land – The loss of this priority habitat is likely to require offsetting and is unlikely to be adequately replaced onsite. However, biodiverse roofs can be created to replicate this habitat by establishing a range of conditions to support flora and invertebrate communities. The quality and distinctiveness of new habitats should be equal to, or an improvement on the existing.
- Standing Open Water - create new ponds and incorporate access to water into the design of biodiverse roofs. SuDS can also contribute towards increasing access to water for wildlife including pollinators and bird baths. Standing waters should be carefully designed and monitored to minimise risks of pests and diseases or poor water quality.

Priority Species in the City

There are seven priority species identified within the BAP which should be considered during biodiversity enhancement design:

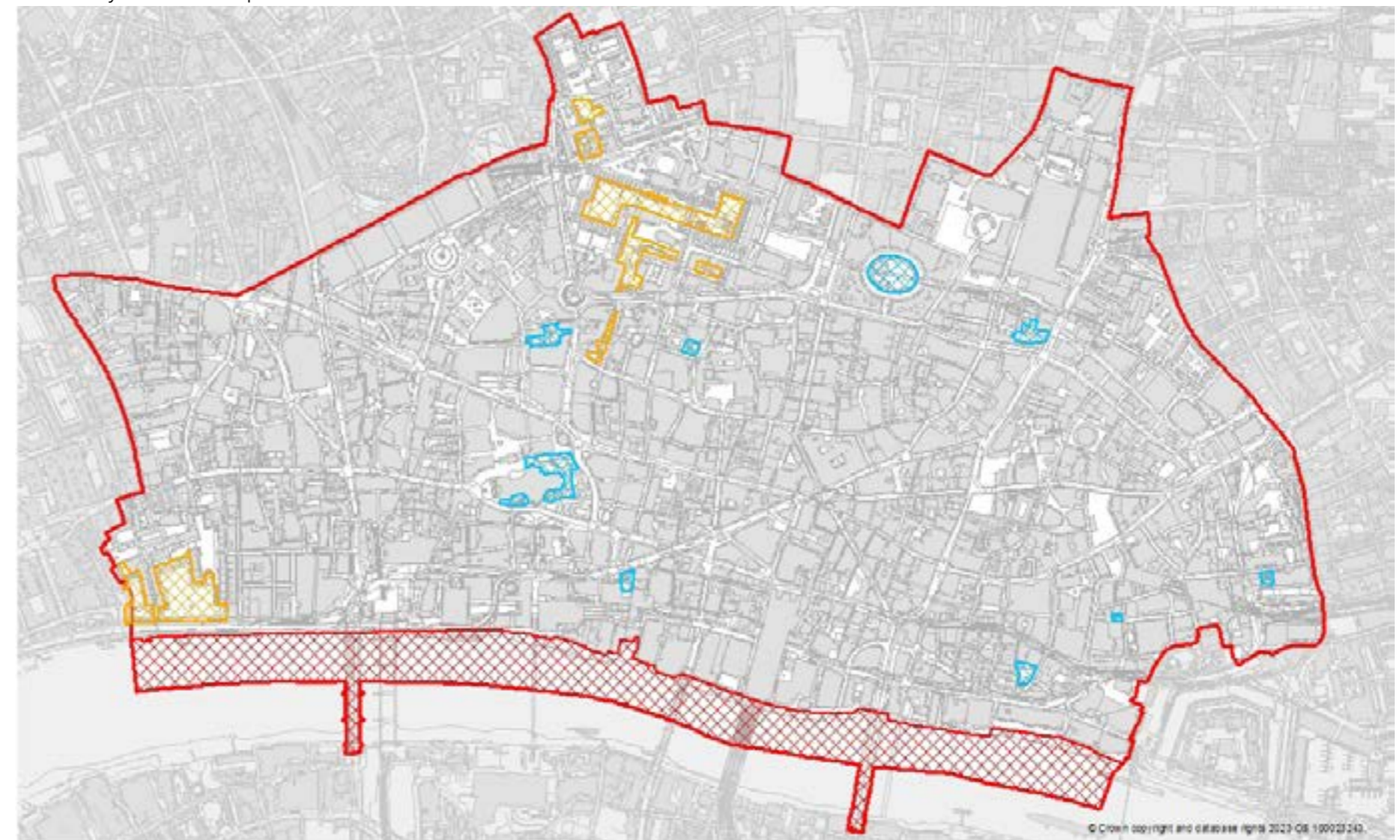
- House sparrow *Passer domesticus*
- Black redstart *Phoenicurus ochruros*
- Common swift *Apus apus*
- Peregrine falcon *Falco peregrinus*
- Bats
- Wild bees (bumblebees and solitary bees)
- Stag beetle *Lucanus cervus*

Sites of Importance for Nature Conservation (SINCs)

The City does not contain any statutory designated sites for nature conservation, however there are several non-statutory designated sites (SINCs) identified by local authorities and recognised as part of the planning process. In London, sites are categorised by importance at a metropolitan, borough and local level. SINCs identified in the City are shown in Figure 7.1.

Figure 7.2 Sites of Importance for Nature Conservation (SINCs) in the City
 Source City of London Corporation

- Site of Metropolitan Importance for Nature Conservation
- Site of Local Importance for Nature Conservation - City Plan 2040
- Site of Borough Importance for Nature Conservation - City Plan 2040



7. URBAN GREENING AND BIODIVERSITY

BIODIVERSITY

Key measures

Whole building

Developments should use planting, green infrastructure and habitat creation measures to protect and enhance biodiversity across the City. Urban greening measures and biodiversity measures should take into consideration local priorities, such as the BAP, and contribute to the enhancement and extension of green corridors and SINC.

To understand existing habitats on a site, London's Local Environmental Records Centre (LERC) and Greenspace Information for Greater London (GiGL) should be consulted to provide comprehensive data on London's habitats, species and protected sites, including SINC.

Urban greening measures should integrate a diverse range of planting types to support year-round forage for pollinators, bats and birds. As well as integrating urban greening measures outlined in previous sections, developments should integrate wildlife-friendly features, including:

- Integral nests boxes (compliant with BS 42021) to provide nesting opportunities for birds, including black redstart, swifts and house sparrows
- Free standing and integrated bat roosting boxes
- Invertebrate habitat features, including as bug boxes, sandy/stoney mounds, logs piles and standing water
- Wild bee nesting habitats and bee bricks

For all wild-life friendly features, care needs to be taken of siting and positioning in relation to the habitat context, exposure, aspect and height. Planning and installation should be conducted by a qualified ecologist. Potential indirect impacts to species should be considered, such as light pollution for bats and disturbance of nesting birds. In accordance with best practice guidance (City of London Lighting SPD) relating to lighting and biodiversity, any new lighting should be carefully designed to minimise potential disturbance and fragmentation impacts on sensitive receptors, such as bat species, including incorporating dark spaces.

Honeybee hives should not be proposed or consented in the City. This is due to negative impacts on wild pollinators, including bumblebees and solitary bees, which are a target species in the BAP. Wild bee populations are facing serious decline due to a range of pressures including habitat loss, pesticide use and

climate change. Honeybees are a major risk to wild bees in the City due to their abundance and competition which limits forage resources.

Applicants are encouraged to incorporate educational initiatives in urban greening and biodiversity proposals, particularly in the public realm. Initiatives should provide accessible information, explanation, and/or learnings on what greening and biodiversity processes are present to advocate for the protection and celebration of biodiversity in the City.

Applicants are encouraged to establish good practice in soil protection and the sustainable use of soils. Soil supports biodiversity and plays an important role in climate change mitigation, by storing carbon. Transport for London's Sustainable Development Framework outlines the following actions that could be considered for the management of soil on development sites:

- Carry out an assessment of any existing soils onsite and set out a soil management plan, including a strategy for importing suitable soils and substrates or creating them onsite
- Safeguard areas where existing soils will be retained or reused onsite, and areas where any imported soils will be stored
- Strip soils identified for reuse and retain onsite in heaps no higher than 1.5 metres
- No soil from site is sent to landfill
- Check imported soils are compliant with BS 3882:2015 (Topsoil) and BS8601:2013 (Subsoil)
- Retain crushed concrete or other suitable demolition by-products (to five millimetres sieve size) and add Compost Quality Standard PAS 100 compliant compost (as necessary) to create suitable growing medium.

Beyond the building

Developments in proximity to SINC need to ensure that nature on these sites is not impacted through development or degraded as a result, but enhanced. Developments within the vicinity of SINC should contribute financially to maintenance and conservation, and incorporate complementary enhancements to the designated features of the SINC. Where development has a potential impact on designated sites of importance for biodiversity in or near the boundary of the site, the developer should submit an appropriate Ecological Assessment outlining how any impacts will be avoided, minimised or mitigated.



7. URBAN GREENING AND BIODIVERSITY

BIODIVERSITY

The River Thames provides a significant corridor for movement and foraging across London for a variety of wildlife, including bats which use vegetation and water bodies to commute and forage. The City Corporation's Riverside Strategy highlights opportunities for development to enhance biodiversity through the conservation of existing features and integration of new features for aquatic and terrestrial biodiversity when flood defences are being raised, including utilising the Estuary Edges guidance by the Thames Estuary Partnership.

Ecosystem services

The value of biodiversity extends beyond supporting habitat and species to the provision of ecosystem services such as reduction of the urban heat island effect, flood resilience and improving air quality.

Future-proof the development

Integrating biodiversity measures will help to future-proof the development for climate change. Biodiversity measures should be designed to respond to local species and the surrounding climate to ensure the longevity of the proposed habitats.

Green roofs, green walls, street trees and areas of semi-natural vegetation are all climate positive initiatives and benefit health and well-being.

Embodied Ecological Impacts

In a global nature and biodiversity crisis, it's important to recognise impacts from the construction industry beyond the Square Mile and UK, on areas such as deforestation, pollution, and water scarcity. Similar to embodied carbon, the City Corporation encourages applicants to consider embodied ecological impacts within their project whole life-cycle: resource extraction, manufacturing process, production and transportation process of new materials, and disposal of unused materials.

Organisations have committed to TNFDs (Taskforce on Nature-related Financial Disclosures) to shift business and finance flows away from nature-negative outcomes to nature-positive outcomes. The UKGBC is releasing material on embodied ecological impacts. The World Business Council for Sustainable Development (WBCSD) released a Roadmap to Nature Positive: Foundations for the built environment system. Applicants are encouraged to consider and embed embodied ecological impact into existing reporting processes.

Case Study: Creed Court Hotel, 3 Ludgate Hill

Use: Hotel and retail

New build (retained façade)



Plan of the biodiverse roof design

Planning Application drawing - Landscape Areas Roof

Key facts:

- Green roof designed to create habitat that will help support populations of declining species including black redstart, common blue butterfly, toadflax brocade moth and bats
- Key features include sedum, wildflower turf, gravel ballast and crushed aggregate, bug hotels, log piles and black redstart posts

Additional features:

- Achieves a 38.2% reduction in carbon emissions over the Part L 2013 baseline

Case Study: 40 Holborn Viaduct

Use: Office and retail

Retrofit and extension



Visual showing enhanced pocket park and green balconies

Source: Design and Access Statement

Key facts:

- Extensive greening in the form of biodiverse and green roofs, greening on terraces and balconies, and enhancements to a pocket park within the vicinity of the site
- Wildflower areas have also been specified with a diverse range of native flowering plant species at varied depth of 80-150mm

Additional features:

- High levels of retention (99.5% of the substructure, and 75% of the superstructure)
- Installation of PV panels covering an area of 240m²
- Air-source heat pumps share energy between different zones of the building to maximise their efficiency; hot water generated by water-source heat pumps
- Targeting BREEAM 'outstanding', NABERS 5* and WELL 'platinum' ratings

7. URBAN GREENING AND BIODIVERSITY

BIODIVERSITY NET GAIN

What is Biodiversity Net Gain (BNG)

Biodiversity is the term used to describe the variety of life. The aim of Biodiversity Net Gain (BNG) is to leave the natural environment in a measurably better state than it was prior to development. The Environment Act (2021) requires all new developments to provide a minimum 10% BNG uplift from baseline value of the site. BNG provides the opportunity to unlock additional space for biodiversity by steering associated soft landscaping towards habitat creation, therefore providing more biodiversity onsite and benefitting local wildlife.

Calculating the value of habitats

The Biodiversity Metric (BM) is a statutory tool that calculates changes in the extent and quality of habitats as a proxy for nature. It is used to calculate and compare Biodiversity Units (BU) found on a site before and after development. The metric should be completed by a suitably qualified and experienced ecologist. Four key factors underpin this calculation:

- Habitat size
- Habitat distinctiveness (conservation value)
- Habitat condition, and
- Strategic significance (local priorities for habitat creation/enhancement)

The metric should be used early on in the design process to evaluate different design options to maximise biodiversity gain within the parameters of the development.

The Mitigation Hierarchy

When applying the Mitigation Hierarchy (Figure 7.3), impacts to sensitive ecological features are avoided and minimised as a priority. This approach reduces risk, and ultimately costs for a project, as compensation and offsetting strategies are more expensive than avoidance.

1. Avoid: retain and protect ecologically valuable or sensitive receptors
2. Minimise: Where avoidance is not possible impacts should be minimised as far as practicable by reducing the area of direct impact or loss
3. Mitigate: Implementing measures to reduce impact through construction, replace lost habitats, and enhance habitats within the development boundary

4. Offset: Only utilised where the previous options have been exhausted.

BNG delivery

Currently all new developments with existing habitats (if applicable) are required to provide a minimum 10% BNG uplift from baseline value of the site. However due to the dense urban nature and high proportion of zero baseline sites within the Square Mile, the mandatory BNG of 10% within the Environment Act 2021 is not considered an appropriate measure for the delivery of meaningful BNG within new developments. The City Corporation commissioned a Biodiversity Net Gain Feasibility Study for the Square Mile to support the City Plan 2040 and ensure BNG was delivered to such sites which would be deemed exempt. When required by the Development Plan, to meet the requirements of delivering BNG in the City, major developments regardless of baseline value are expected to achieve at least 3 BU/ha onsite. The delivery of BNG should be prioritised onsite, but if delivery falls below 3 BU/ha, offsite measures should be agreed with planning officers.

In cases where the biodiversity baseline is zero due to an absence of habitats, the development should still aim to deliver 3 BU/ha to incorporate habitats and green infrastructure of suitable scale into the development design. However, minimum requirements should be agreed in coordination with City Corporation officers during the pre-application process.

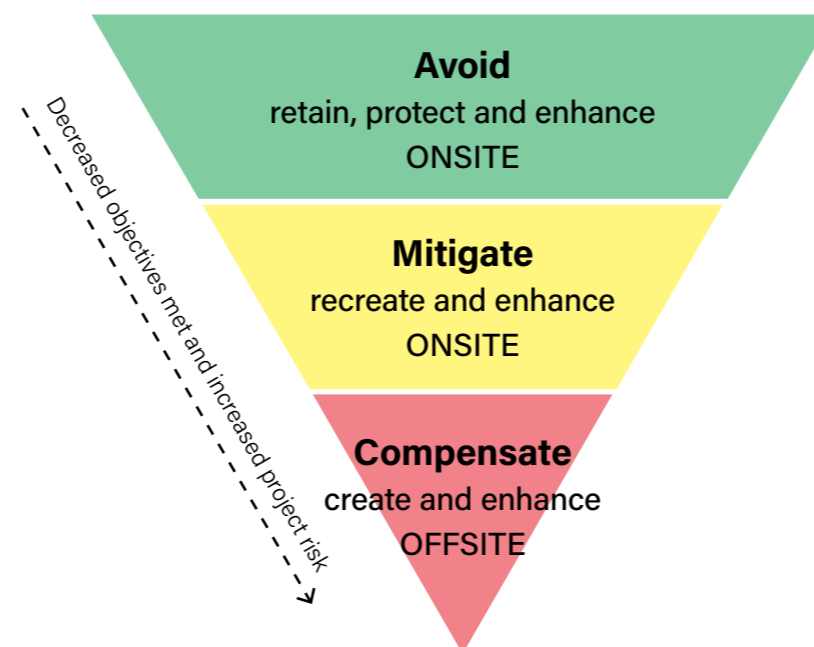


Figure 7.3 Mitigation hierarchy

Case Study: 120 Fleet Street

Use: Office and retail

New Build (including alterations to existing Grade II listed Daily Express building)*



Aerial view visual showing the cascading terraces

Source: Design and Access Statement

Key facts:

- Multiple benefits for native biodiversity planting and habitat creation to provide net gain for biodiversity
- 12 cascading terraces with urban greening and amenity spaces
- Biodiverse and blue roof to provide SUDs and habitats
- Rainwater harvesting for irrigation

Additional features:

- Water efficient fittings targeting a 40% water demand reduction against non-domestic baselines
- Features a mixed mode ventilation strategy, and efficient building services and control systems

7. URBAN GREENING AND BIODIVERSITY

BIODIVERSITY NET GAIN

Where BNG is being provided and as required by the Development Plan, prior to commencement of development, a Biodiversity Gain Plan (BGP) should be submitted and approved. A draft BGP should be included in the planning submission. The BGP should set out the strategy for achieving BNG, include the Statutory Biodiversity Metric (SBM) spreadsheet and outline habitat enhancements that will be incorporated to meet the BNG score.

As required by the Development Plan, prior to commencement of development, a Habitat Management and Monitoring Plan (HMMP) should be submitted and approved for development providing 'significant' onsite and offsite gains (e.g. a biodiverse green roof). The HMMP should outline how the habitat enhancements will be managed, maintained and monitored for a minimum of 30 years. However, if a development is only providing 'non-significant' onsite gains for example 'planters' then a Landscape and Ecological Management Plan (LEMP) would be required.

Strategic approach

The delivery of BNG will have more strategic significance and provide stronger biodiversity value if it adheres to local priorities, such as those outlined in the City Corporation's Biodiversity Action Plan (BAP). As outlined in the previous 'Biodiversity' section, biodiversity measures that consider priority species and habitats, and integrate with existing green corridors, will have a greater benefit to wildlife in the City.

The Environment Act (2021) has introduced the Local Nature Recovery Strategy (LNRS) to help local authorities to incorporate nature recovery objectives and support delivery of BNG through spatial strategies. Until the London LNRS is in place, strategic significance will be considered to be the habitats set out in the City of London BAP.

Each LNRS must:

- agree priorities for nature's recovery
- map the most valuable existing areas for nature, and
- map specific proposals for creating or improving habitat for nature and wider environmental goals

The existing Biodiversity Action Plan concludes in 2026, at which point the City Corporation may decide to develop and adopt a Local Nature Recovery Plan to replace the BAP, following the framework of the LNRS.

The City Corporation's Climate Resilient Planting Catalogue provides guidance on a variety of parameters that will aid the design of public realm and planting schemes including:

- species tolerances (to pests and diseases, extreme heat and weather events etc.)
- species functions (ecosystem services, i.e. biodiversity enhancement, cooling, interception, sequestration)
- planting environment (site types and conditions)

Applicants are advised to fully consider current GLA and City Corporation guidance for urban greening and biodiversity for the design of development proposals.

Image: Urban greening at St Mary Axe © Clive Totman, 2023



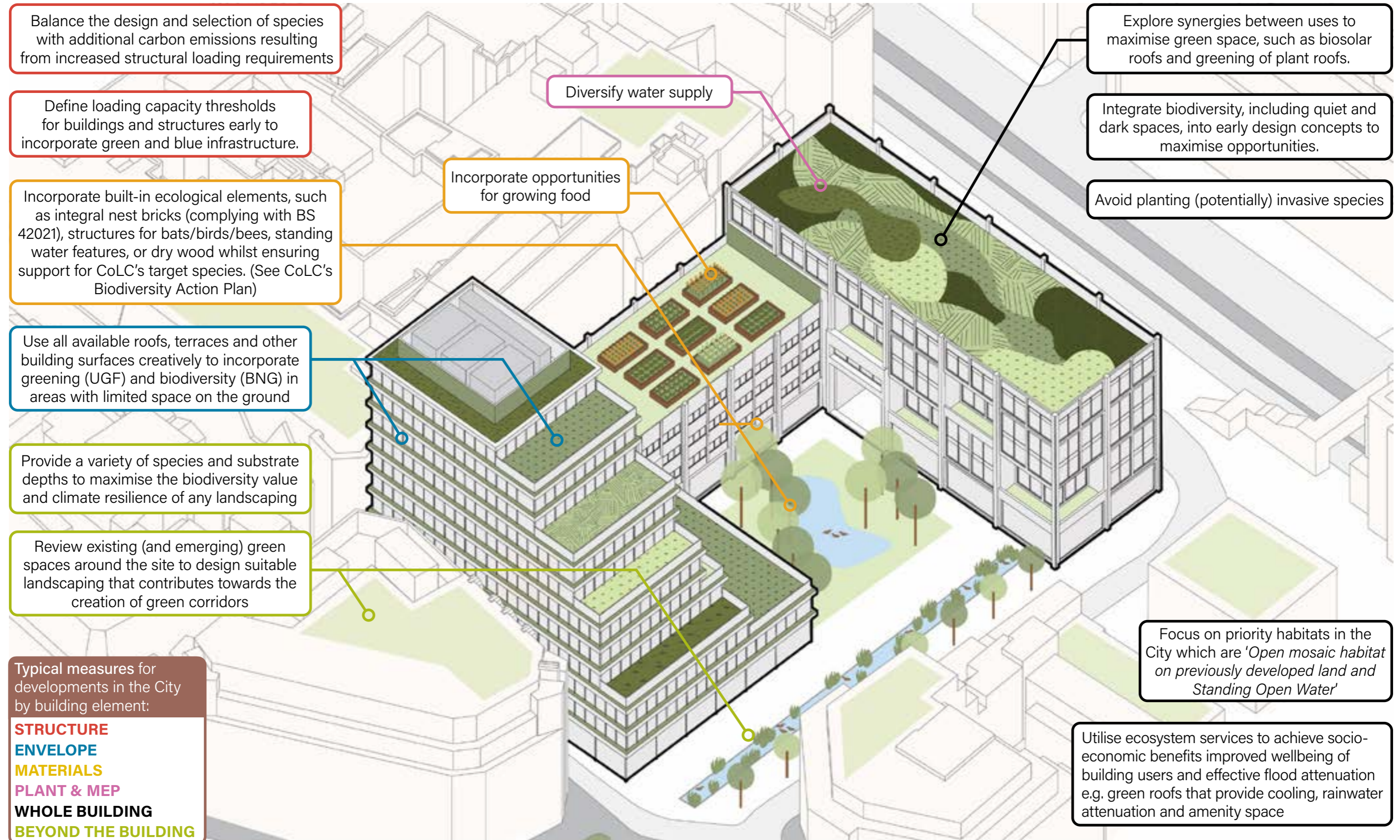
7. URBAN GREENING AND BIODIVERSITY

KEY MEASURES FOR CITY DEVELOPMENTS

This infographic provides a list of potential measures, which is not exhaustive. Applicants are encouraged to propose innovative measures that drive best practice. All measures to be agreed on a case-by-case basis.

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SUBMISSION REQUIREMENTS AND CONSIDERATIONS

08

8. SUBMISSIONS REQUIREMENTS AND CONSIDERATIONS

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Introduction

Planning applications pass through a planning process that covers all RIBA stages and can be particularly complex for major applications. The planning application process concentrates on RIBA stages 1-5, however, there are important considerations and actions to be addressed throughout all RIBA stages that impact on the success of both the application and the completed development.

This section outlines key considerations, required application documents and recommended supplementary material to support planning applications in the City of London. The key considerations suggest key actions to ensure sustainability is successfully integrated in the development approach. The required information outlines planning application submission requirements, as prescribed by the Development Plan. In the pre-application stages, the requested material will help proposals demonstrate that application requirements will be satisfied. The recommended material can demonstrate exemplary practice.

The City Corporation Validation Checklists detail all items required to be submitted in a planning application

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RIBA Stage 0 - Strategic Definition

Key considerations for all applications proposing building works

- Undertake a building survey to identify opportunities and constraints
 - Consider heritage opportunities and constraints
 - Assess the local context, including:
 - availability of energy infrastructure and energy sharing opportunities
 - existing and emerging green infrastructure and biodiversity networks
 - local climate resilience opportunities such as SuDS, cool routes, biodiversity
 - other synergy opportunities
 - engage with supporting Business Improvement Districts
 - Engage a creative and experienced project team, including a heritage specialist for historic buildings
 - Consider sustainability aspirations for the site
 - Consider the optimal use of the site to achieve high environmental sustainability aims
 - Check out the CoLC's priorities and focus relating to environmental, social and economic sustainability
 - Assess opportunities for the retention of buildings or elements, the reuse of materials including from applicant team's other projects or material exchange websites to inform the design of the proposal
 - Carry out a site walk about with design team to identify retention and reuse options.
- Minor applications should consider the above where applicable to the nature of the proposals.*

Recommended material research

Information being assembled to include:

National Planning Policy Framework	CoL Carbon Options Guidance PAN	Existing building information, surveys and material audits	Case studies and precedents
London Plan	CoL Climate Action Strategy	UK Net Zero Carbon Building Standard	Other relevant industry standards and guidance
Other London Plan Guidance (LPGs)	Other CoL policies and guidance, maps	Low Energy Transformation Initiative	Greenspace Information for Greater London

8. SUBMISSIONS REQUIREMENTS AND CONSIDERATIONS

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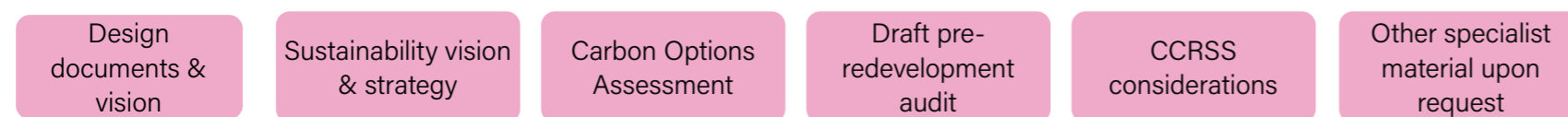
RIBA Stage 1 - Pre-application

Key considerations for all applications proposing building works

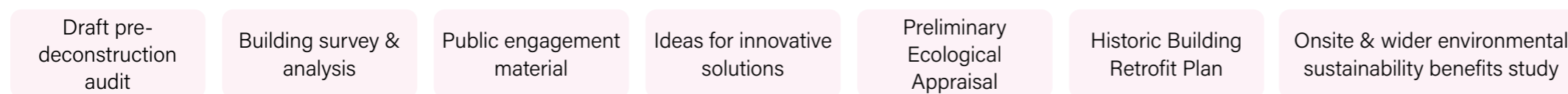
- Enter into a Planning Performance Agreement or arrange a series of pre-application meetings covering all relevant sustainability topics. Recommended for major applications are 2 workshops on optioneering, and 2 meetings on the sustainability strategy, one early and one towards the end of this stage. For minor applications, a meeting combining sustainability and other planning considerations is recommended.
 - Align proposed sustainability inspirations with planning and specialist officer recommendations relating to the site, its context, and the City as a whole. This includes identifying opportunities for wider environmental sustainability benefits
 - Discuss development optioneering requirements and carry out optioneering in line with Carbon Options Guidance, including 3rd party review process
 - Consider a whole building retrofit plan for historic buildings
 - Prepare pre-redevelopment and pre-demolition audits in line with details set out in the Circular Economy chapter
 - Consider all circular economy principles to inform optioneering and the strategy for the site
 - Consider climate resilience measures to be integrated into design through a draft Climate Change Resilience Sustainability Statement (CCRSS)
 - Develop the application scheme following optioneering and identify site-specific sustainability issues to be addressed in more detail
 - Adopt whole life-cycle carbon targets (e.g. LETI, UKGBC EUI targets, UK Net Zero Carbon Buildings Standard) to demonstrate commitment to reducing carbon emissions
 - Deliver the objectives of the Biodiversity Action Plan
 - Achieve high quality balance between amenity, urban greening, biodiversity and climate resilience
 - Integrate collective infrastructure, such as climate resilience measures or energy networks
 - Integrate construction methods, innovative technologies or materials to reduce carbon emissions (e.g. use of timber or CLT elements)
 - Engage with relevant certification schemes (BREEAM; NABERS UK)
 - Discuss public consultation, engagement arrangements and content
 - Confirm required application documents.
- Minor applications should consider the above where applicable to the nature of the proposals.*

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Requested material



Recommended material



8. SUBMISSIONS REQUIREMENTS AND CONSIDERATIONS

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RIBA Stage 2-3 - Planning application

Key considerations for all applications proposing building works

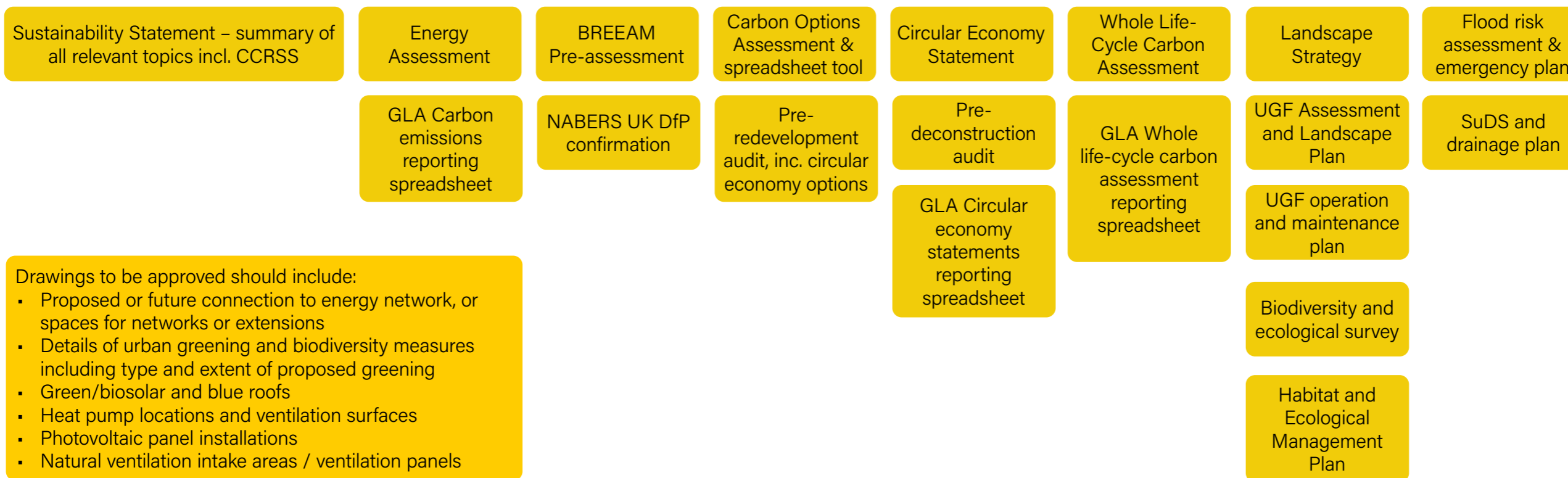
- Incorporate refinements and amendments into the proposals, resulting from the pre-application process, including carbon optioneering and public consultation responses
 - Support the 3rd party review process for the whole life-cycle carbon assessment of the application proposal
 - Ensure the 3rd party review for the optioneering has been carried out and concludes that the options assessment complies fully with the Carbon Options Guidance PAN
 - Ensure all identified issues are comprehensively addressed and prominently presented in the application documents
 - Incorporate any identified wider environmental sustainability benefits for the local area and City as a whole, clearly laid out and demonstrated in the application documents, that have been negotiated with officers to mitigate high embodied carbon impacts of the proposed development in support of the application
 - For exemplary initiative, when there is no expectation to mitigate high embodied carbon impacts, incorporate any identified wider environmental sustainability benefits for the local area and City as a whole, clearly laid out and demonstrated in the application documents, to support the application
 - Generally, deep retrofits can be expected to be designed to perform operationally like new builds and the need for separate assessments for the retrofit and the extension should be discussed with planning officers
 - Include green leases/clauses for tenanted floorspace to ensure energy efficiency design and low carbon fit-out and operation across the whole development
 - Include a commitment to a NABERS UK rating of 5 stars for new builds and 4 stars for retrofits
 - Include the BREEAM pre-assessment along with the pre-assessment tracker, identifying achievable and potential credits and reasons where credits cannot be achieved, in particular in the City Corporation's priority categories Energy, Materials, Pollution, Water and Waste
 - Prepare a deconstruction audit that includes 'passport-style' details of carbon intensive deconstruction materials suitable for use on material exchange platforms as early as possible in order to support efficient reuse through marketplaces
 - Demonstrate future proof design that provides loose fit (to enable easy repair, maintenance and replacements), flexibility and adaptability of floorspaces and building elements including opportunities to retrofit new, leaner technologies when required, to extend the lifetime of a building. This could be outlined in an Access, maintenance and deconstruction strategy.
 - Consider an end-of-life strategy, including design for disassembly and material passports
 - Develop opportunities for innovative measures to be tested, in particular where they can provide solutions for site specific constraints, e.g. mitigation measures such as material optimisation through design of building elements to perform multiple functions, design for deconstruction strategies, renewable energy generation, energy storage solutions and testing new materials, building element systems and services
 - Demonstrate that the proposed development is climate resilient and mitigates any detrimental environmental impacts on the surrounding City context
 - Provide Urban Greening Factor and Biodiversity Net Gain documentation as required
 - Ensure that GiGL data search reports inform urban greening and biodiversity proposals and upload any new biodiversity data gathered as part of the planning application to GiGL
 - Consider details that potentially can be addressed more holistically and optimised at later design stages, and that can be confirmed through appropriate conditions, allowing for flexibility, improvements and incorporation of available materials and building parts, latest technologies and services systems into the design
- Minor applications should incorporate the above where applicable to the nature of the proposals.*

8. SUBMISSIONS REQUIREMENTS AND CONSIDERATIONS

CONTENTS

RIBA Stage 2-3 - Planning application

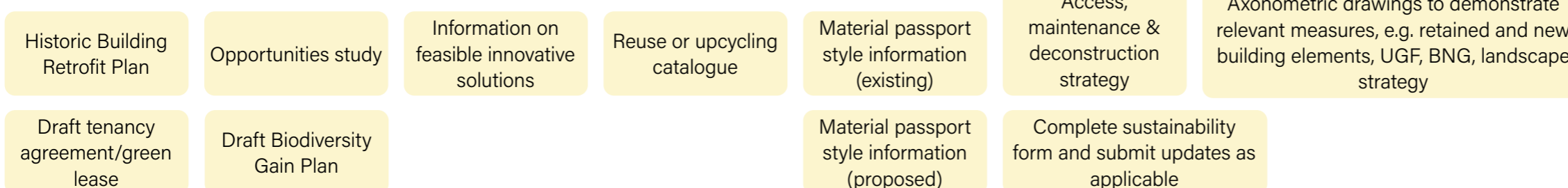
Required information



Required for minor applications

Design & Access Statement, to include a Sustainability section, or a separate Sustainability Statement, covering all topics relevant to the proposal.

Recommended material to demonstrate exemplary practice



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8. SUBMISSIONS REQUIREMENTS AND CONSIDERATIONS

CONTENTS

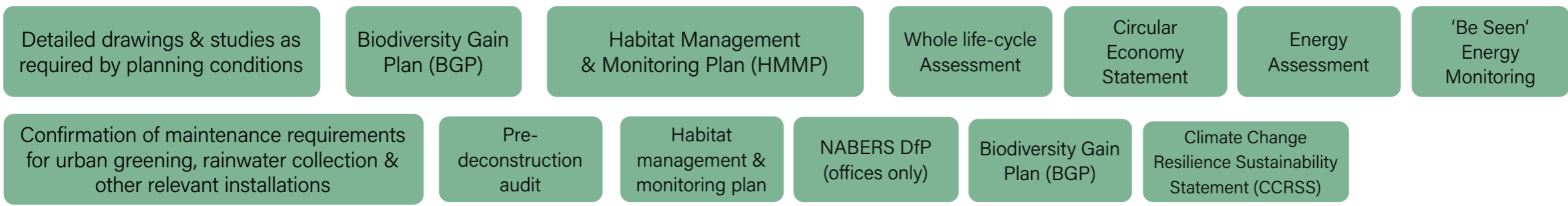
RIBA Stage 4 Post application conditions (detailed design)

Key considerations for all applications proposing building works

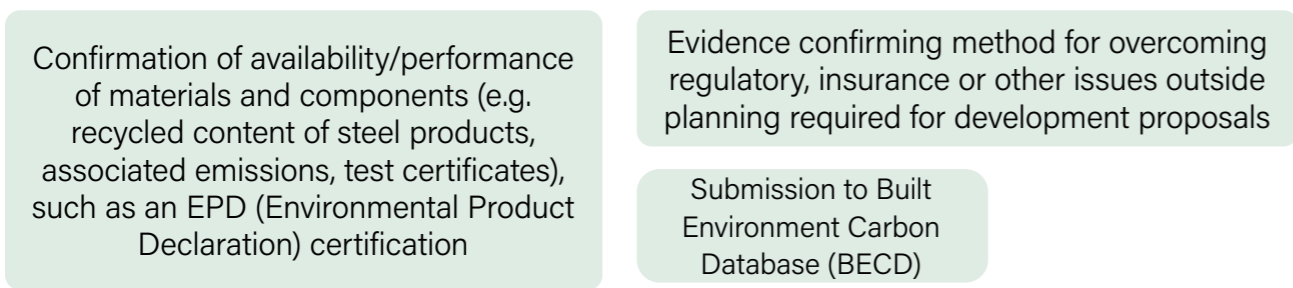
- Enter into a Conditions Planning Performance Agreement to ensure resources are available to discharge conditions relating to relevant details to ensure the highest sustainable design quality
 - Demonstrate how further details have been developed, to include reasons for changes to details or performances in relation to whole life-cycle carbon and circular economy considerations and confirmation of reuse and recycling initiatives
- Develop the energy strategy in accordance with up-to-date technologies and insights, to achieve the best outcome for energy efficiency and carbon emissions, and to reduce offsetting requirements as much as possible. Consider providing a tenant manual or drafting a tenant agreement to optimise the system operation and tenant-related carbon emissions
 - Review the extent and quality of urban greening, biodiversity and climate resilience measures onsite in accordance with updated opportunities and constraints

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Required information



Recommended material to demonstrate exemplary practice



8. SUBMISSIONS REQUIREMENTS AND CONSIDERATIONS

CONTENTS

RIBA Stage 6-7 Post application conditions (completion/in use)

Key considerations for all applications proposing building works

- Review and prepare all post completion information and certificates requested by condition
- Provide a case study of, or a report setting out the lessons learnt from, the scheme to share important insights and contribute to the promotion of best practice in the City
- Engage with the City's Clean City Awards Scheme (CCAS) to drive sustainability amongst member businesses in key areas related to waste, such as communication and engagement, resource efficiency and circular economy practices and reducing plastic waste. The scheme hosts Environmental Best Practice meetings and workshops and awards are given for best performances.

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Required information

'Be Seen' Energy Monitoring - update contextual data & upload energy performance predictions	Post completion Climate Change Resilience Sustainability Statement (CCRSS)	NABERS UK final certificate
Post completion Circular Economy Statement	Post construction Whole Life-Cycle Carbon Assessment	BREEAM final assessment and certificate

Recommended material to demonstrate exemplary practice

Material passport style information (existing) or use of material exchange platform	Material passport style information (proposed)	Case study for publication	Submit project information to the Built Environment Carbon Database (BECD)
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8. SUBMISSIONS REQUIREMENTS AND CONSIDERATIONS

Major application submission documents

CONTENTS

RIBA Stage 0		RIBA Stage 1		RIBA Stage 2-3		RIBA Stage 4		RIBA Stage 6-7	
Strategic Definition		Pre-application		Planning-application		Post application (detailed design)		Post application conditions (completion/occupancy)	
Requested				Required					
Existing building information	Surveys	Design documents & vision	Sustainability vision & strategy	Drawings to be approved	Sustainability statement	Detailed drawings	WLC Assessment	'Be Seen' Energy Monitoring	WLC Assessment
Material audits	Draft pre-redevelopment audit	Carbon Options Assessment	Draft pre-redevelopment audit	Energy Assessment & reporting spreadsheet	Carbon Options Assessment sheet	Energy Assessment	Circular Economy Statement	BREEAM final assessment and certificate	Circular Economy Statement
Case studies / precedents		CCRSS considerations	Other specialist material upon request	WLC Assessment spreadsheet	Circular Economy Statement spreadsheet	'Be Seen' Energy Monitoring	Pre-deconstruction audit	NABERS UK final certificate	Pre-deconstruction audit
				Pre-redevelopment audit	Pre-deconstruction audit	Biodiversity Gain Plan (BGP)	NABERS DfP (offices only)	CCRSS	
				BREEAM pre-assessment	NABERS DfP confirmation (offices only)	CCRSS	Habitat management & monitoring plan		
				Biodiversity and ecological survey	Landscape Strategy				
				UGF Assessment and Landscape Plan	UGF operation and maintenance plan				
				SuDS & drainage plan	Flood risk assessment & emergency plan				
Recommended									
		Draft pre-deconstruction audit	Public engagement material	Innovative solutions	Access, maintenance & deconstruction strategy	Confirmation of materials and components	Submission to BECD	Materials passports	Submission to BECD
	Ideas for innovative solutions	Preliminary ecological appraisal	Building survey & analysis	Reuse or upcycle catalogue	Axonometric drawings	Other details on request		Case study	
		Onsite & wider opportunities study	Heritage building retrofit plan	Heritage building retrofit plan	Draft Biodiversity Gain Plan (BGP)				

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Appendix A: RECOMMENDED STANDARDS, CERTIFICATIONS AND GUIDELINES

A

APPENDIX A RECOMMENDED STANDARDS, CERTIFICATIONS AND GUIDELINES

RETROFIT AND REUSE

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Document	Key Considerations
GLA Circular Economy Statement Guidance (March 2022 or latest version)	Guidance on how to pursue the waste hierarchy and set out Circular Economy Statements required by the GLA for referable developments. Provides the circular economy principles that all developments should be encouraged to incorporate
City of London Carbon Options Guidance (COG) Planning Advice Note (PAN) (March 2023 or latest version)	Guidance on how applicants should demonstrate that development options including refurbishment and retrofit and their carbon impacts have been considered and evaluated. Options should be well-considered, realistic and feasible.
GLA Whole Life-Cycle Carbon Assessment Guidance (March 2022 or latest version)	Guidance on how to complete a WLCA and demonstrate consideration of whole life-cycle carbon in the Design and Access Statement
Arup & the Ellen MacArthur Foundation's Realising the value of the circular economy in real estate' (February 2020 or latest version)	Guidance on how to integrate circular economy principles into the real estate business model, but also provides circular economy principles that all developments should be encouraged to incorporate.
Greater London Authority -Whole Life-Cycle Carbon Assessment Guidance	While not mandatory for non-referable development, strong recommendation to either complete WLCA or demonstrate consideration of whole life-cycle carbon in Design and Access Statement

Reference and further guidance

City of London (2022) [Planning Advice Note. Whole Life-cycle Carbon Optioneering](#). City of London Corporation

City of London & Purcell (2024). [Heritage building retrofit toolkit](#). City of London Corporation

C40 Cities (2020). [The Multiple Benefits of Deep Energy Retrofits: A Toolkit for Cities](#). C40 Cities Climate Leadership Group

Acharya, D., Boyd, R., & Finch, O. (2020). [From Principles to Practices: Realising the value of circular economy in real estate](#). Ellen MacArthur Foundation & Arup.

GLA (2022) [London Plan Guidance. Circular Economy Statements](#). Greater London Authority

GLA (2022) [London Plan Guidance: Whole Life-Cycle Carbon Assessment Guidance](#). Greater London Authority.

LETI (2020) [LETI Climate Emergency Design Guide. How New Buildings can Meet UK Climate Change](#). Low Energy Transformation Initiative

LETI (2021) [Climate Emergency Retrofit Guide](#). Low Energy Transformation Initiative

UKGBC (2022) [Delivering Net Zero: Key Considerations for Commercial Retrofit](#). UK Green Building Council

Guidance related to historic building retrofit

Balson, K., Summerson, G., and Thorne, A. (2014) [Sustainable Refurbishment of Heritage Buildings BREEAM](#)

Grosvenor (2013) [Sustainable Refurbishment: a Toolkit for Going Green](#) Grosvenor Estates

Historic England (2018) [Energy Efficiency and Historic Buildings](#) English Heritage

Miles, N (2013) [Retrofitting Historic Buildings for Sustainability](#) Westminster City Council

APPENDIX A RECOMMENDED STANDARDS, CERTIFICATIONS AND GUIDELINES

GREENHOUSE GAS EMISSIONS AND ENERGY USE

Whole life-cycle carbon

Document	Key Considerations
LETI Embodied Carbon Primer (January 2020 or latest version)	Staggered emissions targets between now and 2030 for residential, commercial and educational buildings with emphasis on material reuse
BREEAM	Exceeding excellent, aim to achieve 'Outstanding' Strong recommendation to achieve: <ul style="list-style-type: none"> Man03 –minimum 2 credits rather than 1 Mat01 –maximise the credits under this criteria
GLA Whole Life-Cycle Carbon Assessment Guidance (March 2022 or latest version)	Guidance on how to complete a WLCA and demonstrate consideration of whole life-cycle carbon in Design and Access Statement
City of London Carbon Options Guidance (COG) Planning Advice Note (PAN) (March 2023 or latest version)	Guidance on how applicants should demonstrate that development options including refurbishment and retrofit and their carbon impacts have been considered and evaluated. Options should be well-considered, realistic and feasible.

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Operational emissions and energy

Document	Key Considerations
BREEAM	Exceeding excellent, aim to achieve 'Outstanding' Ene01 credits targeted to be in line with BREEAM outstanding minimum requirements where feasible
RIBA Climate Challenge (Version 2 2021 or latest version)	Incrementally increasing energy use intensity standards to 2030 for domestic and non-domestic buildings Domestic buildings GIA: (current- business as usual) <120kWh/m2/y, (2025) <60 kWh/m2/y, (2030) <0 to 35 kWh/m2/y Non-Domestic buildings GIA(new build offices): (current- business as usual) <130 kWh/m2/y DEC D (90) rating, (2025) <75kWh/m2/y or DEC B rating and/or NABERS Base Build 5, (2030) < 55 kWh/m2/y DEC B (40) and/or NABERS Base build 6

APPENDIX A RECOMMENDED STANDARDS, CERTIFICATIONS AND GUIDELINES

GREENHOUSE GAS EMISSIONS AND ENERGY USE

Operational emissions and energy (continued)

Document	Key Considerations
NABERS UK	Commit to design and build development to achieve a rating of 5 or more stars (or 4 stars for retrofit), nominate target at outset and rating achievement plan, post-construction quarterly reports on performance during occupational period
Historic England Advice Note 18: Adapting historic buildings for energy and carbon efficiency (July 2024, or latest version)	Guidance on approaches to improve the energy efficiency and support carbon reduction of historic buildings, whilst conserving their significance.
GLA Housing Design Standards (June 2023, or latest version)	<ul style="list-style-type: none"> Use local energy resources (such as secondary heat and local heat networks) and supply energy efficiently and cleanly using efficient low carbon heating solutions, such as heat pumps. (All development) Appraise and optimise network efficiency by minimising distribution heat losses and by locating vertical risers within buildings in positions that reduce horizontal pipe runs to a practical minimum. (New Builds, Change of Use) Onsite renewables: developments should be designed to maximise renewable energy by producing, storing and using renewable
Levitt Bernstein – Passivhaus Easi Guide	<p>Space Cooling Demand <15 kWh/m2/yr</p> <p>Primary Energy Demand (PER) including all energy uses <60 kWh/m2.yr</p> <p>Air tightness: <0.6 ACH</p>
UKGBC Renewable Energy Procurement Part 2 (August 2023, or latest version)	<p>Key aspects within the guidance:</p> <ul style="list-style-type: none"> Principles for good quality renewable energy procurement Toollike to engage with energy supplies Rating system for assessing the performance of a building Procurement routes available in the market

APPENDIX A RECOMMENDED STANDARDS, CERTIFICATIONS AND GUIDELINES

GREENHOUSE GAS EMISSIONS AND ENERGY USE

Reference and further guidance

AHMM, IEDE (2022) [Delivering Net Zero In Use. A guide for architects.](#) The Bartlett Institute for Environmental Design and Engineering & Allford Hall Monaghan Morris

City of London (2022) [Planning Advice Note. Whole Life-cycle Carbon Optioneering.](#) City of London Corporation

Clark, G. (2019). [RIBA Sustainable Outcomes Guide.](#) Royal Institute of British Architects

DGBC(2021) [Whole Life Carbon Position Paper.](#) Dutch Green Building Council

GLA (2018) [Energy, Daylight and Overheating Study in Tall Buildings.](#) Greater London Authority

GLA (2021) [London Plan Guidance Documents. 'Be Seen' energy monitoring guidance.](#) Greater London Authority

GLA (2022) [Energy Assessment Guidance.](#) Greater London Authority

GLA (2023). [London Plan Guidance. Housing Design Standards.](#) Greater London Authority

GLA (2022) [London Plan Guidance. Whole Life-Cycle Carbon Assessment.](#) Greater London Authority

GLA (2023) [Air Quality Neutral \(AQN\) guidance.](#) Greater London Authority

GLA (2021) [London Heat Network Manual II - Guidance for planners, designers & developers.](#) Greater London Authority

Historic England (2023) [Adapting historic buildings for energy and carbon efficiency: Historic England advice note 18](#)

HEMA, ARUP (2017) [Environmental Impact Assessment Guide to: Assessing Greenhouse Gas Emissions and Evaluating their Significance.](#) IEMA

LETI (2020) [LETI Climate Emergency Design Guide. How New Buildings can Meet UK Climate Change.](#) Low Energy Transformation Initiative

LETI (2020) [LETI Embodied Carbon Primer. Supplementary guidance to the Climate Emergency Design Guide.](#) Low Energy Transformation Initiative

LETI (2023) [LETI Unpicker. Retrofit vs rebuild: Unpicking the carbon argument Retrofit vs rebuild unpicker.](#) Low Energy Transformation Initiative

Levitt Bernstein (n.d) [Easi Guide to Passivhaus Design.](#) Levitt Bernstein

NABERS UK (2021) [Guide to Design for Performance.](#) NABERS United Kingdom

RIBA (2021) [RIBA 2030 Climate Challenge v2.](#) Royal Institute of British Architects

UK Net Zero Carbon Buildings Standard (2024) [Pilot version rev1 UK Net Zero Carbon Buildings Standard.](#)

UKGBC (2019) [Net Zero Carbon Buildings: A Framework Definition.](#) UK Green Building Council

UKGBC (2023) [Renewable Energy Procurement Part 2](#) UK Green Building Council

WPA (2021) [Zero Carbon Westminster: A Focus on Retrofit in Historic Buildings.](#) Westminster Property Association

APPENDIX A RECOMMENDED STANDARDS, CERTIFICATIONS AND GUIDELINES

CIRCULAR ECONOMY

Circular Economy in construction and operation

Document	Key Considerations
City of London Carbon Options Guidance (COG) Planning Advice Note (PAN) (March 2023 or latest version)	Evaluate development options with regard to their opportunities to incorporate circular economy principles.
The Chancery Lane Project – Sustainable and Circular Economy Principles in Leasing Arrangements for Repairs and Alterations (June 2022 or latest version)	Committing to green leases as a way to ensure fit-out stages and post-occupation building work support circular economy objectives, see The Chancery Lane Project for useful green contract clauses and templates.
GLA Circular Economy Statement Guidance (March 2022 or latest version)	Guidance on how to pursue the waste hierarchy and set out Circular Economy Statements required by the GLA for referable developments, but also provides circular economy principles that all developments should be encouraged to incorporate.
UK Green Buildings Council: Building Glass into a Circular Economy	Guidance for buildings involving glass being disassembled, demolished, or recycled. This requires early engagement; to enable quality control, remove the glazing units from the building site to a factory environment for disassembly; seal skips and train staff around contamination issues
Living Building Challenge	Progressive targets and guidance for construction material use

APPENDIX A RECOMMENDED STANDARDS, CERTIFICATIONS AND GUIDELINES

CIRCULAR ECONOMY

Reference and further guidance

Arup & Ellen Macathur Foundation [Circular Buildings Toolkit](#)

Arup (2020) [Meanwhile use London: A research report for the Greater London Authority](#). Greater London Authority

Better Buildings Partnership (2024) [Green Lease Toolkit](#), BBP

British Land (2024) [Full Circle, Full Potential: British Land's Approach to the Circular Economy](#)

C40 (2016) [Sustainable Solid Waste Systems](#). C40 Cities Climate Leadership Group

Cheshire, D. (2016) [Building Revolutions: Applying the Circular Economy to the Built Environment](#). Royal Institute of British Architects

City of London (2014) [Waste Strategy 2013-2020. Planning a sustainable future for the City of London](#). City of London Corporation

City of London (2019) [Code of Practice for Deconstruction and Construction Sites](#). City of London Corporation

City of London (2022) [Planning Advice Note. Whole Life-cycle Carbon Optioneering](#). City of London Corporation

City of London [Clean City Awards Scheme](#). City of London Corporation

Fletcher Priest (2024). [Material reuse playbook](#). Fletcher Priest Architects.

GLA (2020) [Design for a Circular Economy. Primer](#). Greater London Authority

GLA (2022) [London Plan Guidance. Circular Economy Statements](#). Greater London Authority

Heinrich, M & Lang, W (2019). [Materials passports - best practice. Buildings as Material Banks \(BAMB\)](#)

Heyne Tillett Steel, HTS [Stockmatcher. A tool to help procure reclaimed steel for use in new construction projects](#)

International Living Future Institute (2019) [Living Build Challenge 4.0. A visionary path to a regenerative future](#). International Living Future Institute

LETI (2020). [Circular Economy 1-Pager](#). Low Energy Transformation Initiative

Living Future (2019) [Living Building Challenge International](#) Living Future Institute

NetPositive Solutions. [Excess Materials Exchange](#) Enfield Council

NLA (2023) [Circular London, Building a renewable city](#). New London Architecture

Mace (2023) [Closing the circle: Making London the circular construction capital of the world](#). Mace Group

Mace & Arup (2024) [Closing material loops. Maximising circularity in the Built Environment](#). Mace Group

Material Reuse Portal. [Material Reuse Portal Circuit Project](#)

OPDC (2018) [Waste in Tall Buildings Study Final Report](#). Old Oak and Park Royal Development Corporation

Stride Treglown (2024). [Towards a circular built environment](#). Stride Treglown.

The Chancery Lane Project (2022) [Sustainable and Circular Economy Principles in Leasing Arrangements for Repairs and Alterations](#)

UKGBC (2018) [Building glass into the circular economy How to guide](#). UK Green Building Council

UKGBC (2019) [Circular economy actor and resource map](#). UK Green Building Council

UKGBC (2019) [Circular economy guidance for construction clients: How to practically apply circular economy principles at the project brief stage](#). UK Green Building Council

UKGBC (2022) [How Circular Economy Principles can impact carbon and value](#). UK Green Building Council

UKGBC (2022) [System Enablers for a Circular Economy](#) UK Green Building Council

UKGBC. [Circular Economy Implementation Packs for Reuse and Products as a Service](#). UK Green Building Council

University of Sheffield. [Regenerate Toolkit](#)

WBCSD (2021) [The business case for circular buildings](#). World Business Council for Sustainable Development

APPENDIX A RECOMMENDED STANDARDS, CERTIFICATIONS AND GUIDELINES

CLIMATE RESILIENCE

Flood Risk and SuDS

Document	Key Considerations
National Planning Policy Framework (National Planning Practice Guidance: Flood risk and coastal change)	<p>The framework defines the type of infrastructure that is permitted within Flood Zones across the city. Infrastructure is divided according to its vulnerability. Some examples are shown below:</p> <ul style="list-style-type: none"> ▪ Essential Infrastructure: essential transport infrastructure, essential utilities, wind turbines and solar farms. ▪ Highly vulnerable: Emergency service stations and basement dwellings. ▪ More Vulnerable: Hospitals, residential units, health services and educational services. ▪ Less Vulnerable: Commercial units, waste treatment and water and sewage treatment works ▪ Water compatible: Water and sewage transmission infrastructure, docks and marinas and open space. <p>Where development is required within an area of high risk, guidance on how to ensure safety is provided.</p>
EA Flood Guidance (including TE2100 plan)	<p>Committing to green leases as a way to ensure fit-out stages and post-occupation Guidance to indicate risk of flooding across the City and what is required to secure the planning of the development. Guidance is also provided regarding the developments design including and not restricted to set backs from river walls, freeboard allowances and habitat creation.</p> <p>All development proposals must comply with the requirements of TE2100.</p> <p>As well as following EA guidance, it is recommended that any project engages with the EA technical experts as early as possible.</p>
City of London Strategic Flood Risk Assessment (SFRA) (April 2023 or latest version)	<p>Provides local, tailored guidance on all the likely sources of flooding within the City and acts as an evidence base in development planning, defining local flood risk policies and emergency planning procedures.</p>
DEFRA Non-statutory technical standards for SuDS (2015 or latest version)	<p>Development shouldn't increase flooding elsewhere, structurally sound to the lifetime of the building and seek to control discharge levels.</p>
London Plan Drainage Hierarchy from London Plan (2021 or latest version)	<p>A Development should utilise Sustainable Drainage Systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the SuDS hierarchy.</p>

APPENDIX A RECOMMENDED STANDARDS, CERTIFICATIONS AND GUIDELINES

CLIMATE RESILIENCE

Water Resource Management

Document	Key Considerations
RIBA Sustainable Outcomes Guide 2019	<p>Potable water use targets</p> <ul style="list-style-type: none"> For domestic buildings: (current) <110L/p/day, (2025) <95L/p/day, (2030) <75L/p/day For non-domestic buildings: (current) <16/L/p/day, (2025) <13L/p/day, (2030) <10l/p/day
BREEAM	<p>Wat 01 Water consumption. Reducing the demand for potable water through the provision of efficient sanitary fitting, rainwater collection and water recycling systems</p> <p>Wat 02 Water monitoring. Specification of a water meter/s on the mains water supply to encourage water consumption management and monitoring to reduce the impacts of inefficiencies and leakage.</p> <p>Wat 03 Leak detection. Recognition of leak detection systems capable of detecting a major water leak on the mains water supply. Flow control devices that regulate the supply of water to each WC area/facility to reduce water wastage.</p> <p>Wat 04 Water efficient equipment. Identifying a building's total unregulated water demand and mitigating or reducing consumption through systems and/or processes.</p>
GLA London Plan Policy 5.15 Water use and supplies (2021 or latest version)	<p>Development should minimise the use of mains water by:</p> <ul style="list-style-type: none"> incorporating water savings measures and equipment designing residential development so that mains water consumption would meet a target of 105 litres or less per head per day New development for sustainable water supply infrastructure, which has been selected within water companies' Water Resource Management Plans, will be supported
Environment Agency Water Resource Planning Guideline (2023 or latest version)	<p>Guidance for the development of a Water Resource Management Plan for the development that complies with all relevant statutory requirements and governments policy.</p>
Building regulations Part G: Sanitation, hot water safety and water efficiency (2024 or latest version)	<p>Reasonable provision must be made by the installation of fittings and fixed appliances that use water efficiently for the prevention for the consumption of undue consumption of water.</p> <p>The potential consumption of wholesome water by persons occupying a new dwelling must not exceed 125 litres per person per day.</p>

APPENDIX A RECOMMENDED STANDARDS, CERTIFICATIONS AND GUIDELINES

CLIMATE RESILIENCE

Building and Urban Overheating

Document	Key Considerations
GLA Housing Design Standards (June 2023, or latest version)	<p>Reduce the risk of overheating, through orientation, layout, the natural cross-ventilation afforded by dual aspect, window design, and shading devices; active cooling should be a last resort.</p> <p>Daylight and overheating assessments should be analysed together to determine the optimal balance. South and west facing façades are most at risk to overheating, and the use of shading should be used to prevent direct sunlight from entering the home during at risk periods.</p> <p>Maximise the benefit of passive ventilation by providing a variety of window opening options that allow controlled ventilation through smaller openings and purge ventilation through larger windows and/or doors.</p>
GLA Energy Assessment Guidance – Cooling Hierarchy	<p>Minimise the amount of heat entering the building, minimise heat generation, manage heat through exposed internal mass and high ceilings, adopt passive ventilation prior to mechanical ventilation and active cooling systems.</p>
BREEAM	<p>Hea 04 Thermal comfort.</p> <ul style="list-style-type: none"> Thermal modelling carried out to appropriate standards. Projected climate change scenarios considered as part of the thermal model. The thermal modelling analysis has informed the temperature control strategy for the building and its users.
DEFRA Building regulations Part O: Overheating (2021 or latest version)	<p>Reasonable provision must be made to residential properties to limit unwanted solar gains in summer and provide an adequate means to remove heat from the indoor environment.</p>
BCO Guide to Specification 2019, to be read in conjunction with the Position Paper Guide to Specification Key Criteria Update – February 2023	<p><40 W/m², averaged over the 4.5 m deep perimeter zone for each façade</p> <p>When averaged over the perimeter zones, the peak solar + fabric gain must not exceed 40 W/m²</p> <ul style="list-style-type: none"> The worst performing space must not exceed 50 W/m² (BCO limit) The percentage of time a space spends above 40 W/m² for any given space should not exceed 3% of occupied hours for example (07:00 – 19:00) for all days <p>The methodology of testing should be in line with BREEAM Hea-04 thermal comfort looking at current and future weather files (DSY1, DSY2 and DSY3) – for both 2020 and 2050 as per CIBSE TM46 – current and new BCO are not providing any clarity around this at the moment.</p>

APPENDIX A RECOMMENDED STANDARDS, CERTIFICATIONS AND GUIDELINES

CLIMATE RESILIENCE

Pests and Diseases

Document	Key Considerations
BREEAM	Health and Wellbeing -ventilation and air circulation - for reducing the spread of airborne diseases.
WELL	22 Pest Control – follow pest reduction and inspection measures
GiGL London Invasive Species Plan	List of species of concern in London with a LISI designation category assigned, and action plans
GLA London Urban Forest Plan (2020) and Forestry Commission London Urban Forest Resilience Project (2024)	Ensure tree planting within development and public realm contributes towards the objectives of the plan and considers the resilience of species selected and the urban forest.

Infrastructure Resilience

Document	Key Considerations
IEMA EIA Guide to Climate Change Resilience	<p>A project’s ability to adapt to climate change should:</p> <ul style="list-style-type: none"> • Consider the whole life of the project • Have a win-win outcome that can provide economic, social and environmental benefits • Favour flexible future options rather than being too prescriptive and specific • Delay details that are subject to the greatest risk and uncertainty from climate change until more evidence is collected • Follow a hierarchy: avoid, control then manage risk
BREEAM	Wst 05 Adaptation to climate change. Encourage consideration and implementation of measures to mitigate the impact of more extreme weather conditions arising from climate change over the lifespan of the building.

APPENDIX A RECOMMENDED STANDARDS, CERTIFICATIONS AND GUIDELINES

CLIMATE RESILIENCE

Reference and further guidance

- BCO (2019) [Guide to specification. Best practice for offices.](#) British Council for Offices
- BCO (2023) [BCO Guide to Specification Key Criteria Update – February 2023.](#) British Council for Offices
- BREEAM (2022) [UK New Construction v6.](#)
- CIBSE (2014) [TM49 Design summer years for London \(2014\).](#) Chartered Institution of Building Services Engineers
- CIBSE (2014) [TM49 Design summer years weather data for London.](#) Chartered Institution of Building Services Engineers
- CIBSE (2017) [TM59 Design methodology for the assessment of overheating risk in homes.](#) Chartered Institution of Building Services Engineers
- CIBSE (2020) [Guide L Sustainability.](#) Chartered Institution of Building Services Engineers
- CIRIA (2015) [The SuDS Manual \(C753\).](#) Construction Industry Research and Information Association
- City of London (2020) [Adaptive Pathways Study.](#) City of London Corporation.
- City of London (2021) [Local Flood Risk Management Strategy.](#) City of London Corporation
- City of London (2021) [Riverside Strategy.](#) City of London Corporation
- City of London (2022) [Biodiversity Action Plan 2021-2026.](#) City of London Corporation
- City of London (2022) [Thermal comfort guidelines.](#) City of London Corporation
- City of London (2023) [Strategic flood risk assessment.](#) City of London Corporation
- City of London & Purcell (2024). [Heritage building retrofit toolkit.](#) City of London Corporation
- City of London (2024) [Public realm toolkit.](#) City of London Corporation
- City of London (2024) [Transport Strategy.](#) City of London Corporation
- City of London (2024). [Utility Infrastructure Strategy.](#) City of London Corporation
- Clark, G (2019). [RIBA Sustainable Outcomes Guide.](#) Royal Institute of British Architects: London, UK.
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APPENDIX A RECOMMENDED STANDARDS, CERTIFICATIONS AND GUIDELINES

URBAN GREENING AND BIODIVERSITY

Green Infrastructure

Document	Key Considerations
Natural England - Green Infrastructure Framework	Provides a list of principles to develop stronger Green Infrastructure policy and delivery and a mapping database which bringing together data from over 40 individual environmental and socio-economic datasets
UKGBC Principles for Delivering Urban Nature Based Solutions	<p>Key recommended interventions include SuDS, street trees, green roofs, green walls, urban parks & green space</p> <p>Quality of Nature Based Solutions is important – e.g. level of biodiversity enhancement, weighted against capacity for local economic uplift or contribution to operational efficiencies. Encourage developers to use existing frameworks for context-specific appraisal of multifunctional NBS quality in projects – assessment of climate resilience, wellbeing, water, wildlife.</p> <p>'Building with Nature' standards and accreditation</p> <p>'Wildlife Trust 'Biodiversity Benchmark'</p>
UKGBC Practical how-to guide: Developing and implementing a green infrastructure strategy	A practical guide for the formulation of a Green Infrastructure strategy for projects
IGNITION Project	<p>Use of nature-based solutions across the built environment.</p> <p>Key nature-based benefits include climate change mitigation and adaptation, resource use (circular economy), nature and biodiversity, health and wellbeing, and socio-economic impact.</p> <p>Developed a range of tools, evidence and resources to help better understand and implement nature-based solutions.</p>
ILP Guidance Note 08/18 – Bats and artificial lighting in the UK	<p>This document outlines the impacts of artificial lighting on bats and recommends mitigation for various scenarios within the built environment.</p> <p>The presence, or potential for, roosts, commuting habitat and foraging habitat should be determined and categorised on importance.</p> <p>Lighting on key habitats and features should be avoided and existing dark corridors protected.</p> <p>Mitigation methods to reduce lighting should be applied. These include dark buffers, illuminance limits, zonation, appropriate luminaire specifications, screening, sensitive site configuration, applying glazing treatments, creation of alternative valuable bat habitat on site, and dimming and part-night lighting.</p> <p>Compliance with illuminance limits and buffer is required to be demonstrated at the designing and pre-planning phase, baseline and post-completion light monitoring surveys, and post-construction/operational phase compliance-checking.</p>

APPENDIX A RECOMMENDED STANDARDS, CERTIFICATIONS AND GUIDELINES

URBAN GREENING AND BIODIVERSITY

Green Infrastructure (continued)

Document	Key Considerations
<p>CIEEM Guidelines for Preliminary Ecological Appraisal (GPEA)</p>	<p>Preliminary Ecological Appraisal and/or Ecological Impact Assessment (EclA) where required including any protected species survey recommended in the PEA or required by the LPA.</p> <p>When assessing the impacts of a development on biodiversity it is essential to first examine the current status of biodiversity onsite and the surrounding areas. A desk study by an ecological consultant, which should include a background data search, is therefore the first step towards understanding whether a development can potentially have an adverse effect on biodiversity and can highlight the need for further site-based assessments.</p>
<p>Tree planting and species selection</p>	<p>Additional guidance to support tree planting and species selection are provided by BS5837:2012 Trees in relation to design, demolition and construction – Recommendations</p> <ul style="list-style-type: none"> ▪ Arboricultural Tree Survey ▪ Arboricultural Impact Assessment ▪ Arboricultural Method Statement <p>Planting pit design should be designed for the specific location and for resilience – large rooting area, gaseous exchange and water availability.</p> <p>Forest Research - Right Trees for Changing Climate Database: www.righttrees4cc.org.uk/</p> <p>TDAG documentation: www.tdag.org.uk/our-guides.html</p>

APPENDIX A RECOMMENDED STANDARDS, CERTIFICATIONS AND GUIDELINES

URBAN GREENING AND BIODIVERSITY

Urban Greening Factor

Document	Key Considerations
Urban Greening Factor for London, The Ecology Consultancy, 2017	<p>London Plan Policy G5 requires all major developments to include urban greening as a fundamental element of site and building design. A UGF calculator has been prepared to help applicants calculate the UGF score of a scheme and present the relevant information as part of their application.</p> <p>Policy G5 recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development.</p>
City of London Urban Greening Factor Study	<p>A total of nine schemes were analysed using the GLA's UGF method.</p> <p>The study recommends to operate a UGF scheme in the City to promote green infrastructure and increase the quantity and quality of green infrastructure.</p> <p>Green roofs and green walls are encourages to be incorporated in taller buildings.</p> <p>The UGF study proposes a revised scoring system specific for the City of 0.3 UFH for all major developments, and to encourage certain categories, particularly tree planting, green roofs and green walls.</p>
City of London Local Plan	<p>Policy DM19.2 states that development should contribute to UGF by incorporating green roofs and walls, soft landscaping and trees. The planting should be resilient to a range of climate conditions and suitable for local conditions, pollution and wind effects. Additionally, good urban greening should be applied to replace any green infrastructure disturbed, removed or damaged as a result of a development.</p>
City of London Biodiversity Action Plan 2021-2026	<p>Section 3 (Local policy context) of the City of London Biodiversity Action Plan highlights the importance of urban greening as natural carbon sinks, and their contribution to biodiversity and overall wellbeing.</p> <p>Major development proposals will be required to include a UGF score of 0.3 as a minimum.</p>

APPENDIX A RECOMMENDED STANDARDS, CERTIFICATIONS AND GUIDELINES

URBAN GREENING AND BIODIVERSITY

Biodiversity Net Gain

Document	Key Considerations
City of London Biodiversity Action Plan 2021-2026	The Biodiversity Action Plan provides a strategic focus to ensure species and habitats are understood and considered throughout the decision-making process. See Biodiversity Action Plan for further information on key local priorities.
Natural England Biodiversity Metric	<p>Minimum of 10% Biodiversity Net Gain achieved throughout site as calculated via the Natural England Biodiversity Metric from November 2023 onwards.</p> <p>On sites with little or no biodiversity features, aim for a meaningful amount of biodiversity and not focus on the minimum.</p>
RIBA Sustainable Outcomes Guide (5. Sustainable Land Use & Ecology)	<p>Leave site in better 'regenerative' ecological condition than before development</p> <p>Carry out sustainable remediation of site pollution</p> <p>Retain existing natural features</p> <p>Create mixed use development with density appropriate to local context</p> <p>Create 'productive' landscapes for urban food production</p> <p>Zero local pollution from the development</p>
Biodiversity Net Gain. Good practice principles for development.	<p>Sets out the UK principles on good practice to achieve BNG.</p> <p>It includes a series of Technical Notes to support the document which includes, but not limited to, aligning BNG with BREEAM and Environmental Impact Assessments and achieving BNG on sites with limited or no impact on biodiversity.</p>
Wildlife Trust - Building with Nature (BwN)	<p>The 12 BwN Standards define "what good looks like" by offering a set of quality standards for placemaking and place-keeping, covering the themes of Wellbeing, Water and Wildlife.</p> <p>Accreditation is likely to be most applicable to larger sites incorporating areas of public realm.</p> <p>The BwN Standards support cross-disciplinary decision making about the master-planning and detailed design, implementation and construction, or management and maintenance of green infrastructure in development.</p>
Wildlife Trust - Building with Nature (BwN)	Where possible make connections between wild spaces
UKGBC Innovation Insights – NBS to Climate Resilience	Recommends using digital tools such as NATURE Tool, ENVI-met, GREENPASS, GI-VAL, EcoservR, iTree Eco to assess optimal natural capital interventions at the project scale and their economic value

APPENDIX A RECOMMENDED STANDARDS, CERTIFICATIONS AND GUIDELINES

URBAN GREENING AND BIODIVERSITY

Biodiversity Net Gain (continued)

Document	Key Considerations
<p>BREEAM Land Use and Ecology (LE01 - LE05)</p>	<p>The Land Use and Ecology category encourages sustainable land use, habitat protection and creation, and improvement of long term biodiversity for the building's site and surrounding land.</p> <p>The category has two routes. Route 2 is the Ecologist route, which comprises a more detailed assessment of the ecological approach.</p> <p>Biodiversity Net Gain is used as evidence to support LE03 (Managing impacts on ecology) and LE04 (Ecological change and enhancement).</p>
<p>Pollinating London Together - Valuing the importance of green spaces and suggested pollinator-friendly trees</p>	<p>There are pollinator friendly trees and shrubs which are suitable for urban London settings, including certain plants for transitional points between seasons that ensure a year round availability of pollinating plants.</p>
<p>London Biodiversity Partnership - Guide to Living Roofs</p>	<p>Designers should ensure that the existing waterproofing is sound and that the structure can support the load. To make the most of a living roof, designers should incorporate a range of microhabitats, use native seeds or plug plants, and ensure safety measures are in place.</p>

APPENDIX A RECOMMENDED STANDARDS, CERTIFICATIONS AND GUIDELINES

URBAN GREENING AND BIODIVERSITY

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B

Appendix B: LETI RETROFIT PROCESS

APPENDIX B LETI RETROFIT PROCESS

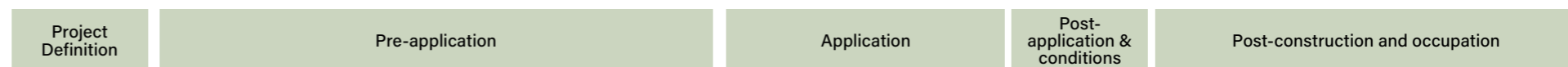
Retrofitting guidance

This section introduces the LETI's Climate Emergency Retrofit Guide which illustrates best industry practices to retrofit existing buildings and make them fit for the future while supporting UK's Net Zero targets.

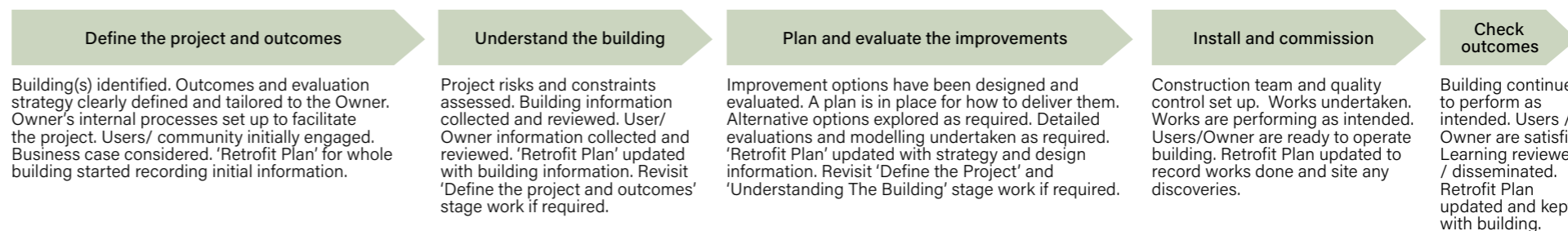
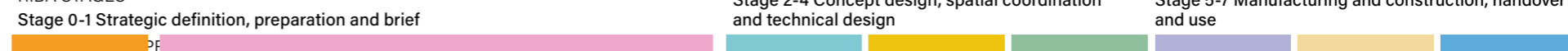
LETI has set out best practice targets for retrofit, which can be easily achieved in the vast majority of buildings within the City. CoLC strongly encourages to follow this approach when retrofitting existing building within the City.

The diagrams on this page depict the LETI Retrofit Process which provide a simple, widely applicable framework to help guide building owners, developers, designers, and contractors through the stages of their retrofit project.

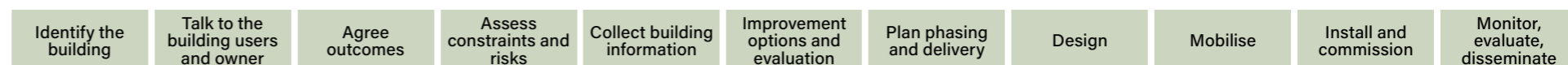
APPLICATION STAGES



RIBA STAGES



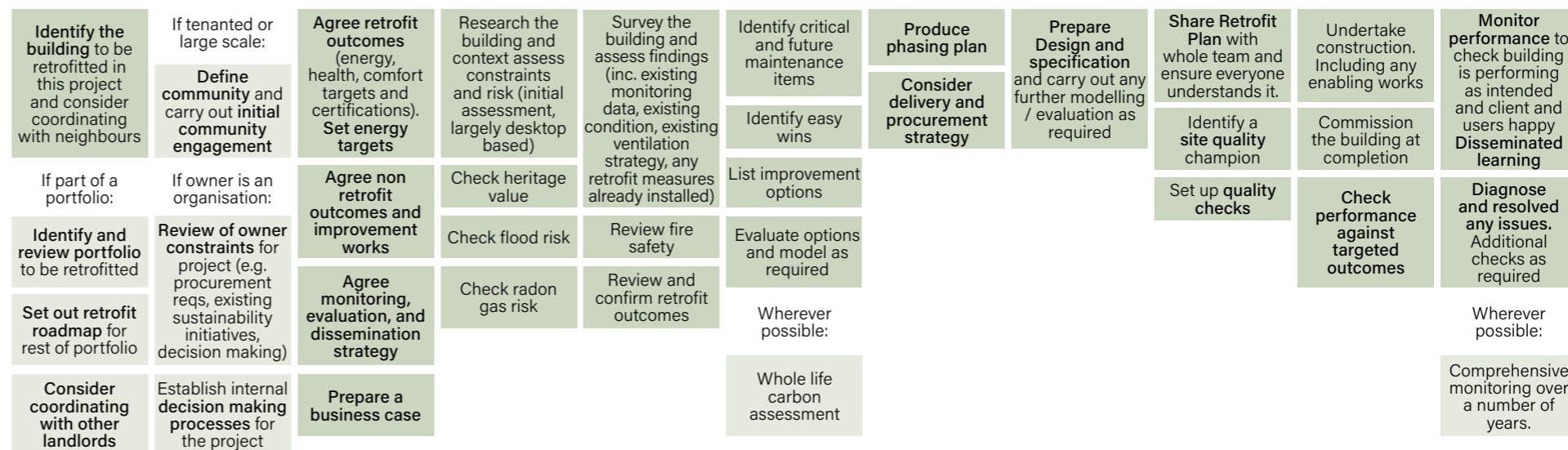
SUB-STAGES



BUILDING USERS + TEAM



GENERAL



RETROFIT PLAN



Additional actions for certain projects. E.g., if the owner is an organization or landlord, there is a stock portfolio to retrofit, the project is large or complex

Figure B1 LETI Retrofit Process flowchart mapped onto RIBA work stages and CoLC planning application stages.

Source: adapted from LETI (2021) Climate Emergency Retrofit Guide.

Appendix C: GLOSSARY

C

APPENDIX C GLOSSARY

A

Air Quality Neutral An Air Quality Neutral development is one that meets, or improves upon, the air quality neutral benchmarks published in guidance from the GLA. The benchmarks set out the maximum allowable emissions of NOx and Particulate Matter based on the size and use class of the proposed development. Separate benchmarks are set out for emissions arising from the development and from transport associated with the development. Air Quality Neutral applies only to the completed development and does not include impacts arising from construction, which should be separately assessed in the Air Quality Assessment.

Amenity Element of a location or neighbourhood that helps to make it attractive or enjoyable for residents and visitors.

B

Beneficial use (excavation waste) The placement of excavation waste to land in a way that provides environmental benefits, particularly through the restoration of priority habitat, flood alleviation or climate change adaptation/mitigation; or contributes towards the restoration of landfill sites and mineral workings while minimising adverse impacts to the environment or communities (for example transport, air quality and other considerations); and demonstrating that the waste cannot be recycled or treated and managed in a more sustainable way.

Biodiversity This refers to the variety of plants and animals and other living things in a particular area or region. It encompasses habitat diversity, species diversity and genetic diversity. Biodiversity has value in its own right and has social and economic value for human society.

Biodiversity offsets Measures to improve existing or create replacement habitat where there are unavoidable impacts on wildlife habitats resulting from development or change of land use.

Blue and water space Areas covered by water including the River Thames and other rivers, canals, reservoirs, lakes and ponds.

Blue roofs Attenuation tanks at roof or podium level.

C

Carbon dioxide (CO2) Principal greenhouse gas related to climate change.

Circular economy An economic model in which resources are kept in use at the highest level possible for as long as possible in order to maximise value and reduce waste, moving away from the traditional linear economic model of 'make, use, dispose'.

Circular economy in construction The London Plan 2021 defines a circular economy as 'one where materials are retained in use at their highest value for as long as possible and are then reused or recycled, leaving a minimum of residual waste.' It is a move away from the current linear economic model, where materials are mined, manufactured, used and discarded. The primary focus when applying circular economy principles in building design and construction should be on working with existing and avoiding new materials as far as possible to reduce waste, environmental impacts and excessive carbon emissions from manufacturing. Circular economy principles can also be applied to the life-cycle of the building by designing materials and structural elements to be adaptable and flexible (to extend a building's useful life), an approach which must be carefully weighed up against additional carbon emissions it might produce.

Commercial waste Waste arising from premises which are used wholly or mainly for trade, business, sport, recreation or entertainment as defined in Schedule 4 of the Controlled Waste Regulations 1992.

Communal heating systems A communal heating system supplies heat to multiple properties from a common heat source. It may range from a district system heating many buildings to a system serving an individual block of flats.

Conservation (heritage) The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

Construction, demolition and excavation waste This is waste arising from the excavation, construction, repair, maintenance and demolition of buildings and structures, including roads. It consists mostly of brick, concrete, hardcore, subsoil and topsoil, but it can contain quantities of timber, metal, plastics and occasionally special (hazardous) waste materials.

D

Decentralised energy A range of definitions exists for decentralised energy. In the context of the London Plan, it refers to low- and zero-carbon power and/or heat generated and delivered within London. This includes microgeneration, such as photovoltaics on individual buildings, through to large-scale heat networks.

Design and access statement A statement that accompanies a planning application to explain the design principles and concepts that have informed the development and how access issues have been dealt with. The access element of the statement should demonstrate how the principles of inclusive design, including the specific needs of disabled people, have been integrated into the proposed development and how inclusion will be maintained and managed.

Designated heritage asset A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

Development This refers to development in its widest sense, including buildings, and in streets, spaces and places. It also refers to both redevelopment, including refurbishment, as well as new development.

Development proposal This refers to development that requires planning permission.

Digital infrastructure Infrastructure, such as small cell antenna and ducts for cables, that supports fixed and mobile connectivity and therefore underpins smart technologies.

Display Energy Certificate Display Energy Certificates (DECs) are designed to show the energy performance of public buildings. They use a scale that runs from 'A' to 'G' – 'A' being the most efficient and 'G' being the least.

District Heating Network (DHN) A network of pipes carrying hot water or steam, usually underground, that connects heat production equipment with heat customers. They can range from several metres to several kilometres in length.

Drainage hierarchy Policy hierarchy helping to reduce the rate and volume of surface water run-off.

APPENDIX C GLOSSARY

E

Embodied carbon/energy/emissions The total life cycle carbon/energy/greenhouse gases used in the collection, manufacture, transportation, assembly, recycling and disposal of a given material or product.

Embodied ecological impacts are the effects on ecosystems when resources for the built environment are extracted or manufactured. They represent the changes imposed on our natural environment by international building supply chains associated with new construction projects. These impacts occur offsite, primarily due to raw material extraction.

Energy efficiency Making the best or most efficient use of energy in order to achieve a given output of goods or services, and of comfort and convenience.

Energy hierarchy The Mayor's tiered approach to reducing carbon dioxide emissions in the built environment. The first step is to reduce energy demand (be lean), the second step is to supply energy efficiently (be clean) and the third step is using renewable energy (be green).

Energy masterplanning Spatial and strategic planning that identifies and develops opportunities for decentralised energy and the associated technical, financial and legal considerations that provide the basis for project delivery.

Environmental assessments In these assessments, information about the environmental effects of a project is collected, assessed and taken into account in reaching a decision on whether the project should go ahead or not.

Environmental statement This statement will set out a developer's assessment of a project's likely environmental effects, submitted with the application for consent for the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999.

F

Flood risk management and sustainable drainage systems The term 'flood risk' refers to the probability of flooding within an area and the associated consequences. The likelihood is based on historical and forecast data. Flood Risk Management identifies how the risk of flooding can be reduced and managed sustainably.

Fuel cell A cell that acts like a constantly recharging battery, electrochemically combining hydrogen and oxygen to generate power. For hydrogen fuel cells, water and heat are the only by-products and there is no direct air pollution or noise emissions. They are suitable for a range of applications, including vehicles and buildings.

Future-proofing Ensuring that designs are adaptable and take account of expected future changes. For example, ensuring a heating system is designed to be compatible with a planned district heat network to allow connection in future.

G

Green corridors Stepping stones of open and green space through the built environment, which link to one another. They often consist of riverbanks, parks, church gardens, and areas of private gardens. They may create routes for biodiversity and connect habitats.

Green cover The total area covered by vegetation and water across London. It not only includes publicly accessible and publicly managed vegetated land (i.e. green space) and waterways, but also non-accessible green and blue spaces, as well as privately owned vegetated land including private gardens and agricultural land, and the area of vegetated cover on buildings and in the wider built environment such as green roofs, street trees and rain gardens.

Green infrastructure Comprises the network of parks, rivers, water spaces and green spaces, plus the green elements of the built environment, such as street trees, green roofs and sustainable drainage systems, all of which provide a wide range of benefits and services.

Green lease A lease agreement that incorporates clauses whereby the owner and the occupier undertake specific responsibilities/obligations to manage and improve the sustainable (and social) operation/occupation of a property. Examples include energy efficiency measures, waste reduction/management and water efficiency.

Green roofs/walls Planting on roofs or walls to provide climate change, amenity, food growing and recreational benefits.

Green space All vegetated open space of public value (whether publicly or privately owned), including parks, woodlands, nature reserves, gardens and sports fields, which offer opportunities

for sport and recreation, wildlife conservation and other benefits such as storing flood water, and can provide an important visual amenity in the urban landscape.

Greenfield runoff rates The Greenfield runoff rate is the runoff rate from a site in its natural state, prior to any development. This should be calculated using one of the runoff estimation methods set out in Table 24.1 of CIRIA C753 The SuDS Manual.

Greenhouse gas Any gas that induces the greenhouse effect, trapping heat within the atmosphere that would normally be lost to space, resulting in an increase in average atmospheric temperatures, contributing to climate change. Examples include carbon dioxide, methane and nitrous oxides.

Greening The improvement of the appearance, function and wildlife value of the urban environment through use of vegetation or water.

Health Impact Assessment (HIA) Health Impact Assessment (HIA) is used as a systematic framework to identify the potential impacts of a development proposal, policy or plan on the health and wellbeing of the population and highlight any health inequalities that may arise. HIA should be undertaken as early as possible in the plan making or design process to identify opportunities for maximising potential health gains, minimising harm, and addressing health inequalities.

H

Health inequalities Health inequalities are systematic, avoidable and unfair differences in mental and/or physical health between groups of people. These differences affect how long people live in good health and are mostly a result of differences in people's homes, education and childhood experiences, their environments, their income, jobs and employment prospects, their access to good public services and their everyday opportunities to live healthier lives.

Heritage assets Valued components of the historic environment. They include buildings, monuments, sites, places, areas or landscapes positively identified as having a degree of historic significance meriting consideration in planning decisions. They include both designated heritage assets and non-designated assets where these have been identified by the local authority (including local listing) during the process of decision-making or plan making.

APPENDIX C GLOSSARY

Historic environment All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

Household waste This includes waste from collection rounds of domestic properties (including separate rounds for the collection of recyclables), street cleansing and litter collection, beach cleansing, bulky household waste collections, hazardous household waste collections, household clinical waste collections, garden waste collections, and any other household waste collected by the waste authorities.

I

Impermeable surface Mainly artificial structures (such as pavements, roads, driveways, parking areas and rooftops) that are covered by materials impenetrable to water (such as asphalt, concrete, brick and stone). Impermeable surfaces also collect solar heat in their dense mass. When the heat is released, it raises air temperatures (see 'Urban heat island').

Industrial waste Waste from any factory and any premises occupied by industry (excluding mines and quarries) as defined in Schedule 3 of the Controlled Waste Regulations 1992.

Infrastructure Includes transport, energy, water, waste, digital/ smart, social and green infrastructure.

Infrastructure resilience At a wider level, infrastructure resilience is defined as the ability for infrastructure such as utilities, transport, and digital networks to withstand the potential shocks or stresses that it may face during its design life including those that London will experience through the inevitable effects of climate change.

Innovation The creation of new products and services, technologies, processes, or business models.

M

Major development For a full definition, see Part 1 of The Town and Country Planning (Development Management Procedure) (England) Order 2015. Generally, major developments are: Development of dwellings where 10 or more dwellings are to be provided, or the site area is 0.5 hectares or more; Development of other uses, where the floor space is 1,000 square metres or more, or the site area is 1 hectare or more.

Municipal solid waste It includes all household waste, street litter, waste delivered to council recycling points, municipal parks and gardens wastes, council office waste, Civic Amenity waste, and some commercial waste from shops and smaller trading estates where local authorities have waste collection agreements in place. It can also include industrial waste collected by a waste collection authority with authorisation of the waste disposal authority. Waste under the control of local authorities or agents acting on their behalf is now better known as 'Local Authority Collected Waste'.

N

Nature conservation Protection, management and promotion for the benefit of wild species and habitats, as well as the human communities that use and enjoy them. This also covers the creation and re-creation of wildlife habitats and the techniques that protect genetic diversity and can be used to include geological conservation.

O

Open space All land in London that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers the broad range of types of open space within London, whether in public or private ownership and whether public access is unrestricted, limited or restricted.

Operational circular economy Operational circular economy is the application of circular economy principles to the operational period of a building's life-cycle. This means anticipating future occupant needs such as avoidance of waste generation and designing for flexibility to allow for asset sharing to maximise use and considering requirement for materials for maintenance and repair during the life of the building.

Operational emissions & energy Operational emissions are generated from the operation of a development once it has been constructed. This includes both the emissions of electricity from the National Grid as well as emissions generated onsite via gas-burning boilers and other emitting processes. Operational emissions are largely a result of energy consumption. There will be increasing demand for electric power as fossil fuels are phased out in favour of electric heating, vehicles and other technologies. Proposals need to consider how to transition from reliance on fossil-fuel to electric and low-carbon alternatives.

P

Pests & diseases In an Urban context, pests can include non-native and established wildlife and invasive plants which can affect the health of people and other flora and fauna. Diseases can include human and plant infections that can be transmitted through zoonotic, airborne, waterborne and contact based transmission.

Photovoltaics (PV) The direct conversion of solar radiation into electricity by the interaction of light with electrons in a semiconductor device or cell.

Pre-redevelopment Audit A detailed assessment conducted before the redevelopment of a site containing existing buildings. The audit evaluates whether current structures and materials can be retained, refurbished, or incorporated into the new development. The goal is to maximize the reuse of materials, reduce waste, and lower the project's environmental impact. Guidance on audits for developments in the City can be found on pages 35-36.

Pre-deconstruction Audit (Pre-demolition Audit/Pre-refurbishment Audit) is a detailed quantitative and qualitative data inventory of existing materials on site to identify potential for reclamation, reuse or recycling. The City Corporation has adopted the term Pre-deconstruction Audit in place of Pre-demolition Audit to drive recovery and reuse. Guidance on audits for developments in the City can be found on page 37.

Priority habitat London's priority habitats are those areas of wildlife habitat which are of most importance in London. Most areas of priority habitat are protected within Sites of importance for Nature Conservation.

Priority species These are species that are a conservation priority because they are under particular threat, or they are characteristic of a particular region.

Protected species Certain plant and animal species protected to various degrees in law, particularly the Wildlife and Countryside Act, 1981 (as amended).

Public realm Publicly accessible space between and around buildings, including streets, squares, forecourts, parks and open spaces.

APPENDIX C GLOSSARY

R

Recovery Refers to “forms of recovery other than energy recovery and other than the reprocessing of waste into materials used as fuels or other means to generate energy. It includes preparing for re-use, recycling and backfilling and other forms of material recovery such as the reprocessing of waste into secondary raw materials for engineering purposes in construction of roads or other infrastructure. Depending on the specific factual circumstances, such reprocessing can fulfil the definition of recycling if the use of materials is based on proper quality control and meets all relevant standards, norms, specifications and environmental and health protection requirements for the specific use” – EU Directive 2018/851.

Recycling Involves the reprocessing of waste, either into the same product or a different one. Many non-hazardous wastes such as paper, glass, cardboard, plastics and metals can be recycled. Hazardous wastes such as solvents can also be recycled by specialist companies, or by in-house equipment.

Renewable energy Energy derived from a source that is continually replenished, such as wind, wave, solar, hydroelectric and energy from plant material, but not fossil fuels or nuclear energy. Although not strictly renewable, geothermal energy is generally included.

Retrofit The upgrading of a building in relation to the installation of new building systems or building fabric to improve efficiency, reduce environmental impacts and/or adapt for climate change. A range of interventions may be deployed, from 'light retrofit' to 'deep retrofit'. The City Corporation considers that a retrofit should retain and reuse at least 50% of the existing building(s)' superstructure (by mass).

Re-use The operation or process of checking, cleaning or repairing materials that have been discarded and are waste so that they can be used again for their original purpose as non-waste without any other pre-processing. Adapted from Environment Agency, Guidance – Decide if a material is waste or not: general guide, May 2016.

S

Secondary heat To recover useful energy, in the form of heat, from sources where processes or activities produce heat which is normally wasted (for example recovering heat from the

Underground network) or from heat that exists naturally within the environment (air, ground and water).

Secondary materials (waste) Waste materials that can be used in reuse, recycling and re-manufacturing processes instead of or alongside virgin raw materials. This can include waste materials from demolition and excavation, or discarded items such as furniture and electrical products.

Self-sufficiency In relation to waste, this means dealing with wastes within the administrative region where they are produced.

Significance (heritage) The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.

Site of Importance for Nature Conservation (SINC) Areas of land chosen to represent the best wildlife habitats in London and areas of land where people can experience nature close to where they live and work. Sites are classified into Sites of Metropolitan, Borough and Local Importance depending on their relative value. Unlike SSSIs, SINCs are not legally protected, but their value must be considered in any land use planning decision. Procedures for the identification of SINCs are set out in Appendix 5 of the Mayor's London Environment Strategy.

Special Areas of Conservation Designated under the EC Habitats Directive (1992), areas identified as best representing the range and variety within the EU of habitats and (non-bird) species.

Special Protection Areas Designated under the EC Birds Directive (1979), areas of the most important habitat for rare and migratory birds within the EU.

Strategic developments (applications referable to the Mayor) The planning applications that must be referred to the Mayor under the Town and Country Planning (Mayor of London) Order 2008 and any amendments thereto.

Sustainability Appraisal A process of considering ways by which a Development Plan can contribute to improvements in environmental, social and economic conditions, as well as a

means of identifying and mitigating any potential adverse effects that the plan might otherwise have. Sustainability Appraisal is required by the Planning and Compulsory Purchase Act 2004.

Sustainable drainage systems Using sustainable drainage techniques and managing surface water run-off from buildings and hardstandings in a way that reduces the total volume, flow and rate of surface water that runs directly into drains and sewers.

T

Thames Policy Area A special policy area to be defined by boroughs in which detailed appraisals of the riverside will be required. A land-use planning tool to help determine the amount of greening required in new developments.

U

Urban greening Urban greening describes the act of adding green infrastructure elements. Due to the morphology and density of the built environment in London, green roofs, street trees, and additional vegetation are the most appropriate elements of green infrastructure in the city.

Urban heat island The height of buildings and their arrangement means that while more heat is absorbed during the day, it takes longer to escape at night. As a result, the centre of London can be up to 10°C warmer than the rural areas around the city. The temperature difference is usually larger at night than during the day. The Urban Heat Island effect is noticeable during both the summer and winter months.

W

Water resource management Water resources are the various types of water which are used or pass through a development. This can include a potable supply from utilities systems, rainwater and other greywater sources, as well as recycled water from within the development. Water resource management identifies how to effectively manage and optimise the use of the available resources.

Whole life-cycle carbon Whole life-cycle carbon emissions are the total greenhouse gas emissions arising from a development over its lifetime, from the emissions associated with raw material extraction, the manufacture and transport of building materials, to installation/construction, operation, maintenance and eventual material disposal.

Appendix C: CASE STUDY INVENTORY

D

APPENDIX D CASE STUDY INVENTORY

Case Study	Topic	Description of works	Use Type	Application number
<i>One Exchange Square</i>	Retrofit and reuse	Retrofit and extension	Office and retail	21/00930/FULMAJ
<i>Museum of London (including Grade II Listed Poultry Market)</i>	Retrofit and reuse	Refurbishment, retrofit and extension	Museum and ancillary uses including office and retail	19/01343/FULEIA
<i>Chancery House</i>	Retrofit and reuse	Retrofit and extension	Office	20/00845/FULL (main extension) Other associated applications: 20/00837/FULL 20/00909/FULL 20/00910/FULL
<i>55 Gracechurch Street</i>	Greenhouse gas emissions and energy use	New build	Office and mixed-use	20/00671/FULEIA
<i>65 Crutched Friars</i>	Greenhouse gas emissions and energy use	New build	Student accommodation and museum	22/00882/FULMAJ
<i>Ibex House (Grade II listed)</i>	Greenhouse gas emissions and energy use	Refurbishment and extension	Office, retail and cultural space	21/00793/FULMAJ
<i>115-123 Houndsditch</i>	Greenhouse gas emissions and energy use	New build	Office, retail, community space	21/00622/FULEIA
<i>2-3 Finsbury Avenue</i>	Greenhouse gas emissions and energy use	New Build	Commercial office with mixed-use including an Open Learning Hub	20/00869/FULEIA
<i>London Wall West</i>	Greenhouse gas emissions and energy use	New build	Office and cultural space	23/01304/FULEIA
<i>100 Fetter Lane</i>	Circular economy, Climate resilience	New build	Office and retail	21/00454/FULMAJ
<i>1 Appold Street</i>	Circular economy	Retrofit and extension	Office and retail	22/01200/FULMAJ
<i>City Place House, 55 Basinghall Street</i>	Circular economy	New build	Office and retail	21/00116/FULMAJ
<i>Fleet House, 8-12 New Bridge Street</i>	Circular economy	Retrofit and extension	Office and retail including public house	22/00622/FULMAJ
<i>St Magnus House</i>	Circular economy	Retrofit and extension	Office and retail	23/01078/FULL
<i>75 London Wall</i>	Circular economy	Retrofit and extension	Office and retail	23/01270/FULMAJ
<i>1 Broadgate</i>	Circular economy	New build	Office and retail	18/01065/FULEIA
<i>55 Old Broad Street</i>	Circular economy	New build	Office and retail	23/00469/FULEIA
<i>47-50 Mark Lane</i>	Circular economy	New build	Office, retail, and cultural learning centre	22/01245/FULMAJ
<i>1 Golden Lane (Grade II Listed)</i>	Circular economy	Retrofit and extension	Office with ground floor community space	22/00202/FULMAJ
<i>Salisbury Square</i>	Circular economy	New build	Courts, police station, retail, and office	20/00997/FULEIA
<i>Seal House</i>	Climate resilience	New build	Office and retail	18/01178/FULMAJ
<i>20 Giltspur Street</i>	Climate resilience	Retrofit and extension	Office and retail	22/00867/FULMAJ
<i>100 Liverpool Street</i>	Climate resilience	Retrofit and extension	Office, retail, and leisure	14/01285/FULEIA
<i>Emperor House, 35 Vine Street</i>	Climate resilience	Public realm planting	Public realm planting	18/00193/FULMAJ 21/00021/MDC - Submission of details of hard and soft landscaping
<i>London Wall Place</i>	Climate resilience	New build	Office and retail	10/00832/FULEIA
<i>65 Gresham Street</i>	Climate resilience	Refurbishment and extension	Mixed-use office	23/00752/FULMAJ

APPENDIX D CASE STUDY INVENTORY

Case Study	Topic	Description of works	Use Type	Application number
<i>New Change Garden</i>	Climate resilience/urban greening and biodiversity	Public space	Relandscaped public garden	
<i>55 Bishopsgate</i>	Urban greening and biodiversity	New build (green wall)	Office, retail, and cultural and community space including public viewing gallery	14/00300/FULMAJ
<i>81 Newgate Street</i>	Urban greening and biodiversity	Retrofit and extension	Office and retail	23/00752/FULMAJ
<i>21 Lombard Street</i>	Urban greening and biodiversity	Retrofit and extension (historic building)	Office and retail	24/00126/FULMAJ
<i>40 Holborn Viaduct</i>	Urban greening and biodiversity	Retrofit and extension	Office and retail	23/00867/FULMAJ
<i>120 Fleet Street</i>	Urban greening and biodiversity	New build (includes alterations to existing Grade II* listed Daily Express building)	Office, retail, cultural and flexible learning space	21/00538/FULEIA
<i>Creed Court Hotel, 3-5 Ludgate Hill</i>	Urban greening and biodiversity	New Build (retained facade)	Hotel and retail	14/00300/FULMAJ

Planning for Sustainability

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Appendix 2 - Planning for Sustainability SPD - Consultation Statement

Introduction

1. The draft Planning for Sustainability Supplementary Planning Document (SPD) was approved by the Planning and Transportation (P&T) Committee for public consultation on the 12 December 2024.
2. The purpose of the Planning for Sustainability SPD is to provide guidance on how applicants should approach environmental sustainability in their developments through the application process. It provides detail and guidance on how to fulfil policies of the current Local Plan, as well as emerging policies such as the emerging City Plan 2040. Specifically it:
 - Sets out the key approaches the City of London Corporation is targeting on different sustainability themes.
 - Identifies a list of key actions.
 - Provides guidance on what, how and when relevant sustainability aspects should be considered during the planning application process.
 - Provides a collation of relevant recommended standards, certifications and guidelines.

Background

3. The City of London Corporation in collaboration with Buro Happold carried out preliminary engagement in May 2023 with key stakeholders, including statutory authorities like Historic England and Greater London Authority, Business Improvement Districts, and environmental industry experts. This engagement was conducted to seek views and ensure that the SPD was focussed on the most important and relevant sustainability issues.
4. The engagement program for the draft Planning for Sustainability SPD was approved by the P&T Committee on the 12 December 2023. It was determined that the City Corporation would consult on the draft SPD for a period of at least six weeks during early spring 2024, in accordance with the City Corporation's Statement of Community Involvement (this is a longer timeframe than the statutory consultation period for a SPD of four weeks, as required by The Town and Country Planning (Local Planning) (England) Regulations 2012).

Public and Stakeholder Consultation

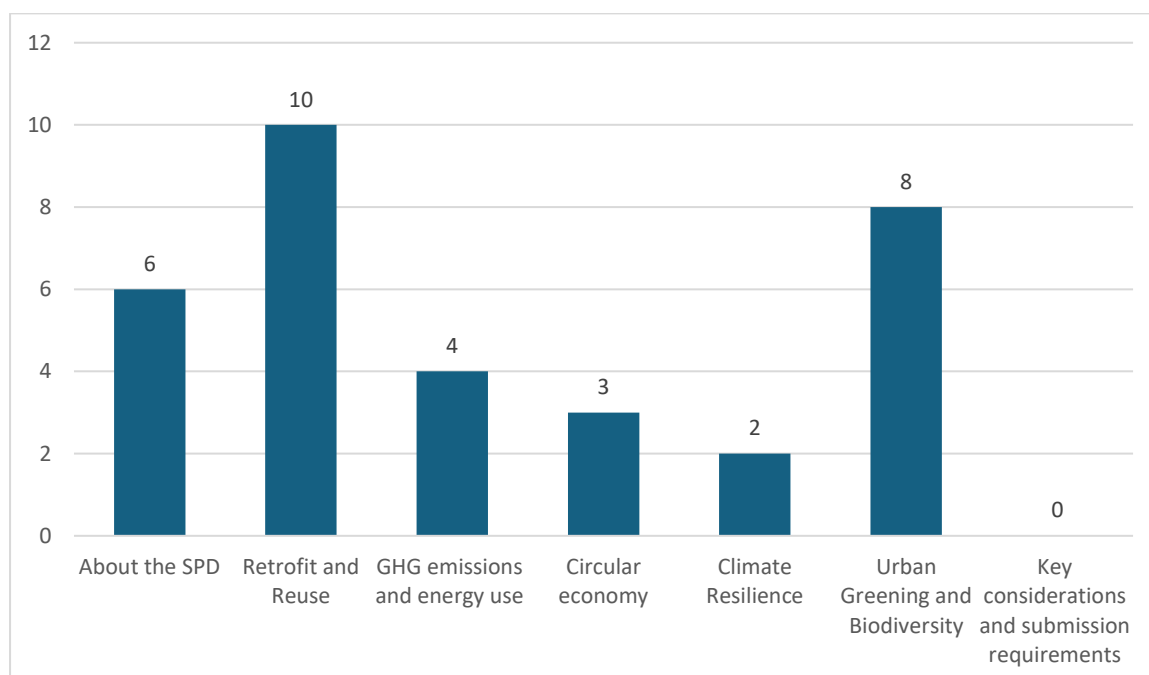
5. Public consultation on the draft Planning for Sustainability SPD was conducted from Monday 18 March to Friday 17 May 2024.

Consultation methods

6. During the consultation period, a range of consultation methods were used:
7. **Website:** digital copies of the draft SPD and relevant documents (HRA screening and SEA screening reports) were published on the City of London Corporation website.
8. **City Libraries:** Physical copies of the draft SPD were available for inspection over the consultation period during opening hours at the following locations:
 - Guildhall North Wing Reception
 - Artizan Library
 - Barbican Library
 - Guildhall Library
 - Shoe Lane Library
 - Small Business Research + Enterprise Centre
9. **Commonplace:** A 'Planning for Sustainability SPD' webpage was set up on the online engagement platform 'Commonplace'. The landing page included general information about consultation of the SPD. Sub-pages were created to share contents about key topic chapters SPD and provided an opportunity for the public to submit feedback.

Key consultation statistics on the Commonplace platform during the consultation period (18 March – 17 May) were:

- 1,436 visitors – total number of unique visitors (measured as one visitor per day)
- 81 subscribers – number of email addresses that are subscribed to the Planning for Sustainability SPD Commonplace page. Subscribers were sent five news updates to draw people back to Commonplace and remind them to submit consultation responses.
- 21 respondents – number of people who added a response to the website.
- 33 responses – total number of responses. Each respondent could respond to more than one page. Responses per topic chapter:



10. **Email:** Approximately 495 emails were sent to consultees on the planning policy consultation database on 18 March 2024. This included all the statutory consultees and individuals who had registered to receive City Plan updates. The email advised recipients of the launch of the consultation on the draft SPD, included links to the digital copies on the website and the Commonplace page, and details of public consultation events.

Emails were also sent to industry contacts to notify them about consultation of the SPD and invite them to expert workshops.

Appendix 2c lists all that were notified about consultation of the SPD.

11. **Social media:** LinkedIn and Facebook were used to promote consultation of the draft SPD. Social media posts were made on the following dates:
- 13 & 18 March – Launch of public consultation and details of public consultation events
 - 8 April – Focused on the theme of retrofit and reuse
 - 24 April – Focused on the theme of circular economy and greenhouse gas emissions
 - 7 May – Focused on the theme of urban greening and biodiversity
 - 15 May – Reminder of the close of consultation
12. **Climate Action Bulletin:** The bulletin provides subscribers an update on the Climate Action Strategy, events, and other related organisational updates. A digital poster was sent in April which promoted consultation on the draft SPD and included links to the document and the Commonplace platform.
13. **City Resident Newsletter:** Aimed at City residents, this monthly digital newsletter provides residents with updates on community and cultural events, health and wellbeing, the environment and public spaces. The April newsletter promoted consultation on the draft SPD and included links to the document and the Commonplace platform.

Events and meetings

14. Two public consultation events were held on:
- Tuesday 19 March 2024 (6 – 7:30pm) – an in-person consultation event at the Guildhall. Six people attended.
 - Wednesday 20 March 2024 (9 – 10:30am) – a virtual consultation event on Microsoft Teams. Fifteen people attended.
15. Two expert roundtable workshops were held on:
- Thursday 2 May 2024 (9 – 11am) – an in-person expert roundtable at the Guildhall which focused on three topic-chapters of the draft SPD: retrofit and reuse, greenhouse gas emissions and energy use, and circular economy.
 - Friday 3 May 2024 (9 – 11am) – an in-person expert roundtable at the Guildhall which focused on two topic-chapters of the draft SPD: climate resilience, urban greening and biodiversity
16. A meeting was held with the City Property Association (CPA) on Wednesday 5 June 2024 (3:30 - 5:30pm) at the Guildhall. The first half of the meeting focused on the emerging City Plan 2040, the second half of the meeting focused on the Planning for Sustainability SPD and discussed the CPA's consultation response.

17. Feedback during the two public consultation events, two expert roundtable events and CPA meeting were captured and are included in Appendix 2a - Consultation response summary.
18. Following consultation, it was determined that further expert advice was required on key topics raised during consultation. Select experts were invited to further workshops on specific topics:
 - Tuesday 6 August 2024 (10am – 12pm) – an in-person workshop at the Guildhall which focused on ‘circular economy’, particularly guidance on pre-redevelopment audits and pre-deconstruction audits.
 - Monday 12 August 2024 (1 – 3pm) an in-person workshop at the Guildhall which focused on ‘carbon’, particularly embodied carbon targets and the application of NABERS UK ratings.
19. The experts reviewed key changes to the SPD to ensure that the technical detail is implementable.
20. Key changes in the SPD were presented back to the CPA on the 20 September 2024.

Strategic Environment Assessment (SEA) and Habitat Regulations Assessment (HRA) Screening consultation

21. LUC, on behalf of the City of London Corporation, drafted the SEA and HRA Screening Reports.
22. The SEA Screening considered whether a Strategic Environment Assessment (SEA) should be undertaken for the SPD. The SEA Screening concluded that the SPD is unlikely to have significant environmental effects and that a full SEA is therefore not required.
23. The HRA Screening concluded that the SPD would not adversely affect any ‘European Site’ in accordance with the Habitat Regulations (HR) 2017.
24. To meet the requirements of the SEA and HR Regulations, the views of three statutory consultees (Natural England, Historic England and the Environment Agency) were sought during a five-week consultation period between 27 February and 2 April 2024.
25. It is Natural England’s opinion that the SEA and HRA Screening Reports show that no adverse effects will be caused by the SPD. It notes that the City Corporation should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be effected. There are no protected species in the City of London and the Biodiversity Action Plan provides detailed consideration of environmental issues, and includes information about City species, habitats, SINCs etc. The SPD supports the implementation of the BAP and therefore does not adversely impact the plan.
26. The Environment Agency notes the findings of both the SEA and HRA Screening Opinions indicate that a full SEA/HRA is not required.

27. Historic England concurs that the SPD is unlikely to result in any significant effects on the historic environment and does not consider it is necessary to undertake a full SEA.

28. All consultee responses, and the City Corporation’s responses are captured in Appendix 2b - HRA and SEA Screening Opinions – Consultee Responses.

SPD consultation responses

29. 39 responses were received from organisations and individuals. This is in addition to comments collected at consultation events.

30. 21 consultation responses were received on Commonplace from the following individuals and/or organisations:

Name	Organisation
Tim Webb	
Chris Fellingham	
Matson	
Galton	
Luke Blaney	
Peter	Rose Associates
Anonymous - 01	
Daniela Catalano	
Craig McDonald	
	London Society
Paul Bentley	City Corporation
Anonymous - 02	
Robert Morris	
Anonymous - 03	
Karti Amrania	SWECO
Tom Matchett	
Suttor	
Prabh Gill	
Gareth Fox	
Brendan	
Michael Priaulx	

Note: Respondents were not required to submit their name. The above names reflect their associated email address. If a name could not be discerned, ‘anonymous’ is listed.

31. 18 consultation responses were received through email from the following individuals / organisations:

Name	Organisation
Fred Rogers	
Kartik Amrania	SWECO UK
Paul Bentley	City Corporation (Air Quality team)
Giles Charlton	Spacehub
Karen Scurlock	Places for London
Chris Colloff	Thames Water
Katie Lewin	Momentum Transport Consultancy
Dustin Lees	Surrey County Council
Josephine Vos	Transport for London
Charles Begley	City Property Association (CPA)

Harry Scott	Environment Agency
Andrew Moore	Hilson Moran
Jennie Colville	Landsec
Lydia Franklin	Save Britian's Heritage
Michael Priaulx	Swifts Local Network
Michelle Statton	Historic England
Joe Loughrey	Prime Light UK
Peter Rogers	Lipton Rogers

32. To summarise, comments generally aligned to the topic chapters of the SPD. Appendix 2a – Consultation response summaries the comments within the following themes:

- General feedback on the structure and contents
- Chapter 1: Introduction
- Chapter 2: Climate change mitigation and adaptation
- Chapter 3: Retrofit and reuse
- Chapter 4: Greenhouse gas emissions and energy use
- Chapter 5: Circular economy
- Chapter 6: Climate resilience
- Chapter 7: Urban greening and biodiversity

33. All public consultation responses have been reviewed by officers. Consultation responses informed a thorough review of the document to ensure clear and consistent language. Amendments were made to all sections.

34. Key areas of changes, as raised by public consultation responses, include:

- Ensuring requirements and recommendations are clearer. The SPD was reviewed to ensure that requirements referenced as 'must' are mandatory as required by the Development Plan (City Plan 2040 upon its adoption/London Plan 2021). Requirements referenced as 'should' are strongly recommended, as applied on case-by-case basis where they constitute a significant opportunity to drive sustainability. These requirements are outlined in Chapter 1. The key actions in each topic chapter were revised to clearly demonstrate what key actions are required to positively address the City Corporation's policy framework, and what key actions are strongly recommended to develop exemplary schemes.
- A revised retrofit definition. In Chapter 3, the definition of retrofit is updated to 'the upgrading of a building in relation to the installation of new building systems or building fabric to improve efficiency, reduce environmental impacts and/or adapt for climate change. A retrofit should retain and reuse at least 50% of the existing building(s)' superstructure (by mass). The SPD includes revised definitions of 'light retrofit', 'deep retrofit', 'retrofit with new build' and 'new build'.
- Clarification on the NABERS UK 5* minimum target to major applications. NABERS is a performance-based rating scheme that measures the energy consumption of a building. The challenging NABERS UK 5* target rating requirement will be applied to new major office developments, while retrofitted office buildings will be required to achieve a 4* rating. The guidance aligns the

planning application process with the NABERS UK Design for Performance agreement and the ongoing reporting process.

Further guidance on operational energy reporting for non-office developments is also included in Chapter 4 to capture developments that are not required to achieve NABERS certification.

Further consultation was conducted with industry experts to ensure the technical detail on NABERS is implementable.

- Introduction of embodied carbon benchmarking as recommended by industry experts. Embodied carbon benchmarks, aligning to GLA whole life-cycle carbon benchmarks, are introduced in Chapter 4. It was determined that introducing benchmarks in the SPD would offer a softer approach than targets, which could be considered in the future. Developments are already required to report against these benchmarks in Whole Life-Cycle Carbon Assessments, therefore, the introduction of embodied carbon benchmarks won't require further reporting. A third-party review is recommended to confirm consistency in the application of the benchmarks.

Further consultation was conducted with industry experts to ensure the technical detail on embodied carbon benchmarks is implementable.

- Introduction of wider environmental benefits in Chapter 4. All high carbon impact developments will be expected to provide wider environmental sustainability benefits if they do not achieve the GLA embodied carbon benchmark at planning stage. These benefits should be proportionate to the level of carbon impact and take advantage of any opportunities of the site for contributing to substantial sustainability improvements in the locality. This could include implementing priorities of the LAEP, supporting sustainable transport modes, developing material passports, implementing climate resilience measures and/or urban greening infrastructure in the local area.

Further consultation was conducted with industry experts to confirm the environmental benefits approach is implementable.

- Further guidance on pre-redevelopment audits and pre-deconstruction audits. Consultation feedback requested further guidance and templates for pre-redevelopment and pre-demolition audits to improve consistency. Pre-demolition audits were reframed to pre-deconstruction audits to reflect the focus on retention and reuse. The draft guidance, included in Chapter 5, draws upon GLA Circular Economy Statement guidance and introduces City-specific and best-practice guidance. The guidance encourages developments to embed circular economy principles and reuse opportunities into early design concept to create an improved basis for retention and reuse.

Further consultation was conducted with industry experts to confirm the pre-redevelopment audit guidance and pre-deconstruction audit guidance is implementable.

Supporting consultation documentation

Consultation responses are captured in the following documents:

Appendix 2a: summaries comments made in response to the consultation

Appendix 2b: a copy of statutory consultee responses on the HRA and SEA Screening opinions.

Appendix 2c: lists all consultees that were notified about consultation of the Planning for Sustainability SPD.

Appendix 2a - Consultation response summary – Planning for Sustainability SPD

Topic	Recommendations	How it has been addressed
<p>General feedback on the structure and contents</p>	<ul style="list-style-type: none"> I. Support of the production of the SPD and its aspirations and approach to sustainability in the City. II. Forward-thinking guidance is welcomed. III. The SPD aligns with the NPPF and London Plan policies. IV. Case studies in the SPD are useful. <p>Consultation responses recommend:</p> <ul style="list-style-type: none"> I. <u>General review.</u> A general review to check for appropriate use of abbreviations and their application, language and wording II. <u>Alignment with GLA guidance.</u> Greater alignment with GLA guidance (e.g. Circular Economy and WLC). Indicate where targets align or exceed the London Plan requirements. III. <u>Requirements and recommendations.</u> Reviewing the document to be more concise and improve clarity on ‘what needs to be completed/ submitted’, clarity on expectations and explanation of how key measures will be evaluated. IV. <u>Transport.</u> Including transport, which is key to enhancing quality and sustainability in both construction and operation, including visitor trips, and delivery and servicing trips. V. <u>Transport standards.</u> A flexible approach to cycle parking standards and blue-badge provision. 	<p>The SPD was reviewed to:</p> <ul style="list-style-type: none"> I. Ensure, the appropriate use of acronyms and abbreviations, appropriate language and consistent terminology of technical terms. Language was reviewed to adhere to the City Corporation style guide. II. Ensure alignment with GLA guidance. GLA was referenced where appropriate, but repetition was reduced. III. The introduction includes clarification on policy and document requirements. Requirements referenced as ‘must’ are mandatory, as required by the Development Plan (emerging City Plan 2040 upon adoption/ London Plan 2021). Requirements referenced as ‘should’ are recommended, as applied on case-by-case basis where they constitute a significant opportunity to drive sustainability. IV. Transport matters are more clearly embedded within the key actions and measures of other chapters. The updated Transport Strategy is included in Chapter 2. VI. Key actions are split into ‘required’ and ‘recommended’ and explanatory text is included VII. ‘Demolition’ was reframed to ‘deconstruction’ where appropriate.

	<p>Cycle parking design should be in accordance with London Plan Guidance.</p> <p>VI. <u>Key actions</u>. Including explanatory text on the key actions included to clarify the expectations of applicants and their status as requirements or recommendations.</p> <p>VII. <u>Deconstruction</u>. Reframing 'Demolition' to 'deconstruction throughout the document.</p> <p>VIII. <u>Defining best-practice</u>. Draw on more best practice principles from other national, local and industry approaches. Include reference to emerging industry standards.</p> <p>IX. <u>Co-benefits</u>. Including links between topic chapters.</p> <p>X. <u>Visual aids</u>. Flow-charts and diagrams were recommended as visual aids to clearly illustrate the interdependencies between policy documents, and clearly outline what is expected to be submitted when during the planning process.</p>	<p>VIII. Best-practice case studies are included. References to emerging industry standards such as the UK Net Zero Carbon Buildings Standard pilot are included.</p> <p>IX. Include references to topic chapters, when there are links between the topics.</p> <p>X. The 'Key policies and guidance' checklist at the forefront of each topic chapter was reviewed to highlight applicable policies. Chapter 8 was revised to visually outline document requirements according to RIBA stages.</p> <p>Note:</p> <p>V. As detailed cycle parking and blue-badge standards are included in London Plan Guidance, it is not included in the SPD to reduce repetition.</p>
<p>Chapter 1: Introduction</p>	<p>Consultation responses recommend:</p> <p>I. <u>Future flexibility</u>. Including a sentence on future flexibility and the process to update the documents as sustainability policy moves at pace.</p> <p>II. <u>Requirements and recommendations</u>. The requirements are reviewed to improve clarity on what are considered minimum requirements and what are considered recommended requirement.</p> <p>III. <u>Defining major and minor developments</u>.</p>	<p>Chapter 1 was reviewed to:</p> <p>I. Include a sentence that the document will be reviewed and updated as and when relevant changes to overarching policy frameworks require this.</p> <p>II. Include clarification on policy and document requirements. Requirements referenced as 'must' are mandatory, as required by the Development Plan (emerging City Plan 2040 upon adoption/ London Plan 2021). Requirements referenced as 'should' are recommended, as applied on case-by-case basis where they constitute a significant opportunity to drive sustainability.</p>

		<p>III. Include a definition of major application, which aligns with the emerging City Plan 2040.</p>
<p>Chapter 2: Climate Change Mitigation and adaptation</p>	<ul style="list-style-type: none"> The SPD supports and aligns with the emerging City Plan 2040. <p>Consultation responses recommend:</p> <ol style="list-style-type: none"> <u>Rename Chapter 2.</u> Chapter 2 is renamed so that it's clearer it's referring to planning policy. <u>Alignment with GLA.</u> Ensuring policy alignment with London Plan policy, including the Mayor's Transport Strategy (MTS) and Healthy Streets approach <u>Air Quality Strategy.</u> Adding a short section on the City Corporation Air Quality Strategy. <u>Flooding strategies.</u> Including references to the Riverside Strategy, ThamesEstuary 2100 Plan and Strategic Flood Risk Assessment (2023) 	<p>Chapter 2 was reviewed to:</p> <ol style="list-style-type: none"> Rename the chapter from 'Climate change mitigation and adaption' to 'Environmental sustainability policy framework'. Ensure the Mayor's Transport Strategy (MTS) and Healthy Streets approach is referenced in Chapter 2 and throughout the SPD. Include the updated City Corporation Transport Strategy. Introduce a section on the Air Quality Strategy 2025-2030 (draft). <p>Note:</p> <ol style="list-style-type: none"> The recommended flooding strategies are referenced within Chapter 6, Climate resilience.
<p>Chapter 3: Retrofit and Reuse</p>	<ul style="list-style-type: none"> Support for the retrofit first approach. Support for the use of case studies in this section, however it'd be useful for case studies to apply the retrofit definitions. <p>Consultation responses recommend:</p> <ol style="list-style-type: none"> <u>Defining retrofit.</u> <u>Including links.</u> Linking Chapter 3 to Chapters 4 and 5. <u>Whole building retrofit plan.</u> Recommending a 'whole building retrofit plan/ longer term retrofit plan' and the 	<p>Chapter 3 was reviewed to:</p> <ol style="list-style-type: none"> Include revised definitions of retrofit, light retrofit, deep retrofit and retrofit with new build. Revise the 'retrofit first approach' and link the steps to Chapters 4 and 5. Include guidance on whole building retrofit plans to enable future retrofits, adaptive reuse and emerging technologies. This guidance encourages projects to consider a retrofit option that achieves the optimum carbon balance between embodied and operational carbon.

	<p>carbon balance between light/deep retrofit and embodied/operational carbon.</p> <p>IV. <u>Retrofit storage strategy</u>. Clarification on the retrofit storage strategy.</p> <p>V. <u>Pre-demolition and pre-redevelopment audits</u>. Including guidance and templates to reduce variation and improve consistency.</p> <p>VI. <u>Retrofit Historic buildings toolkit</u>. Including further guidance on its application</p> <p>VII. <u>Conditions process</u>. Applying flexibility to the conditions process and when documents are required in the planning process.</p> <p>VIII. <u>Historic Significance</u>. Reviewing language to ensure consistent references to historic significance. Highlight the importance of building repair and maintenance</p> <p>IX. <u>Optioneering and third-party review process</u>: include further guidance</p> <p>X. <u>Retrofit first</u>. Ensure the retrofit first policy is carefully worded to ensure that it does not constrain major projects and surrounding land.</p>	<p>IV. Reframe reference to the storage strategy from a requirement, to encourage applicants to consider potential storage options.</p> <p>V. Guidance for pre-demolition audits and pre-redevelopment audits is included in Chapter 5.</p> <p>VI. Provide further detail from the Retrofit Historic Buildings toolkit, including the heritage retrofit roadmap.</p> <p>VII. Include a note that supporting information can be triggered by conditions, when not practical at planning application stage.</p> <p>VIII. Ensure consistent references to historic significance. Highlight the importance of building repair, maintenance and cleaning.</p> <p>Note:</p> <p>IX. The optioneering and third-party review process is not within the scope of this SPD but will be revised in a review of the Carbon Options Guidance PAN.</p> <p>X. The City Corporation has introduced a retrofit first approach, not a retrofit only approach.</p>
<p>Chapter 4: GHG Emissions & Energy Use – Whole Life- Cycle Carbon</p>	<p>Consultation responses recommend:</p> <p>I. <u>Carbon optioneering</u>. Clarifying the trigger for carbon optioneering.</p> <p>II. <u>Transport and WLC Assessments</u>. In-use transport related emissions should be considered within WLC assessments. Reported transport carbon impacts in the WLC assessment (A2 & C2) should be reported in Transport Assessments (TAs) and Construction Logistics Plans (CLPs).</p>	<p>Chapter 4 was revised to:</p> <p>I. Clarify that the trigger for carbon optioneering is all major developments, as well as minor applications that do not retain the majority of substructure and superstructure (by mass).</p> <p>III. Include guidance that B6 reporting should use a predictive energy modelling method, following guidance such as CIBSE TM54 or NABERS UK.</p>

	<p>III. <u>B6 reporting</u>. Including guidance on how carbon is reported for the B6 element of WLC assessments.</p> <p>IV. <u>Conditions process</u>. Flexibility is applied to the submission of RIBA stage 4 and 6 WLC assessments</p> <p>V. <u>Third party review</u>. Further guidance on the third-party review process for carbon optioneering and WLC assessments.</p> <p>VI. <u>Third party review</u> reports should be publicly accessible.</p> <p>VII. <u>Sustainable Life-Cycle Cost (LLC)</u>. Including further guidance on how it links to WLC (p.20).</p> <p>VIII. <u>Embodied carbon benchmarks</u>. Support for embodied carbon targets, as targets drive change and provide an opportunity for the City Corporation to drive best practice.</p> <p>Opposition to embodied carbon targets, as currently there is not a strong enough dataset to report against targets, particularly for tall buildings. Rather, the focus should be improving accuracy in reporting.</p> <p>Banding/benchmarks is a good stepping stone to setting embodied carbon targets. Benchmarks should use industry benchmarks, apply flexibility, and consider using incentives to drive targets.</p>	<p>V. Include a sentence that carbon options assessments and WLC assessments should be independently reviewed to ensure accuracy and quality assurance.</p> <p>VII. The reference to Sustainability Life-Cycle Cost (LLC) analysis was removed as this is not building upon standard practice in planning.</p> <p>VIII. Introduce embodied carbon benchmarks. The approach aligns with the GLA WLC Assessment Guidance, is a softer approach than setting hard targets, and won't require further reporting. High carbon impact developments will be expected to provide sustainability benefits, which included as a beyond the building measure in Chapter 4-WLC.</p> <p>Note</p> <p>II. The City Corporation aligns to the GLA guidance for WLC Assessments, of which in-use transport related emissions is not reported at this stage. The requirements of TAs and CLPs is outside the scope of this SPD.</p> <p>IV. Flexibility on submission requirements is applied on a case-by-case basis and should be negotiated and agreed during pre-application.</p> <p>VI. It is not a statutory obligation for third party reviews to be publicly available. Publicly published documents are to the discretion the City Corporation Officer, who integrate the results into the Officer's report.</p>
<p>Chapter 4: GHG Emissions & Energy Use –</p>	<ul style="list-style-type: none"> Support for the inclusion of Minimum Energy Efficiency Standards (MEES) regulations and Carbon Risk Real Estate Monitor (CREEM) decarbonisation pathways. 	<p>Chapter 4 was revised to:</p> <p>I. Ensure that operational carbon is calculated and monitored through NABERs (for office buildings) and TM54 (for non-office buildings).</p>

<p>Operational Carbon</p>	<p>Consultation responses recommend:</p> <ol style="list-style-type: none"> I. <u>Operational carbon</u> is important to capture, monitor, measure. II. <u>NABERS target</u>. Clarification of the NABERS 5* minimum target including confirmation it applies to offices only. The SPD should recognise the challenge for retrofits projects achieving 5*. The SPD should align with the Design for Performance agreement. III. <u>Operational energy reporting</u> method should be applied to other building types and mixed uses of which NABERS does not apply. IV. <u>Sustainable delivery and servicing</u>. Including a key action on sustainable delivery and servicing strategies, and provision of facilities to maximise active travel in development proposals. V. <u>Backup power generation</u>. Including a hierarchy chart for the backup power generation options. VI. <u>Water efficiency measures</u>. Encouraging water efficiency measures which can reduce operational energy requirements. VII. <u>Flexibility in the application of measures</u>. Applying flexibility to measures to allow for deliverability and viability. Measures include the 'Bespoke, optimised energy strategy', BREEAM 'outstanding' rating, exchange thermal load. VIII. <u>Incentivising mixed-uses</u> and dispersing commercial occupation rates to ensure efficiency in operational energy. IX. <u>Carbon balance</u>. The WLC implications of additional equipment to provide resilience of supply should be acknowledged. 	<ol style="list-style-type: none"> II. Include further guidance on the application of the NABERS UK target. Guidance confirms the certification applies to offices only and introduces a 4* NABERS target for retrofit projects. The guidance aligns the planning application process with the NABERS Design for Performance agreement and ongoing reporting process. III. Include further guidance that non-office developments should use a predictive energy modelling method, in accordance with CIBSE TM54, IV. Include a recommended key action to 'Develop innovative approaches to low carbon servicing and servicing access of buildings'. V. Include a hierarchy of backup power generation options. VI. Include a line that water efficiency measures can reduce operational energy demand, and include a link to Chapter 6, Climate Resilience. X. Add a new measure to the infographic: 'Encourage innovative photovoltaic panel materials to maximise opportunities for use.' <p>Note:</p> <ol style="list-style-type: none"> VII. Flexibility on the requirements and recommendations of the SPD are applied on a case by case basis and should be negotiated and agreed during pre-application. VIII. Influencing uses in the City is outside the scope of this SPD. IX. Chapter 1 recommends applicants work through all topics to achieve the best-balanced approach. This applies to balancing WLC impacts with resilience of supply.
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	<p>X. <u>Encouraging PV</u>. Including a key measure in the infographic that encourages innovative uses of PV panels</p>	
<p>Chapter 5 - Circular Economy</p>	<p>Consultation responses recommend:</p> <ol style="list-style-type: none"> I. <u>Including 'Reuse' and 'recycling' definitions.</u> II. <u>Reframing 'pre-demolition' audit.</u> III. <u>Circular economy reports.</u> Including guidance on the contents, information required, and reporting. IV. <u>Pre-redevelopment and pre-demolition audits.</u> Including guidance and templates to reduce variation and improve consistency. The guidance should include core principles, minimum requirements and aspirational standards. The guidance should clarify whether pre-redevelopment reports should be undertaken independently, and at what stage they should be submitted through the planning process (as per RIBA stages). V. <u>Conditions process.</u> Flexibility should be applied to the RIBA stage 4 circular economy update. VI. <u>Targets and quantification.</u> Further numerical targets and quantification in the circular economy chapter. VII. <u>Demolition strategy.</u> Including a measure encouraging a demolition strategy. VIII. <u>Zero-waste targets</u> should be reviewed. IX. <u>Circular economy principle.</u> The principle 'all new construction must be built in layers' should be reviewed. X. <u>Maintenance and deconstruction strategy.</u> Further guidance and how it would be secured through the planning process. XI. <u>Development coordination team.</u> A City Corporation development coordination team is created to help 	<p>Chapter 5 was revised to:</p> <ol style="list-style-type: none"> I. Include 'reuse' and 'recycling' definitions at the beginning of the chapter. II. Reframe 'Pre-demolition' audit to 'pre-deconstruction' audit, to encourage deconstruction and material reuse over demolition and waste. III. Include further guidance on pre-redevelopment and pre-demolition audits, which draws upon GLA Circular Economy Statement guidance and introduces City-specific and best-practice guidance. The guidance encourages developments to embed circular economy principles and reuse opportunities into early design concept. Templates are considered a future action outside the scope of this SPD. VI. The pre-redevelopment audit and pre-deconstruction audit guidance encourages developments to set their own quantified targets as applicable to the development. VII. The pre-redevelopment audit is a strategic document, that is considered a demolition strategy. VIII. The zero-waste targets are reframed to 'working towards zero waste' to align with the emerging City Plan 2040. IX. The phrase is reframed to 'All new construction must <u>should</u> be designed and built <u>considering</u> layers.' X. Include further guidance on the 'access, maintenance and deconstruction strategy' which should build an access and maintenance strategy usually prepared by the design team.

	<p>facilitate the exchange of materials between projects.</p> <p>XII. <u>Encourage a portfolio-based approach</u> to encourage material exchange between projects and improve WLC.</p> <p>XIII. <u>Materials data/materials passports</u>. Include further guidance about preparing materials data/materials passports. The City Corporation could consider open-source data sharing and a geographic materials database/Square Mile materials dashboard.</p> <p>XIV. <u>Material exchange platforms</u>. Careful promotion of these platforms to ensure all platforms are supported in an open market.</p>	<p>XII. The pre-redevelopment audit guidance encourages applicants to consider collaboration and coordination opportunities within a portfolio.</p> <p>XIII. The pre-demolition audit guidance recommends the data should work towards material passport-type information. A Square Mile materials database is outside the scope of this SPD but may be considered as a future action.</p> <p>XIV. Material exchange platforms are referenced generally, specific reference to Circuland was removed to encourage as many platforms as possible and an open-source approach.</p> <p>Note:</p> <p>III. The SPD notes that all major applications are required to submit a Circular Economy report in line with GLA guidance.</p> <p>V. Flexibility on submission requirements is applied on a case-by-case basis and should be negotiated and agreed during pre-application.</p> <p>XI. City Corporation resourcing is outside the scope of this SPD, including the formation of development coordination team.</p>
<p>Chapter 6 – Climate resilience</p>	<p>Consultation responses recommend:</p> <p>I. <u>Climate Change Resilience Sustainability Statement (CCRSS)</u>. Include further guidance and requirements, e.g. how should applicants approach, report, and provide mitigation solutions against climate risks?</p>	<p>Chapter 6 was revised to:</p> <p>I. Include guidance on the CCRSS and the BREEAM Wst 05 Credit.</p> <p>III. Align the structure to other topic chapters in the SPD with ‘whole building’ and ‘beyond the building measures’.</p>

	<p>II. <u>Carbon balance</u>. The SPD recognises the additional carbon associated with climate resilience initiatives e.g increased cycle storage and showers, water storage in basements.</p> <p>III. <u>General review of the structure</u>.</p> <p>IV. <u>Flood risk</u>. A review of the Flood Risk section to focus on additional guidance, provide clarity on what SuDS should be prioritised, include reference to tidal flooding risk, reference further flooding policies and strategies, and guidance on Flood Risk Assessments.</p> <p>V. <u>Water Resource Management</u>. A review of the Water Resource Management section to include further measures that developments; should calculate 'actual water' consumption, should maximise the capture of rain and grey water, must ensure water supply network capacity, major developments should achieve an 'excellent' BREEAM rating (or equivalent) in the WAT 01 category, and residential developments must achieve water consumption of 105 litres of potable water per person per day (pp/pd).</p> <p>VI. <u>Building and Overheating</u>. A review of the Building and Overheating Section to encourage shading for ground floor uses, reference to the Cool Streets and Greening Programmes, include microclimate requirements, include a connection between the UHIE and the LAEP and transport mobility, and include weather files and future climate scenarios.</p> <p>VII. <u>Pests and Diseases</u>. A review of the Pests and Diseases section to include further guidance and policy references.</p> <p>VIII. <u>Infrastructure Resilience</u>. A review of the Infrastructure Resilience section to encourage the</p>	<p>IV. The flood risk section was reviewed to reference the SuDS hierarchy in London Plan Policy 5.13, include tidal flooding measures, and references to TE 2100 Plan, Strategic Flood Assessment and other flooding policies, and Flood Risk Assessments</p> <p>V. The Water Resource Management section was reviewed to include the recommended measures.</p> <p>VI. The Building and Overheating section was reviewed to ensure reference to the Cool Streets and Greening Programme, weather files, and thermal comfort guidelines. A connection between the UHIE and the LAEP is introduced.</p> <p>VII. The Pests and Diseases section was reviewed to include reference to the UK Plant Health Database, Invasive Non- Native Species (INNS) listed in Schedule 9 of the Wildlife and Countryside Act 1981 (as amended), the Non-Native Species Secretariat of Great Britain and Ireland, and the London Invasive Species Initiative (LISI).</p> <p>VIII. The Infrastructure Resilience section was reviewed to encourage the use of resilience-based measurement frameworks and reporting standards.</p> <p>Note:</p> <p>II. Chapter 1 recommends applicants work through all topics to achieve the best-balanced approach. This applies to the consideration of additional carbon associated with climate resilience measures.</p>
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	use of resilience-based measurement frameworks and reporting standards and guidance.	
Chapter 7 – Urban Greening and Biodiversity	<p>Consultation responses recommend:</p> <ol style="list-style-type: none"> I. <u>Suggested Greening and Biodiversity measures.</u> Encouraging further greening and biodiversity measures such as green bridges, green houses, urban food farms. II. <u>Urban greening section.</u> Include further guidance on connecting onsite and offsite greening, planting and strengthening urban greening in the streetscape, and landscape future proofing. III. <u>Urban Greening Factor (UGF).</u> The UGF section is revised to clearly outline the difference between CoLC and GLA requirements and clarify whether student accommodation classifies as residential. IV. <u>Biodiversity.</u> The biodiversity section is revised to include further guidance on green roof types, soil protection and soil depths, landscape future proofing requirements, soil protection requirements, embodied ecological impacts. The reference of 'species-specific bricks' is changed to 'swift bricks' to comply with BS 42021. V. <u>Biodiversity Net Gain (BNG).</u> The BNG section is revised in accordance with updated regulations and includes further guidance on the underlying criteria, hierarchy of importance for the delivery of BNG. BNG offsets should be permitted offsite on City Corporation controlled lands or on other portfolio sites within the City. VI. <u>Policies and strategies.</u> Including references to further policies and strategies. 	<p>Chapter 7 was revised to:</p> <ol style="list-style-type: none"> I. Align the structure to other topic chapters in the SPD with 'whole building' and 'beyond the building measures'. Further design measures are included in the 'biodiversity' section which align to the BAP and City Plan 2040. II. The Urban Greening section was reviewed to ensure developments are supported to connect onsite greening into public realm strategies and integrate with offsite greening. III. The Urban Greening Factor section was reviewed to outline the difference between CoLC and GLA UGF requirements. Note the LPG confirms that student accommodation classifies as residential, therefore this clarification is not required in the SPD. IV. The biodiversity section was reviewed to include further guidance on green roof types, soil depths, soil protection, embodied ecological impacts. The reference to 'specific-specific bricks' is changed to 'integral nest bricks, complying with BS 4202'. Swift bricks are not specified, as they are more appropriate for residential development and therefore not appropriate for the City context. V. The BNG section was reviewed to reference the updated regulations. The City Corporation is conducting further research on the implementation of BNG which will include further guidance. The SPD states that the delivery of onsite biodiversity should be prioritised.

	<p>VII. <u>Maintenance and management</u>. Including long-term maintenance and management of greening and biodiversity infrastructure as a key consideration.</p> <p>VIII. <u>Clarify the required reports</u>.</p> <p>IX. The SPD acknowledges the conflict priorities competing for roof space – e.g. balancing urban greening, MEP plant, amenity.</p>	<p>VI. Include reference to the Riverside Strategy (CoLC) and Sustainable Development Framework (TFL).</p> <p>VII. Long-term management and maintenance is included under key approaches and is supported by the document requirements outlined in the point below.</p> <p>VIII. Submission requirements were revised to align with the emerging City Plan, including the Biodiversity Gain Plan (BGP), Habitat Management and Monitoring Plan (HMMP), Operation and Maintenance Plan, Ecological Assessment.</p> <p>Note:</p> <p>IX. Chapter 1 recommends applicants work through all topics to achieve the best-balanced approach. This applies to the consideration of competing priorities such as balancing urban greening with carbon initiatives such as MEP plant.</p>
<p>Chapter 8 - Submission requirements and appendices</p>	<ul style="list-style-type: none"> Support the inclusion of Chapter 8 as a summary of all key considerations and document requirements, applicable to each RIBA stage. <p>Consultation responses recommend:</p> <ol style="list-style-type: none"> <u>Simplification</u> of this chapter to clearly distinguish between minimum and recommend requirements. <u>Validation checklist</u>. A review to ensure the submission requirements aligns to the City Corporation validation checklist. <u>RIBA 0</u>. Include recommendations to help set the brief for design teams. <u>RIBA 1</u>. Include guidance on carbon optioneering process. 	<p>Chapter 8 was reviewed to:</p> <ol style="list-style-type: none"> Visually presenting the key considerations, required and recommended information requirements. Ensure alignment to the validation checklist. Include recommended document requirements in RIBA stage 0 which are encouraged to commence early in concept design. Include changes to RIBA 2-3 to clarify that confirmation of a NABERS UK DfP agreement is required at planning application, 'Be seen' operational modelling and BNG requirements are moved to later RIBA stages, air quality assessment and predictive energy modelling are included. RIBA Stages 4-7 are split; RIBA Stage 4 for detailed design conditions and RIBA stages 5-7 for

	<p>V. <u>RIBA 2-3</u>. Clarifications on NABERS UK, 'Be Seen', operational energy modelling, climate risk mitigation, BNG requirements. Recommend including air quality assessments.</p> <p>VI. <u>RIBA 4-7</u>. Recommend splitting deliverables into typical condition stages. Include further guidance on CCRSS, clarify timing of NABERS UK final certificate. Remove reference to Circuland. Submission to BECD and EPDs should be a required information.</p>	<p>completion/in-use conditions. Detail on CCRSS conditions are included in Chapter 6. Reference to Circuland is removed.</p> <p>Note:</p> <p>VII. The carbon optioneering process is detailed within chapter 2.</p>
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Appendix 2b - HRA and SEA Screening Opinions – Consultee Responses - Planning for Sustainability SPD Consultation

Consultee	Consultee Comments	City Corporation Response
<p>Natural England</p>	<p>It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.</p> <p>It is Natural England’s opinion that the SEA and HRA show that no adverse effects will be caused by the Supplementary Planning Document.</p> <p>We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.</p> <p>We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.</p> <p>Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with</p>	<p>There are no protected species within the City of London due to its highly urbanised nature.</p> <p>The Black Redstart is afforded protection as a Schedule 1 Breeding Species under the Wildlife Conservation Action, 1981. It is expected that outcomes from the Planning for Sustainability SPD will support the protection and growth of the species.</p> <p>The City of London Biodiversity Action Plan (BAP) provides detailed consideration of environmental issues, and includes information about CoLC species, habitats, SINCs etc. The Planning for Sustainability SPD supports the implementation of the BAP and therefore does not adversely impact the plan.</p> <p>Therefore, the recommended information has been addressed and considered in the review of the SPD.</p>

	its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.	
Environment Agency	<p>We recommend an objective is included to protect and enhance the environment. Indicators should relate to the environmental constraints in your local area. This may include flood risk, including the risk of flooding from a breach in the Thames tidal flood defenses, water quality, and biodiversity. We also recommend your SEA takes account of relevant policies, plans and strategies including your local Strategic Flood Risk Assessment, flood risk strategies, Riverside Strategy, and the Thames River Basin Management Plan.</p> <p>As there are no European sites within the City of London LPA boundary, we have no comments on the HRA.</p> <p>We note the findings of both documents indicated that a full SEA/HRA is not required, however, if submitted alongside the statutory consultation for the City of London SPD (on 18th March) we will provide any comments we have in more detail as part of our response to that consultation.</p>	<p>The purpose SPD is to address key sustainability issues in the City, to protect and enhance the environment. It includes chapters on Climate resilience (including flood risk management and water resource management) and Urban Greening and Biodiversity.</p> <p>Recommendations from the Environment Agency's consultation response to the Planning for Sustainability have been addressed in the review of the SPD. This includes references to the TE2100. City Corporation's Riverside Strategy and Strategic flood risk assessment. The SPD notes that proposed development on riparian sites should maintain flood defences in line with these flood management policies.</p> <p>Therefore the recommended objective and policies are addressed in the final SPD.</p>
Historic England	Agree with the assessment that the document is unlikely to result in any significant effects on the historic environment. We therefore do not consider it is necessary to undertake a SEA of this particular SPD.	Support noted.

Appendix 2c – Complete list of consultees

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First Name	Last Name	Organisation Name
Marion	Baeli	10 Design
John	Cronin	1st City of London Scout Group
Alex	Herbert	39 Essex Chambers
Lasse	Lind	3XN
Dean	Hodge	Adsatis
David	Cheshire	Aecom
Nathan	Shelley	Aecom
Craig	Roberson	AHMM
Laura	Stephenson	AHMM
Francis	Heil	Aitkens Realis
Ruth	Duston	Aldgate Connect
Zoe	Barwick	Aldgate Connect
Ruth	Duston	Aldgate Connect (Previously The Aldgate Partnership)
Katherine	Hedderly	All Hallows by the Tower Church/Diocese of London
Jo	Bacon	Allies and Morrison
Nick	Carty	American International Group (AIG)
Helen	O'Shea	Anchura
Mark	Patterson	Api:Cultural
Dr. Anusha	Shah	Arcadis
Jean-Louis	Bartlett	Arcadis
Clodie	Peters	Arcadis
Richard	Proctor	Arcadis
		Architects Climate Action Network
		Arcus Consulting Services
Charlotte	Spetch	Arup Group
Anna	Kennedy	Arup Group
Christopher	Pountney	Arup Group
Mel	Allwood	Arup Group
Mishlin	Pillay	Arup Group
Sid	Khamis	Ascalon Global Energy
Alexander	Rix	Asgard Partners Limited
Gustavo	Brunelli	Atelier Ten
Patrick	Bellew	Atelier Ten
Freddie	Clarke	Avison Young
Mark	Knibbs	Avison Young
		Avison Young
Laura	Jenkinson	Avison Young
Aaron	Balfour	Balfour Lewis
Andy	Hoffman	Bank of England
Lee	Dobson	Barbican
Brenda	Szlesinger	Barbican & Golden Lane Neighbourhood Forum
		Barbican Action Quarter
David	Bradshaw	Barbican Association Security & Crime Committee
Allison	Parkes	Barbican Wildlife Group
Joanna	Rodgers	Barbican Wildlife Group
Olivia	Hill	Bartlett School of Planning

Emma	Noehrbass	Barts Square Residents Association
Golnaz	Ighany	BDP
Jonathan	Hulbert	Better Buildings Partnership
Kris	Musikant	Bevis Marks Synagogue Heritage Foundation
Rachel	Owens	BGY
Jonathan	Bainbridge	Bidwells
		Bishopsgate Ward Club
Bilal	Hussain	Bloomberg
Peter	Killen	British Association of Landscape Industries
Michael	Meadows	British Land
Gareth	Roberts	British Land
Matthew	Webster	British Land
Martin	Gettings	Brookfield
Amanda	Dalzell-Sheppard	Building Performance Prediction (BPP) Energy
		Building Research Establishment (BRE)
Sirje	Soosalu	Buildington
Gill	Perkins	Bumblebee Conservation Trust
Dr. Nikki	Gammans	Bumblebee Conservation Trust
Martin	Potkins	Bupa
Neil	Sanders	Burgoynes
Andrew	Wylie	Buro Happold
Anna	Woodeson	Buro Happold
Emily	McDonald	Buro Happold
Nancy	Wood	Buro Happold
Roaa	Babiker	Buro Happold
Fergus	Anderson	Buro Happold
Roger	Savage	Buro Happold
Ruth	Duston	Business Improvement Districts
Sarah	Bevan	BusinessLDN
Steve	Bolton	Butterfly Conservation
Ray	King	Cambridge Heath and London Fields Rail Users Group
Nicola	Tulley	Camden
Ceire	Topley	Canary Wharf Group PLC
David	Reilly	Carbon Trust
Oliver	Caroe	Caroe Architecture
Chloe	Brown	Carter Jonas
Ollie	Morris	CBRE
Patricia	Brown	Central London Forward
Tim	Bacon	Chancery Lane Association
Edmund	Vaughan	Chapmanbdsp
Sam	Miselbach	Chapmanbdsp
Barry	Kitcherside	ChartPlan
Julie	Godefroy	CIBSE
Gerald	Hine	City & Hackney Older People's Reference Group
Cynthia	White	City & Hackney Older People's Reference Group
		City and Hackney Clinical Commissioning Group (NHS)
Jonathan	Dennis	City Apartments Ltd
Eva	Rodriquez	City Information Centre (City of London)

Keith	Bottomley	City of London
Alec	Childs	City of London
Kyri	Eleftheriou-Vaus	City of London
John	Harte	City of London
Natasha	Lloyd-Owen	City of London
Rob	McNicol	City of London
Graham	Packham	City of London
Sue	Pearson	City of London
Lisa	Russell	City of London
Jake	Tibbetts	City of London
Marianne	Fredericks	City of London
		City of London (Smithfield Market)
Gerald	Hine	City of London Access Group (COLAG)
Roger	Archer-Reeves	City of London Police
John	Herlihy	City of London Police
Ford	Keeble	City of London Police
Gavin	Keegan	City of London Police
Russell	Pengelly	City of London Police
Tim	Roberts	City of London Police
Alexander	Williams	City of London Police
Randall	Anderson	City of London/Barbican Residential Association
Alison	Gowman	City of London/Shakespeare Tower House Group
		City of Westminster
Dektorija	Saveca	City Planning
		City Property Advisory Team (CPAT) City of London
Charles	Begley	City Property Association (CPA)
Andrea	Williams	City Property Association (CPA)
Alba	Perela	Cityscape Digital
Claire	Young	Civic Engineers
Gareth	Atkinson	Civic Engineers
Emma	Forrest	Civil Aviation Authority (CAA)
Max	Barber	Clevermax Productions
Mervyn	Keene	Clubman
Priya	Shah	Cobalt Management Limited
Nathan	Barrett	Coldwell Banker Richard Ellis (CBRE)
		Coleman Street Ward Club
Edward	Jones	College of Arms
Kavita	Kumari	Cundall
Caroline	Cochrane	Cundall
Qian	Li	Cundall
Alasdair	Graham	David Chipperfield Architects
Szandra	Mile	David Chipperfield Architects
Paul	Kessler-Lyne	David Lock Associates
Nicky	Sutherland	Dean and Chapter
Steve	House	Dechert
Jill	Glennie	Deloitte
Nathan	Hiles	Deloitte
		Deloitte Real Estate

Laura	Ross	DevPlan
Brian	Cuthbertson	Diocese of London
		Diocese of London
Celine	Luppo McDaid	Doctor Johnson's House
		Doctor Johnson's House
Ian	Fergusson	Dominvs Group
Rich	Foot	DP9
Rebecca	Hampson	DP9
Tom	Horne	DP9
Malcolm	Kerr	DP9
Alasdair	Buckle	DP9
Archie	Noden	DP9
Barnaby	Collins	DP9
Charlotte	Orrell	DP9
Chris	Gascoigne	DP9
Dave	Akam	DP9
Emily	Keenan	DP9
Jonathan	Marginson	DP9
Jonathan	Smith	DP9
Julian	Shirley	DP9
Liam	Lawson-Jones	DP9
Louise	Overton	DP9
Mike	Moon	DP9
Nathan	Hall	DP9
Peter	Twemlow	DP9
Richard	Ward	DP9
Simon	Gunasekara	DP9
Suzy	Crawford	DP9
Tim	Holtham	DP9
Tom	Hawkley	DP9
		E.ON Energy
Abbie	Wesson	E.on energy
Robin	Morgan-Glending	E.on energy
Keven	Le Doujet	E.on energy
Robert	Benton	East India Arms
Kate	Hart	EC Partnership (The Eastern City Partnership)
Claire	Dumontier-Marriage	EC Partnership (The Eastern City Partnership)
		EC Partnership (The Eastern City Partnership)
Loreana	Padron	ECD Architects
Alex	Jackman	EE
Bo	Sjoholm	EIKON Management Ltd
Stephen	Gallacher	Elementa Consulting
Andy	Kirwan	Ener-Vate
Rafe	Bertram	Enfield
Matthew	Pearce	Environment Agency
		Environment Agency
Jon	Pearson	Environmental Consultants
		Environmental Services Association

		Epping Forest District Council
Chris	Worboys	Etude
Gail	Meakin	European Bank for Reconstruction and Development
Bruno	Almeida Santos	Far East Consortium
Alistair	Subba Row	Farebrother
Carla	Hickman	FI Real Estate Management
		Financial & Legal Skills Partnership
Tim	Williams	Firstplan
		Fleet Street Quarter/Partnership
Chris	Radley	Fletcher Priest
Ed	Williams	Fletcher Priest
Joanna	Wilson	Fletcher Priest
Nargis	Christopher	Friends of City Gardens
Peter	Massini	Future Nature Consulting
Dusty	Gedge	Gentian
		Georgian Group
Rosanna	Cole	Gerald Eve
Rebecca	Gunn	Gerald Eve
Edward	Kitchen	Gerald Eve
		Gerald Eve
Bethan	Warwick	Gerald Eve
Chloe	Staddon	Gerald Eve
Jeremy	Randall	Gerald Eve
James	Namazie	Gerald Eve
Shaun	MacArthur	Gerald Eve
Eleni Foui	Foui	Gigl
Molly	Williams	Gigl
Steve	Stevenson	Golden Lane Residents Association
Karen	Johnson	Golden Lane Tenants Forum
Lee	Millam	Golden Lane Tenants Forum
Arun	Rao	Greater London Authority (GLA)
Francis	Castro	Greater London Authority (GLA)
Rhian	Williams	Greater London Authority (GLA)
Dan	Bicknell	Greater London Authority (GLA)
Victoria	Boorman	Greater London Authority (GLA)
Holly	Smith	Greater London Authority (GLA)
Annette	Figueiredo	Greater London Authority (GLA)
Sylvia	Moffatt	Greater London Authority (GLA)
Abby	Crisostomo	Greater London Authority (GLA)
Jude	Hassell	Greater London Authority (GLA)
Kristen	Guida	Greater London Authority (GLA)
Mitch	Cooke	Greengage Environmental
Morgan	Taylor	Greengage Environmental
Sam	Barker	Greengage Environmental
Annelie	Kvick Thompson	Grimshaw
Paul	Toyne	Grimshaw
Annelie	Kvick Thompson	Grimshaw Global
Hannah	Rodger	Guinness Partnership

Ai Ting	Ong	GuocoLand
Oliver	Collins	GVA
Laura	Jenkinson	GVA
Dominic	Lunnon	H Planning
Matt	Humphreys	H Planning
Jeremy	Martin	Hackney
Rachel	Weaver	Hackney
Glen	Cook	Hamilton Brooks Limited
Sophie	Cardinal	Hamphsire County Council Waste Planning Authority
Louisa	Bowles	Hawkins Brown
Gail	Beer	Healthwatch City of London
Liz	Vinson	Heritage Collective
Andrew	Middlebrook	Heyne Tillett Steel
Mark	Tillett	Heyne Tillett Steel
Rose	Adams	HGH Consulting
		Highways England
Andrew	Moore	Hilson Moran
Marie-Louise	Schembri	Hilson Moran
Tim	Brennan	Historic England
		Historic England
Rachael	McMillian	Historic England
Janet	McDougall	Historic Royal Palaces (HRP)
Adrian	Phillips	Historic Royal Palaces (HRP)
Ashley	Bateson	Hoare Lea
Daniela	Madeloff	Hoare Lea
Elizabeth	Ray	Hoare Lea
James	Stevens	Home Builders Federation (HBF)
		Homes England
Greg	Dorey	Honourable Society of the Inner Temple
Richard	Snowdon	Honourable Society of the Inner Temple
Lukasz	Grabowski	Hotel Indigo Tower Hill (IHG Hotel)
Robert	Wickham	Howard Sharp & Partners
Tim	Fleming	Iceni
Nick	Grant	Iceni Projects
Chris	Brown	Igloo
Will	Arnold	Institute of Structural Engineers
John	Watson	J Watson Consulting Ltd
Jamie	Sneeden	Jigsaw Planning
Kirsty	Draper	JLL
John	Ramsey	John Ramsey
Michael	Bowles	John Roberston Architects (JRA)
Blythe	Dunk	Jones Lang La Salle
Gillian	Vallely	Jones Lang LaSalle
Tony	Quinn	Kajima
Del	Shahid	Kinney Green
Stuart	Baillie	Knight Frank
Ryan	Caldon	Knight Frank
Nick	Diment	Knight Frank

Kelly	McCann	Knight Frank
Jamie	Hicks	Kone
John	Bushell	KPF
Louis	Vorster	KPF
Alexia	Laird	Land Securities
Gregor	Haran	Land Securities
Neil	Read	Land Securities
Ross	Sayers	Land Securities
Heather	Ennis	Land Use Consultants
Andrew	Hagger	LB of Richmond and LB of Wandsworth
Paige	Linley	Leith Planning Group
Clara	Bagenal George	LETI (formerly Low Energy Transformation Initiative)
Mark	Jenkinson	LETI/ Crystal Associates
Henry	Burling	LETI/ Elliott Wood
Ian	Anderson	Lichfields
Liz	Loughran	Line Planning
Adam	Weiner	Little Britain Residents Association
		Livery Climate Action Ground (LCAG)
Darren	Cox	Lloyd's
		London Borough of Camden
		London Borough of Camden
		London Borough of Camden
		London Borough of Hackney
		London Borough of Haringey
		London Borough of Hillingdon
		London Borough of Islington
		London Borough of Islington
		London Borough of Islington
		London Borough of Islington
		London Borough of Lambeth
		London Borough of Redbridge
		London Borough of Southwark
		London Borough of Tower Hamlets
Brendan	Barns	London Business Forum
		London Business Forum
		London Chamber of Commerce (LCCI)
		London City Airport
Eloise	Shepherd	London Councils
Alice	Addison	London Councils
Ashwin	Patel	London Councils
Hannah	Jameson	London Councils
Georgia	Goddard	London Councils
Luke	Miller	London Diocesan Fund
		London Economic Action Partnership (LEAP)
		London Enterprise Panel
Ioanna	Mytilinaiou	London First
Mathew	Frith	London Wildlife Trust
		London Wildlife Trust

Ken	Mackay	Mackay & Partners Ltd
Andrea	Charlson	Madaster
Frances	Gannon	Make Architects
Sandra	Wolf	Mallow Street
Tom	Pavitt	Marine Management Organisation
Patrick	Streeter	Matching Press
Hassan	Ahmed	Mayor of London (Greater London Authority)
Katherine	McCullough	Merchant Land
Sophie	Taysom	Merchant Land
		Metropolitan Police
Olivia	Martinez	Milieu Consult
Noushin	Khosravi	Mineral Products Association
Jannah	Evans	Ministry of Housing, Communities & Local Government
		MM&K Limited
		Mobile Operators Association
Gareth	Elliott	MobileUK
Roy	McGowan	Momentum Transport Consultancy
Anna	Russell-Smith	Montagu Evans
Guy	Bransby	Montagu Evans
Peter	Bovill	Montagu Evans
Tom	Pemberton	Montagu Evans
		Museum of London
		National Gas Transmission (Avison Young are appointed by National Gas to respond to LA development plans)
Matt	Verlander	National Grid (Entec on behalf of)
Damien	Holdstock	National Grid (Entec on behalf of)
		National Highways
Katy	Wiseman	National Trust
Piotr	Behnke	Natural England
Sharon	Jenkins	Natural England
Tony	Madgwick	Natural History Museum
Nitesh	Magdani	Net positive solutions
		Network Rail
Amy	Chadwick Till	New London Architecture
Catherine	Staniland	New London Architecture (NLA)
Benjamin	O'Connor	New London Architecture (NLA)
David	O'Hanlon	New Urban Living Limited
Mary	Manuel	NHS London Healthy Urban Development Unit (HUDU)
		NHS Property Services Ltd
Emily	Gabb	NLA
Victoria	Manning	North London Waste Plan (NLWP)
		Office of Rail and Road
Andrew	Lewis	One Risk Africa
Jon	Brown	Oracle Interiors
Rachel	Hoolahan	ORMS
Rupert C.	Irving	Patterson Irving Limited
Paul	Watkins	Paul Watkins Architect
Joanna	Mezzetti	Paytons Solicitors

Paul	Watson	Phillips Planning Services
Abbie	Clark	Plainview Planning
Abbie	Griffiths	Plainview Planning
		Planning Aid for London
Dominique	Oliver	Pollard Thomas Edwards
Dr Heather	Barrett-Mold	Pollinating London Together
Konstantinos	Tsiolis	Pollinating London Together
Anthony	Bickmore	Pollinating London Together / Wax Chandler's Compar
James	Trimmer	Port of London Authority (PLA)
Michael	Atkins	Port of London Authority (PLA)
Grace	Rawnsley	Port of London Authority (PLA)
		Portal Trust
Jim	Asbury	Prospects
Elizabeth	Smith	Purcell
Tatiana	Guinness	Purcell
Laura	Baron	Purcell UK
Rosemary	Foley	Queens Quay Residents' Association
Daniel	Rech	Quod
Charlotte	Williams	Quod
Emma	Palmer	Railway Delivery Group
Austen	Bates	Ramboll
Tom	Harley-Tuffs	Ramboll
Tom	Moynihan	Reformis
Essa	Devreese	ReLondon
Hollie	Bickerstaff	Residents Association, 63 West Smithfield
Dylan	Davies	Rogers Stirk Harbour + Partners
Louise	Palomba	Rogers Stirk Harbour + Partners
Georgina	Robledo Padilla	Rogers Stirk Harbour + Partners
Daniel	Wright	Rogers Stirk Harbour + Partners
Graham	Stirk	Rogers Stirk Partners
Maurice	Brennan	Rogers Stirk Partners
Daniel	Botten	ROK Planning
Peter	Rose	Rose Associates
Louise	Liddle	Rosewood Irrigation Services
Lisa	Van Beveren	Royal Bank of Canada Capital Markets
		Royal Institute of British Architects (RIBA)
		Royal Institute of Chartered Surveyors (RICS)
Joseph	Kane	Royal London Asset Management (RLAM)
Laura	Thrower	Royal London Asset Management (RLAM)
Mark	Carroll	Royal London Asset Management (RLAM)
		Royal Town Planning Institute (RTPI)
Richard	Lemon	SAV Group
Peter	Savage	Savage Associates
		SAVE Britain's Heritage
Ben	Dewfield-Oakley	SAVE Britain's Heritage
Jake	Ash	Savills
Stephen	Cummings	Savills
Richard	Ketelle	Savills

Mia	Scaggiante	Savills
Kirsty	Turner	Savills
David	Whittington	Savills
Rebecca	Smith	Savills
Jane	Smith	Seddon House Group
Laura	Elias	Sergo
Chris	Shaw	Shaw Corporation
Fred	Drabble	Shaw Corporation
Mark	Kowal	Sheppard Robson
Simon	Crane	Simon Crane Associates
Sukriye (Rae)	Robinson	Skidmore Owings Merrill (SOM)
James	Woodall	Skidmore Owings Merrill (SOM)
Carol	Frost	Slaughter & May
Steve	Lewis	Slaughter & May
Lis	Batteson	Smithfield Market Tenants' Association
		South Gloucestershire Council
Giles	Charlton	Spacehub
Patrick	Dumas	Square Mile Farms
Hamish	Grant	Square Mile Farms
Mark	McGovern	SSA Planning Limited
Paul	Kennedy	St Vedast-alias-Foster
Laura	Jorgensen	St. Botolph without Aldgate
William	Taylor	St. Helen Bishopsgate
Daniel Ward	Ward	Stanhope
Tom	Bradley	Stanhope
Roland	Food	Stephenson Harwood LLP
Steve	Daszko	Steve Daszko Photography
Gordon	Bethell	Stewart Watson
Federica	Romeo Beattie	Studio PDP
Connie	Frimpong	Suade
		Surrey County Council
David	Warburton	Sutton
Kartik	Amrania	Sweco
Matthew	Mapp	Sweco
Michael	Priault	Swift Conservation
Simon	Sturgis	Targeting Zero
Philip	Slavin	Taskize
Jon	Riley	Temple group
Elaine	Elstone	Tetlow King Planning Limited
Lucy	Atlee	TFL Places for London
Mat	Lown	TFT Consultants
Amy	Pryor	Thames Estuary Partnership
		Thames Estuary Partnership
		Thames Water (Property Services)
Hattie	Hartman	The Architects' Journal
		The City UK
Elaine	Toogood	The Concrete Centre
John	Croxen	The Countryside Charity
John	Sadler	The Countryside Charity

		The Countryside Charity
Fiona	McKinnon	The Housing Finance Corporation Limited
James	Hopkins	The London Cocktail Club
Tom	Clarke	Theatres Trust
Michael	Reed	TheTin Ltd
John	Archer	Tower Hamlets
Mike	Ibbott	TP Bennett
Conor	Brady	Transport for London
James	Marshall	Transport for London
Sam	Longman	Transport for London
Katherine	Drayson	Transport for London
Carol	Harrison	Trust for London
Laurence	Brooker	Turley
Rory	McManus	Turley
		Twentieth Century Society
Louise	Hutchins	UK Green Building Council
Simon	McWhirter	UK Green Buildings Council
		UK Power Networks
Xianyun	QI	University College London
Patricia	Wilson	University College London
Chia-Lin	Chen	University of Liverpool
Manuela	Madeddu	University of Liverpool in London
Julian	Allen	University of Westminster
Robert	Huxford	Urban Design Group
Bill	Bourne	Vercity
Geary	Newton	Victorian Society
Mark	Faugstad	Vision3
Derek	Barnett	W Denis Credit Risk Ltd
William	Brook	Waldrams
Samantha	Davenport	Waltham Forest
Caroline	Petryshyn	Warwick Estates
David	Alpers	Washington University in St Louis
Ankit	Singh	Waterman Group
Mark	Terndrup	Waterman Group
Stella	Anastasia	Waterman Group
Hrabrina	Nikolova	Westminster
Julia	Donaldson	Westminster
Paolo	Balice	Westminster
Ian	Poole	Westminster
Anna Lisa	McSweeney	White
Cadence	Woodland	Wilson James
Norman	Winbourne	Winbourne Martin French
Andrew	Goodchild	Wolff Architects
Shaun	Baker	Woodalls Design
Bridget	Fox	Woodland Trust
		Wordsearch Limited
Malachy	Doran	Worshipful Company of Barbers
		Worshipful Company of Brewers
Jeff	Mason	Worshipful Company of Butchers
		Worshipful Company of Carpenters

Ann	Head	Worshipful Company of Chartered Architects
Amanda	Jackson	Worshipful Company of Chartered Surveyors
Oliver	Bartrum	Worshipful Company of Clockmakers
Adrian	Carroll	Worshipful Company of Coopers
		Worshipful Company of Cordwainers
		Worshipful Company of Drapers
Matthew	Johnson	Worshipful Company of Environmental Cleaners
Graham	Bamford	Worshipful Company of Farmers
Charlotte	Clifford	Worshipful Company of Farriers
Kate	Pink	Worshipful Company of Fletchers
Michele	Newman	Worshipful Company of Founders
		Worshipful Company of Fruiterers
Bill	Walworth	Worshipful Company of Fuellers
		Worshipful Company of Girdlers
Andrew	Birks	Worshipful Company of Goldsmiths
Greville	Bibby	Worshipful Company of Grocers
Tracy	Jones	Worshipful Company of Grocers
Adrian	Mundin	Worshipful Company of Gunmakers
Mark	Knott	Worshipful Company of Haberdashers
Tony	Colman	Worshipful Company of Horners
		Worshipful Company of Innholders
Amanda	Jackson	Worshipful Company of Joiners & Ceilers
Nick	Dart	Worshipful Company of Leathersellers
Matthew	Lawrence	Worshipful Company of Leathersellers
Nigel	Gammon	Worshipful Company of Merchant Taylors
Hugh	Lloyd	Worshipful Company of Musicians
Nigel	Bamping	Worshipful Company of Plaisterers
Paul	Nash	Worshipful Company of Plumbers
Patricia	Boswell	Worshipful Company of Security Professionals
		Worshipful Company of Shipwrights
		Worshipful Company of Skinners
Helen	Perkins	Worshipful Company of Spectacle Makers
David	Homer	Worshipful Company of Tallow Chandlers
Alex	Robertson	Worshipful Company of Turners
		Worshipful Society of Apothecaries
Chris	Adair	
Kate	Aspinall	
John	Bailey	
Rebecca	Bailey-Harris	
Mariam	Bergloff	
Donald	Berman	
Jane	Bickerton	
Jonathan	Blathwayt	
Derek	Byers	
John	Byrne	
Eileen	Campbell	
David	Canty	
Elizabeth	Carmichael	
Nancy	Chessum	
Rodney	Clark	

Keith	Clarke	
Karl	Clowry	
David	Coleman	
Lynda	Collingwood	
Ruth	Cooke-Yarborough	
Gianetta	Corley	
Yvonne	Courtney	
Nigel	Dixon	
Matthew	Doidge	
Richard	Ellis	
John	Finney	
Marianne	Fredericks	
Kevin	Geary	
Luke	Gething	
Izzy	Gibbin	
Tanja	Goudarzi Pour	
Lorna	Gradden	
John	Greager	
Lionel	Green	
Tony	Halmos	
Jake	Handley	
Alison	Hart	
John	Harte	
Therine	Hedderly	
Andrew Brian	Hickman	
Richard	Hillebron	
Elizabeth	Hirst	
Don	Hodson	
Sarah	Hudson	
David	Hughes	
Mary	Hustings	
Henry	Irwig	
SA	Kitzinger	
Alan	Lacey	
Garth	Leder	
Beverly	Levy	
Natasha	Lloyd-Owen	
Samantha	Logan	
Stuart	Lynas	
Alison	MacDonald	
James	Malpas	
Howard	Martin	
Tom	Martin	
Barbara	Mathews	
Malcolm	Matson	
Elizabeth	McKenzie	
Gary	McLean	
Iain	Meek	
Jakki	Mellor-Ellis	
Stuart	Morganstein	

Christopher	Morley	
CB	Murphy	
Michael	O'Driscoll	
Deborah	Oliver	
David	Pamwaller	
Elizabeth	Patterson	
Derek	Penney	
Janet	Pilch	
Richard	Rauser	
Derek	Read	
Andrew	Rees	
Fred	Rodgers	
Jorge	Rodrigues	
Vanessa	Roguska	
David	Rose	
Susan	Royce	
Nazar	Sayigh	
Marlena	Schmool	
Keith	Simmonds	
Jane	Smith	
Ronald Edgar	Smith	
Dawn	Spicer	
Vicky	Stewart	
Paul	Stone	
Anthony	Swanson	
Brenda	Szlesinger	
David	Taylor	
John	Tomlinson	
Jessica	Tulasiewicz	
Paul	Turtle	
Margaret	Urry	
Dimitri	Varsamis	
Tony	Vogal	
Robert	Warburton	
Siobhan	Ward	
Terence	Webb	
Adam	Weiner	
Joanne	Welch	
AD	Wilson	
Jeni	Wright	
Grace	Yau	
Chris	Young	
Rob	Yuille	
Aisha	Yusaf	
Charles	Fentiman	

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TEST OF RELEVANCE: EQUALITY ANALYSIS (EA)

The screening process of using the Test of Relevance template aims to assist in determining whether a full Equality Analysis (EA) is required. The EA template and guidance plus information on the Equality Act and the Public Sector Equality Duty (PSED) can be found on City of London Intranet at: [Equality and Inclusion](#)

Introduction

The Public Sector Equality Duty (PSED) is set out in the Equality Act 2010 (s.149).

This requires public authorities, in the exercise of their functions, to have statutory 'due regard' to the need to:

- Eliminate discrimination, harassment and victimisation
- Advance equality of opportunity between people who share a protected characteristic and those who do not, and
- Foster good relations between people who share a protected characteristic and those who do not.

The characteristics protected by the Equality Act 2010 are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sexual orientation

It is also Corporation policy to give voluntary (non-statutory) 'due regard' to the impact upon Social Mobility.

What is due regard?

- Statutorily, it involves considering the aims of the duty in a way that is proportionate to the issue at hand.
- Ensuring that real consideration is given to the aims and the impact of policies with rigour and with an open mind in such a way that it influences the final decision.
- Due regard should be given before and during policy formation and when a decision is taken including cross cutting ones as the impact can be cumulative.

The general equality duty does not specify how public authorities should analyse the effect of their business activities on different groups of people. However, case law has established that equality analysis is an important way public authorities can demonstrate that they are meeting the requirements.

Even in cases where it is considered that there are no implications of proposed policy and decision making on the PSED it is good practice to record the reasons why and to include these in reports to committees where decisions are being taken.

It is also good practice to consider the duty in relation to current policies, services and procedures, even if there is no plan to change them.

The Corporation has also adopted a voluntary (non-statutory) due regard of the impact upon social mobility issues. This should be considered generally and, more specifically, against the aims/objectives in the Social Mobility Strategy, 2018-28.

How to demonstrate compliance

Case law has established the following principles apply to the PSED:

- **Knowledge** – the need to be aware of the requirements of the Equality Duty with a conscious approach and state of mind.
- **Sufficient Information** – must be made available to the decision maker.
- **Timeliness** – the Duty must be complied with before and at the time that a particular policy is under consideration or decision is taken not after it has been taken.
- **Real consideration** – consideration must form an integral part of the decision making process. It is not a matter of box-ticking; it must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision.
- **Sufficient Information** - The decision maker must consider what information he or she has and what further information may be needed in order to give proper consideration to the Equality Duty
- **No delegation** - public bodies are responsible for ensuring that any third parties which exercise functions on their behalf are capable of complying with the Equality Duty, are required to comply with it, and that they do so in practice. It is a duty that cannot be delegated.
- **Review** – the duty is continuing applying when a policy is developed and decided upon, but also when it is implemented and reviewed.

However, there is no requirement to:

- Produce equality analysis or an equality impact assessment
- Indiscriminately collect diversity data where equalities issues are not significant
- Publish lengthy documents to show compliance
- Treat everyone the same. Rather, it requires public bodies to think about people's different needs and how these can be met
- Make services homogeneous or to try to remove or ignore differences between people.

The key points about demonstrating compliance with the duty are to:

- Collate sufficient evidence to determine whether changes being considered will have a potential impact on different groups
- Ensure decision makers are aware of the analysis that has been undertaken and what conclusions have been reached on the possible implications
- Keep adequate records of the full decision making process

Test of Relevance screening

The Test of relevance screening is a short exercise that involves looking at the overall proposal and deciding if it is relevant to the PSED.

Note: If the proposal is of a significant nature and it is apparent from the outset that a full equality analysis will be required, then it is not necessary to complete the Test of Relevance screening template and the full equality analysis must be completed.

The questions in the Test of Relevance Screening Template to help decide if the proposal is equality relevant and whether a detailed equality analysis is required. The key question is whether the proposal is likely to be relevant to any of the protected characteristics.

Quite often, the answer may not be so obvious, and service-user or provider information will need to be considered to make a preliminary judgment. For example, in considering licensing arrangements, the location of the premises in question and the demographics of the area could affect whether section 149 considerations come into play.

There is no one size fits all approach, but the screening process is designed to help fully consider the circumstances.

What to do

In general, the following questions all feed into whether an equality analysis is required:

- How many people is the proposal likely to affect?
- How significant is its impact?
- Does it relate to an area where there are known inequalities?

At this initial screening stage, the point is to try to assess obvious negative or positive impact.

If a negative/adverse impact has been identified (actual or potential) during completion of the screening tool, a full equality analysis must be undertaken.

If no negative / adverse impacts arising from the proposal it is not necessary to undertake a full equality analysis.

On completion of the Test of Relevance screening, officers should:

- Ensure they have fully completed, and the Director has signed off the Test of Relevance Screening Template.
- Store the screening template safely so that it can be retrieved if for example, Members request to see it, or there is a freedom of information request or there is a legal challenge.
- If the outcome of the Test of Relevance Screening identifies no or minimal impact refer to it in the Implications section of the report and include references to it in the Background Papers when reporting to the Committee or other decision making process.



1. Proposal / Project Title: Planning for Sustainability Supplementary Planning Document (SPD)

2. Brief summary (include main aims, proposed outcomes, recommendations / decisions sought):

The purpose of this Supplementary Planning Document (SPD) is to provide guidance on how applicants should approach sustainability in their developments through the application process. It has been prepared to provide additional detail and guidance on how to fulfil policies of the current Local Plan, as well as the emerging policies of the City Plan 2040. The SPD underwent extensive public consultation between 18th March and 17th May 2024 and has been amended to take into account suggested changes, where relevant.

Specifically, this SPD:

- Sets out the key approaches that the City of London Corporation (CoLC) is targeting on different sustainability themes and outlines key actions to be taken into consideration to develop an exemplar scheme;
- Identifies a list of key actions to be considered throughout the design process and provides details specific to the City of London for each sustainability theme;
- Provides guidance on what, how and when relevant sustainability aspects should be taken into consideration during the planning application process and sets out submission requirements throughout the life-cycle of the development, from the pre-application process to post completion, and
- Provides a collation of relevant recommended standards, certifications and guidelines.

3. Considering the equality aims (eliminate unlawful discrimination; advance equality of opportunity; foster good relations), indicate for each protected group whether there may be a positive impact, negative (adverse) impact or no impact arising from the proposal:

Protected Characteristic (Equality Group)	Positive Impact	Negative Impact	No Impact	Briefly explain your answer. Consider evidence, data and any consultation.
Age	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The SPD will have a positive impact on older and younger people, who are disproportionately affected by the effects of climate change such as extreme weather conditions, flooding and poor air quality resulting from greenhouse gas emissions.
Disability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The SPD will have a positive impact on people with disabilities who are disproportionately affected by the effects of climate change such as extreme weather conditions, flooding and poor air quality resulting from greenhouse gas emissions. Sustainable construction methods will benefit people with disabilities through achieving accessible and adaptable buildings in line with building regulations.
Gender Reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The SPD will not have a specific impact on people experiencing gender assignment.
Marriage and Civil Partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The SPD will not have a specific impact on people who are married or in civil partnerships.
Pregnancy and Maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The SPD will not have a specific impact on people who are pregnant or have recently given birth.
Race	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The SPD will not have a specific impact on specific races.
Religion or Belief	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The SPD will not have a specific impact on religions or beliefs
Sex (i.e. gender)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The SPD will not have a specific impact on specific sex/genders.
Sexual Orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The SPD will not have a particular impact on gay, lesbian and bisexual people.

4. Are there any potential social mobility or wider issues? Yes No **Briefly explain your answer:** The SPD is not considered to have any impact on social mobility or wider issues.

5. There are no negative / adverse impact(s) Please briefly explain and provide evidence to support this decision:
The nine categories of protected characteristics were assessed, and the SPD has been assessed as having no negative impact on any of the characteristics.

6. Are there positive impacts of the proposal on any equality groups or Social Mobility? Please briefly explain how these are in line with the equality aims or social mobility strategy: The nine categories of protected characteristics were assessed. The SPD has been assessed as having a positive impact on the categories of age and disability, however, the implementation of the SPD will create a more sustainable environment, which will benefit everyone.

7. As a result of this screening, is a full EA necessary?

Yes

No

Briefly explain your answer:

Please check appropriate box

A full EA screening is not considered to be necessary as none of the categories of the nine protected characteristics have been assessed as having a negative or adverse impact resulting from the implementation of the Planning for Sustainability SPD.

8. Name of Lead Officer: Lisa Russell

Job title: Planning Officer

Date of completion: 07/10/2024

Name: Rob McNicol

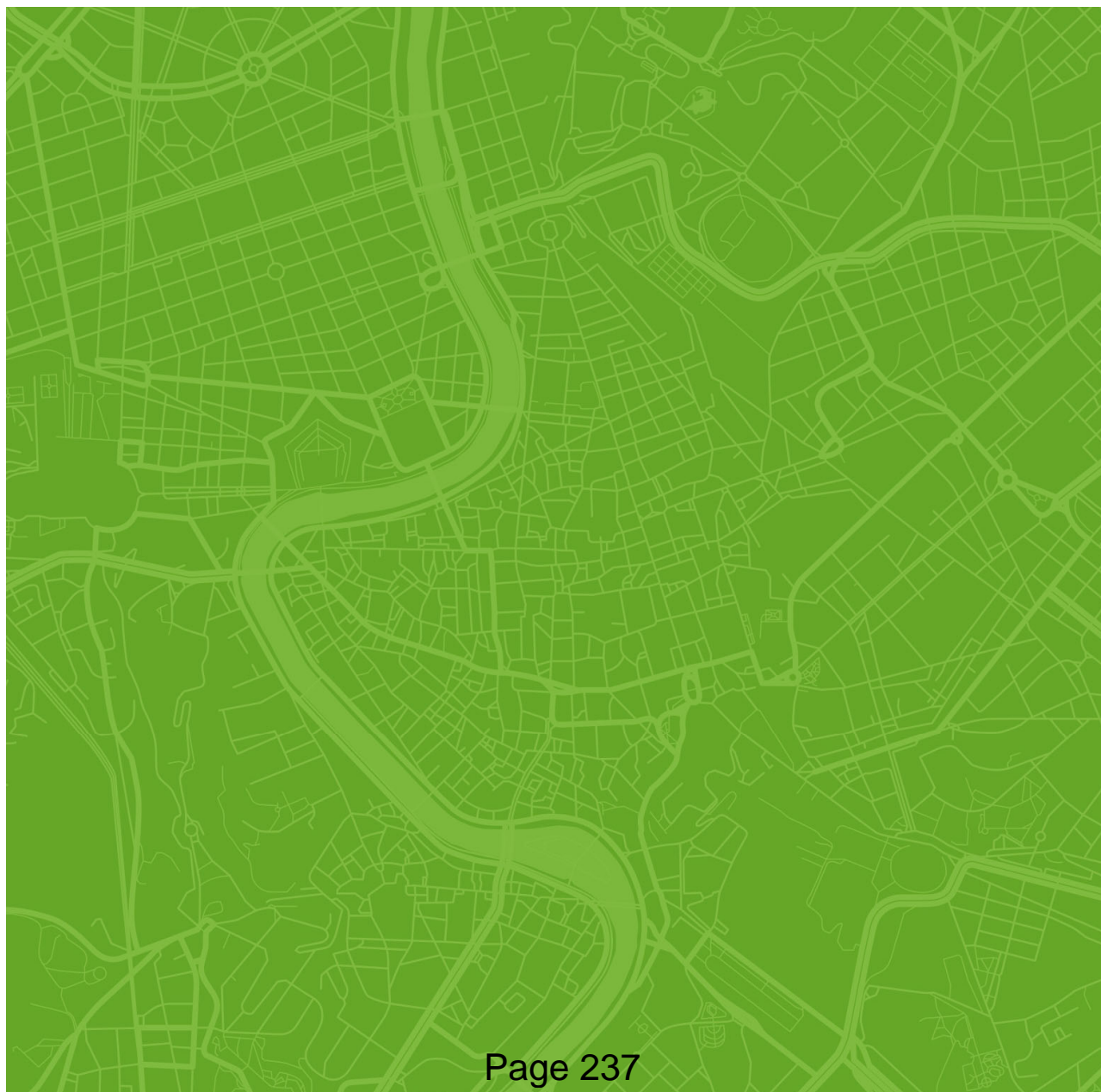
Date: 07/10/2024



City of London Corporation

**Planning for Sustainability
Supplementary Planning
Document
SEA Screening Opinion**

Final report
Prepared by LUC
February 2024



City of London Corporation

**Planning for Sustainability Supplementary
Planning Document
SEA Screening Opinion**

Version	Status	Prepared	Checked	Approved	Date
1.	Draft Screening Report	H Ennis	J Pearson	J Pearson	08.02.2024
2.	Final Screening Report	H Ennis	K Nicholls	K Nicholls	16.02.2024

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Chapter 1

Introduction

1.1 The City of London Corporation (CoLC) is the local planning authority for the City of London, the financial district of London. It has prepared a Planning for Sustainability Supplementary Planning Document (SPD).

1.2 LUC has been appointed by CoLC to consider whether there is a need for Strategic Environmental Assessment (SEA) to be undertaken for the SPD. Planning Practice Guidance (PPG)¹ states that there is no legal requirement for an SPD to be subject to SA, but that SEA may be required if it is likely to have significant environmental effects.

1.3 The SEA process is governed by the SEA Regulations² which transpose European Directive 2001/42/EC (the SEA Directive) into UK law. The Levelling-up and Regeneration Act, which received Royal Assent in October 2023, sets out detailed reforms to the planning system. Amongst other things, the Act allows for the replacement of the current SEA regime with a new requirement for an Environmental Outcomes Report. The specific requirements will be set out in forthcoming regulations, along with information about transition arrangements; however at present the requirement for SEA remains as set out in existing legislation.

¹ [Department for Levelling Up, Housing and Communities \(2016, updated 2023\) Planning Practise guidance](#)

² The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633) as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI2018/1232) and The Environmental Assessment

of Plans and Programmes (Amendment) Regulations 2020 (SI 2020/1531). It should be noted that the purpose of the amendments to the SEA Regulations is to ensure that the law functions correctly after the UK has left the European Union. No substantive changes are made to the way the SEA regime operates.

Chapter 2

SEA screening

Scope of the Planning for Sustainability SPD

2.1 CoLC has prepared the Planning for Sustainability SPD (November 2023), which relates to the City of London area. The purpose of the SPD is to provide guidance on how applicants for planning permission should approach sustainability in their developments through the application process. The SPD includes the following aims:

- Sets out the key approaches that CoLC is targeting on different sustainability themes and outlines key actions to be taken into consideration to develop an exemplar scheme.
- Identifies key actions to be considered throughout the design process and provides details specific to the City of London for each sustainability theme.
- Provides guidance on what, how and when relevant sustainability aspects should be taken into consideration during the planning application process and sets out submission requirements throughout the life-cycle of the development, from the pre-application process to post completion.
- Collates relevant recommended standards, certifications and guidelines.

2.2 The SPD has been prepared to provide additional detail and guidance on how to fulfil policies in the City of London Local Plan 2015, London Plan 2021 and the Revised Proposed Submission Draft City Plan 2040 (previously the City Plan 2036). The SPD will also be a material consideration in determining planning applications. The SPD sets out what planning officers expect to see addressed through the design of a development and applicants should work through all topic areas of the SPD.

2.3 This SPD is divided into thematic chapters, each with subtopics identified as key sustainability considerations for all development proposals within the City as follows:

- Climate change mitigation and adaptation
- Retrofit and reuse
- Greenhouse gas emissions and energy use

- Whole Life-Cycle Carbon
- Operational emissions and energy use
- Circular economy
 - Circular Economy in Construction
 - Operational Circular Economy
- Climate resilience
 - Flood Risk and sustainable urban drainage
 - Water Resource Management
 - Building and Urban Overheating
 - Pest & Diseases
 - Infrastructure resilience
- Biodiversity
 - Urban greening
 - Urban greening Factor
 - Biodiversity net gain

Baseline information

2.4 This section outlines baseline information for the City of London that is relevant to plan-making and SEA. It draws from the information set out in the Sustainability Appraisal (SA) report for the Draft City Plan 2040 (Local Plan Review)³.

Context

2.5 The City of London Corporation is the local planning authority for the City of London. The City of London forms part of London as a whole, along with 32 other London Boroughs. The City of London, also known as the Square Mile, is the financial district of London.

Biodiversity, Flora and Fauna

2.6 Biodiversity within the City of London is constrained by the high density of buildings and built infrastructure along with the pressure on limited areas of isolated open space, which are well used. However, there has been an increase in the number of areas of open space from 32 hectares in 2011/12 to 35 hectares in 2021/22⁴.

2.7 There are a total of 10 Sites of Importance for Nature Conservation (SINCs) in the City. Upon adoption of the emerging City Plan 2040, the City is projected to have 13 SINCs. The potential new SINCs are: Postman's Park; Portsoken Street Garden; and St. Dunstan in the East Church Garden.

2.8 The City of London Biodiversity Action Plan (BAP)⁵, which is currently under review, provides a framework to fulfil all legislative requirements relating to the management of green spaces and identifies and prioritises actions for biodiversity at a local level.

Population

2.9 The City of London as the financial district for London has a low resident population and a large daytime population, most of whom commute to the City from elsewhere in London and beyond. According to the 2021 Census the population of the City of London is 8,600⁶. Data taken from the City Statistics briefing shows that in 2021, there were 587,000 workers in the City of London⁷. When looking at the age profile of the resident population, age groups between 0-19, 20-64 and 65+ are all expected to increase between 2011 and 2036. The age group of the 65+ is expected to see the most significant increase from 1,051 in 2011 to 2,649 in 2036, largely due to the ageing of the population within the main residential areas of Barbican and Golden Lane⁸.

2.10 Housing land use in the City of London is concentrated around four estates (Barbican, Golden Lane, Middlesex Street and Mansell Street), with the remainder living in smaller residential clusters at Smithfield, Queenhithe, Carter Lane and City West. There is a high number of second home ownership within the City. Around 1,714 of the 7,636 homes in the City are second homes (approximately 22.5% of the housing stock)⁹.

Human Health

2.11 The residents of the City consider themselves to be in good or very good health (87.8% of all residents). In 2021, 57% of City residents described their health as "very good", increasing from 55% in 2011. Those describing their health as "good" rose remained steady at 31 between 2011 and 2021¹⁰.

2.12 In terms of life expectancy, male life expectancy at birth was 86.8 years, which was 9.3 years higher than the England

³ [City of London \(2024\) Sustainability Appraisal main report Local Plan Review](#)

⁴ [City Plan 2040 Revised Proposed Submission Draft February 2024](#)

⁵ [City of London Biodiversity Action Plan 2021-2026](#)

⁶ [Office for National Statistics \(2023\). How life has changed in the City of London: Census 2021](#)

⁷ [City of London Statistics briefing](#)

⁸ [City Plan 2036 Proposed Submission Draft Topic Paper 2 - Housing](#)
⁹ [Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government \(2022\). Dwelling stock \(including vacant\)](#)

¹⁰ [Office for National Statistics \(2023\). How life has changed in the City of London: Census 2021](#)

average. Female life expectancy at birth was 90.7 years, which was 7.6 years higher than for England¹¹.

Soil

2.13 Due to the high concentration of buildings and hard surfaces in the City, there are limited high quality soils and land is predominantly in urban use according to the Agricultural Land Classification¹².

Water

2.14 The River Thames flows along the southern boundary of the City. According to the Environment Agency, the middle section of the River Thames that flows past the City is considered to be in moderate condition. There has been no significant change in the water quality between 2013 and 2019¹³.

2.15 The only area at risk of flooding is the southern part of the City within the immediate vicinity of the River Thames. However, the City is protected by a wall along the River Thames and by the Thames Barrier¹⁴.

Air

2.16 The main contributor to local air pollution is road traffic. The City, alongside the rest of central London, is an Air Quality Management Area for fine particulates (PM₁₀) and nitrogen dioxide (NO₂). Between 2015 and 2021, pollution levels at all monitoring sites were significantly below the limits set out in UK air quality objectives for PM₁₀ and NO₂. However, concentrations of PM₁₀ remained above the relevant WHO guidelines at most sites¹⁵.

2.17 The implementation of highway and environmental enhancement schemes has contributed to a reduction in people's exposure to poor air quality by widening pavements, creating traffic free environments and using planting to screen open spaces from roads. Major strategic transport projects such as the Elizabeth Line, Thameslink and the Northern Line/ Bank Station upgrade have been completed and are delivering additional public transport capacity to, from and through the City.

Climatic Factors

2.18 The issues of energy consumption and the consequent emissions of carbon dioxide are of significant importance to CoLC and have a contributory impact on climate change.

2.19 Overall carbon emissions in the City have decreased significantly, particularly in more recent years. Total carbon emissions for the City in 2020 met the Greater London Authority's target of a 60% reduction in carbon emissions by 2025. Industrial, commercial and transport remain the biggest emitters of carbon emissions. However, since 2021 there has been a 60% reduction in carbon emissions in these sectors¹⁶.

Material Assets

2.20 In 2022, the City contributed around £85 billion in GVA to the UK's national income, which is 3.5% of the UK's output and 15% of London's output¹⁷.

2.21 Offices are the predominant land use within the City. As of the 31st March 2022, there was 9,440,000 m² of gross office floor-space within the City. This is expected to rise to 9,668,000 m² in 2025/26. Financial and professional services remain the two largest sectors in the City. Other main land uses are transport, open space, housing, retail, utilities, public buildings, hotels and visitor attractions, education and health¹⁸.

2.22 Enhancement of the public realm is important in providing the high-quality environment that is fitting for one of the world's leading financial and business centres. There are a number of Area Enhancement Strategies for the City, the most recent being the City Cluster Vision and Culture Mile Look and Feel Strategy.

Heritage and Tall buildings

2.23 There is a significant contrast between the modern, high-rise parts of the City and the more historic, predominantly low-rise areas. Intense development pressures in the City have significant implications for both individual heritage assets within the City's boundaries, and also for wider historic character in the neighbouring boroughs of Tower Hamlets, Islington, Camden, Westminster, Southwark and Lambeth and beyond.

2.24 The City contains a high concentration of heritage assets, including over 600 listed buildings, 27 conservation areas, 48 scheduled monuments and 5 registered parks and gardens within the Square Mile. Many of these heritage assets contribute significantly to the City's skyline, namely St Paul's Cathedral and the Monument, whilst the City also provides part of the backdrop and setting for the Tower of London

¹¹ Public Health England Profile of the City of London

¹² Natural England 2011 Agricultural Land Classification map London and the South East

¹³ Environment Agency Thames Middle Water Quality Data 2013-2019

¹⁴ Gov.uk (2021) Flood risk mapping

¹⁵ City of London Corporation Air Quality Annual Status Report for 2022 (May 2023)

¹⁶ Greater London Authority (2023). London Energy and Greenhouse Gas Inventory

¹⁷ City of London Statistics Briefing

¹⁸ City of London Local Plan Monitoring Report – Offices (2022)

World Heritage Site. Today, the City has become internationally famous for its high-rise architecture.

2.25 The City and its surrounding area contain many famous landmarks that are visible from viewpoints across London. Views of the City's skyline from the River Thames are especially notable and certain local views of St Paul's Cathedral have been protected by the City Corporation. Landmarks such as St Paul's Cathedral, the Monument and the Tower of London are internationally renowned. As such CoLC seeks to protect and enhance significant City and London views of important buildings, townscapes and skylines, making a substantial contribution to protecting the overall heritage of City landmarks.

2.26 Tall buildings began emerging in the City on the completion of Tower 42 in 1981. In the City of London, the number of tall buildings and associated floorspace permitted and completed during the period 2011/12 to 2021/22 has varied. There were nineteen tall buildings completed over the period 2011/12 to 2021/22, which delivered over 1,186,000 m² of floorspace¹⁹.

SEA screening

2.27 An assessment has been undertaken to determine whether the Planning for Sustainability SPD requires SEA in accordance with the SEA Regulations.

2.28 **Figure 2.1** overleaf presents a flow diagram entitled 'Application of the SEA Directive to plans and programmes', which is taken from A Practical Guide to the Strategic Environmental Assessment Directive²⁰. This is a useful guide when considering whether a plan should be subject to SEA (The Practical Guide has been superseded by the National Planning Practice Guidance; however it still provides a useful and relevant guide to the process to use in making SEA screening decisions)

¹⁹ [City of London \(2023\). Local Plan Monitoring Report – Tall Buildings](#)

²⁰ [Office of the Deputy Prime Minister \(2005\) A Practical Guide to the Strategic Environmental Assessment Directive](#)

Figure 2.1: Application of the SEA Directive to plans and Programmes

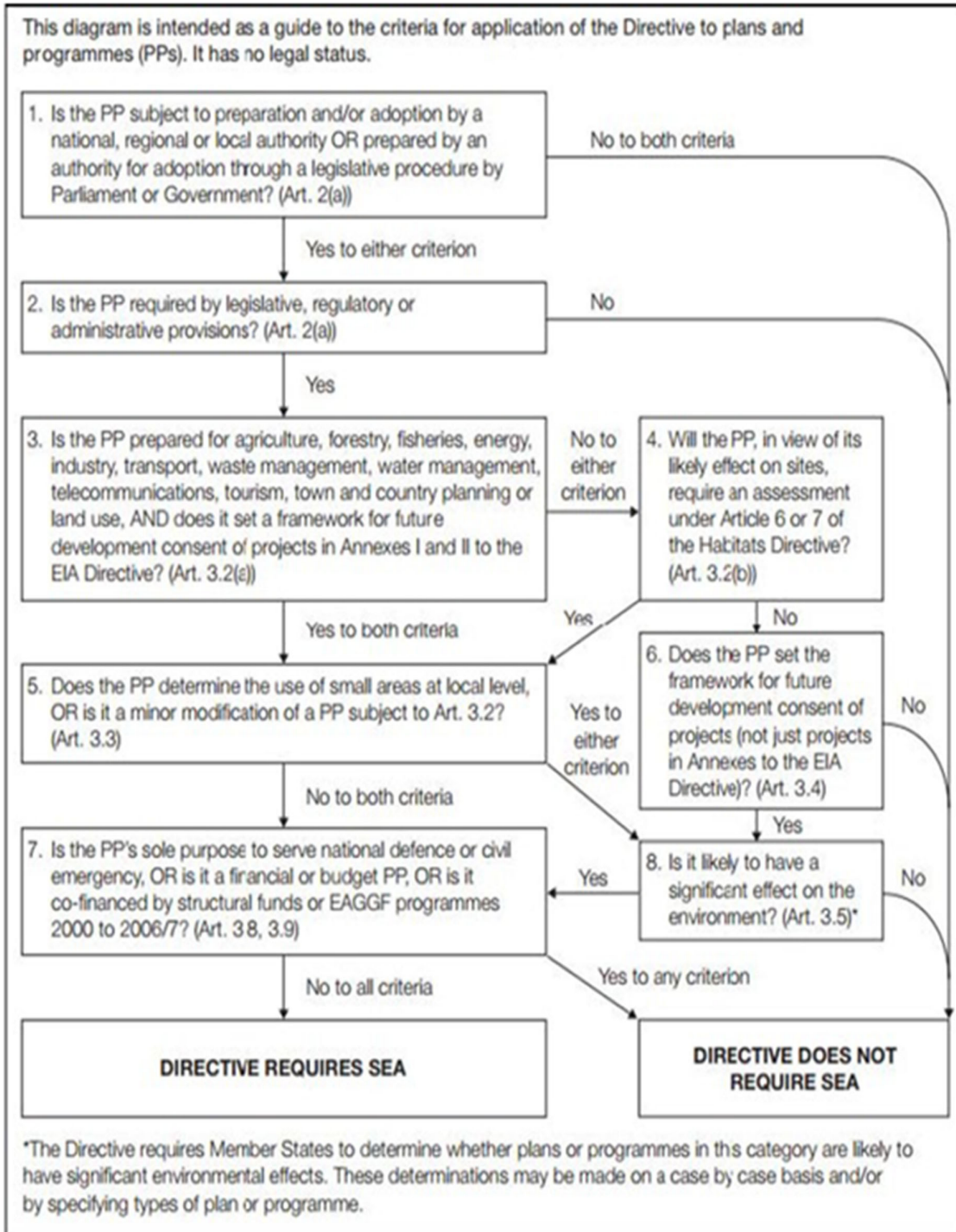


Table 2.1: Screening criteria for application of the SEA Directive to the Planning for Sustainability SPD

Screening question	Yes/No	Reason
1. Is the PP (plan or programme) subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Yes	The SPD is being prepared by CoLC to support the Local Plan 2015, London Plan 2021 and the Draft City Plan 2040 under the Town and Country Planning (Local Planning) (England) Regulations 2012. SEA may be required - move to Q2.
2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))	No	The SPD is being prepared to support the Local Plan 2015, London Plan 2021 and the Draft City Plan 2040. While there is no requirement to produce the Planning for Sustainability SPD (it is an optional plan), once adopted it will become a material consideration when determining planning applications therefore it should continue to be screened. SEA may be required - move to Q3.
3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))	Yes and No	The SPD is being prepared for town and country planning and land use, but it does not set a framework for future development consent of projects in Annexes I and II to the EIA Directive. SEA may be required - move to Q4.
4. Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))	No	HRA Screening (February 2024) of the SPD has been undertaken separately on behalf of the City of London Corporation by LUC and has concluded that no likely significant effects are expected on any European site, either alone or in combination with any other plans or programmes. SEA may be required – move to Q6.
6. Does the PP set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Art. 3.4)	Yes	The SPD does not allocate any sites for development although it sets out planning guidance that will be a material consideration for relevant planning applications. SEA may be required – move to Q8.
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	See below	See below

2.29 Further to question 8 of the SEA Screening guideline questions above, Schedule 1 of the SEA Regulations sets out criteria for determining the likely significance of effects. These are listed in **Table 2.2** below along with comments on the extent to which these significance criteria are met for the likely effects of the Sustainability SPD. A conclusion is then drawn as to whether the SPD is likely to have a significant effect on the environment and hence whether SEA is required.

Table 2.2: Likely significance of the effects of the Sustainability SPD

Significance criteria per SEA Regulations	Comments
The characteristics of the plan or programme, having regard, in particular, to:	
1. The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	The Planning for Sustainability SPD will support the Local Plan 2015, London Plan 2021 and the Draft City Plan 2040, which set out the strategic policies relating to land use and development proposals. The SPD will be a material consideration in the determination of planning applications. The SPD will provide additional detail and guidance on how to fulfil policies of the Local Plan 2015, London Plan 2021 and the Draft City Plan 2040 which are most relevant to climate change and sustainability. The SPD sets out what planning officers expect to see addressed through the design of a development and applicants should work through all topic areas of the SPD. The SPD does not allocate sites for built development.
2. The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.	The SPD has to be in conformity with Local Plan 2015, London Plan 2021 and the Draft City Plan 2040. The SPD must also have regard to the National Planning Policy Framework. The SPD does not have influence over other plans. The SPD will be a material consideration in the determination of planning applications.
3. The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.	The overall purpose of the SPD is to promote sustainable development within the City of London. The SPD provides additional detail and guidance on the retrofitting and reuse of buildings and the circular economy. The additional detail and guidance supports Draft City Plan 2040 policies CE1, S8, S11, HE1, CR1, DE1, DE8, S1, HL2, S10, AT1, AT2, S16, S7 and S15; Local Plan 2015 policies CS12, DM12.1, CS15, CS17, DM17.2, CS10 and CS18; and, London Plan 2021 policies D3, SI 1, SI 2, SI 3, SI 4, SI 5, SI 6, SI 12, SI 13, D4, SI 7, SI 8, D6, D11 and GG6 which support delivering good design, climate change resilience and adaptation and a move to low carbon living. In line with the SPD, development should contribute to sustainable development.
4. Environmental problems relevant to the plan or programme.	Baseline information relating to the City of London was described earlier in this chapter. Biodiversity in the City is relatively constrained by the high levels of development. However, there are ten SINC's within the City. There is also a high concentration of heritage assets which include over 600 Listed buildings, 27 conservation areas, 48 scheduled monuments and 5 registered parks and gardens.
5. The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).	The SPD supports adopting a retrofit first approach which aims to minimise carbon emissions, reduce construction waste and support the reuse of existing buildings. The SPD also supports the circular economy principles which includes reducing waste production and supports zero waste development. The SPD identifies opportunities to tap into waste heat sources within the City. The SPD also supports minimising the volume of water required to be treated and outlines considerations for development related to water resource management.
Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:	
6. The probability, duration, frequency and reversibility of the effects.	The Planning for Sustainability SPD does not allocate sites for built development. The SPD covers the period up to 2040. Effects of the Planning for Sustainability SPD are expected to be indirect (due to not allocating sites) but long-term and permanent.
7. The cumulative nature of the effects.	The effects of the Sustainability SPD will act in combination with those of the Local Plan.

Significance criteria per SEA Regulations	Comments
8. The transboundary nature of the effects.	The SPD focuses on the City of London only. Transboundary effects under the SEA Regulations refers to transboundary effects on other EU Member States; therefore they are not relevant to the SPD.
9. The risks to human health or the environment (e.g. due to accidents).	There are no anticipated risks to human health or the environment from the SPD.
10. The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).	The SPD covers all of the City of London. The City of London has a resident population of 8,600. However, a high number of people commute into the City of London.
<p>11. The value and vulnerability of the area likely to be affected due to:</p> <ul style="list-style-type: none"> ■ Special natural characteristics or cultural heritage; ■ Exceeded environmental quality standards or limit values; and ■ Intensive land-use. 	<p>The City of London is intensively developed.</p> <p>Biodiversity within the City of London is constrained by the high density of buildings and built infrastructure and the pressure on the limited areas of isolated open space which are heavily used. There are a number of SINC's in the City.</p> <p>The health of the City's resident population and their life expectancy are higher than regional and national averages.</p> <p>The City contains a high concentration of heritage assets and many of these heritage assets contribute significantly to the City's skyline. The City also provides part of the backdrop and setting for the Tower of London World Heritage Site and is internationally famous for its high-rise architecture.</p> <p>Road traffic in the City results in local air pollution and while UK air quality objectives are met, WHO guidelines for PM₁₀ are not.</p> <p>The section of the River Thames that flows past the City is in moderate condition.</p>
12. The effects on areas or landscapes which have a recognised national, Community or international protection status.	There are no designated protected landscapes within the City of London but it contains many important heritage assets which provides part of the backdrop and setting for the Tower of London World Heritage Site.

2.30 To assist in judging whether a plan or programme is likely to have significant effects, the SEA Regulations suggest that particular regard is given to the criteria set out in Table 2.2.

2.31 Having considered the characteristics of the Sustainability SPD against these criteria, the key findings are:

- While SPDs in general cannot set out new development policy, they can nevertheless influence the significance of the effects of development policies in the Local Plan by providing additional detail and guidance on their application, particularly since SPDs are a material consideration in determining planning applications.
- The environmental sensitivities of the plan area (the City of London) are such that development is capable of having a significant effect, for example on cultural heritage, biodiversity or air quality. However, the Planning for Sustainability SPD does not allocate sites for development and as such, it is not likely to have significant effects on the environment.
- The overall purpose of the Sustainability SPD is to promote sustainable development within the City of London. Furthermore, it does not allocate sites for built development. As such, it is not likely to have significant effects on the environment.

SEA screening conclusion

2.32 A screening assessment was undertaken by first applying the criteria from the SEA Directive. This determined that SEA of the SPD may be required, if it is likely to have a significant effect on the environment.

2.33 Criteria for determining the likely significance of effects from Schedule 1 of the SEA Regulations were then considered to inform a judgement on whether or not the Planning for Sustainability SPD is likely to have significant environmental effects when assessed against the environmental topics listed in the SEA Regulations. This determined that the nature of SPDs in general and of the receiving environment in the City of London are such that significant effects from an SPD are theoretically possible, particularly in relation to cultural heritage due to the high concentration of heritage assets and development pressures within the City. However, the focus of the Sustainability SPD is on promoting sustainable development and providing guidance on how applicants should approach sustainability in their developments. In addition, the Planning for Sustainability SPD does not allocate any sites for development and is therefore, not likely to have significant effects on the environment.

2.34 The conclusion of the SEA Screening is therefore that the Planning for Sustainability SPD is unlikely to

have significant environmental effects and that full SEA is therefore not required.

Next Steps

2.35 This SEA Screening Report will be sent to the three statutory consultees (Natural England, Historic England and the Environment Agency) and will be reviewed as appropriate in light of any comments received.

LUC

February 2024

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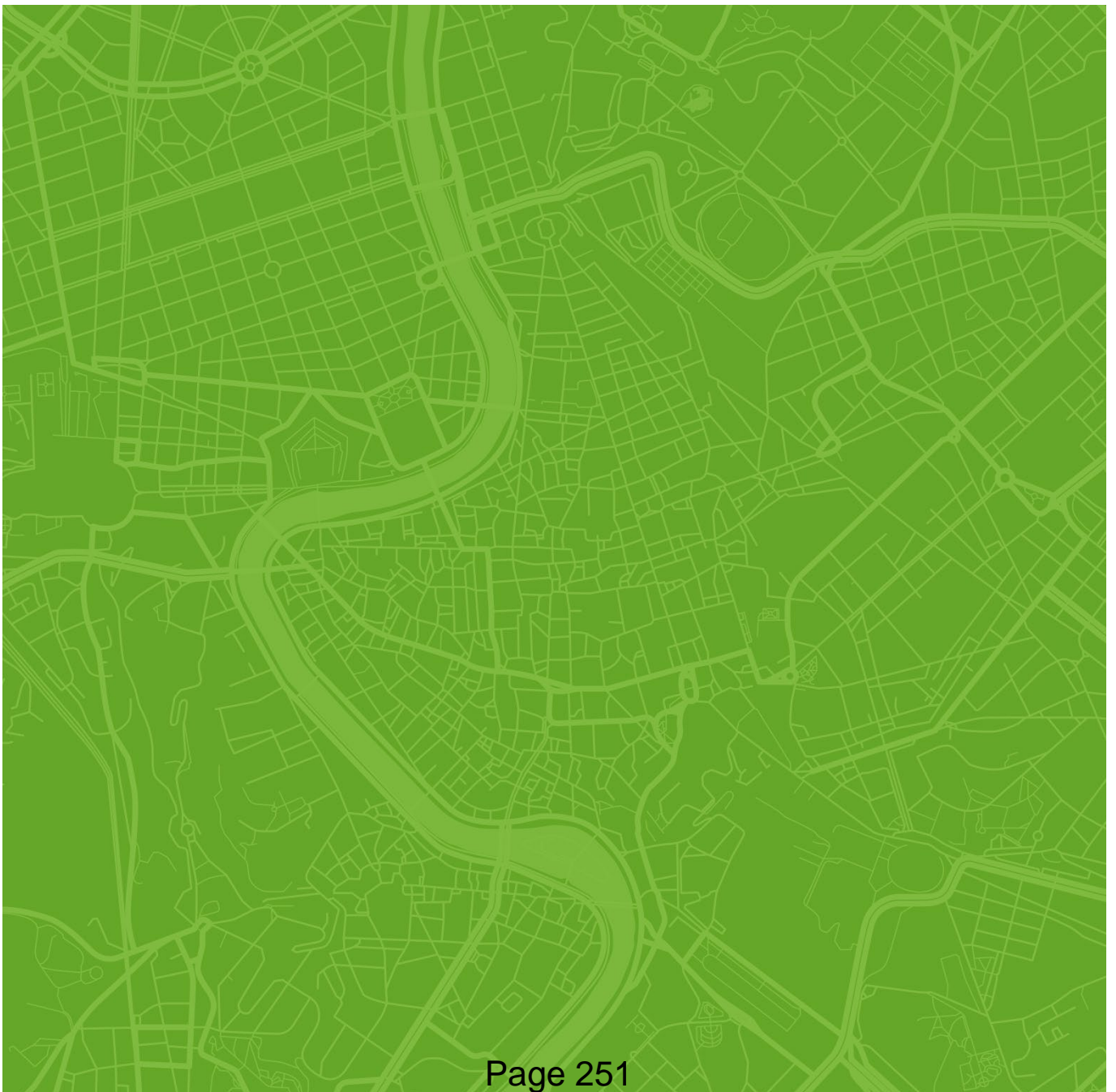
City of London Corporation

Planning for Sustainability Supplementary Planning Document Habitat Regulations Assessment Screening

Final report

Prepared by LUC

February 2024



City of London Corporation

**Planning for Sustainability Supplementary
Planning Document
Habitat Regulations Assessment Screening**

Version	Status	Prepared	Checked	Approved	Date
1.	Draft HRA Screening Report	H Ennis	J Pearson	J Pearson	08.02.2024
2.	Final HRA Screening Report	H Ennis	J Pearson	J Pearson	26.02.2024

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Chapter 1

Introduction

1.1 The City of London Corporation has prepared a Planning for Sustainability Supplementary Planning Document (SPD). LUC has been commissioned by the Council to carry out Habitats Regulations Assessment (HRA) Screening of the SPD on its behalf. The purpose of this screening report is to determine whether the SPD has potential to result in likely significant effects on any European Sites (see Chapter 2).

1.2 A SPD has been prepared by the City of London Corporation, which will be subject to consultation with relevant stakeholders and the public. This report presents a screening assessment of the SPD and should be read in conjunction with that document. If the SPD is subsequently updated, this HRA should be reviewed to determine whether any updates are required in the light of such changes.

Overview of the Planning for Sustainability SPD

1.3 The City of London Corporation has prepared a Planning for Sustainability SPD (November 2023), which relates to the City of London area. The purpose of the SPD is to provide guidance on how applicants should approach sustainability in their developments through the application process. The SPD includes the following aims:

- Sets out the key approaches that the City of London Corporation is targeting on different sustainability themes and outlines key actions to be taken into consideration to develop an exemplar scheme
- Identifies key actions to be considered throughout the design process and provides details specific to the City of London for each sustainability theme
- Provides guidance on what, how and when relevant sustainability aspects should be taken into consideration during the planning application process and sets out submission requirements throughout the life-cycle of the development, from the pre-application process to post completion
- Collates relevant recommended standards, certifications and guidelines.

1.4 The SPD provides additional detail and guidance on how to fulfil the policies in the City of London Local Plan 2015, Local Plan 2021 and the Draft City Plan 2040. Specifically, the additional detail and guidance supports Draft City Plan 2040 policies CE1, S8, DE1, S11, HE1, CR1, DE1, DE8, DE9, S1, HL2, S10, AT1, AT2, S16, S7 and S15; Local Plan 2015 policies CS12, DM12.1, CS15, CS17, DM17.2, CS10 and CS18; and, Local Plan 2021 policies D3, SI2, SI 1, SI 2, SI 3, SI 4, SI 5, SI 6, SI 12, SI 13, D4, SI 7, SI 8, D6, D11 and GG6. The SPD is a material consideration in determining planning applications.

1.5 This SPD is divided into thematic chapters, each with subtopics identified as key sustainability considerations for all development proposals within the City as follows:

- Climate change mitigation and adaptation
- Retrofit and reuse
- Greenhouse gas emissions and energy use
 - Whole Life-Cycle Carbon
 - Operational emissions and energy use
- Circular economy
 - Circular Economy in Construction
 - Operational Circular Economy
- Climate resilience
 - Flood Risk and sustainable urban drainage
 - Water Resource Management
 - Building and Urban Overheating
 - Pest & Diseases
 - Infrastructure resilience
- Biodiversity
 - Urban greening
 - Urban greening Factor
 - Biodiversity net gain

The requirement to undertake Habitats Regulations Assessment of development plans

1.6 The requirement to undertake HRA of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in 2007¹; the currently applicable version is the Habitats Regulations 2017, as amended². When preparing the development plans, the City of London Corporation is therefore required by law to carry out an HRA. The City of London Corporation can commission consultants to undertake HRA work on its behalf and this (the work documented in this report) is then reported to and considered by the City of London Corporation as the ‘competent authority’. The City of London Corporation will consider this work and would usually only progress a Plan if it considers that the Plan will not adversely affect the integrity³ of any ‘European site’, as defined below (the exception to this would be where ‘imperative reasons of overriding public interest’ can be demonstrated; see paragraph 1.10). The requirement for authorities to comply with the Habitats Regulations when preparing a Plan is also noted in the Government’s online Planning Practice Guidance⁴ (PPG).

1.7 HRA refers to the assessment of the potential effects of a development plan on one or more sites afforded the highest level of protection in the UK: SPAs and SACs. These were classified under European Union (EU) legislation but since 1 January 2021 are protected in the UK by the Habitats Regulations 2017² (as amended). Although the EU Directives from which the UK’s Habitats Regulations originally derived are no longer binding, the Regulations still make reference to the lists of habitats and species that the sites were designated for, which are listed in annexes to the EU Directives:

- SACs are designated for particular habitat types (specified in Annex 1 of the EU Habitats Directive⁵) and species (Annex II). The listed habitat types and species (excluding birds) are those considered to be most in need of conservation at a European level. Before EU exit day, designation of SACs also had regard to the coherence of the ‘Natura 2000’ network of European sites. After EU exit day, regard is had to the importance of such sites for the coherence of the UK’s ‘national site network’.

¹ The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007 (2007) SI No. 2007/1843. TSO (The Stationery Office), London.

² The Conservation of Habitats and Species Regulations 2017 (2017) SI No. 2017/1012, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579).

³ The integrity of a site is the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat,

complex of habitats and/or the levels of populations of the species for which it was designated. (Source: UK Government Planning Practice Guidance)

⁴ <https://www.gov.uk/guidance/appropriate-assessment>

⁵ Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the ‘Habitats Directive’)

- SPAs are classified for rare and vulnerable birds (Annex I of the EU Birds Directive⁶), and for regularly occurring migratory species not listed in Annex I.

1.8 The term 'European sites' was previously commonly used in HRA to refer to 'Natura 2000' sites⁷ and Ramsar sites (international designated under the Ramsar Convention). However, a Government Policy Paper⁸ on changes to the Habitats Regulations 2017 post-Brexit states that:

- Any references to Natura 2000 in the 2017 Regulations and in guidance now refer to the new 'national site network'.
- The national site network includes existing SACs and SPAs; and new SACs and SPAs designated under these Regulations.
- Designated Wetlands of International Importance (known as Ramsar sites) do not form part of the national site network. Many Ramsar sites overlap with SACs and SPAs and may be designated for the same or different species and habitats.

1.9 Although Ramsar sites do not form part of the new national site network, Government guidance⁹ states that:

"Any proposals affecting the following sites would also require an HRA because these are protected by government policy:

- proposed SACs
- potential SPAs
- Ramsar sites - wetlands of international importance (both listed and proposed)
- areas secured as sites compensating for damage to a European site."

1.10 Furthermore, the NPPF¹⁰ and practice guidance¹¹ currently state that competent authorities responsible for carrying out HRA should treat Ramsar sites in the same way as SACs and SPAs. The legislative requirement for HRA does not apply to other nationally designated wildlife sites such as Sites of Special Scientific Interest or National Nature Reserves.

1.11 For simplicity, this report uses the term 'European site' to refer to all types of designated site for which Government guidance¹² requires an HRA.

1.12 The overall purpose of an HRA is to conclude whether or not a proposal or policy, or a whole development plan would adversely affect the integrity of the European site in question. This is judged in terms of the implications of the plan for a site's 'qualifying features' (i.e. those Annex I habitats, Annex II species, and Annex I bird populations for which it has been designated). Significantly, HRA is based on the precautionary principle. Where uncertainty or doubt remains, an adverse effect should be assumed.

Stages of HRA

1.13 The HRA of development plans is undertaken in stages (as described below) and should conclude whether or not a proposal would adversely affect the integrity of the European site in question.

1.14 LUC has been commissioned by the City of London Corporation to carry out HRA work on the Council's behalf, and the outputs will be reported to and considered the City of London Corporation, as the competent authority, before adopting the Plan.

1.15 The HRA also requires close working with Natural England as the statutory nature conservation body¹³ in order to obtain the necessary information, agree the process, outcomes and mitigation proposals. The Environment Agency, while not a statutory consultee for the HRA, is also in a strong position to provide advice and information throughout the process as it is required to undertake HRA for its existing licences and future licensing of activities.

Requirements of the Habitats Regulations

1.16 In assessing the effects of a Local Plan in accordance with Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended) (the 'Habitats Regulations'), there are potentially two tests to be applied by the competent authority: a 'Significance Test', followed if necessary by an Appropriate Assessment which would inform the 'Integrity Test'. The relevant sequence of questions is as follows:

⁶ Directive 2009/147/EC of 30 November 2009 on the conservation of wild birds (the 'Birds Directive')

⁷ [The network of protected areas identified by the EU](#)

⁸ <https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017>

⁹ [Defra and Natural England \(2021\) Guidance - Habitats regulations assessments: protecting a European site](#)

¹⁰ [NPPF para 187](#)

¹¹ [The HRA Handbook, Section A3. David Tyldesley & Associates, a subscription based online guidance document](#)

¹² [Defra and Natural England \(2021\) Guidance - Habitats regulations assessments: protecting a European site](#)

¹³ Regulation 5 of the Habitats Regulations 2017.

- Step 1: Under Reg. 105(1)(b), consider whether the plan is directly connected with or necessary to the management of the sites. If not, proceed to Step 2.
- Step 2: Under Reg. 105(1)(a) consider whether the plan is likely to have a significant effect on a European site, either alone or in combination with other plans or projects (the ‘Significance Test’). If yes, proceed to Step 3.

1.17 [Steps 1 and 2 are undertaken as part of Stage 1: HRA Screening, shown in **Table 1.1**.]

- Step 3: Under Reg. 105(1), make an Appropriate Assessment of the implications for the European site in view of its current conservation objectives (the ‘Integrity Test’). In so doing, it is mandatory under Reg. 105(2) to consult Natural England, and optional under Reg. 105(3) to take the opinion of the general public.

1.18 [This step is undertaken during Stage 2: Appropriate Assessment, shown in **Table 1.1**.]

- Step 4: In accordance with Reg. 105(4), but subject to Reg. 107, give effect to the land use plan only after

having ascertained that the plan would not adversely affect the integrity of a European site.

1.19 [This step follows Stage 2 where a finding of ‘no adverse effect’ is concluded. If it cannot be it proceeds to Step 5 as part of Stage 3 of the HRA process]

- Step 5: Under Reg. 107, if Step 4 is unable to rule out adverse effects on the integrity of a European site and no alternative solutions exist then the competent authority may nevertheless agree to the plan or project if it must be carried out for ‘imperative reasons of overriding public interest’ (IROPI).

1.20 [This step is undertaken during Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation shown in **Table 1.1**]

Typical stages

1.21 **Table 1.1** summarises the stages and associated tasks and outcomes typically involved in carrying out a full HRA of a development plan, based on various guidance documents^{14, 15, 16}.

Table 1.1: Stages of HRA

Stage	Task	Outcome
<p>Stage 1: HRA Screening</p>	<p>Description of the development plan and confirmation that it is not directly connected with or necessary to the management of European sites.</p> <p>Identification of potentially affected European sites and their conservation objectives¹⁷.</p> <p>Assessment of likely significant effects of the development plan alone or in combination with other plans and projects, prior to consideration of avoidance or reduction (‘mitigation’) measures¹⁸.</p>	<p>Where effects are unlikely, prepare a ‘finding of no significant effect report’.</p> <p>Where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2.</p>
<p>Stage 2: Appropriate Assessment (where Stage 1 does not rule out likely significant effects)</p>	<p>Information gathering (development plan and European Sites¹⁹).</p> <p>Impact prediction.</p>	<p>Appropriate assessment report describing the plan, European site baseline conditions, the adverse effects of the plan on the European site, how these effects will be avoided or</p>

¹⁴ [UK Government Planning Practice Guidance](#)

¹⁵ European Commission (2001) Assessment of plans and projects significantly affecting European Sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC.

¹⁶ [The HRA Handbook. David Tyldesley & Associates, a subscription based online guidance document](#)

¹⁷ [Conservation objectives are published by Natural England for SACs and SPAs](#)

¹⁸ In line with the CJEU judgment in Case C-323/17 People Over Wind v Coillte Teoranta, mitigation must only be taken into consideration at this stage and not during Stage 1: HRA Screening.

¹⁹ [In addition to European site citations and conservation objectives, key information sources for understanding factors contributing to the integrity of European sites include \(where available\) conservation objectives supplementary advice and Site Improvement Plans prepared by Natural England](#)

Stage	Task	Outcome
	Evaluation of development plan impacts in view of conservation objectives of European sites. Where impacts are considered to directly or indirectly affect qualifying features of European sites, identify how these effects will be avoided or reduced ('mitigation').	reduced, including the mechanisms and timescale for these mitigation measures. If effects remain after all alternatives and mitigation measures have been considered proceed to Stage 3.
Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation	Identify 'imperative reasons of overriding public interest' (IROPI). Demonstrate no alternatives exist. Identify potential compensatory measures.	This stage should be avoided if at all possible. The test of IROPI and the requirements for compensation are extremely onerous.

1.22 It is normally anticipated that an emphasis on Stages 1 and 2 of this process will, through a series of iterations, help ensure that potential adverse effects are identified and eliminated through the inclusion of mitigation measures designed to avoid or reduce effects. The need to consider alternatives could imply more onerous changes to a plan document. It is generally understood that so called 'imperative reasons of overriding public interest' (IROPI) are likely to be justified only very occasionally and would involve engagement with the Government.

Case law

1.23 This HRA has been prepared in accordance with relevant case law findings, including most notably the 'People over Wind' and 'Holohan' rulings from the Court of Justice for the European Union (CJEU).

1.24 The *People over Wind, Peter Sweetman v Coillte Teoranta* (April 2018) judgment ruled that Article 6(3) of the Habitats Directive should be interpreted as meaning that mitigation measures should be assessed as part of an Appropriate Assessment and should not be taken into account at the screening stage. The precise wording of the ruling is as follows:

"Article 6(3)must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site.

1.25 In light of the above, the HRA screening stage does not rely upon avoidance or mitigation measures to draw

conclusions as to whether the Local Plan could result in likely significant effects on European sites, with any such measures being considered at the Appropriate Assessment stage as relevant.

1.26 This HRA also considers the *Holohan v An Bord Pleanala* (November 2018) judgment which stated that:

Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that an 'appropriate assessment' must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site.

1.27 In undertaking this HRA, LUC has considered the potential for effects on species and habitats, including those not listed as qualifying features, to result in secondary effects upon the qualifying features of European sites, including the potential for complex interactions and dependencies. In addition, the potential for offsite impacts, such as through impacts to functionally linked land, and or species and habitats located beyond the boundaries of European site, but which may be important in supporting the ecological processes of the qualifying features, has also been considered in this HRA.

1.28 Similarly, effects on both qualifying and supporting habitats and species on functionally linked land (FLL) or habitat have been considered in the HRA, in line with the High Court judgment in *RSPB and others v Secretary of State* and

London Ashford Airport Ltd [2014 EWHC 1523 Admin] (paragraph 27), which stated that:

“There is no authority on the significance of the non-statutory status of the FLL. However, the fact that the FLL was not within a protected site does not mean that the effect which a deterioration in its quality or function could have on a protected site is to be ignored. The indirect effect was still protected. Although the question of its legal status was mooted, I am satisfied that while no particular legal status attaches to FLL, the fact that land is functionally linked to protected land means that the indirectly adverse effects on a protected site, produced by effects on FLL, are scrutinised in the same legal framework just as are the direct effects of acts carried out on the protected site itself. That is the only sensible and purposive approach where a species or effect is not confined by a line on a map or boundary fence. This is particularly important where the boundaries of designated sites are drawn tightly as may be the UK practice”.

1.29 In addition to this, the HRA takes into consideration the ‘Wealden’ judgment from the CJEU.

1.30 *Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority* (2017) ruled that it was not appropriate to scope out the need for a detailed assessment for an individual plan or project based on the annual average daily traffic (AADT) figures detailed in the Design Manual for Roads and Bridges or the critical loads used by Defra or Environmental Agency without considering the in-combination impacts with other plans and projects.

1.31 In light of this judgment, the HRA therefore considers traffic growth based on the effects of development from the Local Plan in combination with other drivers of growth such as development proposed in neighbouring districts and demographic change.

1.32 The HRA also takes into account the *Grace and Sweetman* (July 2018) judgment from the CJEU which stated that:

““there is a distinction to be drawn between protective measures forming part of a project and intended avoid or reduce any direct adverse effects that may be caused by the project in order to ensure that the project does not adversely affect the integrity of the area, which are covered by Article 6(3), and measures which, in accordance with Article 6(4), are aimed at compensating for the negative effects of the project on a protected area and cannot be taken into account in the assessment of the implications of the project”.

“As a general rule, any positive effects of the future creation of a new habitat, which is aimed at compensating for the loss of area and quality of that habitat type in a protected area, are highly difficult to forecast with any degree of certainty or will be visible only in the future”

“A mitigation strategy may only be taken into account at AA (a.6(3)) where the competent authority is “sufficiently certain that a measure will make an effective contribution to avoiding harm, guaranteeing beyond all reasonable doubt that the project will not adversely affect the integrity of the area”

- Otherwise it falls to be considered to be a compensatory measure to be considered under a.6(4) only where there are “imperative reasons of overriding public interest”

1.33 The Appropriate Assessment of the Local Plan therefore only considers the existence of measures to avoid or reduce its direct adverse effects (mitigation) if the expected benefits of those measures are beyond reasonable doubt at the time of the assessment.

Chapter 2

HRA Screening

2.1 This chapter sets out the findings of the screening stage of the HRA.

Identification of European sites

2.2 In order to initiate the search of European sites that could potentially be affected by a development, it is established practice in HRA to consider sites within the area covered by the plan, and other sites that may be affected beyond this area.

2.3 All European sites lying wholly or partly within 15km of the City of London Corporation were included to reflect the fact that development resulting from a plan may affect European sites that are located outside the administrative boundary of the City of London. This distance has generally been considered reasonable by Natural England in other Local and Neighbourhood Plan HRAs to ensure that all designated sites that could potentially be affected by development are identified and included in the assessment. Consideration was given to other pathways by which the SPD could affect sites further than 15k from the City of London, including the consideration of functionally linked habitat, but none were identified. This aligns with the HRA of the Draft City Plan 2040²⁰ which scoped out functionally linked habitats from further assessment.

2.4 No European sites lie within the City of London boundary but four lie wholly or partially within the 15km buffer area:

- Epping Forest SAC (c.8.7km north east);
- Lee Valley SPA and Ramsar Site (c.6.0km north east);
- Richmond Park SAC (c.11.9km south west); and,
- Wimbledon Common SAC (c.10.4km south west).

2.5 Detailed information about each of these European sites is provided in Appendix A, described with reference to Standard Data Forms for the SPAs and SACs, and Natural England's Site Improvement Plans²¹. Natural England's conservation objectives²² for the SPAs and SACs have also

²⁰ [HRA of the City of London Local Plan: Revised Proposed Submission Draft \(January 2024\)](#)

²¹ [Obtained from the Natural England website](#)

²² [Natural England \(undated\) Conservation Objectives for European Sites](#)

been reviewed, as have any Supplementary Advice to those objectives.

Potential likely significant effects of the SPD alone

2.6 This HRA Screening considers the types of effects that could significantly affect European sites and that could arise from development plan documents in general. It then considers whether such effects are likely to arise as a result of the City of London Planning for Sustainability SPD. The potential types of effects considered are set out below, which are drawn from LUC's extensive HRA experience:

- Physical loss or damage to habitat;
- Non-physical disturbance (noise, vibration and light pollution);
- Non-toxic contamination;
- Air pollution;
- Recreation pressure; and
- Changes to water quantity or quality.

2.7 The SPD will not directly result in development; rather it provides additional detail and guidance on how to fulfil the policies in the City of London Local Plan 2015, Local Plan 2021 and the Draft City Plan 2040. The SPD provides guidance on how applicants should approach sustainability in their developments through the application process. This includes:

- Adopting a retrofit first approach;
- Seeking specialist heritage expertise for historic buildings;
- Pursuing best practice in lowest carbon design and construction principles;
- Developing a bespoke, optimised energy strategy for a development;
- Prioritising the objectives of the City of London Local Area Energy Plan;
- Incorporation of recycled materials and support material efficiency;
- Seek coordination opportunities with nearby development sites and public realm works;
- Avoiding urban heat island effects;
- Reducing the risk of local flooding;

- Incorporating water management;
- Adopting a strategic approach to urban greening and biodiversity enhancements;
- Incorporating nature-based solutions; and,
- Balancing amenity requirements with biodiversity benefits.

2.8 These measures are expected to benefit the natural environment and support adaptation to climate change and sustainable development. Therefore, these measures are not expected to result in likely significant effects on any European sites. Furthermore, the SPD provides further detail on how to fulfil policies within the Local Plan 2015, Local Plan 2021 and the Draft City Plan 2040. An HRA Report²³ was produced in January 2024 which considers the likely significant effects of the Draft Local Plan 2040. The HRA Screening Report identified potential likely significant effects in relation to air pollution, direct pollution into the River Thames, wastewater treatment into the River Thames and water abstraction. These impacts may arise as a result of Draft Local Plan 2040 Policy S1: Healthy and Inclusive City which the SPD provides further guidance for. However, the Appropriate Assessment concluded that mitigation set out in other Local Plan policies, along with regulatory safeguards, are sufficient to avoid adverse effects on the integrity of European sites. None of the other policies within the Draft Local Plan 2040 that could result in likely significant effects relate to this SPD.

Potential likely significant effects of the SPD in-combination with other plans and programmes

2.9 Given that no pathway has been identified by which the SPD could result in likely significant effects on any European site, there is no pathway by which in-combination effects could occur. As such, the SPD is not expected to result in likely significant effects on any European site in combination with any other plans or programmes.

²³ [HRA of the City of London Local Plan: Revised Proposed Submission Draft \(January 2024\)](#)

Chapter 3

Conclusions

3.1 This HRA Screening has determined that the Planning for Sustainability SPD will not result in likely significant effects on any European site, either alone or in combination with any other plans or programmes. This is because the SPD will not result in development and instead seeks to minimise the potential negative environmental impacts of development and to maximise positive environmental impacts.

Next steps

3.2 This HRA Screening Report will be subject to consultation with Natural England. Once any consultation responses are received, this document will be revised and updated if necessary.

LUC

February 2024

Appendix A

Attributes of European Sites

Appendix A
Attributes of European Sites

Planning for Sustainability Supplementary Planning Document
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Site name	Qualifying features	Conservation Objectives	Current pressures or threats	Non-qualifying habitats and species upon which the qualifying habitats and/or species depend
<p>Epping Forest SAC (1,630.74 ha)</p> <p>Page 264</p>	<p><u>Annex 1 Habitats (which are a primary reason for the selection of this site):</u></p> <p>Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrublayer (<i>Quercion robori-petraeae</i> or <i>Ilici-Fagenion</i>).</p> <p><u>Annex 1 Habitats (which are present as a qualifying feature but not a primary reason for the selection of this site):</u></p> <p>European dry heaths</p> <p>North Atlantic wet heaths with <i>Erica tetralix</i> (wet heathland with corss-leaved heath).</p> <p><u>Annex II species (that are a primary reason for the selection of this site):</u></p> <p>Stag beetle <i>Lucanus cervus</i></p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring ;</p> <ul style="list-style-type: none"> ■ The extent and distribution of qualifying natural habitats and habitats of qualifying species ■ The structure and function (including typical species) of qualifying natural habitats ■ The structure and function of the habitats of qualifying species ■ The supporting processes on which qualifying natural habitats and the 	<p>Threats and pressures on this site include the following:</p> <ul style="list-style-type: none"> ■ Air pollution: impact of atmospheric nitrogen deposition ■ Undergrazing ■ Public access / disturbance ■ Changes in species distributions ■ Inappropriate water levels ■ Water pollution ■ Invasive species ■ Disease ■ Invasive species <p>Air Pollution: impact of atmospheric nitrogen deposition - Nitrogen deposition exceeds site-relevant critical loads for ecosystem protection. Some parts of the site are assessed as in unfavourable condition for reasons linked to air pollution impacts.</p> <p>Undergrazing - The quality and diversity of the SAC features requires targeted management best achieved through grazing to: minimise scrub invasion; minimise robust grass domination, and maximise the species</p>	<p>Stag beetles require decaying wood of broadleaved trees for larvae to feed, although not of a particular tree species. The supplementary advice on conserving and restoring site features states that off-site trees in local gardens, parks and along the roadside may be important in helping to maintain the local stag beetle population if decaying timber is present and may help to 'connect' the SAC population with neighbouring colonies.</p> <p>The supplementary advice also states:</p> <p>The qualifying habitat comprises beech <i>Fagus sylvatica</i> forests with holly <i>Ilex aquifolium</i>, growing on acid soils, in a humid Atlantic climate. Sites of this habitat type often are, or were, managed as wood-pasture systems, in which pollarding of beech <i>Fagus sylvatica</i> and oak <i>Quercus</i> spp. was common.</p> <p>Wet heath usually occurs on acidic, nutrient-poor substrates, such as shallow peats or sandy soils with impeded drainage.</p> <p>European dry heaths typically occur on freely-draining, acidic to circumneutral soils with generally low nutrient content. Nearly all dry heath is seminatural, being derived from woodland through a long history of grazing and burning. Most dry heaths are managed as extensive grazing for livestock.</p> <p>Some plant or animal species (or related groups of such species) make a particularly important contribution to the necessary structure, function and/or quality of qualifying habitats. For wet heath, this includes: <i>Calluna vulgaris</i>, <i>Erica cinerea</i>, <i>E. tetralix</i>, <i>Salix repens</i>, <i>Ulex minor</i>, <i>Vaccinium</i> spp., <i>Carex panicea</i>, <i>C. pulicaris</i>, <i>Dactylorhiza maculata</i>, <i>Eleocharis</i> spp., <i>Eriophorum angustifolium</i>, <i>Juncus acutiflorus</i>, <i>J. articulatus</i>, <i>Molinia caerulea</i>, <i>Anagallis tenella</i>, <i>Drosera</i> spp., <i>Galium saxatile</i>, <i>Genista anglica</i>, <i>Polygala serpyllifolia</i>,</p>

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Page 265		<p>habitats of qualifying species rely</p> <ul style="list-style-type: none"> ■ The populations of qualifying species, and, ■ The distribution of qualifying species within the site. 	<p>diversity of heathland plant communities.</p> <p>Public Access / Disturbance - Epping Forest is subject to high recreation pressure.</p> <p>Changes in species distributions - Beech tree health and recruitment may not be coping sufficiently with environmental conditions to sustain its presence and representation within the SAC feature. This may be linked to climate change as well as other factors such as air quality, recreation pressure and water availability.</p> <p>Inappropriate water levels - Wet heath is dependent on suitable ground water levels. There is a threat of prolonged drying out through climate change.</p> <p>Water pollution - Surface run-off of poor quality water from roads with elevated levels of pollutants, nutrients and salinity may be affecting wet heath, probably mostly around the edges.</p> <p>Invasive species - Heather beetle has locally impacted on some heathland areas. Grey squirrel is not currently known to be significantly affecting tree health or regeneration but this will need to be monitored.</p> <p>Disease - Tree diseases such as</p>	<p><i>Potentilla erecta, Succisa pratensis, Pedicularis sylvatica.</i> For dry heath, this includes: <i>Calluna vulgaris, Erica cinerea, E. tetralix, Ulex minor, Vaccinium spp Genista anglica, Agrostis spp., Carex spp., Danthonia decumbens, Deschampsia flexuosa, Festuca spp., Molinia caerulea, Nardus stricta, Galium saxatile, Hypochaeris radicata, Lotus corniculatus, Pedicularis sylvatica, Plantago lanceolata, Polygala spp. Potentilla erecta, Rumex acetosella, Succisa pratensis, Scilla verna, Serratula tinctoria, Teucrium scorodonia Thymus praecox, Viola riviniana,</i></p> <p>There are many plants and animals which use or co-exist with non-native trees, but many rare and threatened woodland species are specialists adapted to one or a few native trees or shrub species (birches, willows and oaks, are examples of trees that host many specialist insect species). At this SAC, site-native species of tree and shrub include those typical of the H9120 type including Beech <i>Fagus sylvatica</i>, Oak <i>Quercus robur</i> and <i>Quercus petraea</i>, Holly <i>Ilex aquifolium</i>, Bramble <i>Rubus fruticosus</i> agg. Honeysuckle <i>Lonicera periclymenum</i>, Hornbeam <i>Carpinus betulus</i>, Silver birch <i>Betula pendula</i>, Downy birch <i>Betula pubescens</i>, Yew <i>Taxus baccata</i>, Elder <i>Sambucus nigra</i>, Goat willow <i>Salix caprea</i> and Wild Cherry <i>Prunus avium</i>. In addition to this, the characteristic mosaics and transitions of ancient forests and wood-pasture-types are well-represented within the site and are necessary for the conservation of SAC features and site integrity.</p> <p>Key species of ground flora, epiphytic bryophytes, mosses, liverworts and lichens are also listed.</p>

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Page 266			<p>Phytophthora present a real threat to Beech.</p> <p>In addition to the above, the supplementary advice identifies the following vulnerabilities:</p> <p>Adaptation and resilience of the feature – the vulnerability of Epping Forest SAC to climate change has been assessed by Natural England as being Medium taking into account the sensitivity, fragmentation, topography and management of its habitats.</p> <p>Functional connectivity with wider landscape- The heathland resource is extensive in county terms but is fragmented, mainly by closed tree canopy habitat and roads. It is therefore vulnerable to encroachment, boundary effects, pollution, recreational impact and hydrological changes.</p> <p>Vegetation structure - Variations in the structure of the heathland vegetation (vegetation height, amount of canopy closure, and patch structure) is needed to maintain high niche diversity and hence high species richness of characteristic heathland plants and animals. There is currently low cover (<25%) of dwarf shrubs present for the feature and less than 15% of scrub and</p>	

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Page 267			<p>tree cover.</p> <p>Soils - the soils of the wet heath habitat are vulnerable to, and have been exposed to acidification, nutrient enrichment and pollution due to their fragmentation and proximity to roads and urban/residential development.</p> <p>Illumination - Epping Forest is fragmented by roads and largely surrounded by urban development and residential areas. Opportunities should be sought to minimise and reduce light pollution from existing development and any development plans or projects to ensure SAC features and significant biodiversity assets are safeguarded.</p>	
<p>Lee Valley SPA and Ramsar Site (447.87 ha)</p>	<p>SPA: <u>Annex 1 species (non – breeding):</u> Great bittern <i>Botaurus stellaris</i></p> <p><u>Annex 1 (migratory species, non - breeding):</u> Northern shoveler <i>Anas clypeata</i> Gadwall <i>Anas strepera</i></p> <p><u>Non Qualifying Species of Interest:</u></p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;</p> <ul style="list-style-type: none"> ■ The extent and distribution of the habitats of the qualifying features 	<p>Threats and pressures on this site include the following:</p> <ul style="list-style-type: none"> ■ Water pollution ■ Hydrological changes ■ Public access / disturbance ■ Inappropriate scrub control ■ Fisheries: Fish stocking ■ Invasive species ■ Inappropriate cutting / mowing 	<p>The information below is drawn from the supplementary advice on conserving and restoring site features.</p> <p>Great bittern</p> <ul style="list-style-type: none"> ■ Standing open water and canals - bittern rely on the presence and continuity of open water habitat. Changes in water area, and associated marginal habitat, can adversely affect the suitability of supporting open water habitat. ■ Reedbeds. ■ Open terrain – bittern favour large areas of open terrain, largely free of obstructions, in and around its nesting,

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<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 268</p>	<p>Cormorant <i>Phalacrocorax carbo</i> Great Crested Grebe <i>Podiceps cristatus</i> Tufted Duck <i>Aythya fuligula</i> Pochard <i>Aythya ferina</i> Grey Heron <i>Ardea cinerea</i></p> <p><u>Ramsar:</u> The site supports the nationally scarce plant species whorled watermilfoil <i>Myriophyllum verticillatum</i> and the rare or vulnerable invertebrate <i>Micronecta minutissima</i> (a waterboatman).</p> <p>Over winter the area regularly supports: Gadwall, <i>Anas strepera</i> – 456 individuals, representing an average of 1.5% of the population Shoveler, <i>Anas clypeata</i> – 406 individuals, representing an average of 1% of the population</p>	<ul style="list-style-type: none"> ■ The structure and function of the habitats of the qualifying features ■ The supporting processes on which the habitats of the qualifying features rely ■ The population of each of the qualifying features, and, ■ The distribution of the qualifying features within the site. 	<ul style="list-style-type: none"> ■ Air pollution: risk of atmospheric nitrogen deposition <p>Water Pollution - The vegetation and invertebrates provide food for the ducks, while fish provide food for the bitterns; and the habitat mosaic needs to vary from clear open water with abundant aquatic vegetation to moderately eutrophic conditions. Changes in water quality need to be managed to prevent loss of suitable habitat and food sources.</p> <p>Hydrological changes - Reservoir levels linked to operational requirements and all water bodies subject to natural fluctuations accounting for abstraction and climatic change.</p> <p>Public Access/Disturbance - Areas of the SPA are subject to a range of recreation pressures including watersports, angling and dog walking. This has the potential to affect SPA populations directly or indirectly.</p> <p>Inappropriate scrub control - The reedbed habitats, muddy fringes, and bankside all provide habitat as part of the mosaic for the SPA birds. Scrub control is necessary to ensure these habitats are maintained.</p> <p>Fisheries: Fish stocking - Fish</p>	<p>roosting and feeding areas. Often there is a need to maintain an unobstructed line of sight within nesting, feeding or roosting habitat to detect approaching predators, or to ensure visibility of displaying behaviour.</p> <ul style="list-style-type: none"> ■ Key prey species include eel, rudd, roach, frogs, toads and invertebrates. <p>Within the SPA/Ramsar, the majority of bittern are found in the Turnford and Cheshunt Pits site while Amwell Quarry and Rye Meads also support the species. Walthamstow Reservoirs also occasionally supports bittern.</p> <p>Gadwall</p> <ul style="list-style-type: none"> ■ Standing open water - gadwall favour gravel pits and reservoirs during the winter period where they feed on seeds, leaves and stems of water plants. ■ Preferred food plants – sweet-grass (<i>Glyceria fluitans</i>), creeping bent (<i>Arostis stolonifera</i>), stoneworts (<i>Chara</i>), pondweeds (<i>Potamogeton</i>, <i>Ceratophyllum</i> spp., <i>Ruppia</i>, <i>Elodeo nuttallii</i>). <p>Each of the SPA/Ramsar's component SSSIs support gadwall in numbers which are sufficient to qualify them as being of national importance.</p> <p>Northern shoveler</p> <ul style="list-style-type: none"> ■ Standing open water - in winter, shoveler frequent shallow water areas on marshes, flooded pasture, reservoirs and

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Page 269			<p>population and species composition needs to be appropriate to ensure suitable habitats including food resource and water quality are maintained for SPA bird species.</p> <p>Invasive species - Azolla and/or invasive aquatic blanket weeds will adversely affect aquatic habitat (food sources).</p> <p>Inappropriate cutting/mowing - The reedbed requires rotational management for bittern.</p> <p>Air Pollution: risk of atmospheric nitrogen deposition - Nitrogen deposition exceeds site relevant critical loads.</p> <p>The Information Sheet on Ramsar Wetlands also notes the whole site supports high levels of visitor pressure; principally for purposes of angling, walking, cycling and birdwatching; with boating on the adjacent canal. These activities are mostly well regulated and at current levels are not considered to threaten the interest of the Ramsar site (although they may reduce the potential for enhancing the interest). In addition to the above, the supplementary advice identifies the following vulnerabilities:</p>	<p>lakes with plentiful, marginal reeds or emergent vegetation and are found throughout.</p> <ul style="list-style-type: none"> ■ Preferred food plants – <i>Scirpus</i>, <i>Eleocharis</i>, <i>Carex</i>, <i>Potamogeton</i>, <i>Glyceria</i>. Shoveler also feed on zooplankton (e.g. <i>Hydrobia</i>, crustaceans, caddisflies, <i>Diptera</i>, beetles) in the shallow margins of waterbodies. Preferred food plants are linked with early successional stages of waterbodies, therefore succession, particularly tree cover, can lead to the loss of suitable foraging habitat. <p>The British Trust for Ornithology records the site's qualifying bird species' diets as:</p> <ul style="list-style-type: none"> ■ Bittern: mostly fish, amphibians, insects but wide variety; ■ Shoveler: omnivorous (incl. insects, crustaceans, molluscs, seeds); and ■ Gadwall: leaves and shoots. <p>The Information Sheet on Ramsar Wetlands also notes the ecological features of the site include open water, with associated wetland habitats including reedbeds, fen grassland and woodland which support a number of wetland plant and animal species including internationally important numbers of wintering wildfowl.</p>

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Page 270			<p>Conservation measures - Active and ongoing conservation management is often needed to protect, maintain or restore Botaurus stellaris Great bittern (non-breeding) at this site.</p> <p>Vegetation characteristics - Many bird species will have specific requirements that conservation measures will aim to maintain, for others such requirements will be less clear. Activities that may directly or indirectly affect the vegetation of supporting habitats and modify these characteristics may adversely affect the feature.</p> <p>Connectivity with supporting habitats - Bitterns clearly move between sites within the Lee Valley and to do this they will need to move safely to and from supporting habitat between individual waterbodies and above/across land outside the SPA. Also, the ability of Northern Shoveler to safely and successfully move to and from feeding and roosting areas is critical to their adult fitness and survival.</p> <p>Water depth - As the birds will rely on detecting their prey within the water to hunt, the depth of water at critical times of year may be paramount for successful feeding and therefore their</p>	

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Page 271			<p>fitness and survival.</p> <p>Population abundance – the population of Northern Shoveler within Lee Valley SPA has shown a slight decrease since Classification. The key SPA sites at Amwell and Turnford & Cheshunt Pits experienced a population decline during the 1999/00 – 2008/09 period, along with the functionally linked non-SPA Holyfield gravel pits. The SPA Walthamstow reservoirs and non-SPA Chingford reservoirs show population trends that appear to be related to water levels and available food resource.</p> <p>Food availability within supporting habitat - the availability of an abundant food supply is critically important for successful breeding, adult fitness and survival and the overall sustainability of the population. As a result, inappropriate management and direct or indirect impacts which may affect the distribution, abundance and availability of prey may adversely affect the population.</p>	
Richmond Park SAC (846.68ha)	Richmond Park has a large number of ancient trees with decaying timber. It is at the heart of the south London centre of distribution for stag	Ensure that the integrity of the Site is maintained or restored as appropriate, and ensure that the Site contributes to achieving the	No current issues affecting the Natura 2000 feature have been identified. Despite this, the Richmond Park Management Plan should continue to be periodically reviewed to ensure the	Stag beetle <i>Lucanus cervus</i> Supporting habitats

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Page 272	<p>beetle <i>Lucanus cervus</i>, and is a Site of national importance for the conservation of the fauna of invertebrates associated with the decaying timber of ancient trees.</p> <p><u>Annex II species that are a primary reason for selection of this Site:</u></p> <p>Stag beetle <i>Lucanus cervus</i></p>	<p>Favourable Conservation Status of Stag beetle, by maintaining or restoring:</p> <ul style="list-style-type: none"> ■ The extent and distribution of the habitats of qualifying species. ■ The structure and function of the habitats of qualifying species. ■ The supporting processes on which the habitats of qualifying species rely. ■ The populations of qualifying species, and, ■ The distribution of qualifying species within the Site. 	<p>continuing availability of decaying wood habitat.</p>	<ul style="list-style-type: none"> ■ Decaying-wood habitat: Maintain an abundance and constant supply of ancient trees, standing dead trees, fallen trees, stumps and roots in a state of decay. In urban areas ensure larger native trees and man-made timber structures persist as a larval resource. ■ Woodland habitat structure: Maintain a well-structured broadleaved woodland habitat, with sheltered, sunlit glades and rides containing stumps and other suitable decaying wood. <p>Supporting Processes</p> <ul style="list-style-type: none"> ■ Natural processes: Ensure the continuity of timber decay and nutrient recycling processes, in particular the continued provision of plentiful decaying stumps and roots. ■ Conservation measures: Maintain the management measures (either within and/or outside the Site boundary as appropriate) which are necessary to maintain or restore the structure, functions and supporting processes associated with the stag beetle feature and/or its supporting habitats.
<p>Wimbledon Common SAC (348.31ha)</p>	<p>Wimbledon Common has a large number of old trees and much fallen decaying timber. It is at the heart of the south London centre of distribution for stag beetle <i>Lucanus cervus</i>. The Site supports a number of other scarce invertebrate</p>	<p>Ensure that the integrity of the Site is maintained or restored as appropriate, and ensure that the Site contributes to achieving the Favourable Conservation Status of its Qualifying</p>	<p>The Site is located in an urban area and therefore experiences air pollution and heavy recreational pressure. According to Natural England's Site Improvement Plans, measures should be implemented by Natural England to establish a Site Nitrogen Action Plan. Furthermore, Natural England and</p>	<p>For Stag beetle see Richmond Park Special Area of Conservation above.</p> <p>H4030 European Dry Heaths Supporting habitats</p> <p>Vegetation Composition</p>

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<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 273</p>	<p>species associated with decaying timber.</p> <p><u>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this Site</u></p> <ul style="list-style-type: none"> ■ Northern Atlantic wet heaths with <i>Erica tetralix</i> ■ European dry heaths <p><u>Annex II species that are a primary reason for selection of this Site:</u></p> <ul style="list-style-type: none"> ■ Stag beetle <i>Lucanus cervus</i> 	<p>Features, by maintaining or restoring:</p> <ul style="list-style-type: none"> ■ The extent and distribution of qualifying natural habitats (Northern Atlantic wet heaths with <i>Erica tetralix</i> & European dry heaths) and habitats of qualifying species (Stag beetle). ■ The structure and function (including typical species) of qualifying natural habitats. ■ The structure and function of the habitats of qualifying species. ■ The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely. 	<p>Wimbledon and Putney Common Conservators should implement measures to reduce visitor impact. Issues associated with habitat fragmentation and invasive species have also been identified. The Species Recovery Programme should address this, while an invasives response plan should be developed.</p>	<ul style="list-style-type: none"> ■ Bracken cover: Maintain or restore a cover of dense bracken which is low, typically at <5%, across the H4030 feature. ■ Vegetation community composition: Ensure the component vegetation communities of the H4030 feature are referable to and characterised by the following National Vegetation Classification type (s): ■ H1 <i>Calluna vulgaris</i> – <i>Festuca ovina</i> Heathland; ■ H2 <i>Calluna vulgaris</i> – <i>Ulex minor</i> heath (and as mosaics with acid grassland vegetation). ■ Vegetation community transitions: Maintain or restore any areas of transition between the H4030 feature and other heathland associated habitats, such as humid heath, mires, acid grassland, scrub and woodland. ■ Key structural, influential and distinctive species: Maintain or restore the abundance of the species listed below to enable each of them to be a viable component of the Annex 1 habitat: Heather <i>Calluna vulgaris</i>, Bell heather <i>Erica cinerea</i>, dwarf gorse <i>Ulex minor</i>, pill sedge <i>Carex pilulifera</i>, heath bedstraw <i>Galium saxatile</i>, petty whin <i>Genista anglica</i>, <i>Hypochaeris radicata</i>, tormentil <i>Potentilla erecta</i>, sheep’s sorrel <i>Rumex acetosella</i>, Mosses <i>Hypnum jutlandicum</i>, <i>Dicranum scoparium</i>, <i>Polytrichum juniperinum</i>. <p>Vegetation Structure</p>

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Page 274		<ul style="list-style-type: none"> ■ The populations of qualifying species, and ■ The distribution of qualifying species within the Site. 		<ul style="list-style-type: none"> ■ Cover of gorse: Maintain or restore a cover of common gorse <i>Ulex europaeus</i> at <1-5% and a combined cover of <i>U.europaeus</i> and dwarf gorse <i>U.minor</i> at <20%, across the H4030 feature. ■ Tree and scrub cover: Maintain or restore the open character of the H4030 feature, with a typically scattered and low cover of trees and scrub <10% cover (excluding common gorse). ■ Heather age structure: Maintain or restore a diverse age structure amongst the ericaceous shrubs typically found as part of the H4030 feature. ■ Cover of dwarf shrubs: Maintain or restore an overall cover of dwarf shrub species which is typically between 75- 90% of the H4030 feature. <p>Extent and Distribution</p> <ul style="list-style-type: none"> ■ Extent of the feature within the Site: Restore the combined total extent of the H4030 and H4010 feature to 48.6 hectares, including its component habitat types and transitions to adjacent habitats. ■ Spatial distribution within the Site: Maintain or restore the distribution and configuration of the H4030 feature, including where applicable its component vegetation types, across the Site. <p>Structure and Function</p>

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Page 275				<ul style="list-style-type: none"> ■ Vegetation: undesirable species. Maintain or restore the frequency/cover of the following undesirable species to within acceptable levels and prevent changes to surface condition, soils, nutrient levels or hydrology which may encourage their spread: <i>Acaena</i> spp., <i>Rhododendron ponticum</i>, <i>Gaultheria shallon</i>, <i>Fallopia japonica</i>, <i>Cirsium arvense</i>, <i>Digitalis purpurea</i>, <i>Epilobium</i> spp. (excl. <i>E. palustre</i>), <i>Ranunculus repens</i>, <i>Senecio jacobaea</i>, <i>Rumex obtusifolius</i>, <i>Urtica dioica</i>. ■ Functional connectivity with the wider landscape: Maintain or restore the overall extent, quality and function of any supporting features within the local landscape which provide a critical functional connection with the Site. ■ Adaptation and resilience: Maintain or restore the H4030 feature's ability, and that of its supporting processes, to adapt or evolve to wider environmental change, either within or external to the Site. ■ Soils, substrate and nutrient cycling: Maintain or restore the properties of the underlying soil types, including structure, bulk density, total carbon, pH, soil nutrient status and fungal/bacterial ratio, to within typical values for the H4030 feature. <p>Supporting Processes</p> <ul style="list-style-type: none"> ■ Conservation measures: Maintain or restore the management measures (either within and/or outside the Site boundary as appropriate) which are necessary to

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Page 276				<p>maintain or restore the structure, functions and supporting processes associated with the H4030 feature.</p> <ul style="list-style-type: none"> ■ Air quality: Restore the concentrations and deposition of air pollutants to at or below the Site-relevant Critical Load or Level values given for this feature of the Site on the Air Pollution Information System. <p>H4010 Northern Atlantic Wet Heaths with <i>Erica tetralix</i></p> <p>Extent and Distribution</p> <ul style="list-style-type: none"> ■ Extent of the feature within the Site: Restore the total extent of the H4010 and H4030 features to 48.6 hectares. ■ Spatial distribution of the feature within the Site: Maintain the distribution and configuration of the H4010 feature, including where applicable its component vegetation types, across the Site. <p>Structure and Function (including its typical species)</p> <ul style="list-style-type: none"> ■ Vegetation community transitions: Maintain or restore any areas of transition between this and communities which form other heathland-associated habitats, such as dry and humid heaths, mires, acid grasslands, scrub and woodland. ■ Vegetation community composition: Ensure the component vegetation communities of the H4010 feature are referable to and characterised by the following National Vegetation Classification type (s):

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Site name	Qualifying features	Conservation Objectives	Current pressures or threats	Non-qualifying habitats and species upon which the qualifying habitats and/or species depend
Page 277				<ul style="list-style-type: none"> ■ M16 <i>Erica tetralix</i> – Sphagnum compactum heathland ■ Mosaics with M25 <i>Molinia caerulea</i> – <i>Potentilla erecta</i> mire. ■ Vegetation structure: cover of dwarf shrubs. Maintain an overall cover of dwarf shrub species which is typically between 75-90%. ■ Vegetation structure: heather age structure. Maintain a diverse age structure amongst the ericaceous shrubs typically found on the Site. ■ Vegetation structure: cover of gorse: Maintain cover of common gorse at <10%. ■ Vegetation structure: tree and shrub cover. Maintain the open character of the H4010 feature, with a typically scattered and low cover of trees and scrub (<10% cover). ■ Vegetation composition: bracken cover. Restore a cover of dense bracken which is low, typically at <5%. ■ Key structural, influential and Site distinctive species: Restore the abundance of the species listed below to enable each of them to be a viable component of the H4010 Annex 1 habitat: <i>Calluna vulgaris</i>, <i>Erica tetralix</i>, <i>Myrica gale</i>, <i>Salix repens</i>, <i>Ulex minor</i>, <i>Eleocharis</i> spp., <i>Eriophorum angustifolium</i>, <i>Molinia caerulea</i>, <i>Trichophorum cespitosum</i>, <i>Anagallis tenella</i>, <i>Drosera</i> spp., <i>Narthecium ossifragum</i>.

Appendix A
Attributes of European Sites

Planning for Sustainability Supplementary Planning Document
February 2024

Site name	Qualifying features	Conservation Objectives	Current pressures or threats	Non-qualifying habitats and species upon which the qualifying habitats and/or species depend
Page 278				<ul style="list-style-type: none"> ■ Vegetation: undesirable species. Restore the frequency/cover of the following undesirable species to within acceptable levels and prevent changes in surface condition, soils, nutrient levels or hydrology which may encourage their spread: <i>Acaena</i> spp., <i>Rhododendron ponticum</i>, <i>Gaultheria shallon</i>, <i>Fallopia japonica</i>, <i>Cirsium arvense</i>, <i>Digitalis purpurea</i>, <i>Epilobium</i> spp. (excl. <i>E. palustre</i>), <i>Ranunculus repens</i>, <i>Senecio jacobaea</i>, <i>Rumex obtusifolius</i>, <i>Urtica dioica</i>. ■ Functional connectivity with the wider landscape: Maintain the overall extent, quality and function of any supporting features within the local landscape which provide a critical functional connection with the Site. ■ Adaptation and resilience: Maintain or restore the H4010 feature's ability, and that of its supporting processes, to adapt or evolve to wider environmental change, either within or external to the Site. <p>Supporting Processes</p> <ul style="list-style-type: none"> ■ Conservation measures: Maintain the management measures (either within and/or outside the Site boundary as appropriate) which are necessary to maintain or restore the structure, functions and supporting processes associated with the H4010 feature. ■ Soils, substrate and nutrient cycling: Maintain the properties of the underlying soil types, including structure, bulk density, total carbon, pH, soil nutrient status and

Appendix A
 Attributes of European Sites

Planning for Sustainability Supplementary Planning Document
 February 2024

Site name	Qualifying features	Conservation Objectives	Current pressures or threats	Non-qualifying habitats and species upon which the qualifying habitats and/or species depend
				<p>fungal:bacterial ratio, at within typical values for the H4010 habitat.</p> <ul style="list-style-type: none"> ■ Air quality: Restore the concentrations and deposition of air pollutants to at or below the Site-relevant Critical Load or Level values given for the H4010 feature of the Site on the Air Pollution Information System. ■ Hydrology: At a Site, unit and/or catchment level as necessary, maintain or restore the natural hydrological regime to provide the conditions necessary to sustain the H4010 feature within the Site.

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Agenda Item 9

Committee(s)	Dated:
Planning & Transportation Committee	21/01/2025
Subject: Revenue and Capital Budgets 2025/26	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	n/a
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	n/a
What is the source of Funding?	n/a
Has this Funding Source been agreed with the Chamberlain's Department?	n/a
Report of: The Chamberlain Executive Director Environment	For Decision
Report author: Dipti Patel, Chamberlain's Department	

Summary

This report presents for approval the revenue and capital budgets for the Planning & Transportation Committee for 2025/26.

Overall, the proposed revenue budget for 2025/26 totals (£18.637m), an increase in net expenditure of (£1.701m) compared to the 2024/25 Original Budget of (£16.936m).

The proposed budget for 2025/26 has been prepared in line with the budget guidelines set by Resource Allocation Sub Committee and within the resource envelope allocated to the Executive Director Environment, including an inflation increase of 2%.

The resource envelope must be adhered to, as failure to do so will impact Finance Committee's ability to set Council Tax rates for the year ahead and the requirement in law for the City to set a balanced City Fund budget.

Recommendation(s)

Members are asked to:

- i) review and approve the proposed revenue budget for 2025/26 for submission to Finance Committee;
- ii) review and approve the proposed capital budgets for 2025/26 for submission to Finance Committee;
- iii) agree that amendments for 2024/25 and 2025/26 budgets arising from changes to recharges or any further implications arising from subsequently approved savings proposals or changes to the Cyclical Works Programme (CWP) be delegated to the Chamberlain in consultation with the Executive Director Environment.

Main Report

Background

1. This report sets out the latest budget for 2024/25 and the proposed revenue and capital budgets for 2025/26 for your Committee and under the control of the Executive Director Environment, analysed between:
 - **Local Risk budgets** – these are budgets deemed to be largely within the Chief Officer’s control.
 - **Central Risk budgets** – these are budgets comprising specific items where a Chief Officer manages the underlying service, but where the eventual financial outturn can be strongly influenced by external factors outside of their control or are budgets of a corporate nature (e.g. interest on balances and rent incomes from investment properties).
 - **Support Services and Capital Charges** – these cover budgets for services provided by one activity to another. The control of these costs is exercised at the point where the expenditure or income first arises as local or central risk.
2. In the various tables, income, increases in income, and reductions in expenditure are shown as positive balances, whereas brackets will be used to denote expenditure, increases in expenditure, or reductions in income. Only significant variances (generally those greater than £50,000) have been commented on.
3. The latest 2024/25 budget and provisional 2025/26 budgets are summarised in Table 1 below and further analysed by risk, fund, and Chief Officer in Appendix 1.

Table 1 Summary Revenue Budgets 2024/25 and 2025/26	Original Budget 2024/25 £'000	Latest Budget 2024/25 £'000	Original Budget 2025/26 £'000
Expenditure	(39,946)	(41,604)	(42,771)
Income	33,989	34,362	35,012
Support Services & Capital Charges	(10,979)	(10,932)	(10,878)
Total Net Expenditure	(16,936)	(18,174)	(18,637)

Latest Revenue Budget 2024/25

- Appendix 2 provides details on budget movements between the 2024/25 original budget and 2024/25 latest budget. Overall, the 2024/25 latest budget is net expenditure of (£18.174m), an increase in net expenditure of (£1.238m) compared to the 2024/25 original budget. The main reasons for this net expenditure increase are:

Budget Increases:

- Additional new CWP bid agreed by Priorities Board relating to Off-Street car parks which will be funded from the On-Street Parking Reserve Account, as agreed at Resource Allocation Sub Committee (RASC), (£871,000).
- Changes to the newly agreed CWP, (£418,000), relating mainly to Highways works.
- Savings to be applied allocated to services as a result of additional income savings achieved, (£110,000).
- Historic England SLA costs, (£85,000), agreed as part of the Deep Dive budget review.
- New Health & Safety post agreed by RASC, (£75,000).

Budget Decreases:

- Increase in Traffic Management fee income, £270,000.
- Net reduction in recharges for the Department, £47,000.
- Increase in net transfers from the On-Street Parking Reserve Account, £4,000.

Proposed Revenue Budget for 2025/26

- The proposed 2025/26 budget is net expenditure of (£18.637m), an increase of (£1.701m) in net expenditure compared to the 2024/25 original budget.
- For 2025/26 budgets include:
 - 2% uplift for inflation.

The resulting resource envelope must be adhered to, as failure to do so will impact Finance Committee's ability to set Council Tax rates for the year ahead and the requirement in law for the City to set a balanced budget.

- The budget has been prepared within the resource envelope allocated to the Executive Director Environment, with the following exceptions and assumptions:
 - Members should note that the CWP figures included in this report relate to both the newly agreed programme for the City overall and the new additional CWP bid agreed for Off-Street car parks, which will be funded from the On-Street Parking Reserve Account, as agreed at RASC in January 2024.

- Support Services budgets reflect the attribution and cost of central departments. All support services are based on time spent or use of services and were reviewed during 2023/24 with the method of apportionment updated to reflect the latest up to date corporate information. However, the full budgets for these departments have not yet been finalised, so further changes to these budgets may be required. Members are asked to agree that the decision as to the changes required to these budgets are delegated to the Chamberlain in consultation with the Executive Director Environment.

8. Appendix 3 provides details on budget movements between the 2024/25 original budget and the 2025/26 proposed budget. Overall, there is an increase in net expenditure of (£1.701m). The main reasons for this net expenditure increase are:

Budget Increases:

- Additional new CWP bid agreed by Priorities Board relating to Off-Street car parks which will be funded from the On-Street Parking Reserve Account, as agreed at RASC, (£2.126m).
- Reduced local risk income from car park fees, (£1.042m), and Planning Performance Agreements, (£237,000).
- Increase in employee cost provision for pay increases due to estimated July 2025 pay award, incremental and career grade progression, and additional new Health & Safety post, (£815,000).
- Increase to the newly agreed CWP, (£302,000), relating mainly to Highways works.
- Increase in various supplies & service budgets relating to Historic England SLA costs, fees & services, computer licences, software maintenance support costs, subscriptions, advertising costs and parking contract costs, (£281,000).
- Savings to be applied allocated to services as a result of additional income savings achieved, (£110,000).
- Increase in car park rates, (£33,000).

Budget Decreases:

- Increase in central risk income budgets mainly relating to On-Street parking PCN income, and Planning pre-app advice fees, £1.018m.
- Increase in net transfers from the On-Street Parking Reserve Account, £820,000.
- Increase in local risk income budgets relating to Traffic Management fees, £514,000, Planning Application fee income, £178,000, and other fee income, £75,000.
- Reduced energy costs £262,000.
- Increased income for staff costs recharged to capital projects, £258,000.
- Net reduction in recharges for the Department , £101,000.

Staffing Statement

9. Table 2 below shows the movement in manpower and related staff costs.

Table 2 Staffing Summary	Original Budget 2024/25		Original Budget 2025/26	
	Manpower Full-time Equivalent	Estimated Cost £000	Manpower Full-time Equivalent	Estimated Cost £000
Executive Director Environment				
Town Planning	64.3	(4,478)	64.3	(4,657)
City Property Advisory Team	6.0	(428)	6.0	(442)
Planning Obligations	8.2	(542)	8.2	(560)
Transportation Planning	33.7	(2,859)	34.3	(2,953)
Road Safety	1.7	(131)	1.0	(76)
Building Control	26.4	(2,121)	27.7	(2,246)
Structural Maintenance/Inspections	5.1	(514)	5.1	(523)
Highways	20.2	(1,552)	21.3	(1,674)
Traffic Management	20.1	(1,302)	21.4	(1,404)
On-Street Parking	18.6	(1,100)	17.8	(1,101)
Off-Street Parking	1.0	(85)	1.8	(137)
Drains & Sewers	7.6	(529)	7.6	(540)
Directorate	25.0	(1,957)	26.0	(2,100)
Vacancy Factor		155		155
Total P&T Committee	237.9	(17,443)	242.5	(18,258)

Draft Capital and Supplementary Revenue Budgets

10. The latest estimated costs of the Committee's current capital and supplementary revenue projects are summarised in Appendix 4.
11. Pre-implementation costs comprise feasibility and option appraisal expenditure which has been approved in accordance with the project procedure, prior to authority to start work.
12. The latest Capital and Supplementary Revenue Project forecast expenditure on approved schemes will be presented to the Court of Common Council for formal approval in March 2025.

Conclusion

13. This report presents the proposed budgets for 2025/26 for the Planning & Transportation Committee for Members to consider and approve.

Appendices

- Appendix 1 – Committee Summary Budget – by Risk, Fund and Chief Officer
- Appendix 2 – 2024/25 Original Budget to 2024/25 Latest Budget
- Appendix 3 – 2024/25 Original Budget to 2025/26 Original Budget
- Appendix 4 – Draft Capital and Supplementary Revenue Budgets

Report author

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Committee Summary Budget – by Risk, Fund and Chief Officer

Analysis by Service: City Fund by Chief Officer	Original Budget 2024/25 £'000	Latest Budget 2024/25 £'000	Original Budget 2025/26 £'000
CITY FUND			
Executive Director Environment			
Town Planning	(2,467)	(2,552)	(2,847)
City Property Advisory Team	(570)	(570)	(604)
Transportation Planning	(1,481)	(1,481)	(1,562)
Road Safety	(288)	(288)	(246)
Street Scene	0	0	0
Building Control	(1,012)	(1,012)	(1,097)
Structural Maintenance/Inspections	(767)	(767)	(776)
Highways	(3,519)	(3,519)	(1,535)
Traffic Management	979	1,249	1,391
Off Street Parking	1,712	1,712	1,745
On Street Parking	(3,603)	(3,603)	(3,676)
Drains & Sewers	(409)	(409)	(360)
Contingency	265	155	155
Built Environment Directorate	(2,118)	(2,193)	(2,261)
LOCAL RISK	(13,278)	(13,278)	(11,673)
City Surveyor – All Services	(352)	(1,641)	(2,780)
TOTAL LOCAL RISK	(13,630)	(14,919)	(14,453)
CENTRAL RISK			
Executive Director Environment			
Town Planning	783	783	853
Transportation Planning	430	430	451
Structural Maintenance/Inspections	60	60	60
Highways	3,752	2,713	447
Off Street Parking	(1,251)	(212)	928
On Street Parking	3,899	3,903	3,955
Contingency	0	0	0
TOTAL CENTRAL RISK	7,673	7,677	6,694
TOTAL SUPPORT SERVICES AND CAPITAL CHARGES	(10,979)	(10,932)	(10,878)
COMMITTEE TOTAL NET EXPENDITURE	(16,936)	(18,174)	(18,637)

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APPENDIX 2

Latest Revenue Budget 2024/25	Local or Central Risk	Original Budget 2024/25 £'000	Latest Budget 2024/25 £'000	Movement Better/ (Worse) £'000	Para Ref
Analysis of Service Expenditure					
Expenditure					
Employees	L	(17,443)	(17,548)	(105)	1
Premises Related Expenses	L	(5,598)	(6,476)	(878)	2 (a-b)
Premises Related Expenses	C	(72)	(72)	0	
City Surveyor – Repairs & Maintenance	L	(352)	(1,641)	(1,289)	3
Transport Related Expenses	L	(31)	(31)	0	
Supplies & Services	L	(2,234)	(2,553)	(319)	4
Supplies & Services	C	(133)	(133)	0	
Third Party Payments	L	(3,614)	(3,614)	0	
Savings to be Applied	L	110	0	(110)	5
Transfer to Reserve	C	(10,355)	(9,312)	1,043	6
Capital Charges	C	(224)	(224)	0	
Total Expenditure		(39,946)	(41,604)	(1,658)	
Income					
Grants, Reimbursements & Contributions	L	715	1,202	487	7
Grants, Reimbursements & Contributions	C	224	224	0	
Customer, Client Receipts	L	11,905	12,175	270	8
Customer, Client Receipts	C	13,919	13,919	0	
Transfer from Reserves	L	600	1,255	655	2(a)
Transfer from Reserves	C	3,445	2,406	(1,039)	6
Recharges to Capital Projects	L	2,312	2,312	0	
Recharges to Capital Projects	C	869	869	0	
Total Income		33,989	34,362	373	
Total Expenditure/(Income)		(5,957)	(7,242)	(1,355)	
Recharges					
Central Support & Capital Charges		(13,016)	(13,016)	0	
Recharges within Fund		971	999	28	
Recharges Across Funds		1,066	1,085	19	
Total Recharges		(10,979)	(10,932)	47	
TOTAL NET EXPENDITURE/(INCOME)		(16,936)	(18,174)	(1,238)	

Notes:

1. Additional new Health & Safety post in the Directorate agreed by RASC, (£75,000), and additional TfL contribution for cycle training, (£30,000), which is fully offset by matching income contributions (see note 7).
2. Increase relates to:
 - a) Additional Highways repairs & maintenance expenditure agreed at RASC, (£655,000), to be fully funded from the On-Street Parking Reserve Account, £655,000.
 - b) Local Implementation Plan Programme, (£223,000), which is fully offset by matching income contributions (see note 7).
3. Cyclical Works Programme (CWP) newly agreed programme, (£418,000), plus additional Off-Street Parking CWP bid agreed at RASC to be funded from the On-Street Parking Reserve Account, (£871,000).
4. Local Implementation Plan Programme, (£234,000), which is fully offset by matching income contributions (see note 7). Plus, adjustment to fund Historic England SLA costs, (£85,000), agreed as part of the Deep Dive budget review.
5. Savings to be applied allocated to services as a result of additional income savings achieved.
6. Increase in net transfer from reserves mainly due to a reduction in car park income and increase in Off-Street Parking CWP works. These were largely offset by reduced funding requirements for central risk highways schemes, £4,000 (£1,043,000 - £1,039,000).
7. Local Implementation Plan Programme contributions, £487,000 (see offsetting expenditure in notes 1, 2b, and 4).
8. Increase in Traffic Management fee income, £270,000.

APPENDIX 3

Latest Revenue Budget 2025/26 Analysis of Service Expenditure	Local or Central Risk	Original Budget 2024/25 £'000	Original Budget 2025/26 £'000	Movement Better/ (Worse) £'000	Para Ref
Expenditure					
Employees	L	(17,443)	(18,258)	(815)	1
Premises Related Expenses	L	(5,598)	(5,441)	157	2(a-c)
Premises Related Expenses	C	(72)	0	72	2(b)
City Surveyor – Repairs & Maintenance	L	(352)	(2,780)	(2,428)	3
Transport Related Expenses	L	(31)	(30)	1	
Supplies & Services	L	(2,234)	(2,470)	(236)	4
Supplies & Services	C	(133)	(133)	0	
Third Party Payments	L	(3,614)	(3,659)	(45)	
Savings to be Applied	L	110	0	(110)	5
Transfer to Reserve	L	0	(41)	(41)	6
Transfer to Reserve	C	(10,355)	(9,959)	396	6
Capital Charges	C	(224)	0	224	7
Total Expenditure		(39,946)	(42,771)	(2,825)	
Income					
Grants, Reimbursements & Contributions	L	715	733	18	
Grants, Reimbursements & Contributions	C	224	0	(224)	7
Customer, Client Receipts	L	11,905	11,393	(512)	8
Customer, Client Receipts	C	13,919	14,937	1,018	9
Transfer from Reserves	L	600	3,619	3,019	10
Transfer from Reserves	C	3,445	891	(2,554)	10
Recharges to Capital Projects	L	2,312	2,481	169	11
Recharges to Capital Projects	C	869	958	89	11
Total Income		33,989	35,012	1,023	
Total Expenditure/(Income)		(5,957)	(7,759)	(1,802)	
Recharges					
Central Support & Capital Charges		(13,016)	(13,386)	(370)	
Recharges within Fund		971	1,297	326	
Recharges Across Funds		1,066	1,211	145	
Total Recharges		(10,979)	(10,878)	101	12
TOTAL NET EXPENDITURE/(INCOME)		(16,936)	(18,637)	(1,701)	

Notes:

1. Increase in staff costs relates to:
 - a) Provision for pay increases due to estimated July 2025 pay award and incremental career grade progression (£740,000), additional new Health & Safety post in the Directorate agreed by RASC (£75,000).

2. Decrease in premises expenses relates to:
 - a) Reduction in energy costs £262,000.
 - b) Transfer of Lord Mayors Show Highways repairs & maintenance costs from central risk, £72,000, to local risk (£72,000).
 - c) Increase in car park rates (£33,000).
3. Changes to planned works and phasing of the CWP (£302,000), plus Off-Street Parking CWP additional works agreed at RASC to be funded from the On-Street Parking Reserve Account (£2.126m).
4. Increase in supplies & services expenses relates to:
 - a) Historic England SLA costs (£85,000).
 - b) Parking Ticket Office postage and fees & services costs (£40,000).
 - c) Highways software maintenance costs and licences (£38,000).
 - d) Town Planning GDO advertising costs (£34,000).
 - e) Other increases in subscriptions costs, computer licences, fees & services and expenses (£39,000).
5. Savings to be applied allocated to services as a result of additional savings achieved.
6. Net decrease in transfers to reserves due to increase in overall On-Street Parking net operating costs, (£355,000).
7. Decrease capital charges relates to reduced revenue expenditure funded from capital under statute, this is offset by reduction in matching contribution.
8. Net reduced local risk income from services:
 - a) Reduction in car park fees (£1,042,000).
 - b) Reduction in Planning Performance Agreement fees (£237,000)
 - c) Increase in Traffic Management fees £514,000, Planning Application fee income £178,000 and other fees £75,000.
9. Increased central risk income from On-Street Parking PCN's £918,000, suspension income £20,000, Planning pre-app advice fee £50,000, Land Charges income £20,000, and Minorities car park rental income £10,000.
10. Net increase in transfers from reserves due mainly to a reduction in Off-Street Parking income performance from car park fees, £465,000.
11. Increase in staff costs recharged to capital projects reflects the staff time allocations on local risk budgets for increases in direct salary costs and central risk increase in overhead costs, £258,000.
12. Net reduction in overall recharges due to increased cost of central support & capital charges, plus the Directorate costs which are offset by re-allocations over the Department. Recharges reflect the attribution and cost of central departments. All support services are based on time spent or use of services and were reviewed during 2023/24 with the method of apportionment updated to reflect the latest up to date corporate information.

Draft Capital and Supplementary Revenue Budgets

Project	Exp. Pre 01/04/24	2024/25	2025/26	2026/27	Later Years	Total
	£'000	£'000	£'000	£'000	£'000	£'000
<u>Pre-Implementation</u>						
Barbican Podium Waterproofing	2,288	266	-	-	-	2,554
Pedestrian Priority Programme	1,650	2,133	2,377		-	6,160
West Smithfield Area Public Realm & Transportation	1,003	397	245	-	-	1,645
<u>Authority to start work</u>						
St Pauls Gyratory Transformation	1,304	4,150	-	-	-	5,454
22 Bishopsgate Phase 2 S278	863	-	15	380	-	1,258
2-6 Cannon Street Public Realm Improvements	836	239	-	-	-	1,075
40 Leadenhall Street S278 Highway Works	316	969	-	-	-	1,285
Bank Junction Improvements	5,111	1,663	442	40	38	7,294
City Greening & Biodiversity Project	390	791	315	45	-	1,541
Crossrail Broadgate - Arts Programme	1,369	434	111	-	-	1,914
Crossrail Moorgate Urban Integration	318	951	525	-	-	1,794
Cultural Hub Public Realm Projects	1,997	182	95	-	-	2,274
HVM Security Programme	2,750	591	326	-	-	3,667
Moor Lane Environmental Enhancements S106	410	80	971	-	-	1,461
St Pauls Area Enhancements	1,671	103		-	-	1,774
St Pauls Cathedral External Lighting	414	618	273	-	-	1,305
Sub-Total > £1m schemes	22,690	13,567	5,695	465	38	42,455
<u>Schemes less than £1m</u>	11,941	3,224	4,888	943	54	21,050
Sub-Total < £1m schemes	11,941	3,224	4,888	943	54	21,050
Total Planning & Transportation Committee	34,631	16,791	10,583	1,408	92	63,505

Draft Capital and Supplementary Revenue Budgets

Committee: Planning and Transportation Committee Court of Common Council	Dated: 21 January 2025 6 March 2025
Subject: 36 Carter Lane & 34 - 37 Bartholomew Close	Public Report For Decision
This proposal provides business enabling functions	
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of:	The City Surveyor
Report author: Alex John, Investment Property Group, City Surveyor's Department (CS: 001/25)	

Summary

This report seeks determination from the Planning and Transportation Committee that 36 Carter Lane and 34-37 Bartholomew Close are no longer required to be held for the planning purposes and that they are appropriated to be held for investment purposes.

Recommendations

The Planning and Transportation Committee is asked to:

- i) Determine that 36 Carter Lane and 34 - 37 Bartholomew Close are no longer required for the planning purposes for which they were acquired; and
- ii) Recommend to Court of Common Council that 36 Carter Lane and 34 - 37 Bartholomew Close be appropriated for investment purposes.

Main Report

Background

Planning and Transportation Committee's remit

1. Determination and approval of this Agenda Item arises because the Planning and Transportation Committee's Terms of Reference include "making recommendations to Common Council relating to ...appropriation...of land held for planning purposes....and making determinations as to whether land held for planning or highways purposes is no longer required for those purposes" and to recommend appropriation to Investment purposes to Court of Common Council.

Context – Planning Purposes and Disposal Powers

2. Post-WWII the City Corporation exercised its local authority powers to facilitate reconstruction of the City, including assembling redevelopment areas, by acquiring land, and participating in redevelopment using its planning powers.

3. Some properties have continued to be held for planning purposes where their original planning acquisition purpose has been fulfilled. Once land is acquired for a particular purpose it continues to be held for that purpose until it is specifically appropriated to be held for another local authority purpose.
4. In the case of the properties which are the subject of this report, it is considered that appropriation of these properties to investment purposes better reflects the reality on which the properties are held and managed as income producing assets, given the original acquisition purposes are fulfilled and the limited potential of the properties to be developed in pursuit of planning purposes by City Fund. Appropriating to investment purposes also provides less restriction for future asset sales should they be pursued. Security of tenure of leaseholders and their continued occupation would not be affected by any such appropriation and disposal.

36 Carter Lane - Evaluation

5. Carter Lane is a freehold property and known as “the site of The Old Choir School”. It is shown edged red on the plan annexed to this report at **Appendix 1**.
6. The property is single let to the YHA on a 35-year lease expiring on 14 December 2050. The tenant operates the property as a youth hostel.
7. **Original Planning Purpose:** The City’s records indicate that 36 Carter Lane was most likely acquired for planning purposes to provide a new site for the Old (St Paul’s Cathedral) Choir School as part of post-war reconstruction of the area.¹
8. There is no evidence to suggest that the property was appropriated for any other purpose since the City’s acquisition in 1967.
9. Is ***the property still required for the original planning purpose for which it was acquired?*** No. Post-war reconstruction is completed and the property is no longer used as a choir school. From at least 1990, the property has been let to a third party operating as a youth hostel with ancillary purposes.
10. ***Could the property be appropriated for investment purposes?*** Yes. The property has long since ceased to be used as a choir school and criteria to qualify for appropriation have been met. The original planning purpose was achieved and the property is surplus to planning requirements i.e. to provide a new choir school site.

¹ The Court of Common Council Report dated 27/3/58 explains the Old Choir School site was to be designated as land adjacent to an area of comprehensive development so a government grant aimed at supporting post-war reconstruction could be given to the City to fund the site’s acquisition. The acquisition was contingent on such designation being included in the London County Council Development Plan. According to the report, such inclusion was agreed on 23 January 1958. S.93 of the Town and Country Planning Act 1947 provides for the payment of grant by government to local authorities in connection with acquisition of land. Part IV of the 1947 Act provides for acquisition of land for *planning* purposes. In the absence of greater detail in the acquisition file it therefore seems reasonable to conclude that the Old Choir School site was acquired for planning purposes.

34 – 37 Bartholomew Close – Evaluation

11. 34-37 Bartholomew Close is a freehold property and known as “34-37 Bartholomew Close and 3 to 6 Bartholomew Place, London”. It is shown edged red on the plan annexed to this report at **Appendix 2**.
12. The property is let on a 125-year lease to Healthlink Investments Limited. The City Corporation is not in direct management control of the occupation of the property and has limited influence over leasing decisions due to the long lease.
13. There are two subsisting underleases: the City of London (Children and Community Services) from the 3rd to 5th floors expiring in January 2030 and City & Hackney Primary Care Trust from the basement to 2nd floors expiring in February 2030. The City of London has sub-underlet the 3rd to 5th floors to Broadway Homelessness & Support until January 2024 and that sub-underlease has been assigned to Evolve Hospitality Limited.
14. **Original Planning Purpose:** The original planning purpose was post-war reconstruction. The property formed part of “Redevelopment Unit 32” which was declared in May 1964.
15. **Is the property still required for the original planning purpose for which it was acquired?** No. Post-war reconstruction is complete.
16. **Could the property be appropriated for investment purposes?** Yes. The criteria to qualify for appropriation have been met. The original planning purpose was achieved and the property is surplus to planning requirements i.e. for post war reconstruction.

Corporate & Strategic Implications

17. None

Resource, Equalities and Security implications

18. None.

Legal implications

19. One of the practical consequence of sites still being held for planning purposes is that the relevant statutory disposal power is S.233 Town and Country Planning Act 1990 which authorises disposal for the better planning of the area or the best use of land.² Where land is held for investment purposes the disposal power is S.9 City of London (Various Powers) Act 1958 which authorises disposal on such terms and conditions as the City thinks fit (and there is no statutory restriction on the purpose of the disposal)

1. S.233 provides for the disposal of land held for planning purposes “to such person, in such manner and subject to such conditions as appears to [the CoL] to be expedient in order

- (a) to secure the best use of that or other land and any building or works which have been, or are to be, erected, constructed or carried out on it; or
- (b) to secure the erection, construction or carrying out on it of any buildings or works appearing to them to be needed for the proper planning of the area...”.

20. S.12 of the City of London (Various Powers) Act 1949 allows for appropriation from one local authority purpose to another purpose for which the authority is authorised to acquire land, if the land is no longer required for the original planning purposes for which it was acquired. S.12 of the Local Government Act 2003 authorises a local authority to invest for any purpose relevant to its functions or for the purposes of the prudent management of its financial affairs.

Risk, Equalities, Climate and Security implications

21. None

Conclusion

22. Both 36 Carter Lane and 34-37 Bartholmew Close are no longer required for the original planning purposes for which they were acquired and are both capable of appropriation.
23. As such, it is open to your Committee to determine that 36 Carter Lane and 34 – 37 Bartholomew Close are no longer required for the planning purposes for which they were acquired and to recommend to Court of Common Council that it may appropriate the properties for investment purposes.

Appendices

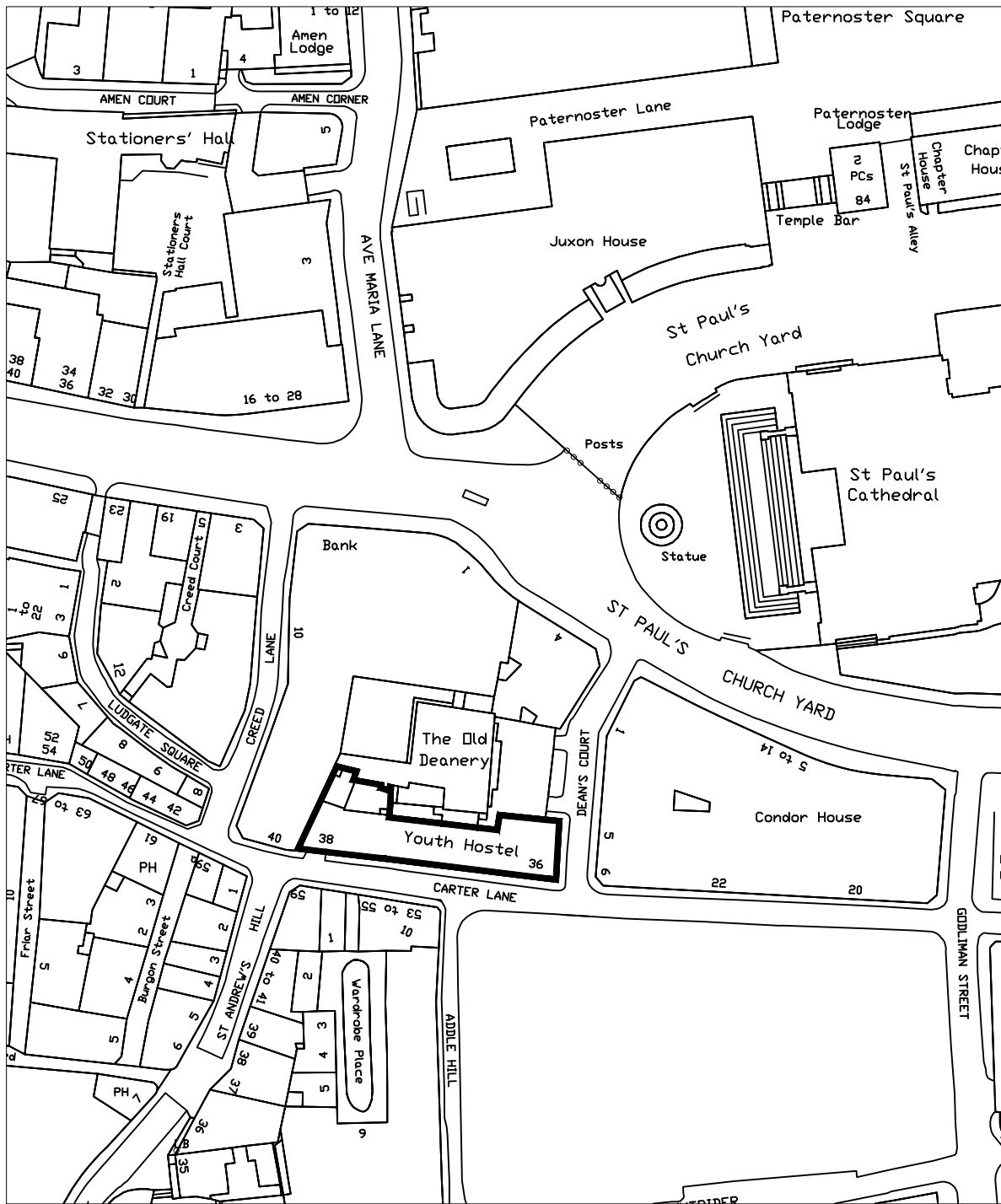
Appendix 1 – 36 Carter Lane - Boundary Plan

Appendix 2 - 34 – 37 Bartholomew Close - Boundary Plan

Appendix 3 - Redevelopment Unit 32 Plan

Background Documents

Court of Common Council Report 27/3/58



Address :

36 Carter Lane,
London, E.C.4.

Title :

Committee Plan

Pro code

UPRN



*P.G. Wilkinson BSc MSc MRICS
City Surveyor*

CITY SURVEYOR'S DEPARTMENT

Corporate Property Group :

Plans & Records Section

Page 299

Print Scale :

1 : 1250

Date :

Feb 2015

Drawn by :

K.T.

Drawing No :

5-C-38516

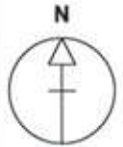
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TITLE NUMBER
NGL848882



CITY OF LONDON

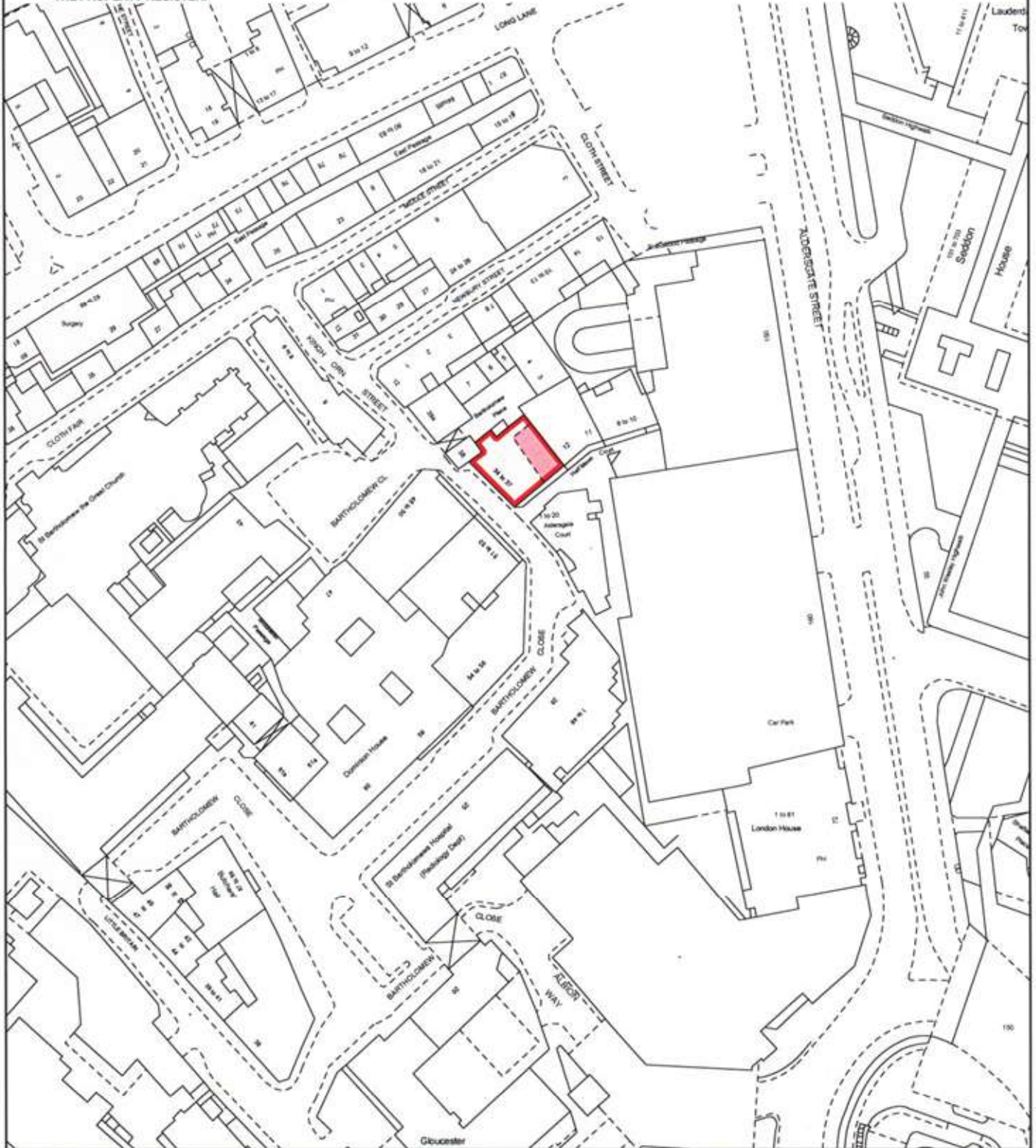
ORDNANCE SURVEY MAP REFERENCE:

TQ3281NW

SCALE 1:1250

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NOTE: THE LAND IN THIS TITLE LIES WITHIN THE AREA EDGED RED HEREON AND IS MORE PARTICULARLY DESCRIBED IN THE LEASE OR LEASES REFERRED TO IN THE PROPERTY REGISTER.



This title plan shows the general position of the boundaries: it does not show the exact line of the boundaries. Measurements scaled from this plan may not match measurements between the same points on the ground. For more information see Land Registry Public Guide 7 - Title Plans.

This official copy shows the state of the title plan on 1 September 2005 at 07:49:54. It may be subject to distortions in scale.

Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.

Issued on 1 September 2005.

This title is dealt with by the Harrow District Land Registry.

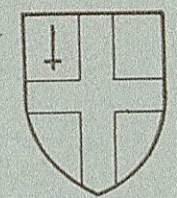


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Page 303

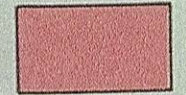
CITY OF LONDON

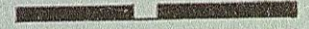



REDEVELOPMENT UNIT No. 32.

ACQUISITION OF LAND.

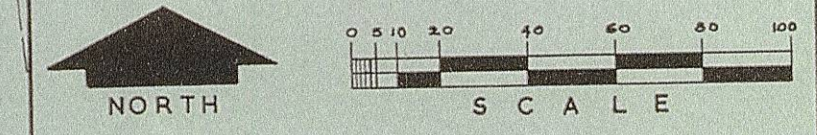
FREEHOLD /AND OR LEASEHOLD
LAND ACQUIRED BY THE CITY
CORPORATION.



BOUNDARY OF UNIT. 

BOUNDARY OF CITY. 

R. S. WALKER, F. R. I. C. S.
CITY SURVEYOR,
GUILDHALL, E. C. 2.



PV/BMB 4.415 MAY 1964

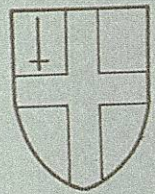
R19583



Page 804





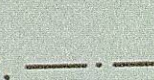
PLAN B

CITY OF LONDON

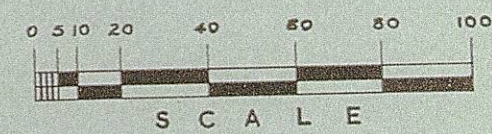
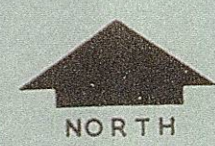


REDEVELOPMENT UNIT No. 32.

PROPOSED REDEVELOPMENT

- LAND FOR DISPOSAL. 
- LAND ALREADY DISPOSED OF. 
- HIGHWAYS 
- BOUNDARY OF UNIT. 
- BOUNDARY OF CITY. 

R. S. WALKER, F. R. I. C. S.
 CITY SURVEYOR,
 GUILDHALL, E. C. 2.



PV/BMB

4-416

MAY 1964