



Port Health & Environmental Services Committee

Date: MONDAY, 2 JUNE 2025

Time: 2.00 pm

Venue: COMMITTEE ROOM 2 - 2ND FLOOR WEST WING, GUILDHALL

Members:

Deputy Peter Dunphy (Deputy Chairman)	Helen Ladele
George Abrahams	Gregory Lawrence, Farringdon Without North Side
Deputy Christopher Boden	Antony Manchester
Leyla Boulton	Vasiliki Manta
Deputy Timothy Butcher	Deborah Oliver
Simon Burrows, Bishopsgate	Fraser Peck
Simon Duckworth OBE DL	Deputy Henry Pollard
Deputy John Edwards	Jason Pritchard
John Foley	Sushil Saluja, Coleman Street
Dawn Frampton	Hugh Selka
Deputy Marianne Fredericks	Dr Giles Shilson
Mercy Haggerty	Alethea Silk
Deputy Caroline Haines	Stuart Thompson
Deputy Jaspreet Hodgson	Mandeep Thandi
Alderman Robert Hughes-Penney	Alderman Kawsar Zaman

Enquiries: **Jayne Moore**
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Ian Thomas CBE
Town Clerk and Chief Executive

AGENDA

Part 1 - Public Agenda

1. **APOLOGIES**

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

3. **COURT ORDER**

To receive the Order of the Court of Common Council dated 25th April 2025 appointing the Committee and setting its Terms of Reference.

For Information
(Pages 7 - 8)

4. **ELECTION OF A CHAIRMAN**

To elect a Chairman in accordance with Standing Order No. 28.

For Decision

5. **ELECTION OF A DEPUTY CHAIRMAN**

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

For Decision

6. **MINUTES**

To agree the public minutes and summary of the meeting held on 7th January 2025.

For Decision
(Pages 9 - 16)

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

Report of the Town Clerk

For Decision
(Pages 17 - 20)

8. **PORT HEALTH FOOD SAFETY ENFORCEMENT PLAN AND PORT HEALTH SERVICE PLAN 2025-6**

Report of the Executive Director of Environment.

For Decision
(Pages 21 - 48)

9. **COMMERCIAL ENVIRONMENT HEALTH SERVICE PLAN 2025-26**
Report of the Executive Director of Environment.
For Decision
(Pages 49 - 60)
10. **DELEGATED POWERS TO THE EXECUTIVE DIRECTOR OF THE ENVIRONMENT DEPARTMENT - SINGLE USE VAPES**
Report of the Executive Director of Environment.
For Decision
(Pages 61 - 66)
11. **HIGH-LEVEL BUSINESS PLAN 2024/25 END OF YEAR PERFORMANCE REPORT**
Report of the Executive Director of Environment.
For Information
(Pages 67 - 84)
12. **RISK MANAGEMENT UPDATE**
Report of the Executive Director of Environment.
For Information
(Pages 85 - 98)
13. **FIRST CONSIDERATIONS: ENHANCED FOR BIODIVERSITY DUTIES OF PUBLIC AUTHORITIES**
Report of the Executive Director of Environment.
For Information
(Pages 99 - 114)
14. **REPORT OF ACTION TAKEN**
Report of the Town Clerk.
For Information
(Pages 115 - 118)
15. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
16. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
Any items of business that the Chairman may decide are urgent.

17. **EXCLUSION OF THE PUBLIC**

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

Part 2 - Non-public Agenda

18. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 7th January 2025.

For Decision
(Pages 119 - 120)

19. **ANIMAL HEALTH AND WELFARE SERVICE - OPTIONS REVIEW**

Report of the Executive Director of Environment.

For Decision
(Pages 121 - 198)

20. **WALBROOK WHARF FEASIBILITY 2027 AND BEYOND**

Joint report of the City Surveyor and Executive Director of Property, and the Executive Director of Environment.
APPENDICES IN SEPARATE PACK

For Decision
(Pages 199 - 204)

21. **PORT HEALTH AND ENVIRONMENTAL SERVICES DEBTORS - PERIOD ENDING 31 MARCH 2025**

Report of the Executive Director of Environment.

For Information
(Pages 205 - 214)

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

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

Agenda Item 3

KING, Mayor	RESOLVED: That the Court of Common Council holden in the Guildhall of the City of London on Friday 25 th April 2025, doth hereby appoint the following Committee until the first meeting of the Court in April, 2026.
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PORT HEALTH & ENVIRONMENTAL SERVICES COMMITTEE

- Constitution**
A Ward Committee consisting of,
 - two Aldermen nominated by the Court of Aldermen
 - up to 31 Commoners representing each Ward (two representatives for the Wards with six or more Members regardless of whether the Ward has sides) or Side of Ward.
- Quorum**
The quorum consists of any nine Members.
- Membership 2025/26**

ALDERMEN

- 1 Robert Charles Hughes-Penney
- 4 Kawsar Zaman

COMMONERS

2	Deborah Oliver TD.....	Aldersgate
4	Mandeep Thandi	Aldgate
1	Leyla Boutlon.....	Bassishaw
	(Billingsgate has paired with Aldgate for this appointment)	Billingsgate
4	Simon D'Olier Duckworth OBE DL.....	Bishopsgate
1	Simon Burrows.....	Bishopsgate
4	Dr Giles Robert Evelyn Shilson.....	Bread Street
3	Hugh Selka.....	Bridge and Bridge Without
1	Antony Geoffrey Manchester.....	Broad Street
4	Christopher Paul Boden, Deputy.....	Candlewick
1	Helen Ladele	Castle Baynard
1	Vasiliki Manta.....	Castle Baynard
1	Sushil Kumar Saluja	Coleman Street
13	Peter Gerard Dunphy, Deputy.....	Cornhill
2	Dawn Frampton	Cripplegate
1	Mercy Haggerty	Cripplegate
12	James Henry George Pollard, Deputy.....	Dowgate
1	Fraser Stuart Peck	Farringdon Within
3	John Ross Foley	Farringdon Within
5	George Christopher Abrahams.....	Farringdon Without
2	Gregory Alfred Lawrence	Farringdon Without
3	Timothy Richard Butcher, Deputy	Langbourn
	(Lime Street has paired with Cornhill for this appointment)	Lime Street
7	Jason Paul Pritchard	Portsoken
4	Caroline Wilma Haines, Deputy	Queenhithe
5	Marianne Bernadette Fredericks, Deputy	Tower
3	Jaspreet Hodgson, Deputy	Vintry
4	Alethea Melody Silk.....	Walbrook

Together with two Members in place of the Ward of (Cheap) not taking up their appointment; and (Aldersgate) not taking up one of their two appointments on this occasion:-

Deputy John Ernest Edwards
Stuart Peter James Thompson

4. **Terms of Reference**

To be responsible for:-

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

PORT HEALTH & ENVIRONMENTAL SERVICES COMMITTEE

Tuesday, 7 January 2025

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

Present

Members:

Mary Durcan (Chairman)	Deputy Jaspreet Hodgson
Deputy Peter Dunphy (Deputy Chairman)	Wendy Hyde
George Abrahams	Deborah Oliver
Deputy Timothy Butcher	Deputy Henry Pollard
Deputy John Edwards	Henrika Priest
John Foley	Hugh Selka
Steve Goodman OBE	Jacqui Webster

Officers:

Katie Stewart	- Executive Director, Environment
Timothy Bage	- Environment Department
Joanne Hill	- Environment Department
Graham Holmes	- Environment Department
Ian Hughes	- Environment Department
Joe Kingston	- Environment Department
Aggie Minas	- Environment Department
Susie Pritchard	- Environment Department
Rachel Pye	- Environment Department
Gavin Stedman	- Environment Department
Jenny Pitcairn	- Chamberlain's Department
Frank Marchione	- Comptroller & City Solicitor's Department
James Edwards	- Remembrancer's Department
Joesph Smith	- Town Clerk's Department
Kate Doidge	- Town Clerk's Department

1. APOLOGIES

Apologies were received from Deputy Christopher Boden, Dawn Frampton, Deputy Marianne Fredericks, Caroline Haines, Andrew McMurtrie, and Glen Witney.

Shahnan Bakth, Caroline Haines, Andrew McMurtrie, Deputy Dr Giles Shilson, and Alderman Kawsar Zaman observed the meeting virtually.

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

There were no declarations.

3. **MINUTES**

RESOLVED – That the public minutes and non-public summary of the previous meeting held on 19th November 2024 be approved as an accurate record.

4. **OUTSTANDING ACTIONS**

The Committee received its outstanding actions. It was agreed that as the actions listed had been largely resolved, or had moved into business as usual, that they be removed from the outstanding actions list.

RESOLVED – That the Committee note the outstanding actions and agree to remove them from the list.

5. **REVENUE AND CAPITAL BUDGETS 2025-26**

The Committee received a joint report of the Chamberlain and the Executive Director for Environment, concerning the approval of the revenue and capital budgets for the Port Health and Environmental Services Committee for 2025/26.

The Committee heard that the cleansing service, as with budgets for all local risk services, was given a 2% annual uplift. The waste collection and street collection contract had a separate mechanism for calculating the contractual price increase each year. This was often higher than 2% and therefore a bid had been submitted for the On-Street Parking Reserve to meet the difference between the 2% uplift and the contractual increase to ensure services were maintained at current levels. This required approval from the Resource Allocation Sub-Committee (RASC).

A Member asked whether the Executive Director for Environment was confident they were able to meet the given budget. The response was a confirmation that there were no current concerns that services within the Committee's remit would not be able to operate within the allocated budget. Budgets would be managed closely, and concerns would be highlighted to the Committee if they arose.

Following a query, the Committee heard that the responsibility and ownership of closed public conveniences facilities would be incorporated into a report to be received by the Committee later in 2025. There had been public conveniences closed in various tranches over the last 30 years, for reasons such as affordability. Those structures which still existed need to be managed in conjunction with City Surveyors. This linked in with further work required on an asset management plan for the Environment Department. It was suggested that the future report includes discussion on not using the closed structures, or those structures be used free of charge. It was noted that should those structures become commercial lettings (i.e., no longer a public convenience), these would become the responsibility of RASC.

The Committee heard that agency staff were more appropriate for staffing the public convenience facilities and allowed for a greater flexibility in staffing, to meet the seasonal demand at the facilities. .

Finally, the Committee heard that the increase of staffing at ports were the result of the introduction of new border controls on imported food and feed from both the EU and rest of world, and that the Port Health Service operated on a full cost recovery basis.

RESOLVED – That Members:

- Review and approve the proposed revenue budget for 2025/26 for submission to Finance Committee.
- Review and approve the proposed capital budgets for 2025/26 for submission to Finance Committee.
- Agree that amendments for 2024/25 and 2025/26 budgets arising from changes to recharges, energy prices or any further implications arising from subsequently approved savings proposals or changes to the Cyclical Works Programme be delegated to the Chamberlain in consultation with the Executive Director for Environment.

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

The Committee received a report of the Executive Director for Environment, concerning the approval of the high-level Business Plan for the Environment Department for 2025-30.

A Member of the Committee raised the need to emphasise references to residents and how the high-level Business Plan would benefit residents, noting the resident reset initiative from the Chairman of Policy & Resources.

It was queried why e-bikes were not referenced in the Business Plan. The response was that e-bikes sat within the remit of the Planning and Transportation Committee, and the Committee were assured that they were referenced in that Committee's Business Plan. Later, the Committee raised the need to reference working together and the links with other Committee's for the business plan to succeed. It was agreed to reword the Business Plan to emphasise the links between the Committees.

On Equality, Diversity, & Inclusion (EDI), including social mobility, the Executive Director for Environment was working on an emerging piece of work with the Equalities Director, to consider the broad benefits of EDI and social mobility. This included finding ways to articulate this in terms of the Committee's remit, and what it meant for the services overseen by the Committee.

Following a query on Walbrook Wharf, the Committee heard that several options with different funding options were being considered, and a report would be received by the Committee later in 2025, following the completion of the soft market testing. The Committee were reassured that officers would not recommend an option that could not be funded.

RESOLVED – That Members:

- Note the factors taken into consideration in compiling the Environment Department's high-level Business Plan 2025-30; and
- Approve, subject to incorporation of any changes sought by this Committee, the elements of the departmental high-level Business Plan

2025-30 which fall within the remit of the Port Health and Environmental Services Committee.

7. MESSAGE AND SPECIAL TREATMENT (MST) FEES FOR 2025-6

The Committee received a report of the Executive Director for Environment, concerning the approval of the annual fees for those premises requiring a licence for Massage and Special Treatments (MSTs), which included premises seeking to register for acupuncture, tattooing, cosmetic piercing, or electrolysis.

Following a query, it was noted that owing to case law, fees were set on a full cost recovery basis and not on a competitive level against the fees charged by other local authorities. Similar licensing fees could vary and depend on compliance levels. The City of London had high compliance rates and low enforcement activity. Fees were set based on officer time in administering and enforcing the service, and the hourly rate, which included covering all overheads.

Officers were aware of a Private Members' Bill in relation to cosmetic treatments, but those treatments were not scoped out in the legislation before the Committee. Officers were not aware of any such venues in the City operating non-surgical treatments provided by a medically unqualified professional.

It was queried why the fees were not increased in accordance with inflation. Officers reassured the Committee that the fees could only be based on full cost recovery, noting that not all the MST were increasing due to an over recovery of costs in prior years.

RESOLVED – That Members:

- Agree the proposed fees for 2025/26 as set out in Appendix 2 (column two).
- Delegate authority to the Executive Director for Environment to approve future annual fees on a full cost recovery basis, including adjustments for prior years' under/over recovery where relevant, and subject to any statutory limits that may apply.

8. STREET TRADING FEES FOR 2025-6

The Committee received a report of the Executive Director of Environment, concerning the approval of the setting of annual fees for issuing a licence to those persons wishing to participate in Street Trading in Middlesex Street and for those persons wishing to apply for a temporary street trading licence elsewhere in the Square Mile.

RESOLVED – That Members:

- Agree the proposed fees for 2025/26 as set out in Appendix 2 (column two).
- Delegate authority to the Executive Director for Environment to approve future annual fees on a full cost recovery basis, including adjustments for prior years' under/over recovery where relevant, and subject to any statutory limits that may apply.

9. **CEMETERY AND CREMATORIUM FEES AND CHARGES 2025-2026**

The Committee received a report of the Executive Director for Environment, concerning the annual setting of fees and charges for the services provided at the City of London Cemetery and Crematorium for 2025/26.

RESOLVED – That Members agree the fees and charges as set out in the report and shown in Appendix 1 for implementation with effect from 1 April 2025.

10. **CEMETERY AND CREMATORIUM ADMINISTRATION SYSTEM**

The Committee received a report of the Executive Director for Environment, concerning the approval of a contract award for the administration system to be used at the City of London Cemetery and Crematorium. Following the procurement tender exercise, all bidders, including the preferred bidder and the current supplier, had failed the financial assessment. The Service was therefore unable to proceed without the Committee's approval.

It was confirmed that the system used by the preferred bidder would be cloud based. The cost of the annual licensing fees were in line with expectations, noting that approximately £33,000 would be saved per annum in posting, packaging and franking costs when the system was fully implemented.

The Committee raised concerns on the preferred bidder having failed the financial assessment. The basis of this failure was queried. The response was that the response to this specific query would have to be held in non-public session. The Committee agreed that it could not approve the contract award until it had heard and were satisfied with the explanation for the failure of the financial assessment. It was agreed to Delegate Authority to the Town Clerk, in consultation with the Chairman and Deputy Chairman, to approve the contract award subject to the Committee's satisfaction on the explanation for the failure of the City Corporation's standard financial appraisal.

RESOLVED – That the Committee agree to Delegate Authority to the Town Clerk, in consultation with the Chairman and Deputy Chairman of the Port Health & Environmental Services Committee, to agree to approve the awarding of the contract to the preferred bidder, subject to the Committee's satisfaction on the explanation for the failure of the Corporation's standard financial appraisal.

11. **52ND CITY OF LONDON THAMES FISHERY RESEARCH EXPERIMENT**

The Committee received a report of the Executive Director for Environment, concerning the results of the 52nd City of London Thames Fishery Research Experiment, and the options for the 53rd Experiment in 2025 for the Committee's consideration.

It was confirmed that the report and results of the Experiment were shared as widely as possible, including with the Port of London Authority, relevant environmental agencies, and The Fishmongers' Company.

A Member raised that the Hampstead Heath Consultative Committee had received a report on a study which had linked dogs swimming in Heath ponds being the likely source of pesticides that could be harmful to the natural environment in those ponds. It was suggested that measuring pesticides could be an aspect of future Fishery Experiments.

A Member noted comments following the previous year's report in seeking funding and queried what funding had been sought for the 52nd Experiment and if funding would be secured for the 53rd Experiment. The response was that following the approval of the 52nd Experiment, connections for potential funding were made but few resulted in additional funding. Officers would endeavour to continue to seek funding from multiple sources. It was requested that Members submit any suggestions or contacts for potential funding sources.

RESOLVED – That Members agree:

- To proceed with the 53rd City of London Thames Fishery Research Experiment in 2025 in the existing format.
- To review and approve the grant of £4,800 from the City's Estate to partially fund the 2025 Experiment.
- Approve delegated authority to the Town Clerk, in conjunction with the Chairman and Deputy Chairman, to determine the details of the proposed Research Project in conjunction with suitable academic institutions.

12. TERRORISM (PROTECTION OF PREMISES) BILL - 'MARTYN'S LAW'

The Committee received a report of the City Remembrancer, concerning the provisions of the Terrorism (Protection of Premises) Bill, also known as "Martyn's Law" and any implications for the City of London Corporation, City of London Police and the Police Authority Board.

A Member sought reassurance that the security of the Lord Mayor's Show was proportionate and well considered, given that it was not qualified as an event under the Bill, and in the context of recent events in New Orleans. The response was that the legislation was defining locations and venues as a defined ticketed area, which the Lord Mayor's Show was not. However, this was not to say that the Lord Mayor's Show would not be reviewed within the lens of the Bill.

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

13. LONDON PORT HEALTH AUTHORITY ORDER 2024

The Committee received a report of the Executive Director for Environment, concerning the new Port Health Order, which had been made with the Central Government Legal Department and the Secretary of State for Health and Social Care, and was now in force.

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

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

There were no public questions.

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

There were no public items of urgent business.

16. **EXCLUSION OF THE PUBLIC**

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

17. **NON-PUBLIC MINUTES**

RESOLVED – That the non-public minutes of the previous meeting held on 19th November 2024 be approved as an accurate record.

18. **CEMETERY AND CREMATORIUM ADMINISTRATION SYSTEM**

The Committee received a report of the Executive Director for Environment, concerning the approval of a contract award for the administration system used at the City of London Cemetery and Crematorium. It heard an explanation for the failure of the City Corporation's standard financial appraisal, as referenced in Minute Item 10.

19. **REVENUE AND CAPITAL BUDGETS 2025/26**

The Committee received Appendix 4 to Item 5, Revenue and Capital Budgets 2025/26.

20. **HAZARDOUS WASTE COLLECTION AND DISPOSAL SERVICE CONTRACT**

The Committee received a report of the Executive Director of Environment, concerning the London-wide Hazardous Waste Collection and Disposal Service Contract.

21. **PORT HEALTH SERVICE UPDATE**

The Committee received a report of the Executive Director for Environment, concerning an update on the implementation of the new United Kingdom Border Target Operating Model for checks on imported food and feed from the European Union and Rest of World.

22. **ANIMAL HEALTH AND WELFARE SERVICE - NEW SERVICE DELIVERY PLAN**

The Committee received a report of the Executive Director of Environment, concerning an update on the Animal Health and Welfare Service's New Service Delivery Plan.

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

There were no non-public questions.

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

There were no non-public items of urgent business.

The meeting closed at 1.00 pm

Chairman

Contact Officer: Kate Doidge
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City of London Corporation Committee Report

Committee(s): Port Health and Environmental Services Committee	Dated: 2 nd June 2025
Subject: Appointments to Sub Committees and Representatives to Outside Bodies	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:	Kate Doidge, Governance & Member Services' Team, Town Clerk's Department

Summary

Members are asked to approve various appointments which the Port Health and Environmental Services Committee makes annually to various other Committees and outside bodies. Further information on these bodies, including the previous appointees for 2024/25, is included at Appendix 1.

Recommendation(s)

- (i) Members are asked to:
- Appoint a Member of this Committee to serve on the Local Plans Sub-Committee;
 - Appoint a Members of this Committee to serve on the Streets and Walkways Sub-Committee;
 - Appoint a Member of this Committee to serve on the Projects and Procurement Sub-Committee;
 - Appoint a Member of this Committee to serve as a representative on the Thames Estuary Partnership;
 - Appoint a Member of this Committee to serve as trustee on Thames21's Board (of Trustees).

(ii) Members are also asked to:

- Note that the Chairman, or their representative, shall serve on the Health and Wellbeing Board;
- Note that the Chairman and Deputy Chairman, or their representatives, shall serve on the Crime and Disorder Scrutiny Sub Committee.

Appendices

- Appendix 1 – Further information on Committee appointments.

Kate Doidge

Governance & Member Services' Team

Town Clerk's Department

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Appendix 1 – Further Information on Committee Appointments

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

a) Local Plans Sub (Planning and Transportation) Committee

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

2024/25 Appointee: Alderwoman Elizabeth King

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

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

2024/25 Appointee: John Foley

c) Projects and Procurement Sub Committee

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

2024/25 Appointee: Mary Durcan

d) Thames Estuary Partnership

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

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

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

2024/25 Appointee: Deputy John Edwards

e) Thames21

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

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

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

2024/25 Appointee: Henrika Priest

City of London Corporation Committee Report

Committee: Port Health & Environmental Services Committee (For Decision)	Dated: 02/06/2025
Health & Wellbeing Board (For Information)	11/07/2025
Subject: Port Health Food Safety Enforcement Plan and Port Health Service Plan 2025/26	Public For Decision
This proposal: • delivers Corporate Plan 2024-29 outcomes • provides statutory duties	• Providing Excellent Services • Diverse Engaged Communities
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of:	Katie Stewart, Executive Director Environment
Report authors:	Tim Bage, Assistant Director – Port Health

Summary

This report seeks approval for the Port Health Service Food Safety Enforcement Plan 2025/26 (Appendix 1).

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

Our service plan sets out how and at what level regulatory controls will be provided and Committee approval of the plan is expected by the Food Standards Agency (FSA)

Recommendation(s)

Members of the Port Health & Environmental Services Committee are asked to:

- Approve the Port Health Service Food Safety Enforcement Plan 2025/26 (Appendix 1).
- Note the Port Health Service Plan 2025/26 (Appendix 2).

Members of the Health & Wellbeing Board are asked to:

- Note both the Port Health Service Food Safety Enforcement Plan 2025/26 (Appendix 1) and Port Health Service Plan 2025/26 (Appendix 2).

Main Report

Background

1. As an enforcement authority the London Port Health Authority (LPHA) has obligations for the delivery of certain food and standards controls.
2. In the case of the LPHA, Articles 3 and 4 of The London Port Health Authority Order 2024 and the associated Schedules, make provision as to the jurisdiction and the functions that the port health authority is to exercise as regards the London port health district, which includes food safety and standards controls within ports falling under its jurisdiction, and the River Thames.
3. To ensure local transparency and accountability and to show our contribution to the authority's corporate plan the FSA advise that service plans and performance reviews should be approved at the relevant level established for the authority. Our service plans are presented to these Committees annually.

Current Position

Port Health Food Safety Enforcement Plan 2025/26

4. LPHA has 160 food premises registered. 141 are within the Ports/River area and 19 in the London Gateway Logistics Park (inspected under a S.101 agreement with Thurrock Council). These fall within the full range of FSA categories, requiring inspection from every 6 months to 3 years.
5. In 2024/25, 60 food hygiene inspections were carried out during the period. Only 1 was not broadly compliant (falling below the FSA's expected standard). 10 food standards inspections were also carried out.
6. The detailed programme of work for the Port Health Service are outlined in the Port Health Service Food Safety Enforcement Plan 2025/26 (Appendix 1).

Port Health Service Plan 2025/26

7. The Port Health Service has focused its attention on undertaking border controls on food and feed under the new Border Target Operating Model (BTOM); a high-level plan that outlines the new regime for Sanitary and Phytosanitary (SPS) checks on all food and feed entering the UK from both the European Union (EU) and the Rest of the World (RoW).
8. The plan outlines a comprehensive approach to managing and monitoring public, animal and environmental health at the ports and surrounding areas. The plan details the responsibilities and activities of the Port Health Service, which includes controlling food and feed imports, food standards, food safety, water quality, infectious disease control, civil contingencies, ship sanitation,

environmental protection, and shellfish control. By implementing these measures, the Service aims to protect and enhance public health, prevent the spread of diseases, and ensure the quality and safety of food and water supplies.

9. The Port Health Service is responsible for compliance checks for all food and feed imports from the EU and the RoW, ensuring that these imports meet the necessary standards and regulations. This is particularly important as the ports are the first point of entry into the UK, and any issues with imported food and feed can have significant implications for the biosecurity of the UK.
10. Moreover, the plan highlights the Service's commitment to delivering a high-quality, accessible, and responsive service. It details how the service has reacted to the new BTOM by extending operating hours, restructuring into multidisciplinary teams, and investing in professional and personal development, the Service aims to be the fastest processor of imported food and feed consignments in the UK while maintaining robust biosecurity measures at the border. This not only ensures the efficient and effective delivery of services but also supports the growth and development of the ports, contributing to the economic prosperity of the region.
11. The detailed program of work for the Port Health Service are outlined in the Port Health Service Plan 2025/26 (Appendix 2).

Corporate & Strategic Implications

12. Strategic Implications - The Service Plans link to a number of the objectives in the City Corporation's revised Corporate Plan 2024-29:
 - Providing Excellent Services
 - Dynamic Economic Growth
13. Financial implications - None. The Service Plans will be met from within existing local risk budgets.
14. Resource implications - None.
15. Legal implications - Failure to plan and implement a program of official food controls could result in sanctions by the FSA, in extremis taking over the operational control of the LPHA's food safety and standards, enforcing authority functions.
16. Risk implications - Potential reputational risk to the LPHA and thus the City Corporation, if the above happens.
17. Equalities implications – None following a test of relevance.
18. Climate implications - None.
19. Security implications - None

Conclusions

20. The LPHA will continue to meet its obligations to the FSA in respect of food safety and standards within its jurisdiction.
21. The Port Health Service Plan outlines a program of work objectives and how these will be delivered. LPHA will continue to ensure their work is risk-based in line with the BTOM, targeting non-compliance whilst facilitating the smooth passage of goods through our ports for compliant businesses to ensure a level playing field of regulation.

Appendices

- Appendix 1 – Port Health Food Enforcement Plan 2025/26
- Appendix 2 – Port Health Service Plan 2025/26

Background Papers

None

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Port Health - Food Safety Law Enforcement Plan 2025/26

Service Aims and Objectives

Through this plan, the London Port Health Authority (LPHA) aims to ensure compliance with legislation related to imported food and animal feed to protect food safety and animal health. Deliver a high quality, accessible and responsive service to protect, enhance, and improve public, environmental, and animal health throughout the London Port Health district.

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

In this context the LPHA also has responsibility for Food Hygiene and Standards, Imported Food Sampling, Animal Feeding Stuffs and Shellfish Classification.

Food Hygiene and Food Standards Inspections

The Port Health Service undertakes food hygiene and food standards inspections of premises within the Port domain, including Approved premises. The Port is also responsible for the inspection of some fixed craft and moving vessels serving food and drink on the tidal Thames. Food premises airside at London City Airport also come under the Port. LPHA currently regulates 160 food businesses, of which 1 is non-compliant at the start of 25/26.

The number of Food Hygiene/Food Standards inspections undertaken in 2024/25 were 160 for Food Hygiene (including Alternative Enforcement Strategy) and 10 Food Standards.

The City has also entered into a Local Government (Miscellaneous Provisions) Act section 101 agreement with Thurrock Council to exercise Thurrock's functions under the feed and food laws in a section of the Logistics Park **Alternative Enforcement Strategy**.

LPHA received 9 food complaints in 24/25 – 7 for the River/Airport and 2 for the Logistics Park.

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

For 25/26 the Port Health Team have 57 inspections due for Food Hygiene and 13 for Food Standards.

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

Premises and vessels under the AES will receive a specific questionnaire which will be scrutinised by a competent officer to assess if enough information has been obtained. A follow up telephone call may be necessary. Some premises will receive a follow up visit to

verify information on the questionnaire and visits, if necessary, will take place following complaints, ID notifications, changes of activity/management or non-return of questionnaire.

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

Feed and Food Complaints

The Service follows corporate policy in relation to any complaints and we aim to provide a same day response to all consumer complaints on food matters.

Home Authority Principle and Primary Authority Scheme

It is our policy to contact the Primary Authority when we become aware of an importer not conforming with the relevant import regulations. We also try to identify and contact Primary Authorities following adverse sample results.

The Primary Authority database is always examined to check for any partnerships in relation to any food premises that face interventions.

We also provide updates on current issues and offer advice and support in the use of electronic systems such as the IPAFFS system.

Food and Feed Sampling

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

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

POAO is checked at the frequencies set by the Border Operating Model.

Sampling plans will change throughout the year to reflect emerging issues and evidence.

This has resulted in further formal action, including detention and/or destruction of the consignment, for adverse chemical and biological results. Labelling issues are referred to the responsible Trading Standards service at consignment's destination.

Selection of Consignments

The requirement and selection of a consignment for routine sampling is decided officers either during the documentary check process or at the time of the physical examination of the product. Officers can subject any consignment at any stage of the checks to any sampling and laboratory tests if it is considered necessary to ascertain that the consignment meets the import requirements. Officers are either a qualified Chartered/Environmental Health Practitioner or Official Veterinarian.

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

1. Intelligence obtained from different national and international databases: IPAFFS, EWS
2. Specific priorities and alerts issued by the different Regulators.
3. Local intelligence/professional expertise from results from previous years and type of imports.

The information sources listed above can be used to assess risks. The risk assessment is likely to be a combination of data, judgement and expert knowledge.

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

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

New products should be sampled if possible or where the AO suspects the consignment does not comply with the import conditions.

Feed, Food Safety and Standards promotional work, and other non-official controls interventions

Regular stakeholder events are held to update the trade and discuss current issues. This opportunity is taken to promote the use of Information Technology to speed clearance times.

Feed and Food Safety Incidents

LPHA are committed to responding promptly to all food or feed safety incidents. The Service has arrangements in place to ensure that it is able to respond to Food Alerts issued by the

FSA. Warnings are received electronically, and all urgent Food Alerts receive immediate attention and action where necessary. Out of hours arrangements are in place.

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

Organisational Structure

The LPHA employs a range of roles within the Port Health Service, these are outlined below with the numbers on establishment also provided; this might be different at the number employed in those roles at any one time.

- 1 Assistant Director
- 5 Managers
- 9 Team Leaders
- 9 Port Health Officers
- 8 Official Veterinarians
- 10 Senior Port Health Technical Officers
- 33 Port Health Technical Officers (PHTOs)
- 5 Senior Support Assistants
- 12 Support Assistants
- 2 Assistant Accounts Receivable Officers
- 2 Apprentices
- 6 Launch Crew
- 1 Compliance Officer
- 1 Training Officer

2025/26 Sampling Plans

Sampling Plan 25/26 - Products of Animal Origin and Non-Animal Origin (Food & Feed)

The purpose of the plan is to specify the imported Products of Animal Origin (POAO) and Non-Animal Origin (NAO) food/feed that should be sampled for examination and analysis each year.

The plan is devised using a risk-based approach when deciding which tests and products to be sampled, balanced with the requirement of randomisation in the selection of consignments.

The LPHA Imported Food Sampling Policy allows sampling of food and feed to be decided on a local basis according to product type, local knowledge, seasonal variation and historical import records at each individual port.

Deviations from the sampling protocol are permitted to take account of an importer's history of non-compliance with legislative requirements, previous adverse sample results

and intelligence received, for example, from inland local authorities, importers and consumer complaints. Sampling plans are provided in the appendices to this service plan.

NAO Sampling

Appendix 1 provides the plan for NAO food and feed samples being taken this year.

POAO Sampling

Appendix 2 provides the plan for POAO food and feed samples being taken this year.

Fishery Products

Appendix 3 provides the plan for fishery products being taken this year.

Shellfish Sampling

Appendix 4 provides the plan for locally sourced samples of shellfish from the Thames Estuary performed as part of official shellfish controls.

FSA Food Sampling Survey

There is an additional FSA Food Sampling Survey to be carried out for this period, where funding is obtained directly from Central Government. The purpose of this survey is to supplement Local Government food sampling with specific priorities, so foods of national concern can be tested.

Laboratories used by Port Health are listed below:

1. Food Water and Environmental Microbiology Laboratory London 61 Colindale Avenue, London, NW9 5EQ

Telephone: 02083276550

Email: FWEM@ukhsa.gov.uk

2. Kent Scientific Services

8 Abbey Wood Road, Kings Hill, West Malling, Kent ME19 4YT Telephone 030004151000

Email : kss@kent.gov.uk

3. Public Analyst Scientific Services (Eurofins UK)

i54 Business Park, Valiant Way, Wolverhampton. WV9 5GB

Telephone 01902627200

Email: info@publicanalystservices.co.uk

4. Centre for Environment, Fisheries and Aquaculture Science (CEFAS) Pakefield Road, Lowestoft, Suffolk, NR33 0HT

Telephone 01502562244

Email : www.cefascos.co.uk/contact-us

Results

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

For unsatisfactory results, officers will instigate further action which includes:

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

Appendix 1 - Proposed Imported FNAO NMP – sampling priorities table for 25/26 for food not of animal origin

	High priority
	Medium priority
	Low priority

[Text Wrapping Break]

Nuts & seeds products

Priority Ranking	Product Category	Hazard	Specific sampling guidance
High	Nuts & seeds products	<i>E. coli, Salmonella, Listeria monocytogenes</i>	Potentially ready-to-eat commodities: fresh coconut, nut spreads, sesame seeds, cumin seeds; alfalfa sprouts, all bean sprouts, other sprouted seeds, tahini & halva (from Syria)
High	Nuts & seeds products	<i>Aflatoxins</i>	Almonds (including ground/flour), groundnuts (including spreads/flour), Brazil nuts, pistachios, hazelnuts, walnuts, other tree nuts and mixed nuts, nut spreads and butters, melon seeds (egusi), chia seeds
Medium	Nuts & seeds products	<i>Cyanide (hydrocyanic acid)</i>	Apricot kernels, bitter almonds
Medium	Nuts & seeds products	<i>Undeclared allergens</i>	Nut spreads and butters
Medium	Nuts & seeds products	<i>Pesticide residues</i>	Bean sprouts (mung beans)
Low	Nuts & seeds products	<i>Undeclared sulphites</i>	Coconut (desiccated, dried, flour)

Herbs & spices

Priority Ranking	Product Category	Hazard	Specific sampling guidance
High	Herbs & spices	<i>Salmonella, Shiga toxin producing E. coli (STEC), Listeria monocytogenes</i>	Potentially ready-to-eat commodities: paan (betel) leaves, coriander leaves and other herbs (fresh or dried); pepper (black, pink & white), paprika powder, chilli powder, spice mixtures
High	Herbs & spices	<i>Aflatoxins</i>	Nutmeg (whole & ground), paprika, chilli powder
High	Herbs & spices	<i>Sudan dyes</i>	Turmeric (from Bangladesh), crushed pepper (from China), paprika (from Russia), spices and sumac (from Turkey)
Medium	Herbs & spices	Undeclared allergens, colours/dyes or sulphites	Spice mixtures, curry powder
Medium	Herbs & spices	<i>Pyrrolizidine alkaloids (PAHs)</i>	Cumin, oregano (from a number of countries)
Medium	Herbs & spices	<i>Pesticide residues</i>	Tea leaves (especially from India); ginger, coriander roots & leaves, paprika, chilli powder; herbs (from Israel and Cambodia)
Low	Herbs & spices	<i>Benzo(a)pyrene (BaP)</i>	Ginger, oregano

Fruit & vegetables

Priority Ranking	Product Category	Hazard	Specific sampling guidance
High	Fruit & vegetables	<i>Salmonella</i> , <i>Shiga toxin producing E. coli (STEC)</i> , <i>Listeria monocytogenes</i>	Potentially ready-to-eat commodities: e.g. peppers (sweet or bell), salad leaves, prepared fresh vegetables, enoki mushrooms (especially from China)
High	Fruit & vegetables	<i>Aflatoxins</i>	Dried figs, chilli peppers (fresh or dried)
Medium	Fruit & vegetables	<i>Pesticide residues</i>	Dried beans (from any non-EU country), beans (fresh), yardlong beans, okra, peppers (sweet or bell), chilli peppers (fresh or dried), spinach, vine leaves (from Egypt). Vine fruits/raisins, pomegranates, citrus fruits, mangoes (fresh or dried), prepared fresh fruit, dried dates, bananas (from Ecuador), apples (from India)
Medium	Fruit & vegetables	<i>Norovirus / Hepatitis A</i>	Frozen sweetcorn, frozen raspberries, other small fruit & berries
Low	Fruit & vegetables	<i>Ochratoxin A</i>	Vine fruits/raisins, dried figs
Low	Fruit & vegetables	<i>Cadmium</i>	Avocados & asparagus (from Peru)
Low	Fruit & vegetables	<i>Undeclared sulphites</i>	Dried apricots, dried dates, other dried or candied/mixed fruits
Low	Fruit & vegetables	<i>Iodine</i>	Seaweed and kelp (from China, Japan & Korea)

Other FNAO products

Priority Ranking	Product Category	Hazard	Specific sampling guidance
High	Edible oils	<i>Sudan dyes</i>	Palm oil (from Ivory Coast)
High	Grain products	<i>Sudan dyes</i>	Couscous (from Lebanon), fruit bars (from USA)
Medium	Edible oils	<i>3-MPCD & Pyrrolizidine alkaloids (PAHs)</i>	Palm oil
Medium	Grain products	<i>Pesticide residues</i>	Rice (from India)
Low	Grain products	<i>Ethylene oxide</i>	Noodles (from Vietnam)
Low	Food supplements	<i>Ethylene oxide</i>	Various food supplements (from India)

Appendix 2 - Proposed Imported POAO NMP – sampling priorities table for 25/26 for products of animal origin

This is pending a review by the Food Standards Agency in conjunction with LPHA. This aspect of the service plan will be populated when this work is completed.

**Appendix 3 - Proposed Imported POAO NMP – sampling priorities table for 25/26 for
Fishery Products Monitoring Plan**

<u>Priority</u>	<u>Hazard</u>	<u>Sampling Guidance</u>	<u>Total Samples</u>
High	Salmonella, Vibrio, Listeria monocytogenes	Cooked crustaceans	2
High	Listeria monocytogenes, Clostridium botulinum	Smoked fish	2
High	Veterinary medicine residues	Fish and crustaceans	10
Medium	<i>Cadmium</i>	Fish – wild sardines	1
Medium	Mercury (total mercury and methylmercury)	Fish – wild	6
Medium	<i>Histamine</i>	Fish associated with histidine	5
Medium	<i>Lead</i>	Fish – wild sardines	6
Low	E. coli, Staphylococcus aureus	Imitation crab claws	1
Low	<i>Dioxins/PCBs</i>	Oily fish only.	2

Total Samples: 35

Appendix 4 - Proposed Shellfish Sampling Plan for 25/26

Sample Site	Species	No of samples	Purpose	Sampled for	Laboratory	Chargeable to LPHA
Brandy Hole	Pacific Oyster	12	Classification	Micro	Colindale	Yes
Paglesham Pool	Pacific Oysters	4	Declassified Dec 2024 quarterly sampling for 2 years	Micro	Colindale	NA
Barling Hall	Pacific Oysters	12	Classification	Micro	Colindale	Yes
Paglesham	Pacific Oysters	12	Classification	Micro	Colindale	Yes
Paglesham	Hard Clams	12	Biotoxin	Biotoxins	CEFAS	No
Rushley Island	Pacific Oysters	12	Classification	Micro	Colindale	Yes
Off Rochford Outfall	Pacific Oysters	12	Classification	Micro	Colindale	Yes
Crouch Approach	Cockles	12	Classification	Micro	Colindale	Yes
Crouch Approach	Cockles	4	Biotoxin	Biotoxins	CEFAS	No
East of Havengore Creek	Cockles	12	Classification	Micro	Colindale	Yes
East of Havengore Creek	Cockles	4	Biotoxin	Biotoxins	CEFAS	No
Phoenix	Cockles	12	Classification	Micro	Colindale	Yes
Phoenix	Cockles	4	Biotoxin	Biotoxins	CEFAS	No
East of Shoebury Buoy	Cockles	12	Classification	Micro	Colindale	Yes
Barton Point	Mussels	12	Classification	Micro	Colindale	Yes
Leigh Foreshore	Cockles	0	Declassified 2024	Micro	Colindale	NA
West of Southend Pier	Pacific Oysters	12	Classification	Micro	Colindale	Yes
West of Southend Pier	Pacific Oysters	8	Biotoxin	Biotoxins	CEFAS	No
East of Southend Pier	Pacific Oysters	12	Classification	Micro	Colindale	Yes
Southend Leisure Centre	Mussels	12	Classification	Micro	Colindale	Yes
Barrow Deep	Native Oysters	12	Classification	Micro	Colindale	Yes
Black Deep	Razor Clams	12	Classification	Micro	Colindale	Yes
Total		228				



Port Health Delivery Plan 25/26

Service Profile

As the London Port Health Authority (LPHA), the **Port Health Service** is responsible for a district extending for 94 miles along the River Thames from Teddington to the outer Estuary. The area includes the London Gateway port as well as the ports of Tilbury, Tilbury 2, Purfleet, Thamesport and Sheerness. The area also includes London City Airport as well as the various docks and dockland areas which have now been redeveloped.

The Service aims to deliver a high quality, accessible and responsive service to protect, enhance, and improve public, environmental, and animal health by controlling food and feed imports; food standards, food safety and water quality; infectious disease control; civil contingencies; ship sanitation; environmental protection and shellfish control.

The control of imported food and animal feed is an important requirement as the checks take place at ports that are first point of entry into the United Kingdom.

Last financial year saw significant changes in the way in which the Service was delivered. The imposition of checks to imported food and feed entering from the EU was brought alongside existing checks on food and feed from the rest of the world (RoW) through the Border Target Operating Model.

The service significantly restructured to form 4 groups – each a multidisciplinary team of technical and professional officers, managed by a group manager and two team leaders each. A further team managed by a Business Manager provides Technical Administration Support to the 4 groups. Operating Hours were extended by 4 hours per day, adding an extra 20 hours per week to our service coverage.

Port Health also contains the River Division with bases at Denton, Gravesend and Charlton. This team leads on ship sanitation, shellfish sampling, noise and nuisance control on the tidal Thames and ceremonial duties.

Now LPHA are responsible for compliance checks for all food and feed imports from the EU and the Rest of World (RoW) that enter via the Border Control Posts at London Gateway, Tilbury, Tilbury2, Purfleet, Thamesport and Sheerness.

The Port of London is the largest mixed cargo port in the United Kingdom. Containerized cargo continues to grow through further phased development at Tilbury and the investment in the 4th berth at London Gateway which came online in January 2025, quickly attracting a new customer base. Investment in the ports of London remains strong and underpins long term forecasts for growth.

Service Responsibilities

The main activity for LPHA is the checking of food and feed imports from all countries which includes checks on all of mainland Europe. Cargo arrives from many areas of the world including South America, Africa, Australia, New Zealand, India, East Asia, the Mediterranean, USA, and Canada.

In addition to its imported food responsibilities, LPHA also has responsibility for Animal Feeding Stuffs, Shellfish Classification, Infectious Disease Control, Pollution Control and Pest Control.

Shellfish classification forms one of the many tasks performed by the River Division; there are 17 active beds (2 declassified last year) within the Authority's area and 4 further active beds are monitored on a contractual basis for Swale Borough Council, and Thanet Borough Council plus additional samples are taken for FSA projects, as required.

Infectious disease control continues to present a significant effect on staff resource with enhanced checks of all vessel arrivals in our area. Relationships developed during the pandemic remain strong, such as those with Border Force, Port of London Authority and relevant port operators who assist in maintaining the biosecurity of the UK's borders.

Drinking water quality has remained an area of significance as vessels moor up for longer periods of in activity in the docks and surrounding areas (including the River and London City Airport).

Port Health Service Aims and Ambitions

The Port Health Service aims to:-

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

It is the ambition of LPHA to:

- Develop our Port Health Service to be the fastest processor of imported food and feed consignments in the UK whilst maintaining robust biosecurity measures at the border.
- At all times to seek value for money in the activities we undertake so that the highest possible standards are achieved cost effectively.

Links to City of London Corporation Plans

The Port Health Service Plans link to the Key Service Objectives set out in Port Health & Public Protection Business Plans.

 [Env Dept HLBP 2025-30 - FINAL.pdf](#)

Port Health and Public Protection High Level Delivery Plan

1. Promote and Protection Animal and Environmental Health, and Consumer Protection. The High-Level Business Plan requires us to Embed the Border Target Operating Model (BTOM) at Ports for Food and Feed.

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) Protect and promote Public, Animal and Environmental Health and Consumer Protection					
1. Embed the Border Target Operating Model (BTOM) at the Ports for food and feed and at Heathrow for live animals (AVI). • Finalise development of the services to move to Business as Usual operations by Q3 2025/26.	4.8% (BTOM work is cost neutral)	44%	Providing Excellent Services Vibrant Thriving Destination Dynamic Economic Growth	• % of checks undertaken on low and medium risk food and feed imports.	• Provision of effective biosecurity controls at the border and promotion of animal welfare. • Realisation of new border controls for food and feed from the EU where the service is meeting demand from industry whilst providing effective public health protection.

2. Ensure Provision of Appropriate Facilities to enable delivery of services. The High-Level Business Plan requires us to Carry out a strategic review of operational facilities to ensure they are fit for purpose to enable effective, efficient and sustainable service delivery.

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) Ensure provision of appropriate facilities to enable delivery of services					
1. Carry out a strategic review of operational facilities to ensure that they are fit for purpose to enable efficient, effective and sustainable service delivery. Review to include: • Cemetery and Crematorium. • Public conveniences. • Port Health Service accommodation. • Heathrow Animal Reception Centre.	0.3%	0.5%	Providing Excellent Services	Narrative updates will be provided on progress against the actions listed.	The continued delivery of high quality statutory services to customers and stakeholders in the most efficient and sustainable manner.

3. Financial Security and development. Consider commercial development opportunities for Port Health in London and the wider area.

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) Financial security and development					
1. Consider commercial development opportunities for Port Health and HARC across London and a wider area. :	0% (cost neutral)	3%	Dynamic Economic Growth Flourishing Public Spaces Providing Excellent Services Vibrant thriving destination	• Provide an additional 300 lawn graves by end of Q4 2025/26.	• Sustainable services delivering high quality outcomes and 'steady state' infrastructure. • Generation of additional income for the services to protect staffing levels and ensure sustainable delivery of statutory services. • Increase CoL reputation for delivery of excellent public services within the Square Mile and beyond.

Risks

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 key service-level risks for the Port Health and Public Protection Division and the Cleansing Service are listed below.

Risk Title	Score
Brexit – impact on Port Health and Animal Health	RED, 24
Road traffic collision caused by City of London staff or contractor who is unfit to drive while on City business	RED, 16
A major incident, such as flooding or fire, makes Walbrook Wharf unusable as a depot	AMBER, 8
Air Quality (Department-level risk)	GREEN, 3

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

Mitigations

The Port Health Service is committed to creating aspirational roles, with career progression and job satisfaction.

A number of our team joined the service in more junior role and have developed upwards. Last year we restructured adding in some progression posts at the technical level with the aspiration of providing first line manager training, and an apprenticeship which would allow us over the long term to 'grow our own' Environmental Health Practitioners (Port Health Officers).

We have invested and will continue to invest in professional and personal development to achieve a sustainable, inclusive, resilient and agile workforce.

We are developing effective and collaborative relationships with business partners, the PH&PP team regularly meet with City Surveyors, Finance, HR and Media Teams either together or on an individual basis. A standout from last year was the multi business partner BTOM project group which oversaw the changes to the service.

Last year we implemented the Seal Check App, as part of our continued drive to develop our use of ICT, data and intelligence led solutions, and to ensure that the service is as effective and efficient as possible.

The Port Health Management team regular engage with PLA, DEFRA, FSA, Border Force, APHA and many other external stakeholders to ensure that we stay in tune with the external demands placed upon the service in the short, medium and longer term.

Scope of the Food and Feed Service

The LPHA is responsible for enforcing legal requirements relating to food safety and food standards for all food and animal feed that is imported through the ports within its area. This includes:

- Operation of the Border Control Posts at London Gateway Port, Tilbury, Tilbury 2, Purfleet and Thamesport
- Monitoring for illegal food or animal feed imports at any of the Ports within the district
- Carrying out documentary, identity and physical checks on imported consignments of products of animal origin and products not of animal origin
- Making checks of fish catch certificates to ensure compliance with regulations concerning Illegal, Unreported and Unregulated Fishing
- Sampling food and animal feed for chemical analysis and microbiological examination
- Checking consignments of imported animal feed comply with the relevant legislation
- Controls relating to Food Contact Materials
- Enforcing Contaminants in Food legislation
- Verification of Organic Produce
- Control of infectious diseases and food poisoning in liaison with UK Health Security Agency (UKHSA)
- Control of shellfish harvesting areas including sampling for classification and biotoxin analysis
- Sampling of drinking water supplied to vessels and from fixed points within the port boundary
- Food safety and hygiene inspections of premises and craft at dock locations and London City Airport
- Control of nuisance from the ports of London and regulation of premises under the Integrated Pollution Prevention and Control (IPPC) regime.

Other responsibilities that are delivered alongside the food service include:

- Enforcement of Rabies prevention legislation
- Export Health Certification as a direct result of our departure from the European Union.
- Investigating and controlling statutory nuisance

to noise and odour emissions from certain port industries

- Monitoring of waste control procedures relating to International Catering waste
- Inspection of vessels under the International Health Regulations and UK health legislation
- Liaison with Government Departments and Agencies
- Co-operate with Port Health Authorities nationally and internationally to maintain and improve service delivery.

Service Demands

Imported Food

Our main goal is to ensure that the Port Health Service is meeting its statutory obligations in relation to imported food and feed control. In doing this we aim to promote consumer confidence as a result of our work to assure the safety of the food supply chain, whilst protecting public, animal and environmental health.

Whilst meeting our statutory obligations we also have to pay attention to the principles of Better Regulation and take into account the way we deliver and enforce the legislation that we are responsible for.

LPHA has developed good working relationships with the trade using our ports by trying to understand the risks affecting businesses and dealing with consignments efficiently so as to avoid delays because of the checks we are obliged to carry out.

This understanding is an important aspect of our Service; however, there is a need to strike a balance between support for businesses, especially smaller businesses, and protecting consumers and others from fraudulent and illegal practices.

The main inspection activity for high risk non animal origin (HRNAO) and products of animal origin (PoAO) from countries outside the EU takes place at London Gateway Border Control Post (BCP) and, now to a lesser extent, Tilbury BCP.

With the implementation of EU checks we have seen a wider spread of import work geographically, which presents challenges both in terms of increased inspections, additional documentation checks, longer operating hours and increased traveling for staff – this has seen our staffing contingency grow from 50 to 105 staff within 12 months.

Changes in throughput have had a significant effect on the operation of the service. Additionally, whilst the Border Target Operating Model (BTOM) has lowered checks for most RoW countries and/or products, volumes of these imports are also predicted to increase as London Gateway attracts more business, and the associated logistics park development continues to expand. Berths 5, 6 and a second rail head are due to be delivered within the next 2 years. Failure of the Service to clear cargo swiftly will have a detrimental business effect and tarnish the reputation of LPHA and by implication, the City of London Corporation.

Throughput variations are a challenge because of numerous external factors affecting trade, including seasonal variations. This means that a flexible workforce is required to meet the fluctuations in service demand.

Under the new BTOM regime controls will be applied to goods proportionately based upon their risk categorisation:

- High risk (predominantly live animals, germinal products and goods under safeguard measures) will require pre-notification, simplified health certificates, documentary checks and a higher degree of physical and ID checks.
- Medium risk will require pre-notification, simplified health certificates, documentary checks and be subject to risk-based identity and physical checks at the border. Some will be set at 1%

physical and identity checks, although other goods will be considerably higher based on specific risks.

- Low risk will have minimal routine border controls applied. The proposal is for there to be no health certification or routine physical border checks, only a pre-notification data set and commercial documentation will be required for all low-risk animal products along with routine surveillance.

If risks increase or decrease and commodities need to move between risk categories, traders will be given 3 months notice so they can adapt their processes as needed, unless urgent protective action is required. The ability to apply emergency control measures on any commodities which pose an imminent risk to human or animal health will be retained.

The Accredited Trusted Trader scheme is still in pilot stage. This scheme would allow frequent importers of products of animal origin and animal by-products to potentially reduce the need for routine physical checks at the Border Control Posts by taking responsibility for carrying out routine checks and sampling to ensure the protection of biosecurity, animal and public health whilst being closely regulated by government.

LPHA continues to engage with Government Departments and other Port Health Authorities to understand and influence decisions post EU Exit.

The hours of operation currently being worked are 06:00hrs to 22:00hrs Weekdays, 08:00hrs to 16:15hrs Saturdays and Sundays. The need to amend operational hours as a result of existing port operations also remains under regular review. The introduction of a nightshift is planned for 25/26 operating from 22:00 until 03:00 to assist with the EU trade.

Changes to legislation places considerable demands on the Service; often the changes can be at short notice to respond to a particular problem. In particular, problems with microbiological contamination, undeclared cargo, pesticide and veterinary drug residues continue to surface. Controls implemented at short notice may continue to operate for a long period such as those implemented following the issues with Brazilian beef and poultry and all High Risk non animal origin products.

Other emerging risks are notified by the FSA, in addition our Public Analysts circulate information to assist in determining which products may require our attention. Updates to the "High Risk" list under the UK's adopted version of Regulation (EC) 2019/1793 now take place every 6 months.

Checks of catch certificates and other documentation (including EU origin from January 2021) under legislation related to the import of illegal, unreported and unregulated (IUU) fishery products is time consuming as a considerable number of consignments have multiple certificates relating to the products being imported. The LPHA has good liaison arrangements with the UK Single Liaison Office of the Marine Management Organisation (MMO) who are responsible for this area of work. The introduction of EU sourced imports has increased the volume of checks in this area of control.

The trade expects consignments to be cleared as quickly as possible as delays result in additional costs and disruption to their business. For this reason, our Business Plans include a performance indicator to measure the time it takes to release consignments. Where containers have to be detained; queries on documentation are processed as quickly as possible; samples are submitted efficiently and there are Service Level Agreements with the laboratories to ensure delays are kept to a minimum.

Food Hygiene and Standards

A small number of food businesses remain within the docks and London City Airport, including processing plants located outside of the dock areas but within the Port of London district that require inspection, in-house expertise has been retained to carry out this work. The volume of work is likely to increase as the port logistic

centres are developed at London Gateway and Tilbury. N.b. the logistics park at London Gateway is now subject to a Section 101 agreement with Thurrock Council

Products of Animal Origin

Sampling of imported Products of Animal Origin (POAO) is carried out in accordance with detailed EU rules and an internal sampling plan related to the physical checks that are undertaken by the Official Veterinarians and Port Health Officers. The aim is to sample between 1 and 10% of all the physical exams carried out linked to a sampling matrix that is produced quarterly anticipating the number of samples required. This is reviewed quarterly in order to make the necessary adjustments in accordance with any throughput variations. Samples taken may contribute to the National Sampling Plan coordinated by the FSA.

High Risk Non Animal Origin

The legislation relating to High-Risk non-Animal Origin products (HRNAO) is now reviewed on an ad hoc basis following divergence from the EU, this can mean changing requirements for sampling. Temporary increased controls because of emerging risks or widespread non-compliance plus other emergency measures add to the rapidly changing nature of these controls. Close liaison with the laboratories is essential because of the potential impact the change will have on them. Insufficient laboratory capacity or expertise is a concern which can cause considerable delays to imports.

Shellfish

As the Food Authority for the tidal Thames, the Service has responsibility for the harvesting of shellfish throughout its area. The LPHA has a responsibility for monitoring the harvesting of shellfish throughout its area. A sampling program is in place for classification purposes and biotoxin monitoring. Sampling for Swale and Thanet Borough Councils is carried out on a contract basis, with any follow up enforcement activity being carried out by local teams.

International Health

London City Airport is within the LPHA boundary and checks are made under the Public Health (Aircraft) Regulations. The Food Safety (Ships & Aircraft) (England & Scotland) Order 2003 is in force and has implications for food safety and potable water on board aircraft. Supplies of water at London City airport are regularly sampled and analysed. In addition to the controls on water supplies, regular inspections of the outside catering units and the vehicles delivering the foods for aircrafts are performed.

Port Health Authorities have powers and duties to prevent and control risks to human health from infection or contamination, including by chemicals and radiation. This includes investigating incidents relating to foodborne illnesses in premises and on vessels and in relation to infectious disease control

LPHA officers board vessels including Cruise Liners arriving within the port to undertake inspections under the Public Health (Ships) Regulations and issue Ship Sanitation Certificates under the International Health Regulations. The Food Safety (Ships & Aircraft) (England & Scotland) Order 2003 also applies sections of the Food Safety Act to vessels arriving in port. We work closely with other Port Health Authorities to enforce standards on vessels, in particular to ensure “problematic” vessels are tracked around the UK.

In 2024/25 officers recorded 2993 vessel arrivals, boarding 61 and issuing 30 ship sanitation certificates. Our vessel arrival number includes multiple arrivals of the same vessel during the defined period.

The Service has an Infectious Disease Protocol that has been drawn up in conjunction with UKHSA. Close liaison takes place between UKHSA staff and the LPHA following the protocol to ensure control of the situation.

LPHA Approach to Enforcement

This Plan aims to ensure that our enforcement remains targeted, proportionate, consistent and transparent, and sets out the framework for its delivery. It has been prepared as required by the FSA and in accordance with their "Food Law Enforcement Service Planning Guidance" and the content of the Plan provides the basis upon which the London Port Health Authority will be monitored and audited by the FSA.

The City Corporation is committed to the principles of the Regulators' Code, a statutory code for all regulators. Port Health & Public Protection has its own Policy Statement on Enforcement which has been approved by the Port Health & Environmental Services Committee and sets out its approach to enforcement. The policy can be found [here](#).

The LPHA provides advice and support to business is in line with the FSA's Code of Practice. The Service aims to maintain and build on existing relationships to encourage businesses to meet their legal obligations and to develop best practice.

Detailed information on the Service's activities and practical advice on compliance with legislation is available on the City of London website www.cityoflondon.gov.uk/porthealth. The website is regularly updated to include any changes in legislation or procedures.

Where we cannot provide the advice sought, the enquiry will be referred direct to either a dedicated branch of the FSA, Defra or the MMO.

On a routine basis, information regarding new "controls" is sent direct to importers and agents. Where necessary, individual meetings are also held with agents, importers and other trade organisations to clarify and discuss legal issues and best practice.

We also provide updates on current issues and offer advice and support in the use of electronic systems such as IPAFFS.

Port Health Delivery Plan

Progress against the Key Performance Indicators and Key Objectives will be reported to the Port Health and Environmental Services Committee on a four monthly basis throughout the year.

The City's Corporate Plan has a number of key themes supported by the Port Health Function, these are:

Port Health Performance 2024/25

PH1	POAO • Documentary checks 110,290 CHEDPs were validated. • Physical checks 3683 Samples 204
PH2	PNAO • Documentary checks 33402 • Physical and Identity checks 5140 • Samples 1438
PH3	Number of shellfish samples collected 228
PH4	Percentage of Food Hygiene Inspections completed. 100% (160 in total (141 in LPHA area, and 19 in Logistics Park)
PH5	Percentage of operational time the Launch and ancillary craft are available. 95%
PH6	All permitted process to have 1 inspection minimum each year. 11 inspections undertaken on the permitted activities,
PH7	Number of ship boardings: 2024/25 – 61 boardings (7 of which were cruise ship inspections and 30 SSCEC renewal inspection
Notes	POAO - Products of Animal Origin PNAO - Products of Non-Animal Origin

Corporate Key Indicators 2025/26

PI 1.	Proportion of RoW imported food and feed consignments that satisfy the checking requirements cleared within five days: • POAO ○ Non-fish 85% ○ Fish 85% • PNAO - 85%
PI 10.	85% of imported food and feed consignments (PNAO) are subjected to mandatory documentary controls within five days.
Notes	POAO - Products of Animal Origin PNAO - Products of Non-Animal Origin

City of London Corporation Committee Report

Committee(s): Port Health & Environmental Services Committee (For Decision) Health & Wellbeing Board (For Information)	Dated: 02/06/2025 11/07/2025
Subject: Commercial Environmental Health Service Plan 2025-26	Public report: For Decision
This proposal: • delivers Corporate Plan 2024-29 outcomes • provides statutory duties	• Providing Excellent Services • Vibrant Thriving Destination • Dynamic Economic Growth • Diverse Engaged Communities
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of:	Katie Stewart, Executive Director Environment
Report authors:	Peter Brett, Commercial Environmental Health Team Manager

Summary

This report seeks approval for the Commercial Environmental Health Service Plan 2025-26 (Appendix 1).

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

Our service plan sets out how and at what level regulatory controls will be provided and Committee approval of the plan is expected by the Food Standards Agency (FSA) and Health & Safety Executive (HSE).

Recommendation(s)

Members of the Port Health & Environmental Services Committee are asked to:

- Approve the Commercial Environmental Health Service Plan 2025-26 (Appendix 1).

Members of the Health & Wellbeing Board are asked to:

- Note the Commercial Environmental Health Service Plan 2025-26 (Appendix 1).

Main Report

Background

1. As an enforcement authority, the City Corporation has obligations for the delivery of certain food and health and safety controls arising from existing legislation, statutory Codes of Practice and related guidance. The Framework agreement sets out requirements for the planning, management and delivery of the requisite local authority enforcement services.
2. To ensure local transparency and accountability and to show our contribution to the authority's corporate plan, both the FSA and the HSE advise that service plans and performance reviews should be approved at the relevant level established for the authority. Our service plans are presented to your Committee annually.
3. The FSA's expectation is that we will deliver a programme of interventions that meets the requirements of the current Food Law Code.

Current position

4. The Commercial Environmental Health Team (the Team) continues to prioritise high risk and non-compliant establishments to ensure that City businesses in a variety of sectors, operate and remain safe for their customers.
5. In the first quarter of this reporting year (Q1 April – June inclusive) the team will focus on reducing the number of new/unrated food establishments requiring an initial inspection. Further new establishments that register during the remainder of the year will be programmed in as required.
6. The new food standards delivery model is now implemented. Plans for a corresponding new food hygiene delivery model have been postponed but the FSA continues to develop programmes aimed at reforming controls and enforcement.

7. The detailed programme of work for the team (not just food safety and health & safety) are outlined in our Commercial Environmental Health Service Plan 2025-26 (Appendix 1).

Corporate & Strategic Implications

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

Conclusion

16. The Service Plan outlines a programme of work objectives and how these will be delivered by the Commercial Environmental Health Team. The team will ensure that their work is risk-based, supportive of businesses where they are, or seek to be compliant, providing protection to workers, consumers and the public.
17. The City Corporation will continue to meet its obligations to central Government and its agencies as outlined in the various Codes of Practice.

Appendices

- Appendix 1 – Commercial Environmental Health Service Plan 2025/26

Background Papers

None.

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Executive Summary

This Service Plan outlines our service aims, objectives, key activities, and performance measures for the upcoming year. It updates and refreshes objectives and sets out how we plan to achieve them.

We regulate food safety, occupational health and safety, and certain public health controls, adhering to frameworks set by national regulators such as the Food Standards Agency (FSA) and the Health & Safety Executive (HSE).

Our focus will remain on high-risk establishments while considering flexibilities for lower risk establishments. Interventions will be tailored to national requirements and local needs.

1. Background

1.1 Profile of the Authority and our Service

- The City of London, along with 32 London boroughs is responsible for local government services in their respective areas. The profile of our authority, our organisational structure and governance are detailed [on our website](https://cityoflondon.gov.uk/about-us/about-the-city-of-london-corporation/our-role-in-london). <https://cityoflondon.gov.uk/about-us/about-the-city-of-london-corporation/our-role-in-london>
- The Commercial Environmental Health (EH) Team operates within the Environment Department, Port Health & Public Protection Service (PHPP)

1.2 Organisational Structure of the Service

- The team is overseen by the Assistant Director (Regulation and Compliance) and managed by the Commercial EH Team Manager, with support from Lead Officers for Food Safety and Health & Safety.

1.3 Scope of the Service

- The Commercial EH Team regulates food safety, occupational health and safety and certain public health controls arising from commercial business activities.

1.4 Regulation Policy

- Focus on high-risk establishments and adapting to evolving regulatory frameworks.
- PHPP has a [documented enforcement policy](#).

2. Overall Aims & Objectives

2.1 Aims

- We promote and support a risk based, goal setting regulatory regime developing our service to contribute to the improved management and control of risk, sharing our knowledge.
- Work with others to make workplaces safer and healthier. We help ensure higher risk activities are properly managed, and employers committed to developing healthier workplaces., providing a level playing field for responsible employers by advising, promoting, and where necessary, enforcing good standards of risk control.
- We help ensure Food is hygienically prepared, safe to eat and what it says it is; safeguarding food safety and public health by implementing effective regulatory measures and enforcement actions.
- We regulate in a way that supports businesses to comply and where necessary evolve, whilst not losing sight of the integrity and assurance of safe food for consumers and safe workplaces needing to be at the heart of what we do.
- Sharing our knowledge and continuing our dialogue with stakeholders to improve services, always looking to provide simple, pragmatic advice and support
- Ensuring our workforce is adequately resourced and experienced, enabling the service to fulfil the objectives set in the Department's Business Plan and this local Plan.

2.2 Links to Corporate Objectives and Plans

- Our Service Plan aligns with the City Corporation's [Corporate Plan 2024-29](#), [Health and Wellbeing Strategy](#), [People Strategy](#), and [Digital, Data and Technology Strategy](#) as well as the [Environment Department's High Level Business Plan 2025-30](#).
 - We contribute to corporate outcomes such as providing excellent services, promoting a vibrant and thriving destination, and ensuring dynamic economic growth.
-

3. Resources, Review & Service Delivery

3.1 Resource: Financial and staffing allocation

- We aim to maintain a competent and adequately resourced workforce. The team comprises 8.2 Full-Time Equivalent (FTE) Officers, with an additional 0.3 FTE for allied food control work in Port Health. Contractors are utilised to cover staff absence and assist with additional work.

3.2 Review: Against the 2024-25 Service Plan

- Our food intervention plans were reviewed to incorporate the Action Plan agreed with the FSA Performance Team and addressing intervention backlogs. We completed focused intervention programmes for D-rated and E-rated premises and aimed to update interventions for other risk categories by year-end. New/unrated establishments will be prioritised in Q1 of 2025-26.

- Table 1 shows the food hygiene interventions we completed in the year

Table 1 Intervention Programme Category¹		Interventions done
		2024-25
Inspections & audits (*by food hygiene risk category, below) Total		693
A	7	
B	55	
C	203	
D	217	
E	63	
New/unrated	148	
Verification & surveillance visits		504
Sampling visits		14
Advice & education visits		19
Information & intelligence gathering visits		194
Total		1424

- Key statistics:
 - 96.1% of food businesses were broadly compliant (an FHRS of 3 or better) at year-end.
 - 100% premises in hygiene risk categories A to D received an appropriate intervention.
 - 97.92% of interventions due or overdue in category E premises were completed.
 - We have noted a marked increase in the number of food businesses registering with a business churn of around 20%.
 - We received 96 complaints about food or food premises.
 - 10 premises accepted voluntary closure to effect immediate improvements and to protect the public
 - 25 food businesses applied for and received an FHRS rerating in the period. All but one improved their rating; twenty-one were given a 5 rating.
- We are now implementing the food standards delivery model. Significant preparation was required, including ongoing training for all Officers and work with our Management Information System (MIS) provider.
- In 2023-24, we introduced a new MIS. Officers were involved in its development to meet data and reporting need. In 2024-25 we had to consider implementation of the new FSA food standards model. MIS revisions to the food standards risk matrix and migration of

old data to new were finally incorporated in April 2025; this enabled the model's implementation, including revised data capture for reporting and KPIs.

- We completed our cooling tower intervention programme, targeting inspections based on risk rating data from previous interventions and any further intelligence received.
- We continue to manage our Primary Authority Partnerships, focusing on occupational health and safety. This includes audit work across the UK for a high street retailer and developing (and auditing) advice for a national gym company regarding an unstaffed model of work.
- We completed a programme of interventions in establishments with massage and special treatment licences.
- We actively take part in SAG activity as necessary and reviewed an additional 59 event applications to City of London in relation to health and safety matters this year.
- A number of outbreaks and incidents were followed up in the year with our colleagues in UKHSA.

3.3 Service Delivery: 2025-26

- We will continue to prioritise high-risk and non-compliant establishments, deliver planned interventions, prioritising new premises, investigate complaints, support businesses through the Primary Authority scheme, and implement a risk-based sampling programme. We will respond promptly to food safety incidents and collaborate with other authorities to ensure consistent enforcement. We will investigate notifications of illness, disease outbreaks and food-related infectious disease in partnership with the UK Health Security Agency (UKHSA) and the City & Hackney Public Health Teams.
- Our overall Food Establishment Profile is detailed in **Table 2** below.

Table 2	
Establishment profile by Intervention rating (risk) category	Total Number of establishments
A	9
B	57
C	305
D	788
E	400
Unrated	197
Other category (e.g. Approved premises)	65
Total	1756

- Specific planned interventions, controls and activities are detailed in the section on the services objectives and activities. The number of food hygiene interventions that are due are detailed in Table 3; these include businesses that registered on or before 1st April 2025 and still require an initial inspection. Our intervention programme will also include any further new establishments that register in the course of 2025-26; this figure is likely to be significant.
- Details of our service delivery points are explained on our website [here](#) .

4. Quality Assessment

4.1 Quality Assessment and Internal Monitoring

- We have measures to assess officer performance and are developing systems to accurately depict service demands in real time, enabling us to target resources more effectively. Our enforcement activity and key performance indicators (KPIs) are regularly reported to the Port Health & Environmental Services Committee.

Objectives and Activities

1: Deliver a Targeted Programme of Official Food Controls

We will meet service delivery expectations for Local Authorities in the Food Law Code, prioritising high-risk and non-compliant establishments. We will manage the transition to the new food standards delivery model and undertake proactive surveillance to maintain an accurate business landscape.

This table shows the proactive hygiene inspections that are scheduled for 2025-26.

Food Hygiene Intervention Rating		Table 3
Risk Category, (interval)	Interventions due in 2025-26	
A (6 months)	7	
B (12 months)	57	
C (18 months)	155	
D (2 yearly)	361	
E (3 yearly)	77	
Unrated	197	

2: Maintain Support for the National Food Hygiene Rating Scheme (FHRS)

We will support FHRS and ensure the credibility and objectivity of the scheme. Our intervention work will establish compliance even in lower-risk premises, and we will support re-rating visits as outlined on our website.

Distribution of FHRS ratings.

FHRS Rating	Number premises (04-2025)	Category, %	Table 4
0	2	Non-compliant, 3.3 %	
1	17		
2	39		
3	39	Broadly compliant, 2.6 %	
4	109	Compliance Good or better, 93.5 %	
5	1279		
Unrated/outside program	265		
Total	1750		

3: Appropriate food standards interventions are completed using the new food standards risk rating model (FSDM)

Our regulatory work remains a targeted (risk-based) intervention program developed to ensure businesses meet key requirements in both food hygiene and food standards. The food standards interventions due in 2025-26 are in Table 5 below

Food hygiene and appropriate food standards interventions are combined in new/unrated establishments.; We also anticipate that the majority of the food standards interventions required can be managed through the food hygiene program as they were in the previous system. Priority food standards interventions will be appropriately managed.

Food Standards Intervention intervals (in months)	Interventions due in 2025-26
3	0
6	8
12	17
24	161
36	157
48	58
60	275
72	116

4: Develop and Implement a Risk-Based Food Sampling Programme

We have a [Sampling Policy](#) and we participate in relevant regional/national studies. We will exchange intelligence on sampling results to maintain a robust system of Official Food Controls.

5: Ensure Adequate Arrangements for Health and Safety Regulation and Enforcement

We will focus on high-risk duty-holder businesses and activities, undertaking targeted initiatives based on local intelligence and evidence of risk. In setting our priorities we will utilise HSE LAC 67-2- Setting Local Authority Priorities and Targeting Interventions for 2025/2026. Our programme will include interventions focusing on duty-holders management of legionella in cooling towers. We will promote proportionate health and safety through business engagement and partnership working.

6: Promote Workplace Health and Wellbeing

We will align our work with the evolving public health agenda, encouraging the development and use of good practice frameworks for workplaces. We will raise awareness of work-related stress and mental health campaigns.

7: Develop Primary Authority Partnership Work

We will pursue ongoing Primary Authority Partnership (PAP) work, providing assured and tailored advice to businesses. We aim to improve support for businesses and economic growth, ensuring progress towards the Government's better regulation agenda. Currently we have seventeen PAP agreements Details are available on the [GOV.uk website](#),

8: Further Develop the Commercial EH Team

We will focus on our people, producing training and development opportunities, and aligning with the City Corporation's People Strategy. We will enhance the competency of our frontline professionals and develop suitable training arrangements.

9: Develop IT and Information Management Systems

We will work collectively to embed and develop Uniform to match business processes, develop Power BI data reporting, and improve our digital customer services. We aim to streamline internal and external processes, reducing administrative burdens and improving information and intelligence gathering.

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Committee(s): Port Health and Environmental Services Committee	Dated: 02/06/2025
Subject: Delegated Powers to the Executive Director of the Environment Department	Public report: For Decision
This proposal: • delivers Corporate Plan 2024-29 outcomes • provides statutory duties	• Leading Sustainable Environment • Providing Excellent Services • Enforcement of the regulatory framework
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 Department
Report author:	Steve Playle, Trading Standards Team Manager

Summary

Executive Directors and designated post holders within the City of London Corporation are required to implement various legal acts under the authority of delegated powers. The purpose of this report is to seek delegated authority to amend the authorisations of relevant officers to accommodate recent legislative changes introduced by the Environmental Protection (Single-use Vapes) (England) Regulations 2024, which are made under the powers conferred by Part VIII of the Environmental Protection Act 1990.

These new Regulations came into force on 1 June 2025. They support the ban on the supply of single-use vapes, with the intention of reducing the number of vapes being incorrectly disposed of and leading to better environmental outcomes. It is also anticipated that they will reduce the appeal of vaping to children and young people. The legislation enables a local authority to authorise suitable persons to exercise the enforcement powers specified in regulation 10: 'Powers of entry and examination etc.'

To enable suitable enforcement of the Regulations, it is proposed that authorisations for Trading Standards Officers be amended to include the Environmental Protection (Single-use Vapes) (England) Regulations 2024.

Recommendation(s)

Members are asked to approve **Option 1**:

- Approve delegation of authority to the Executive Director Environment, and in her absence, the Port Health and Public Protection Director, to institute proceedings and other enforcement remedies in respect of offences under the Environmental Protection Act 1990, Part VIII.
- Approve delegation of authority to the Executive Director of Environment, and in her absence the Port Health and Public Protection Director to authorise relevant officers under the provisions of the Environmental Protection (Single-use Vapes) (England) Regulations 2024.
- This option will enable the City Corporation's Trading Standards Team to continue to carry out their full statutory duties.

Main Report

Background

1. The Common Council of the City of London, in its capacity as a local authority, is responsible for enforcing the provisions of the Environmental Protection (Single-Use Vapes) (England) Regulations 2024 in the City of London. Made under the powers conferred by Part VIII of the Environmental Protection Act 1990, the new Regulations, which came into force on 1 June 2025, place a duty upon local authorities to enforce the Regulations in its area.
2. Your Committee has previously delegated authority to Trading Standards Officers to enforce a range of legislation intended to protect consumers and ensure that businesses adhere to certain standards in their sales operations. Authorisation is now also required under the Environmental Protection (Single-use Vapes) (England) Regulations 2024.

Current Position

3. The purpose of the new Environmental Protection (Single-Use Vapes) (England) Regulations 2024 is to address the growing concern over the environmental impacts of single-use vapes by supporting the ban on their supply. It is anticipated that the legislation will support a reduction in the use of critical resources used to manufacture vapes, a reduction in the number of

vapes being littered, and an increase in vape components being recycled. Additionally, the legislation is expected to reduce the appeal of vapes to children and young people.

4. To support enforcement of the ban, the Regulations introduce new offences – both civil and criminal - for a person supplying single-use vapes in the course of a business. The legislation enables the City of London to authorise persons to exercise, for an authorised purpose and in accordance with the terms of the authorisation, any of the enforcement powers specified in regulation 10: 'Powers of entry and examination etc.'
5. The Regulations are made under the powers conferred by Part VIII of the Environmental Protection Act 1990. Your Committee has previously delegated authority to the Executive Director Environment under Parts II, III and IV of the Environmental Protection Act 1990 and this report seeks approval for that authority to be extended to Part VIII.
6. To enable suitable enforcement of the new Regulations, supporting the government's aim to prevent waste through a circular economy, it is also proposed that the authorisations for Trading Standards Officers be amended to include the Environmental Protection (Single-use Vapes) (England) Regulations 2024.

Options

Option 1 - recommended

- Approve delegation of authority to the Executive Director Environment, and in her absence, the Port Health and Public Protection Director, to institute proceedings and other enforcement remedies in respect of offences under the Environmental Protection Act 1990, Part VIII.
- Approve delegation of authority to the Executive Director of Environment, and in her absence the Port Health and Public Protection Director to authorise relevant officers under the provisions of the Environmental Protection (Single-use Vapes) (England) Regulations 2024.
- This option will enable the City Corporation's Trading Standards Team to continue to carry out their full statutory duties.

Option 2 – not recommended

- Refuse delegation of authority to the Executive Director of Environment, and in her absence the Port Health and Public Protection Director, to institute proceedings and other enforcement remedies in respect of

offences under the Environmental Protection Act 1990, Part VIII.

- Refuse delegation of authority to the Executive Director of Environment, and in her absence the Port Health and Public Protection Director, to authorise relevant officers under the provisions of the Environmental Protection (Single-use Vapes) (England) Regulations 2024.
- Should this option be selected, while the City Corporation's Trading Standards Team will be able to continue to carry out some of their statutory duties, they will not be able to do so in full; this would mean that we would not be in a position to fully comply with our local authority duties.

Proposals

7. It is proposed that the delegation of authority under Part VIII of the Environmental Protection Act 1990, and under the powers contained within the Environmental Protection (Single-use Vapes) (England) Regulations 2024 be approved by your Committee. This will enable the new Regulations to be added to the existing powers of Trading Standards Officers to ensure that the specified post holders are able to carry out necessary enforcement action in accordance with the statutes covered.

Corporate and Strategic Implications

Strategic implications - The proposal presented in this report specifically supports the Corporate Plan 2024-29 outcome of 'Leading Sustainable Environment' as the legislation is intended to address the negative environmental impacts of single-use vapes. In addition, the work of the Trading Standards Team aligns with, and supports the delivery of, the outcome of 'Providing Excellent Services'. This outcome focuses on delivering high-quality, efficient, and effective services that meet the needs of our communities and stakeholders. By amending the authorisations for Trading Standards Officers to include the Environmental Protection (Single-use Vapes) (England) Regulations 2024, we will enhance our ability to ensure that businesses adhere to certain standards in their sales operations, thereby contributing to the overall strategic goals of the City Corporation.

Financial implications – None.

Resource implications – None. The duties under the new legislation will be undertaken within existing resources.

Legal implications If we do not have mechanisms for officers to enforce the regulations, we would not be able to comply with our statutory duties.

Risk implications – None.

Equalities implications - This proposal has been carefully reviewed to ensure compliance with our Public Sector Equality Duty 2010. This duty requires us to have due regard to the need to eliminate unlawful discrimination, advance equality of opportunity, and foster good relations between people who share a protected characteristic and those who do not.

The proposed amendments are not expected to have any negative impact on people protected by existing equality legislation, including age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, and pregnancy and maternity. The changes are procedural and relate to the enforcement powers of Trading Standards Officers, ensuring they can effectively carry out their duties under the new legislative framework.

Climate implications - The Environmental Protection (Single-use Vapes) (England) Regulations are specifically intended to address the negative environmental impact of single-use vapes. It is anticipated that the legislation will support a reduction in the use of critical resources used to manufacture vapes, a reduction in the number of vapes being littered, and an increase in vape components being recycled.

Security implications – None.

Conclusion

8. To ensure the Environment Department's Trading Standards Officers can effectively enforce the provisions of a range of legislation, it is recommended that authority be delegated to the Executive Director of Environment, and in her absence the Port Health and Public Protection Director, under Part VIII of the Environmental Protection Act 1990 and under the powers contained within the Environmental Protection (Single-use Vapes) (England) Regulations 2024.

Appendices

None.

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Committee: Port Health and Environmental Services Committee	Dated: 2 June 2025
Subject: Business Plan 2024/25: Year-End Progress Report	Public report: For Information
This proposal: • delivers Corporate Plan 2024-29 outcomes • provides statutory duties • provides business enabling functions	• Leading Sustainable Environment • Vibrant Thriving Destination • Providing Excellent Services
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of:	Katie Stewart, Executive Director Environment
Report author:	Joanne Hill, Environment Department

Summary

This report provides an update on progress made between 1 October 2024 and 31 March 2025 against the high-level Business Plan 2024/25 for the following service areas of the Environment Department which fall within the remit of your Committee:

- The Cleansing Service
- Port Health and Public Protection

Recommendation(s)

Members are asked to:

- Note the content of this report and its appendices.

Main Report

Background

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

2. The Environment Department's 2024/25 high-level Business Plan was approved by your Committee in March 2024. The plan set out the key aims, workstreams and performance indicators (KPIs) for the year ahead.
3. To ensure your Committee is kept informed, progress made against the high-level Business Plan is reported to you on a six-monthly basis. This approach allows Members to ask questions and have an input into areas of particular importance to them.

Key workstreams

4. The high-level Business Plan set out the key 2024/25 workstreams for all service areas that report to your Committee. All workstreams support the delivery of the Corporate Plan 2024-29 outcomes, and other cross-cutting strategies and programmes.
5. During the year, teams made good progress against all workstreams. A list of the workstreams with a summary of their key deliverables and outcomes is provided below. Detailed updates are provided at Appendix 1.

- **Protecting and promoting public, animal and environmental health, and consumer protection.**

This workstream includes the delivery of the Food Law Enforcement Plan; the Health and Safety Cooling Towers regime; an effective noise response service; and continued Trading Standards involvement in Operation Broadway to disrupt investment fraud. Good progress has been made during the year, resulting in support for businesses in line with local, national and international standards and priorities to achieve impactful outcomes for stakeholders.

- **Protect public, animal and environmental health at the borders**

This workstream focuses on the work of the London Port Health Authority (LPHA) and the Animal Health and Welfare Service (AHWS) to deliver their statutory functions, but particularly, for 2024/25, to implement and adapt to the new Border Target Operating Model (BTOM). Both service areas have been working with the new government to fully implement the new border control regime. The Port Health Service has continued to develop its processes and capacity to meet the demands of the new controls since their implementation in April 2024. The AHWS is awaiting a decision from Defra on the delivery of live animal EU import checks.

- **Financial security and development.**

With the aim of seeking opportunities for income generation, this workstream includes the development of relationships with key stakeholders in respect of new commercial opportunities for the LPHA and AHWS across London and beyond. There has also been continued development of the Cemetery and Crematorium's site and services to better meet the needs and preferences of customers and optimise income. The LPHA is now delivering services at three

new locations: Purfleet; Tilbury 2; and Plymouth. The AHWS is engaging with Defra and Welsh Government to deliver services at new points of entry under contract, as part of the forward plan for cost recovery.

- **Air Quality Strategy**

A new Air Quality Strategy 2025-30 has been published and a work plan produced to start to implement the actions. Air quality data for 2024 is being analysed and the Annual Status Report being prepared.

- **Cleansing Service**

This workstream focussed on the continued delivery of an effective, high quality and responsive service which meets the needs of City residents, businesses and visitors, and the demands arising from the implementation of the Destination City Strategy, Climate Action Strategy and Transport Strategy. Over the whole year, the improved outcomes following the reintroduction of resources have been thoroughly embedded across all days of the week, including during night-time hours. Street cleanliness across the Square Mile, measured using the Local Environmental Quality standard, has returned to a consistently high standard.

- **Mitigate results of anti-social behaviour (ASB)**

The prevention of ASB and mitigation of its effects is a key workstream for the Cleansing Service. Anti-social behaviour reports have remained consistent over the reporting period. Resources continue to be effectively deployed to proactively monitor priority areas and respond promptly to incidents.

In response to the issue of public urination, a campaign is currently being developed in partnership with the Licensing Service and the Police. This initiative will aim to deter offending through a combination of increased visibility, enforcement, and public messaging. Actions undertaken so far this year include the addition of a new post to work across the organisation, assisting with data gathering and the development of services and campaigns to address the issue.

- **Circular Economy Framework**

The adoption of Circular Economy principles will keep products and materials in use for as long as possible, reducing waste and helping to achieve the City's Climate Action ambitions. 2024/25 saw good progress of the Circular Economy Framework (CEF). The CEF was approved at Court of Common Council in January and launched across the Corporation's social media platforms. Regular review meetings are in place with key action holders and work to begin baselining several key metrics has commenced.

Key Performance Indicators

6. Each of the key workstreams has one or more associated Key Performance Indicators to measure progress against the target. These measures are monitored during the year and details of performance to the end of March 2025 (where available) is provided at Appendix 2. Overall, the results show that

planned progress towards achieving the workstream objectives was largely achieved. For any indicator which slipped or was not on target at the end of year, an explanation is given.

Additional performance information

7. Cleansing Service: Appendix 3 provides infographics summarising the performance of the Cleansing Service's work.
8. Port Health and Public Protection: Appendix 4 comprises infographics demonstrating the levels of work undertaken by each team during the period October 2024 – March 2025 and the whole year

Corporate & Strategic Implications

Strategic implications – The monitoring of key improvement objectives and performance measures links to the achievement of the aims and outcomes set out in the Corporate Plan 2024-29.

Financial implications – Financial implications will be addressed within the separate Chamberlain's Outturn report which will be presented to your Committee in July 2025.

Resource implications – None.

Legal implications – None.

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

Equalities implications – None.

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

Security implications – None.

Appendices

Appendix 1 – Progress against key workstreams

Appendix 2 – Progress against key performance indicators

Appendix 3 - Cleansing Service: Additional performance information

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

Background Papers

Draft High-Level Business Plan 2024/25 – Environment Department' (PH&ES Committee, 12 March 2024)

Business Plan 2024/25: Progress Report (Mid-Year: 1 April – 30 September 2024)

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**Progress against key workstreams
1 October 2024 – 31 March 2025**

Ref:	Workstream	Progress 1 October 2024 – 31 March 2025
1.	Protecting and promoting public, animal and environmental health, and consumer protection. - Promote the Healthier Catering Commitment (HCC) Scheme to relevant City food establishments. - Deliver the Food Law Enforcement Plan. - Deliver the Health and Safety Cooling Towers regime. - Deliver a 24/7/364 Noise Response Service. - Actively participate in multi-agency partnership, Operation Broadway, to disrupt investment fraud in and around the Square Mile.	- The Healthier Catering Commitment Scheme has restarted with initial meetings being attended by CoL officers. - Outstanding food inspections (Category A-E premises) were completed to comply with the Food Law Enforcement Plan. - Scheduled inspections for the Cooling Tower inspection regime were completed. - Noise complaints continued to meet the 15-minute response time KPI target, and 100% of all complaints were resolved satisfactorily. Weekly updates are provided to Members and key partners. - Operation Broadway continued to meet every two weeks with disruption activity carried out by both Trading Standards and City of London Police as part of this joint working initiative. - The Massage and Special Treatment inspection plan was delivered with collaboration between the Commercial Environmental Health Team and the Licensing Team.
2.	Protect public, animal and environmental health at the borders - Delivery of Border Target Operating Model for Food, Feed and Live Animals. - Continue to deliver Port Health and Animal Health statutory functions.	Port Health Service: The new Border Target Operating Model (BTOM) was introduced on 30 April 2024; food is flowing through the Border Control Points with minimal disruption. The Service continued to adapt its processes and staff resource to meet the demands of the new regime. Animal Health and Welfare Service: The Service is awaiting a decision from Defra on delivery of live animal EU import checks.
3.	Financial security and development Examination of Commercial Development Opportunities for Port Health and HARC across London and the wider area. (2024-2027)	Port Health and Animal Health: Both services continue to develop relationships with key stakeholders in respect of new commercial opportunities. Port Health is now delivering services at three new locations: Purfleet; Tilbury 2; and Plymouth. The Animal Health and Welfare Service is engaging with Defra and the Welsh Government to deliver services at new points of entry under contract, as part of the forward plan for cost recovery.

Ref:	Workstream	Progress 1 October 2024 – 31 March 2025
	Adapt Cemetery and Crematorium services to provide a variety of options relevant to the needs and preferences of customers and optimise income. (2024-2026)	Cemetery and Crematorium: The development of the Cemetery and Crematorium's site and services continued, with additional and varied options introduced to better meet the needs and preferences of customers and optimise income.
4.	Air Quality Strategy - Draft a new Air Quality Strategy and present PHES Committee (May 2024). - Undertake statutory consultation. - Present final draft strategy to PHES Committee (September 2024). - Publish and implement new Air Quality Strategy (October 2024).	- A new Air Quality Strategy 2025-30 was published following Committee approval and a work plan has been produced to start to implement the actions. - Air quality data for 2024 is being analysed and the Annual Status Report is being prepared. The report will include the data and a summary of the actions taken during 2024.
5.	Cleansing Service Deliver an effective, high-quality and responsive Cleansing Service which aligns with Member-approved service levels and meets the needs of City residents, businesses and visitors.	- Over the past year, the improved outcomes from the reintroduction of resources have been thoroughly embedded across all days of the week, including during night-time hours. - Street cleanliness across the Square Mile, measured using the Local Environmental Quality standard, has returned to a consistently high standard.
6.	Mitigate results of Anti-Social Behaviour (ASB) – Cleansing Service Prevent, and mitigate effects of, Anti-Social Behaviour (ASB) in the City.	- Anti-social behaviour reports have remained consistent over the reporting period. Resources continue to be effectively deployed to proactively monitor priority areas and respond promptly to incidents. - A total of 1,045 Fixed Penalty Notices (FPNs) were issued during 2024/25, including 39 for littering; 22 for cigarette butt littering; and 9 for public urination. This marks an increase from the previously reported 926 FPNs issued in 2023/24.
7.	Circular Economy Strategy Adopt and begin to implement the Circular Economy Framework.	2024/25 saw good progress of the Circular Economy Framework (CEF). - The CEF was approved at Court of Common Council in January and launched across the Corporation's social media platforms. - Regular review meetings are held with key action holders, and work to begin baselining several key metrics has commenced.

Appendix 1

Ref:	Workstream	Progress 1 October 2024 – 31 March 2025
		• A piece of work is being carried out through a third party to get a holistic view of the waste produced by the Corporation to create an action plan to drive improvement. • Work on the ROMULUS platform, streamlining construction material reuse, continues with two stakeholder forums having taken place and positive outcomes being realised.

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Progress against Key Performance Indicators
End of year 2024-25: 1 April 2024 to 31 March 2025

Performance Measure	Target 2024-25	Performance (1 Apr-30 Sept)	Performance (1 Oct-31 Mar)	Performance (Full Year 2024-25)
Protecting and promoting public, animal and environmental health, and consumer protection				
Number of relevant food businesses signed up to the Healthier Catering Commitment Scheme	93%	0%	0%	0% *1
% of justifiable noise complaints investigated which result in a satisfactory outcome.	90%	100%	100%	100%
% of planned food hygiene inspections (planned interventions) completed in year.	95%	53% <i>(of annual target)</i>	>99%	>99%
% of planned Cooling Tower inspections completed in year.	100%	Annual measure	Annual measure	100%
Number of Operation Broadway deployments.	80	34	71	105
*1 The Healthier Catering Commitment Scheme was paused due to the team focusing on the food hygiene action plan that was agreed with the Food Standards Agency.				

Appendix 2

Performance Measure		Target 2024-25	Performance (1 Apr-30 Sept)	Performance (1 Oct-31 Mar)	Performance (Full Year 2024-25)
Protect public, animal and environmental health at the borders.					
% increase in consignments (Port Health).		20%	Annual measure	Annual measure	19.3% ^{*2}
Number of new locations or premises served.		New KPI 2024/25	3	0	3 ^{*3}
% of imported food and feed consignments (that satisfy the checking requirements cleared within 5 days).	Products of Animal Origin (POAO)	91%	85%	98%	96%
	High risk products of non-animal origin (NAO)	95%		97%	97%
% of flight collections attended within 30 minutes of the flight offloading.		98%	95%	98%	99%
^{*2} The Port Health Authority cannot directly influence the choice of port used to enter goods into Great Britain. The origin of a product, shipping route and operational costs of the port operator at the point of entry influences the choice of the importer. ^{*3} These are the three new locations served by the Port Health Service: Purfleet; Tilbury 2; and Plymouth.					

Performance Measure		Target 2024-25	Performance (1 Apr-30 Sept)	Performance (1 Oct-31 Mar)	Performance (Full Year 2024-25)
Financial security and development					
HARC % of market share.		>60%	Annual measure	Annual measure	60-75%
HARC % increase in income.		5%	5.7%	6.3%	12%
Number of burials and cremations.		>3,290	Not available	Not available	Not available - see note ^{*4}
^{*4} This KPI result is derived from data sourced from the National Death Statistics. The data is not available at the time of writing due to technical problems with the external source; it will be reported separately when it becomes available.					

Appendix 2

Performance Measure	Target 2024-25	Performance (1 Apr-30 Sept)	Performance (1 Oct-31 Mar)	Performance (Full Year 2024-25)
Air Quality Strategy				
% of the City's area that meets the health-based Limit Values and WHO Guidelines for nitrogen dioxide levels.	90% by March 2025	Annual measure (calendar year)	Annual measure (calendar year)	94% (2023) *5
*5 Air quality data is provided from an external source by calendar year. The latest figure available is for 2023 – we will report the 2024 figure in due course.				

Performance Measure	Target 2024-25	Performance (1 Apr-30 Sept)	Performance (1 Oct-31 Mar)	Performance (Full Year 2024-25)
Cleansing Service				
% of streets with unacceptable levels of litter, detritus, graffiti and flyposting (NI 195).	<5%	2.55%	2.03%	4.58%
Number of major and minor issues raised with Cleansing Contractor.	<=24 p.a. (<=2 per month)	5	8	13 *6
Community Toilet Membership.	75	71	71	71*7
Annual household waste recycling rate (% by weight).	32%	Annual measure	Annual measure	26.07% *8
*6 There have been five significant contract performance issues around specific sweeping standards as the new resources were introduced, with remedial action plans now in place. *7 Officers continue to target areas for recruiting new members where most needed as identified by previous mapping. *8 Despite sustained efforts and engagement campaigns, the target was not achieved this year partly due to issues with waste contamination. Our waste per household remains low compared to national averages and our work on the Reuse and Recycling Plan continues.				

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Business Plan 2024/25

Key Performance Information

Cleansing Service Q3&Q4: Oct 24 – Mar 25



Community Toilet Scheme

71

Members

Clean Streets Partnership

*

Scheme being reviewed

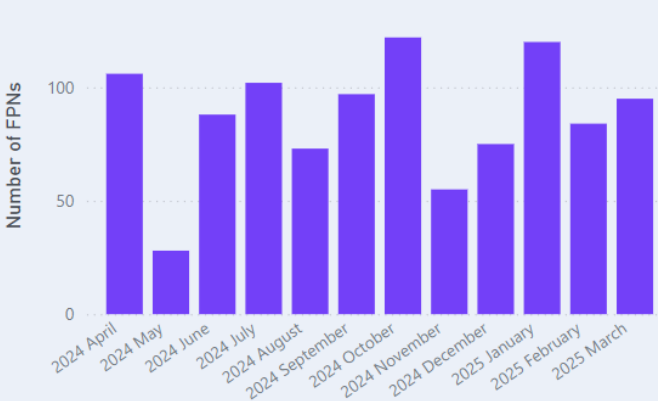
Members

Clean City Awards Scheme

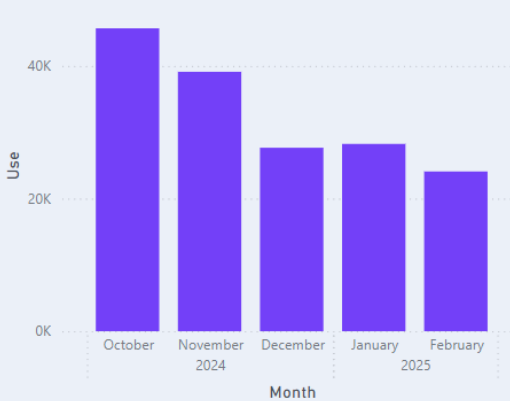
7

Members

Total FPNs Issued



Public Convenience Usage



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Port Health and Public Protection

Performance information

1 October 2024 - 31 March 2025

Public Protection



317

food hygiene inspections conducted
(2024/25 full year total: 585)



366

Noise complaints investigated
(2024/25 full year total: 790)



1,396

Trading Standards complaints and service requests received
(2024/25 full year total: 2,776)

Food Hygiene Rating Scheme: profile of food businesses



2024/25 full year result: 96% broadly compliant

Require improvement
(0-2 rating)

4%

(58)

Broadly compliant
(3-5 rating)

96%

(1485)


3

Number of prosecutions/legal action in relation to unlicensed street trading
(2024/25 total: 9)

Figure includes prosecutions and warnings issued to traders in CoL jurisdiction.

Port Health

Products of Animal Origin consignment checks

2,111

Number of physical checks
(2024/25 full year total: 3,685)



Products of Non Animal Origin consignment checks

3,217

Number of physical checks
(2024/25 full year total: 5,036)

Animal Health



240

Number of Animal Health inspections carried out
(2024/25 full year total: 402)



5,634

Number of consignments of animals through Heathrow Animal Reception Centre
(2024/25 full year total: 12,115)

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Committee: Port Health and Environmental Services Committee	Dated: 02/06/2025
Subject: Risk Management Update	Public report: For Information
This proposal: • delivers Corporate Plan 2024-29 outcomes • provides statutory duties • provides business enabling functions	• Providing Excellent Services • Vibrant Thriving Destination • Leading Sustainable Environment • Dynamic Economic Growth
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 provides the Port Health and Environmental Services Committee with assurance that risk management procedures in place within the Environment Department are satisfactory and that they meet the requirements of the corporate Risk Management Framework.

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

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

- Port Health and Public Protection
- The Cleansing Service

Recommendation

Members are asked to:

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

Main Report

Background

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

Current Position

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

Summary of key risks

6. The register of key risks held by the Port Health and Public Protection Division and the City Operation Division's Cleansing Service includes one departmental level risk (Air Quality) and three service level risks, as summarised below. The detailed risk register is presented at Appendix 2.
7. **ENV-SLT 005 Air Quality (Current risk score: Green, 3)**
This former-Corporate risk was de-escalated to a Departmental risk in 2024. This decision was taken by the Chief Officer Risk Management Group based on the significant improvement in air quality in the City, compliance with national standards and consistent fulfilment of statutory obligations. The risk had previously been reduced to a score of 3 and a new target has been set to reduce it further, to a score of Green 2 (unlikely; minor), by the end of 2026. The new Air Quality Strategy 2025-2030 has been published. Delivery of the Strategy's Action Plan will be monitored and progress will be reported annually with the first report due in June 2026.

8. **ENV-PHPP 001 Brexit – Impact on Port Health and Animal Health (Current risk score: Red, 24)**

Phase Two of the new border checks commenced on 30 April 2024. This means that documentary, physical and identity checks are now required at the border for medium and low risk food and feed imports. The first year of this new regime have shown that the projected increase in throughput has been realised. The Port Health Service continues to develop its processes and capacity to meet the new demands. The risk remains high due to the continued uncertainties with the new regime.

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

All employees must complete a mandatory 'Driver Check' questionnaire. If that questionnaire identifies them as someone who drives on City of London business, they are automatically registered with an online licence checking system. Obtaining data from the existing software to determine compliance with the initial 'Driver Check' questionnaire has been problematic, but a manual system has been put in place. However, the software is now due to be replaced as part of the new Corporate ERP system, which should resolve the issues. Once the new system is in place, the risk will be reassessed and the score reduced if appropriate.

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

This risk remains at a score of Amber 8: unlikely, but with a major impact on the ability to deliver cleansing and waste services should it occur. A robust Business Continuity Plan is in place. A Business Continuity Exercise was undertaken in December 2024; officers are now reviewing the outcomes and appropriate actions will be undertaken before the next review. A range of other suitable actions are in place to control the likelihood and impact of the risk.

Identification of New Risks

11. New and emerging risks are identified through several channels, the main being:

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

Corporate and Strategic Implications

12. Effective management of risk is at the heart of the City Corporation's approach to delivering cost effective and valued services to the public as well as being an important element within the corporate governance of the organisation.
13. The proactive management of risk, including the reporting process to Members, demonstrates that the department is adhering to the requirements of the City of London Corporation's Risk Management Policy and Strategy.
14. The risk management processes in place in the Environment Department support the delivery of the Corporate Plan, our Departmental and Divisional Business Plans and relevant Corporate Strategies

Conclusion

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

Appendices

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

Contact

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

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

(A) Likelihood criteria

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

(B) Impact criteria

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

(C) Risk scoring grid

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

(D) Risk score definitions

RED	Urgent action required to reduce rating
AMBER	Action required to maintain or reduce rating
GREEN	Action required to maintain rating

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

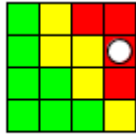
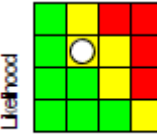
Contact the Corporate Risk Advisor for further information. Ext 1297

October 2015

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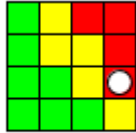
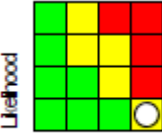
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Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
P2023-001 PHPP - Brexit - Impact on Port Health and Animal Health	Cause: The outcome of Brexit negotiations does not secure continuity of contracts, access to talent, ongoing grant funding and/or security of supply chains. Event: The City Corporation services fail to prepare appropriately for the end of the Brexit transition period. Uncertainty around the potential outcomes until it is too late to react. Effect: There is a range of potential impacts. The City Corporation's services are disrupted due to increases/changes in trade and as supply chains and contracts are reassessed, potentially increasing cost and reprioritisation of resources. Increased risk to public, animal and environmental health due to legislative changes. Increased risk and cost to consumers. Inadequate IT support if current EU software is replaced by bespoke UK systems that do not have sufficient functionality. Reduction in income if charging regimes are not established as part of Brexit. Potential for increased workload depending on whether agreement is reached from 'no deal' (check everything), through to no checks on EU products based and on risk via a full reciprocal arrangement (status quo).		24	The phased border checks commenced on 31 January 2024 with the introduction of the need for importers to submit documentation. Phase Two began on 30 April 2024, meaning that documentary, physical and identity checks are required at the border for medium and low risk food and feed imports. The first year of this new border control regime has shown that the projected throughput volumes are being realised (circa. 140,000 food and feed consignments per annum). The Service continues to develop its processes and take on additional staff to meet the new demands, including the emerging foot and mouth outbreak in Europe.		6	31-Dec-2025	

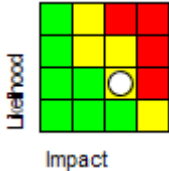
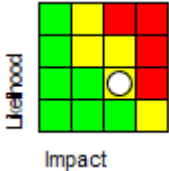
08-Nov-2016 Gavin Stedman				The CoL has started charging on a full cost recovery basis for undertaking these controls at the border. The risk remains high (Red 24) due to continued uncertainties with the new regime and the new Government desire for a closer relationship with the EU, including discussions regarding a future veterinary agreement with the EU. In view of this, the target date has been extended to the end of 2025. 09 May 2025				
							Reduce	Constant

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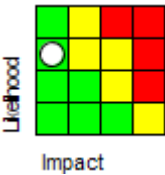
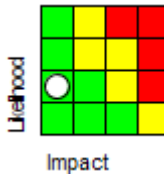
Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
ENV-PHPP 001c	Engage with stakeholders to assist in the identification of impacts and possible mitigations. Ensure Remembrancer and CoL departments are fully aware of the implications of Brexit on PH&PP and that they lobby accordingly.	Although the BTOM has now been implemented, the service continues to engage with stakeholders to ensure an effective border.	Gavin Stedman	09-May-2025	31-Dec-2025
ENV-PHPP 001d	Respond promptly to policy decisions from the UK Government and the outcome of negotiations.	The Port Health Service will continue to respond accordingly to the government's stakeholder consultations on the delivery of the BTOM. A Port Health Brexit Readiness Project Team continues to develop training and processes to ensure an effective border.	Gavin Stedman	09-May-2025	31-Dec-2025

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
ENV-CO-GC 002 Road traffic collision caused by City of London staff or contractor who is unfit to drive while on City business 13-Mar-2015 Joe Kingston	Cause: A member of staff/contractor who is unfit or unqualified to drive causes ... Event: a road traffic collision which results in ... Effect: death or injury; financial claim.	 Likelihood Impact	16	Work undertaken between Corporate Transport and HR has clarified the total number of staff currently working for the City and those who have not undertaken a driving assessment. Work with the IT has led to the development of a process to manually run regular reports in order to identify those individuals and their Chief Officers who will subsequently be notified to ensure increased compliance. Although work still remains to reduce this risk, it is an improvement. The existing software is being replaced as part of the new corporate ERP system. We are waiting for this to go live and are working HR to progress. Once in place, the new system should allow us to produce compliant reports as necessary. At that time we will review this risk and reduce the risk score if appropriate. The target date has been extended to reflect this. The current compliance rate across all departments is 74%. 12 May 2025	 Likelihood Impact	8	30-Oct-2025	 Constant
							Reduce	

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
ENV-CO-GC 002c	Monitor the percentage of City of London staff who have completed Driver Check and ensure that it remains above 92.5%. Monitor the percentage of City of London staff who have been identified, through Driver Check, as drivers (or managers of drivers) who have completed the Corporate Transport Policy online training course and ensure that it remains above 92.5%. Monitor overall completion rates for both driver check and the online training course and ensure that it remains above 92.5%. Monitor the collection and periodic monitoring of driver licence details (and, in the case of grey fleet drivers, vehicle details).	Work undertaken between Corporate Transport and HR has clarified total number of staff currently working for the City and those who have not undertaken a driving assessment. Work with IT has led to the development of a process to manually run regular reports in order to identify those individuals and their Chief Officers who will subsequently be notified to ensure increased compliance. The existing software is being replaced as part of the new corporate ERP system. We are waiting for this to go live and are working with Human Resources to progress. Once in place, the new system should allow us to produce compliant reports as necessary. At that time we will review this risk and reduce the risk score if appropriate. The action due date has been extended to reflect this. The current compliance rate across all departments is 74%.	Vince Dignam	12-May-2025	30-Oct-2025

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
ENV-CO-GC 006 A major incident, such as flooding or fire, makes Walbrook Wharf unusable as a depot	Cause: A major incident, such as flooding or fire. Event: Walbrook Wharf unusable as a depot. Effect: Unable to clean streets, collect waste or maintain City of London Police vehicles. City of London unable to meet its contractual arrangements with third parties who use the depot for their commercial purposes.	Likelihood 	8	A robust Business Continuity Plan is in place and was discussed at the Quarterly Partnership Board meeting in January 2024. A Business Continuity Exercise was carried out in December 2024; officers are now reviewing the outcomes and appropriate actions will be undertaken before the next risk review. It was confirmed that it is now sufficient to carry out an Exercise every 18 months, instead of annually. The Business Impact Assessment is also undergoing detailed review. This risk has also been identified as a longer-term risk linked to Climate Change and is being addressed as part of the Climate Adaptation Action Plan. We continue to undertake a range of actions to control the likelihood and impact of the risk, and keep it under review, but are unable to reduce the score any further at present. The target date shown is the date that the risk will next be reviewed. 12 May 2025	Likelihood 	8	31-Aug-2025	
27-Mar-2015 Joe Kingston							Accept	Constant

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
ENV-CO-GC 006a	Conduct regular Business Continuity Exercise.	The Business Continuity Plan was discussed at the Quarterly Partnership board meeting in January 2024. A Business Continuity Exercise was undertaken in December 2024; officers are now reviewing the outcomes and will take appropriate actions. In future, Business Continuity Exercises will be undertaken every 18 months.	Vince Dignam	12-May-2025	31-Aug-2025
ENV-CO-GC 006b	Maintain fire prevention / fire safety procedures.	The City Surveyor's Department has updated Mechanical and Engineering (M&E) provision at Walbrook Wharf, including new fire walls, smoke cameras and sprinklers within the depot and around the electric vehicles and vehicle charging areas. They are currently reviewing the Fire Risk Assessment. Systems are checked and tested on a regular basis. This is an ongoing action.	Vince Dignam	12-May-2025	31-Aug-2025
ENV-CO-GC 006c	Reduce the impact of potential flooding.	Mitigations have been put in place for weak flood defence areas due to the close proximity of the river, but the risk of flooding remains. To prevent flood water ingress, an old roof has been renewed. The Climate Action Team is due to fund sensors for gullies. For our contractors, we have a Business Continuity Plan to enable them to operate from another department.	Vince Dignam	12-May-2025	31-Aug-2025

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
ENV-SLT 005 Air Quality 07 Oct-2015 Gavin Stedman	Cause: Levels of air pollution in the City, specifically nitrogen dioxide and fine particles, impact on the health of residents, workers and visitors. The City Corporation has a statutory duty to take action to improve local air quality. Event: The City of London Corporation is insufficiently proactive and resourced, and does not have the right level of competent staff, to be able to fulfil statutory obligations, as a minimum, in order to lower levels of air pollution and reduce the impact of existing air pollution on the health of residents, workers and visitors. Effect: The City Corporation does not fulfil statutory obligations and air pollution remains a problem, impacting on health. Potential for legal action against the Corporation for failure to deliver obligations and protect health. Adverse effect on ability to deliver outcomes 2 and 11 of the Corporate Plan		3	The new Air Quality Strategy 2025-30 was approved by Port Health and Environmental Services Committee in November 2024. The Strategy aims to exceed national standards, further demonstrating the City of London's commitment to maintaining and improving air quality. Delivery of the Strategy's Action Plan will be monitored and an annual assessment and progress report completed to demonstrate compliance. 09 May 2025		2	31-Dec-2026	 Constant
							Reduce	

Action no	Action description	Latest Note			Action owner	Latest Note Date	Due Date
ENV-SLT 005n	Complete an annual assessment and progress report to demonstrate compliance with the aims of the Air Quality Strategy.	The first annual assessment and progress report on the new Air Quality Strategy will be completed by the end of June 2026.			Ruth Calderwood	09-May-2025	30-Jun-2026

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City of London Corporation Committee Report

Committee(s): Planning and Transportation Committee – for decision Natural Environment Board – for information Port Health and Environmental Services – for information	Dated: 21/01/2025 06/02/2025 07/06/2025
Subject: First Consideration: Enhanced Biodiversity Duties of Public Authorities	Public Report: For Information
This proposal: • Delivers Corporate Plan 2024-29 outcomes • Provides statutory duties	Corporate Plan outcomes: • Leading sustainable environment • Flourishing public spaces • Vibrant and thriving destination Statutory duties: • Enhanced Biodiversity Duty • Biodiversity Net Gain
Does this proposal require extra revenue and/or capital spending?	N/A
Report of: Executive Director of Environment, Katie Stewart	
Report authors: Gudrun Andrews, Head of Planning Policy Ben Bishop, Environmental Resilience Officer John Harte, Planning Policy Officer Joanna Leyden, Waste Strategy and Biodiversity Group Manager	

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.

This report was approved by the Planning and Transportation committee on the 21st of January 2025 as the City Corporation's 'First Consideration', and was taken to the Natural Environment Board for information on the 6th of February 2025.

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 Corporations 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 open 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's are non-statutory designated sites which are afforded protection within local planning. The objective of designating SINC's 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's of borough or local significance are adopted through the local planning process and submitted to relevant bodies for advice on selecting and confirming SINC's (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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City of London Corporation Committee Report

Committee(s): Port Health and Environmental Services Committee – For Information	Dated: 02/06/2025
Subject: Report of Action Taken	Public report: For Information
This proposal: Delivers Corporate Plan 2024-29 outcomes	Providing Excellent Services Flourishing Public Spaces See background papers
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	£N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of:	Town Clerk
Report author:	Kate Doidge, Governance & Member Services Team

Summary

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

Recommendation(s)

Members are asked to note the report.

Delegated Decisions Under Standing Order 41B

Cemetery and Crematorium Administration System

1. The City of London Cemetery and Crematorium's administration system was outdated, non-compliant with statutory legislation and unable to serve the needs of a modern cemetery and crematorium.
2. A recent procurement exercise ended with one preferred bidder, GSS (NI) Ltd (PlotBox). However, all bidders had failed the financial assessment performed during the procurement process, including the preferred bidder and current provider. All bidders were financially appraised by the City of London's Treasury Team.

3. It was proposed that the financial risk be mitigated and minimised by paying the supplier upon receipt of goods or services, rather than upfront. A termination clause would be submitted should the supplier encounter financial difficulty and would enable the City Corporation to exit the contract without incurring additional costs. Regular contract meetings between the department, supplier and Commercial Services were also proposed, to allow performance to be monitored, with regular financial monitoring checks carried out on the supplier.
4. It was not recommended to run an additional tender as the additional time and resources required was considered unlikely to result in a different outcome, especially as it would be unlikely the financial situation would have changed significantly. The Service was unable to proceed without the Committee's approval and was utilising a system which was outdated (with the current provider being bespoke and unable to develop or upgrade further), non-compliant with statutory legislation (such as demonstrating compliance with the new medical examiner certification) and unable to serve the needs of a modern Cemetery and Crematorium Service (such as accepting electronic signatures).
5. At its meeting on 7th January 2025, the Committee raised concerns that the preferred bidder had failed the financial assessment, and the Committee felt that it could not progress until it had heard and were satisfied with the explanation. It was agreed to Delegate Authority to the Town Clerk, in consultation with the Chairman and Deputy Chairman, to approve the contract award subject to the Committee's satisfaction on the explanation for the failure of the City Corporation's standard financial appraisal.
6. The Executive Director for Environment sought review and approval from the Chamberlain, to seek assurance that the Chamberlain was content with the proposed mitigations for the risks associated with the preferred bidder. The preferred bidder was a market leader in the industry, with 60 sites across the UK and more across US and Australia, which meant a lower risk. It was also not a bespoke system and thus would mitigate the risk of additional costs if the preferred bidder were unable to develop the administration system appropriately. The Service would also follow the agreed mitigations laid out by the Commercial Service (described above), which will require the Service to manage the contract closely to reduce any exposure to contract and supplier failure.
7. The Chamberlain indicated via email that they were content to proceed with the awarding of the contract to the preferred bidder given the explanation and mitigations provided. This was shared with the Chairman and Deputy Chairman of the Committee, who indicated that they were content with the explanation and mitigations provided and agreed for the Delegated Authority to progress under Standing Order No. 41(B).
8. Approval under urgency procedures was sought for the awarding of the contract to the preferred bidder GSS (NI) Ltd (PlotBox), as the Cemetery and

Crematorium Service was running a system which was not legally compliant, and with the Port Health and Environmental Services Committee not meeting again until June 2025, the approval of the contract would enable the Service to commence the migration to a compliant system as soon as possible.

9. The Town Clerk therefore agreed, in consultation with the Chairman and Deputy Chairman of the Port Health and Environmental Services Committee, to approve the awarding of the contract to the preferred bidder GSS (NI) Ltd (PlotBox).

Background Papers

- Public Report – Cemetery and Crematorium Administration System

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