Public Document Pack

Planning and Transportation Committee

Date: **TUESDAY, 21 OCTOBER 2025**

Time: 10.30 am

Venue: **OLD LIBRARY – GUILDHALL**

Members:

Deputy Tom Sleigh (Chair)
Shravan Joshi MBE (Deputy Chair)
Tana Adkin KC
Samapti Bagchi
Deputy Emily Benn
Deputy John Edwards
Anthony David Fitzpatrick
Deputy Marianne Fredericks
Alderman Alison Gowman CBE
Alderman Prem Goyal CBE
Deputy Madush Gupta
Josephine Hayes
Deputy Jaspreet Hodgson
Amy Horscroft
Philip Kelvin
Alderwoman Elizabeth Anne King, BEM JP
Charles Edward Lord, OBE JP
Antony Manchester
Tim McNally
Sophia Mooney
Deputy Alastair Moss
Alderwoman Jennette Newman
Deborah Oliver
Deputy Henry Pollard
Alderman Simon Pryke
Deputy Nighat Qureishi
Gaby Robertshaw
Hugh Selka
Naresh Hari Sonpar
William Upton KC
Matthew Waters
Jacqui Webster
David Williams

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Ian Thomas CBE
Town Clerk and Chief Executive

AGENDA

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

Part 1 - Public Agenda

1. **APOLOGIES**

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

3. **MINUTES**

To consider minutes as set out below:

For Decision

a) To agree the public minutes of the Planning and Transportation Committee on 8 July 2025 (Pages 7 - 16)

b) To agree the public minutes of the Planning and Transportation Committee on 9 September 2025 (Pages 17 - 22)

4. **CITY PLAN MAIN AND ADDITIONAL MODIFICATIONS**

Report of the Executive Director Environment.

(The report and its six appendices are available in a separate document pack.)

For Decision

5. **SUPPLEMENTARY PLANNING DOCUMENTS (SPD) UPDATE**

Report of the Executive Director Environment.

For Decision
(Pages 23 - 28)

6. **PLANNING ADVICE NOTE - HEAT NETWORK SUPPLY ZONES IN THE THAMES POLICY AREA**

Report of the Executive Director Environment.

For Decision
(Pages 29 - 68)

7. **INFRASTRUCTURE FUNDING STATEMENT - COMMUNITY INFRASTRUCTURE LEVY (CIL) / SECTION 106 (2024-25)**

Report of the Planning and Development Director.

For Decision
(Pages 69 - 114)

8. **ALDGATE TO BLACKFRIARS CYCLEWAY**

Report of the Executive Director Environment.

For Decision
(Pages 115 - 346)

9. **NAMING OF NEW HIGHWAY MAINTAINABLE AT PUBLIC EXPENSE: GREYFRIARS SQUARE**

Report of the Executive Director Environment.

For Decision
(Pages 347 - 352)

10. **ADVERTISING BOARD UPDATE**

Report of the Executive Director, Environment.

For Decision
(Pages 353 - 430)

11. **PIPE SUBWAYS OF HOLBORN VIADUCT AND SNOW HILL OVER THAMESLINK**

Report of the Executive Director Environment.

For Decision
(Pages 431 - 448)

12. ***LEGIBLE LONDON SECTION 106 FUNDS**

Report of the Executive Director Environment.

For Information

13. ***QUARTERLY PUBLIC LIFT AND ESCALATOR REPORT - 1 JULY TO 30 SEPTEMBER 2025**

Report of the Executive Director Environment.

For Information

14. ***STREETS AND WALKWAYS SUB-COMMITTEE DRAFT MINUTES**

To note the draft minutes of the Streets and Walkways Sub-Committee held on 16 September 2025.

For Information

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

16. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS 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.

For Decision

Part 2 - Non-public Agenda

18. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 9 September 2025.

For Decision

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

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

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PLANNING AND TRANSPORTATION COMMITTEE

Tuesday, 8 May 2025

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

Present

Members:

Deputy Tom Sleigh (Chair)
Shravan Joshi MBE (Deputy Chair)
Tana Adkin
Matthew Bell
Deputy Emily Benn
Deputy John Edwards
Deputy Marianne Fredericks
Alderman Alison Gowman CBE
Alderman Prem Goyal, OBE
Deputy Madush Gupta
Josephine Hayes
Deputy Jaspreet Hodgson
Amy Horscroft
Philip Kelvin
Alderwoman Elizabeth Anne King, BEM JP
Charles Edward Lord, OBE JP
Antony Manchester
Timothy James McNally
Deputy Alastair Moss
Sophia Mooney
Deborah Oliver
Deputy Henry Pollard
Alderman Simon Pryke
Deputy Nighat Qureishi
Gaby Robertshaw
Naresh Hari Sonpar
William Upton KC
Jacqui Webster
Matthew Waters

Officers:

Katie Stewart	-	Executive Director, Environment
Polly Dunn	-	Assistant Town Clerk
Matt Baker	-	Environment Department
Ian Hughes	-	Environment Department
Rob McNicol	-	Environment Department
Bruce McVean	-	Environment Department
Gwyn Richards	-	Environment Department
Gordon Roy	-	Environment Department
Samantha Tharme	-	Environment Department
John Cater	-	Town Clerk’s Department
Ben Dunleavy	-	Town Clerk’s Department

1. **APOLOGIES**

At the beginning of the meeting, Alderman Alison Gowman, as senior Member present, was moved into the Chair.

Apologies for absence were received from Anthony Fitzpatrick.

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

There were no declarations of interest.

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

The Committee received the Order of the Court of Common Council dated 25 April 2025.

4. **ELECTION OF CHAIRMAN**

The Committee proceeded to elect a Chair in accordance with Standing Order No. 28.

The Town Clerk informed the Committee that Deputy Marianne Fredericks and Deputy Tom Sleigh had both expressed a willingness to serve, and that a ballot was therefore necessary.

A ballot having been taken, votes were cast as follows:

Deputy Marianne Fredericks	-	8
Deputy Tom Sleigh	-	14

Deputy Tom Sleigh, having received the majority of votes, was duly elected as Chair for the ensuing year and took the Chair. Addressing the Committee, he thanked Members for their support, thanked those Members no longer on the Committee for their service, and welcomed new Members.

5. **ELECTION OF DEPUTY CHAIRMAN**

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

Shravan Joshi, as the only Member expressing their willingness to serve, was duly elected as Deputy Chairman for the ensuing year.

The Chief Commoner, Deputy Henry Pollard, moved a Vote of Thanks to Shravan Joshi, the immediate past Chairman.

RESOLVED UNANIMOUSLY, that –

Members of the Planning and Transportation Committee wish to place on record their heartfelt appreciation to

SHRAVAN JOSHI MBE

for his outstanding leadership and transformative contributions during his three-year tenure as Chairman of the Planning & Transportation Committee.

Under SHRAVAN's visionary guidance, the planning landscape has been significantly enhanced. His commitment to fostering a pro-growth and pro-development culture has resulted in a consistent increase in planning permissions, including 12 new tall buildings, with 1 Undershaft standing as the tallest in Western Europe at over 309 metres. These developments have added over 800,000sqm of Grade A workspace, reinforcing the City's international stature and meeting the high demand from occupiers.

SHRAVAN's tenure has also seen a remarkable diversification of the City's ecosystem, with a substantial rise in hotels, co-living, and student accommodations. His efforts have transformed the public realm, introducing new pocket parks, civic spaces, public gardens and 14 new pedestrian routes. Notably, the planning permissions granted during his chairmanship have garnered numerous awards, including the National Planning Permission of the Year for Friary Court.

SHRAVAN has been instrumental in integrating cultural and heritage destinations into planning permissions, creating a vibrant 7-day Destination City. These include the Migration Museum, the London Tunnels, and several elevated public roof gardens and terraces. His leadership in sustainability has been groundbreaking, with initiatives like the City's first Sustainability SPD and the Heritage Retrofit Toolkit.

Moreover, SHRAVAN has successfully navigated the new City Plan through the Committee and addressed the Examination in Public. His efforts have led to the establishment of the City Business Investment Unit, promoting the City as a prime location for development and investment.

SHRAVAN's tenure has been marked by a proactive approach to digital planning, securing major government funding to develop a truly digital planning service. His vision and dedication have left an indelible mark on the City's planning landscape.

We are immensely grateful for Shravan's exceptional service and wish him continued success in all his future endeavours.

Thank you, SHRAVAN, for your remarkable contributions.

6. **MINUTES**

The public minutes and non-public summary of the meeting held on 18 February 2025 were approved as an accurate record.

7. **APPOINTMENT OF SUB-COMMITTEES**

Members received a report of the Town Clerk concerning the appointment of Sub-Committees.

Deputy Marianne Fredericks, noting the Sub-Committees importance, the status of the Local Plan and the fact that there was only one additional Member seeking to join it over the limit, moved that the composition of the Local Plans Sub-Committee be increased by one. This was seconded by the Chief Commoner and agreed by the Committee.

The Town Clerk informed Members that no Member had expressed an interest in the position of Chair for the Local Plans Sub-Committee. The Chair noted the convention that the Chair of the Planning and Transportation Committee also chaired this Sub-Committee, and Members agreed with his proposal that this be continued.

RESOLVED, that – the Committee:

a) Appoints the following Members to the Streets and Walkways Sub-Committee for the ensuing year and approves its terms of reference detailed at Appendix A to the report

Deputy John Edwards

Deputy Marianne Fredericks

Alderman Alison Gowman

Deborah Oliver

Hugh Selka

Matthew Waters

Jacqui Webster

b) Appoints the following Members to the Streets and Walkways Sub-Committee for the ensuing year and approves its terms of reference detailed at Appendix A to the report

Deputy Marianne Fredericks

Deputy John Edwards

Alderwoman Elizabeth King

Deputy Alastair Moss

Hugh Selka

Jacqui Webster

c) Approves the Planning Applications Sub-Committee terms of reference detailed at Appendix A to this report

d) Elects Deputy John Edwards to be Chair of the Streets and Walkways Sub-Committee and note that the Deputy Chair of the Sub-Committee will be elected by the Sub-Committee at its first meeting; and

e) Elect Deputy Tom Sleigh, as Chair of the Appointing Committee, to be Chair of the Local Plans Sub-Committee and note that the Deputy Chair of the Sub-Committee will be elected by the Sub-Committee at its first meeting.

8. **TRANSPORT STRATEGY: 2024/25 ANNUAL REPORT, 2025/26 - 2030/31 DELIVERY PLAN AND CITY STREETS 2025 SUMMARY REPORT**

The Chair informed the Committee that he would bring the report circulated as a supplementary paper to be considered as item 8 on the agenda. Members received a report of the Executive Director, Environment, concerning the Transport Strategy.

Officers introduced the report and presented the Committee with an overview of the Strategy and the work done against the Delivery Plan.

The following points were considered during discussion:

- A Member asked who was responsible for administering cargo bike grants from the Greater London Authority, as businesses in their wards had faced difficulty in applying for them. In reply, officers said that the grants were funded from the Mayor's Air Quality Fund. There were a limited number of grants available in each round of bidding, and officers undertook to follow up with the Member on the specific case mentioned.
- Officers undertook to explore ways to improve access from Fann Street to the Golden Lane Leisure Centre, and committed to picking up how City Corporation projects with consequences for the wider public realm would be included in future iterations of the Delivery Plan.
- A Member asked officers to consider what measures could be taken to ensure that freight coming into the Square Mile to support known projects came outside of peak hours
- The City Corporation would be delivering around 1,500 additional e-bike parking spaces by the end of 2025. Officers set out how enforcement action was carried out, and Members noted that they would work with e-bike operators to manage and move bikes where necessary. Officers emphasised the importance of maintaining good relationships with operators while waiting for new legislation which would enhance enforcement powers. Further information on the number of monthly trips undertaken by e-bike would be shared with the Streets & Walkways Sub-Committee. Officers were keen to explore introducing cycle facilities with cycle tracks, and a Member encouraged them to consider how to introduce alternative cycle facilities rather than creating and trying to enforce non-cycle zones. There were 146 new private cycle parking spaces, and Members noted that the increase in cycling had seen more private cyclists than e-bike users.
- A Member noted that their constituents in the Ward of Langbourn faced difficulties in getting taxis and asked if the measures to reduce motor vehicle traffic as set out in the Strategy may have been too effective. In reply, officers said more space and priority needed to be given to pedestrians and noted that there were fewer taxis in central London as a whole. The traffic control experiment at Bank Junction would begin in July.
- It was noted that officers had constructive relationships with the BIDs.
- In response to a question from a Member as to whether the City Corporation was monitoring river traffic and usage of Blackfriars Pier, officers said that statistics on this were obtained through TfL, and they could speak to TfL to gain further information.
- A Member asked officers what could be done to resolve accessibility issues caused by floating bus islands. In reply, officers said that these islands were part of the TfL network, who were looking at updating them. A consultation on the Aldgate – Blackfriars Cycleway had been undertaken in the Spring, with a report coming to the July meeting of the Street's & Walkways Sub-Committee. A briefing session to allow Sub-Committee Members to hear from street users would be held in advance of this.
- The City Corporation had a constructive relationship with TfL, supported through regular quarterly meetings between TfL, the Chair of the Committee

and senior officers. Officers remained the most appropriate venue through which Members could contact TfL.

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

9. **SMITHFIELD MARKET BRIEF**

Members considered a report of the Executive Director, Environment, concerning Smithfield Market.

Following a question from a Member, officers said that a communications draft would be developed, and the results of wider consultation shared with the Committee. The planning brief would be returned to P&T for assessment, and then subject to planning consultation.

A Member raised concerns, on behalf of an absent Member, that attempting a planning brief for the Market in advance of a planning brief and overarching cultural strategy for the wider area was premature, and risked decisions being made without sufficient context In reply, officers said that the Brief was a supplementary planning document which translated the policy set out in the Local Plan to this specific site. It was a common tool across London and other local authorities. Officers provided assurance that other City Corporation strategies would be considered.

A Member noted the buildings delineated in red in the report, and asked officers how they could ensure that the future of the area was broad and inclusive of the public realm. In reply, officers said that the red line denoted Smithfield Market. They could look at the interface but noted there was not scope for comprehensive redevelopment. The Member encouraged officers to consider how wide they could go, noting the criticality of the public realm to the project. Officers replied that there was also a public realm strategy. Members agreed that this would need to work in tandem with the Smithfield Market brief.

RESOLVED, that – Members approve the commencement of a draft Smithfield Market Planning Brief.

10. **BUILDING CONTROL CHARGES REPORT 2025/26**

Members considered a report of the Executive Director, Environment, concerning building control charges.

A Member, noting reports from residents on the Barbican Estate on the length of time it could take to get building control and safety regulator approval for works, asked for further information on the current performance metrics. In reply, officers acknowledged that the process could be lengthy but noted that this was outside of the control of the District Surveyor's team; works in buildings such as the Barbican Estate properties required approval from the Building Safety Regulator ('the Regulator'). Officers were working with the Regulator at a national level to try to improve this, and recently the latter had granted consent that applications they received for works in the Barbican Estate, once validated, would be allocated to the City Corporation's building control team. They hoped that this would lead to a decrease in the waiting period. Similar negotiations had begun

to achieve a similar outcome for the Golden Lane Estate. A regular report on the metrics would normally be submitted to the July Committee meeting.

RESOLVED, that – Members approve Option 3 and agree a new “City of London Building Regulations Charges Scheme No 8: 2025” and a new “Building Control Miscellaneous Charges No 6: 2025.

11. **DISCONTINUANCE OF THE CITY WALKWAY**

Members considered a report of the Executive Director, Environment concerning the City Walkway.

RESOLVED, that – Members:

a) Subject to:

   i. the implementation of planning permission (Registered No. 23/00469/FULEIA) for the redevelopment of 55 and 65 Old Broad Street, EC2M 1RX; and

   ii. completion of the bridge removal agreement; and

   iii. completion of an agreement between the owners of 55 and 65 Old Broad Street and 99 Bishopsgate;

   resolve to rescind the resolution of the Court of Common Council dated 17th July 1986 so as to discontinue the City Walkway footbridge over Wormwood Street shown cross hatched yellow on the drawing entitled The City Walkway Footbridge and numbered 7146-A03-FPA-ZZZ-100L-DR-A-990014-P01 at Appendix 1 of this report (“the City Walkway Footbridge”) in accordance with the resolution set out in Appendix 2 to this report.

b) Delegate to the City Operations Director (City Streets and Spaces) authority to insert an appropriate date for the resolution to come into force.

c) Delegate to the City Operations Director (City Streets and Spaces) the authority to negotiate and agree the heads of terms and to enter into an agreement with all relevant parties for the removal and disposal of the City Walkway Footbridge.

12. ***QUARTERLY PUBLIC LIFT & ESCALATOR REPORT – JANUARY TO MARCH 2025**

Members received a report of the City Surveyor concerning public lifts and escalators in the Square Mile.

A Member asked for further information on the Tower Place Public Lift, which had been out of service for a considerable period of time. It was now functional again, but the Member asked what lessons had been learned to ensure quicker resolution to any similar issues in the future. In reply, officers said that this incident had been due to a specific issue with the lift; routine maintenance had been extended due to an electrical fault.

The Member also noted that the City Corporation had occasionally required construction of a lift as part of the public benefit when granting planning consent. These were often operated by the building and thus were not fully public. The lift

at Fenchurch Street Place could only be accessed by request, while the lift at Mansion House Station had been fenced off. This negated their use as public realm benefits, and the Member encouraged officers to ensure that the lifts were completely accessible and could be used.

Officers said that they had seen a marked improvement in the lifts following recent investment and continued maintenance, but acknowledged the point made on the importance of the availability of lifts in the City. Following the experience of Fenchurch Street Place, any new development was subject to a legal agreement under section 106 to ensure its continued maintenance.

Officers also provided an update on the status of the escalators at 125 Alban Gate; the new managing agent at 125 Alban Gate had confirmed that they were about to commence an 18-month programme to renovate these escalators.

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

13. ***STREETS AND WALKWAYS SUB-COMMITTEE DRAFT MINUTES**
The public minutes and non-public summary of the Streets and Walkways Sub-Committee meeting on 4 February 2025 were noted.

14. ***REPORT OF ACTION TAKEN**
Members received a report of the Town Clerk concerning action taken between meetings.

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

15. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
There were no questions.

16. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
The Chair informed the Committee that he would be writing to congratulate Claudia Kenyatta and Emma Squire on their appointment as the Chief Executive of Historic England.

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

18. **NON-PUBLIC MINUTES**
The non-public minutes of the meeting held on 11 February 2025 were approved as a correct record.

19. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
There were no questions.

20. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**
There was no other business.

21. **CONFIDENTIAL MINUTES**
The confidential minutes of the meeting held on 11 February were approved as a correct record in the non-public session.

The meeting closed at 10.20 am

Chairman

Contact Officer: Ben Dunleavy
Ben.Dunleavy@cityoflondon.gov.uk

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PLANNING AND TRANSPORTATION COMMITTEE

Tuesday, 9 September 2025

Minutes of the meeting of the Planning and Transportation Committee held at the Guildhall EC2 at 9.15 am

Present

Members:

Deputy Tom Sleigh (Chair)
Shravan Joshi MBE (Deputy Chair)
Tana Adkin
Samapti Bagchi
Matthew Bell
Deputy John Edwards
Deputy Marianne Fredericks
Alderman Alison Gowman CBE
Alderman Prem Goyal CBE
Deputy Madush Gupta
Josephine Hayes
Deputy Jaspreet Hodgson
Philip Kelvin
Alderwoman Elizabeth Anne King, BEM JP
Charles Edward Lord, OBE JP
Sophia Mooney
Deborah Oliver
Deputy Henry Pollard
Alderman Simon Pryke
Deputy Nighat Qureishi
Robertshaw
Hugh Selka
Naresh Hari Sonpar
Matthew Waters
Jacqui Webster

Officers:

Kate Alexander Newton	-	Environment Department
Chris Elliot	-	Environment Department
Michael Folayan	-	Environment Department
Fleur Francis	-	Comptroller and City Solicitor’s Department
Joanne Grimley	-	Environment Department
David Horkan	-	Environment Department
Samuel James	-	Environment Department
Georgina McBirney	-	Environment Department
Kieran McCallum	-	Environment Department
Rob McNicol	-	Environment Department
Rachel Pye	-	Environment Department
Gwyn Richards	-	Planning and Development Director, Environment Department
Fiona Williams	-	Environment Department
Peter Wilson	-	Environment Department
Callum Southern	-	Town Clerk’s Department
Judith Dignum	-	Town Clerk’s Department

CHAIRMAN'S OPENING REMARKS

The Chairman welcomed Members back from the recess and expressed thanks to those who had attended the site visits relating to items on this agenda and the first in a series of Member training sessions. He highlighted that invitations would soon be sent for future sessions and he encouraged Members to attend if possible.

1. **APOLOGIES**

Apologies for absence were received from Anthony Fitzpatrick, Amy Horscroft, Anthony Manchester, Tim McNally and William Upton.

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

Marianne Fredericks declared an interest in Agenda Item 7 (Review of Public Parking Provision at Minories Car Park) in that she was a use of the Car Park – Minute 7 below refers. The item was considered during the non-public part of the meeting.

3. **CITY FUND HIGHWAY DECLARATION: 60 QUEEN VICTORIA STREET, EC4N 4TR**

The Committee received a report of the City Surveyor and Executive Director Property seeking approval to declare as surplus to highway requirements a parcel of airspace City Fund highway land located at the entrance of 60 Queen Victoria Street, EC4N 4TR. The land measured approximately 187.7 sq ft (17.44 sq m). The declaration would enable disposal of the land in support of the permitted development at the site. This involved the expansion of the building's entrance at ground and first floor levels on the south-western corner of 60 Queen Victoria Street, for which planning permission was granted on 27 December 2023.

A Member asked whether the proposed changes to the building's entrance took sufficient account of public access issues. Officers advised that such matters would have been considered during the granting of planning permission in 2023 and were not a valid concern in relation to the issue currently before the Committee. However, a fairly large proportion of the land would remain available for access upon completion of the development.

Resolved: That Members-

1. Declare a parcel of City Fund highway land, measuring 187/7 sq ft (17.44 sq m) and situated at the entrance of 60 Queen Victoria Street, EC4N 4TR, surplus to highway requirements to facilitate its disposal on terms to be approved under the City Surveyor's Delegated Authority.

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

Alderman Alison Gowman had given notice of the following two questions, in the context of the aspiration within the City Transport Strategy, echoed within the emerging City Plan 2040, to increase the use of the River Thames for freight.

1. As the PLA's net zero vision for the Thames is driving towards electric only vessels, the City is lacking any electrical infrastructure to which to connect. … We need to have this capacity if we are to make full use of the River. What steps are we taking to build this and the related grid capacity?

2. Like many rivers the oversight is complicated and confusing (maybe even conflicting) and our own Corporation structure does not help. Oversight is split between committees and separate departments. Should we not now bring these strands together in some internal working group or oversight panel in order to ensure that the River frontage is properly used and enhanced? For example, the works at Bazalgette Pier, Walbrook Wharf future use, upgrading Blackfriars Pier and the reinstatement of Swan Lane that will happen now or in the future. All these need to be driven through with cohesion, purpose and impact. An oversight panel is essential.

Officers responded as follows:

- Officers confirmed the aspiration within the Transport Strategy to increase the use of the River for freight. It was noted that the Corporation was a member of the Thames Estuary Growth Board, which formed part of the structure designed to manage the diverse interests involved with the River.

  A description was given of the ongoing discussions taking place in the context of the Transport Strategy on both the potential to increase use of the River for light freight and the provision of charging facilities. Effective relationships had been built with key River users, including Thames Clipper, and engagement on both sides was facilitating progress, for example concerning opportunities for developing light freight coming into the Square Mile. Additionally, Thames Clipper, having a current agreement to use the piers and wharves to the south of the River, were keen to expand this to the north. The Corporation would welcome discussions with Thames Clipper and TfL on this, noting the involvement of TfL with commercial partners, suggesting that the project was seen as viable.

  Concerning charging facilities, the complexity of the issue was acknowledged. However, departments within the Corporation were united in their willingness to see progress and the Environment and City

Surveyors departments were investigating opportunities for charging facilities along the riverside. Ongoing discussions were taking place with Thames Clipper, from whom further information on specifications had been requested, and a meeting was due to take place soon.

Finally, when opportunities arose, work was being done to identify opportunities which may arise in the medium term. Officers referred to a detailed piece of work carried out recently to assess the suitability of Walbrook Wharf Waste Transfer Station for additional use. Although the possibility of using the Wharf to land light freight had proved to be commercially unviable at present, the position was likely to change in future as the technology matured. It had therefore been agreed to review the position in five years.

Commenting on the planning aspect of the question, Officers referred to the policies relevant to the River which existed in the emerging City Plan, and to a Supplementary Planning Document and Planning Advice Note in the course of development. All of these were designed to encourage use of the River for freight purposes and would be used as part of the process to determine relevant planning applications.

In response to two further questions, Officers advised that they had confidence in the adequacy of riverside safety provision following a recent audit carried out in conjunction with the City Bridge Foundation and a wider review of the arrangements for inspection and maintenance. The equipment was inspected regularly and the Corporation continued to engage with charities, including the RNLI and the Samaritans, to ensure that the type of provision matched current requirements.

Concerning the need to address the pollution of the River caused by food and beverage detritus, Officers undertook to raise this with Cleansing and seek engagement with the businesses located on the riverside. The situation may also be alleviated in future due to the existence of a longer-term plan to review the height of the river wall for reasons of flood defence.

5. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
There were no items of urgent business.

6. **EXCLUSION OF THE PUBLIC**
RESOLVED – that under Section 100(A) of the Local Government 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part 1 of Schedule 12A of the Local Government Act.

7. **REVIEW OF PUBLIC PARKING PROVISION AT MINORIES CAR PARK**
8. The Committee considered a report of the Executive Director Environment and the City Surveyor concerning Minories car park.

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

Questions were raised concerning two issues.

9. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**
There were no items of urgent business.

The meeting closed at 10.06am.

Chairman

Contact Officer: Judith Dignum
judith.dignum@cityoflondon.gov.uk

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Committee(s)	Dated:
Planning and Transportation Committee	21/10/2025
Subject: SPD update	**Public report:** For decision
This proposal: • **delivers Corporate Plan 2024-29 outcomes** • **Provides statutory duties**	This report relates to the statutory planning function
Does this proposal require extra revenue and/or capital spending?	**No**
If so, how much?	**n/a**
What is the source of Funding?	**n/a**
Has this Funding Source been agreed with the Chamberlain's Department?	**n/a**
Report of:	Katie Stewart, Executive Director of Environment
Report author:	Gudrun Andrews, Head of Planning Policy

Summary

Work is progressing on a series of new and updated Supplementary Planning Documents to support the implementation of the City Plan 2040. To date this has focussed upon project initiation, fact-finding and research. Best practice research into engagement practices has focussed the approach to the engagement proposed within this report, emphasising input from key stakeholders at an earlier stage in the preparation process, ahead of scope finalisation and document drafting. This report seeks authorisation to seek a formal SEA Screening view from Environmental Bodies outlined in the legislation and to conduct a 'call for evidence'.

Recommendation

Members are asked to:

- NOTE the approach to SPD production and engagement
- APPROVE the request for a Screening opinion on the SPDs with the three Environmental Bodies
- APPROVE a public 'Call for Evidence' on the SPDs

Main Report

Background

1. At the February 2025 meeting members approved the new Local Development Scheme. This included a timetable for the preparation of eight new or updated Supplementary Planning Documents (SPDs).

Local Development Scheme

2. There have been some minor amendments to the SPD timetables since preparation of the LDS. The main change is that the consultation will now be split into pre-engagement with key stakeholders ahead of the formal 'Regulation 13' consultation under the Town and Country Planning (Local Planning) (England) Regulations, 2012. However, the anticipated adoption dates are all expected to be met or exceeded as set out below.

	Pre-engagement	**Regulation 13 consultation**	**Adoption**
Offices SPD (update)	Autumn 2025	Spring 2026	Summer 2026
Culture SPD	Autumn 2025	Spring 2026	Summer 2026
Planning Obligations SPD (update)	Autumn 2025	Spring 2026	Summer 2026
An Inclusive City SPD	Autumn 2025 to Spring 2026	Spring/Summer 2026	Spring 2027
Celebrating our Heritage SPD	Autumn 2025	Spring/Summer 2026	Winter 2026

3. The LDS also made a commitment to the preparation of an update to the Air Quality SPD, Protected Views SPD and a new Puddle Dock SPD. These are being prepared by other teams across the Corporation and will be brought back to members for consultation in due course.

Work to date

4. The SPDs listed above are considered a 'suite' of new guidance to support the emerging City Plan. Each document is being taken forward as a single project with a Project Initiation Document (PID), Scoping document and Engagement Strategy. A detailed work programme has also been developed to be able to meet the timescales as above.

5. Alongside the detailed project set-up processes, work has also commenced on background research and preparation of new evidence. This includes commissioning an update to the Viability Study which will provide evidence for the Planning Obligations SPD and Offices SPD in relation to the viability

requirements within Policy OF2. It will also support a future potential review of the Community Infrastructure Levy (CIL). This work has also involved gathering data and internal insight across the Corporation to identify initial key themes and focal points for each SPD. This has further influenced the scope of each SPD, however further external insight to be gathered through these 'pre-engagement' exercises will be considered before the scope is finalised and the SPD drafted.

6. This stage has also involved research into best practice in engagement exercises and how these can be adapted to apply to the SPD preparation process. This has identified potential to focus upon informal engagement ahead of the formal 'Regulation 13' consultation on draft SPD. Therefore, the engagement planned for Autumn 2025 as set out in the LDS will focus on input to the initial scope of the SPDs, allowing a degree of iteration of the themes and focal points ahead of the production of a draft document. Detailed stakeholder mapping has also fed into this approach by identifying the key stakeholders, their interests and perspectives alongside the potential risks of non-engagement, and this has been utilised to broaden the scope of engagement to more effectively capture views.

7. The SPD workstreams are also complementary to other Corporation projects. The Culture SPD presents an opportunity to further some of the discussions that have happened as part of the Corporation's Culture Strategy and expose selected stakeholders to a mechanism by which new cultural spaces could be delivered.

Approach to consultation and engagement

8. Taking into consideration learnings from the above, a series of engagement sessions are programmed for November 2025. In some cases, these will focus upon a particular SPD, for example the Celebrating our Heritage SPD will have a series of events with key heritage stakeholders. However other sessions will seek input on several of the SPD topics from groups identified within the stakeholder mapping exercises. At this stage the events will likely focus upon landowners, developers and planning agents; residents' groups and bodies; faith groups and cultural organisations; and neighbouring boroughs. The sessions will be tailored towards the stakeholders present but are likely to involve presentations of findings to date; workshops and roundtables; and attendance at suitable community events.

9. Market insights will also be captured through detailed interviews with commercial agents across the Square Mile. This will assist in understanding further the factors affecting the marketing and uptake of office stock within the City in relation to the key criteria within emerging Policy OF2: Protection of Offices.

10. The sessions will also gather developer perspective and residents' insight into the approach to S106 to be taken forward within the Planning Obligations SPD update. However, it is likely that further dedicated sessions may well take place in early 2026 once some of the outputs of the Viability Study update are known. These core stakeholders will also be engaged in due course in relation to the

Infrastructure Delivery Plan (IDP) update, project prioritisation and the statutory processes associated with the potential review of the CIL.

11. Although the Inclusive City SPD sits later in the LDS timescales specific matters and questions will be raised in the engagement sessions in the Autumn relating to how groups experience the City. The engagement on this SPD will be conducted over several months utilising several different methods. The aim will be to capture views from a diverse range of users of the City, including from city workers, across the course of the day and week, visitors and residential communities. This work will also focus on groups with protected characteristics, to capture experience of the city from a broad range of perspective. The aim of is to utilise and develop new best practice for engagement across these communities, therefore this is likely to involve external engagement expertise and support.

12. It is also proposed that a public 'call for evidence' be put out. This is similar to the approach taken by the GLA on the London Plan and allows stakeholders to submit their own data, evidence or research for topics in relation to the SPDs. This will then be reviewed by officers, and where relevant may be utilised as part of the evidence base, or form part of follow-up informal conversations.

SEA Screening

13. It is best practice to undertake an SEA screening exercise for SPDs to determine whether it is likely to have 'significant effects'. This has been conducted for the SPDs set out in Table 1. Each assessment has concluded that there is no need for a full SA/SEA of the SPD as the matters have been accounted for within the over-arching City Plan Sustainability Appraisal. However, the SEA Screening documents will be sent out to the three Environmental Bodies as identified in section 4 of the Environmental Assessment of Plans and Programmes Regulations 2004 (Natural England, Historic England and the Environment Agency) to provide comment on the appropriateness of the screening process and whether they agree with the conclusion. Where a consultation body decides to respond, it should do so within 5 weeks of receipt of the request, which will be made in the week commencing 27 October 2025.

Next steps

14. The pre-engagement exercises will take place during November 2025. This will assist in the preparation of the draft SPDs which will then be brought back to Committee for member approval to formally consult under Regulation 13 in Spring 2026.

Corporate & Strategic implications

15. The City Plan 2040 has been prepared to contribute to corporate objectives, in particular the Corporate Plan. The SPDs will sit under the City Plan and will assist in delivering the aims and objectives of the plan, as well as providing guidance on policies contained within it.

Financial implications

16. The preparation of the SPDs will be undertaken under existing and identified local plan budgets.

Resource implications

17. The resources associated with the preparation of the SPDs will be undertaken within the existing team structures.

Legal implications

18. The LDS has been prepared in accordance with Section 15 of the Planning and Compulsory Purchase Act 2004.

Risk implications

19. None.

Equalities implications

20. The Public Sector Equality Duty is an ongoing requirement and will be taken into account by officers throughout the preparation of planning policy documents. Each SPD will be accompanied by an Equalities Impact Assessment which will be continually reviewed and updated and made available alongside the formal consultation on each SPD.

Climate implications

21. None.

Security implications

22. None.

Conclusion

23. The report provides and update on the new SPDs to be prepared in line with the LDS. It also seeks authorisation for formal consultation with the Environmental Bodies on the SEA Screening of the SPDs and to conduct a 'call for evidence'.

Appendices

- None

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City of London Corporation Committee Report

Committee(s): Planning and Transport – For decision	**Dated:** 21/10/2025
Subject: **Planning Advice Note – Heat Network Supply Zones in the Thames Policy Area**	**Public report:** For Decision
This proposal: • **Delivers Corporate Plan 2024-29 outcomes**	Leading Sustainable Environment: climate action, resilience, air quality and sustainability are all facets of ambitious targets for the City to be net zero by 2040.
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: **Aled Thomas, Climate Action – City Workstream Manager**	

Summary

Members have approved a phased delivery of heat networks across the Square Mile, where it is projected to be the lowest cost solution to decarbonise heat for buildings (Policy and Resources, June 2025).

A critical element of heat network delivery in the Square is the supply of low cost, low carbon heat at a scale which meets the high density of heat demand in the Square Mile and Central London in general.

The Thames and riverside area have the potential to play a critical role in the provision of heat - as a direct source of heat; as a transporter of heat; and as a corridor for the development of heat main infrastructure. A draft Planning Advice Note (PAN) has been produced, which provides advice for developments that could be affected by the heat network plans.

The draft PAN sets out the policy context for developing strategic heat supply in the Thames Policy Area; indicates the potential and preferred options for the mooring of thermal barges in the supply of heat in the short-term; and highlights the recent decision to designate a strategic heat main as a nationally significant infrastructure project.

If approved, a consultation will be undertaken to seek feedback on the draft PAN. A final version will return to this Committee for adoption. The PAN will be kept under review and revised as required.

Recommendation(s)

Members are asked to:

- Endorse the draft Planning Advice Note on Heat Network Supply Zones in the Thames Policy Area
- Approve the undertaking of a consultation on the Planning Advice Note

Main Report

Background

1. The development and expansion of heat networks is a priority for national government, the Mayor of London and the City of London Corporation as a critical contribution to decarbonising heat, achieving net zero goals and increasing energy security.

Current Position

2. The government's forthcoming Heat Network Zoning regulations (due to be adopted in early 2026) will provide a legal framework for scaling the deployment of heat networks as the lowest cost, low carbon option for decarbonising heat in major urban areas.

3. In preparation for the Heat Network Zoning regulations, the City Corporation has been participating in the government's Advanced Zoning Programme (AZP) to better understand the potential impact of the regulations on the Square Mile. This work suggests:
    - The City of London has the highest density of heat demand in the UK
    - The whole of the Square Mile will form part of a designated Central London Heat Zone
    - Around 1200 Square Mile buildings could be mandated to connect to heat networks, based on the government's threshold of heat demand above 100 MWh/y
    - These buildings collectively have a heat demand of c.1,000 GWh

4. In June 2025, Policy and Resources committee approved a phased delivery of heat networks across the Square Mile, only where it is projected to be the lowest

cost solution to decarbonise heat for buildings - verified on a phase-by-phase basis.

5. The main constraint to heat network development is the current availability of low carbon heat to meet the high density of demand in the Square Mile. The Thames and the riverside area have the potential to play a critical role in providing a substantial amount of low cost, low carbon heat enabling large-scale heat network development in the Square Mile and Central London in general.

6. The greatest opportunities for heat networks to access low carbon heat sources in the short-term (5-10 years) are located along the River Thames foreshore. It provides options to extract heat from the river water directly and also for heat to be delivered by Cory in river barges whose heat is captured and stored from waste heat generated at their Riverside Energy from Waste facility in east London.

7. From early/mid 2030 the supply of large-scale waste heat from sources in outer London via pipes may be available to meet most/all the heat needs of the buildings within the Square Mile. Cory are proposing to develop a strategic heat main to transport waste heat generated at their Riverside Energy from Waste facility to Central London, including the Square Mile.

8. In August 2025, Cory's proposed strategic heat main project was recognised as a project of national significance by the Secretary of State for the Department of Energy Security and Net Zero (DESNZ). This is the first time a heat infrastructure project has been designated as nationally significant by DESNZ. Construction is targeted to start in 2028 with heat supplied from 2032.

Options

9. The City has commenced engagement with Cory on opportunities to deliver waste heat via river barges utilising thermal storage which could supply the Square Mile in the short-term while considering a longer-term piping option.

10. An initial assessment of suitable mooring locations has been undertaken for the thermal barges. Swan Lane foreshore / east of Walbrook Wharf has been identified as the preferred site, mainly due to the relatively good condition of the existing campsheds.

Proposals

11. The draft Planning Advice Note sets out the current plans for strategic heat supply to enable the delivery of low cost, low carbon heat networks in the Square Mile. This includes the preferred location for the mooring of thermal barges to transport heat along the Thames as well as the plans for a strategic heat main being recognised as a project of national significance.

12. If approved, a consultation will be undertaken to seek feedback on the draft PAN. A final version will return to this Committee for adoption. The PAN will be kept under review and revised as required.

13. The PAN is being developed in coordination with the City Corporation's Heat Network Programme. A separate paper on the design and delivery of Heat Network Zoning in the Square Mile will be presented to Policy and Resources committee (for decision) and Planning and Transport committee (for information) before the end of 2025.

Key Data

14. Cory operates the Riverside 1 Energy-from-Waste (EfW) facility and is currently constructing Riverside 2, which will double its processing capacity. Together, these facilities are expected to generate up to 3 TWh of waste heat annually - sufficient to meet the entire heating demand of the Square Mile (approximately 1,200 GWh) and half of Westminster (around 4,000 GWh per year).

Corporate & Strategic Implications

Strategic implications

15. This proposal supports our Corporate Plan priority for a Leading Sustainable Environment through support of heat decarbonisation across the Square Mile, and additional air quality benefits by reducing the use of gas-fired boilers.

Financial implications

16. There are no direct financial implications from this Planning Advice Note. The City Corporation's Heat Network Programme (HNP) is being financed through the Climate Action Strategy, UK government funding and other sources.

Resource implications

17. The City Corporation's Heat Network Programme (HNP) is supported by staff and external consultancy resource, including legal, commercial and technical resources. The HNP is being developed in consultation with wider internal and external stakeholders.

Legal implications

18. None

Risk implications

19. The supply of low cost, low carbon heat is critical for the development of heat networks in the Square Mile. The draft PAN seeks to raise awareness of the plans being developed to maximise the potential use of waste heat for the Square Mile and to consult on these plans with key stakeholders.

Equalities implications

20. None

Climate implications

21. Heat decarbonisation is the most significant challenge for the Square Mile to be net zero by 2040. Heat networks are likely to be the lowest cost, low carbon solution for

decarbonising heat for buildings in the Square Mile and supports the CAS net zero 2040 target. The supply of low cost, low carbon heat at scale is a critical element of being able to develop heat networks in the Square Mile

Security implications

22. None

Conclusion

23. Heat networks are likely to play a central role in providing a lower cost low carbon solution for buildings to decarbonise in support of our Square Mile 2040 net zero target. Members have approved a phased approach to heat network development, only where it is projected to be the lowest cost solution to decarbonise heat for buildings

24. The Thames and the riverside area has the potential to play a critical role in providing a substantial amount of low cost, low carbon heat enabling large-scale heat network development in the Square Mile and Central London in general.

25. The draft PAN seeks to set this opportunity within a policy and regulatory context as well as outlining the current plans for strategic waste heat supply for the Square Mile and Central London.

Appendices

- Appendix 1 – Planning Advice Note (Draft) – Heat network supply zones in the Thames Policy Area

Background Papers

‘Citigen and Heat Network Zoning’ approved by P&R on 12/06/2025 (Non-public paper)

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Planning Advice Note (Draft)

Heat network supply zones in the Thames Policy Area

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1. Executive Summary

This Planning Advice Note (PAN) sets out plans for the supply of strategic heat, particularly those aspects relating to the Thames Policy Area, to enable the development of heat network development in the Square Mile.

The development and expansion of heat networks is a priority for national government, the Mayor of London and the City of London Corporation as a critical contribution to decarbonising heat, achieving net zero goals and increasing energy security.

The government's forthcoming Heat Network Zoning regulations provides a legal framework for scaling the deployment of heat networks as the lowest cost, low carbon option for decarbonising heat in major urban areas. In preparation for the Heat Network Zoning regulations, the City Corporation has been participating in the government's Advanced Zoning Programme (AZP) to better understand the potential impact of the regulations on the Square Mile. This work suggests:

- The City of London has the highest density of heat demand in the UK
- The whole of the Square Mile will form part of a designated Central London Heat Zone
- Around 1200 Square Mile buildings will be mandated to connect to heat networks, based on the government's threshold of heat demand above 100 MWh/y
- These buildings collectively have a heat demand of c.1,000 GWh

While the high density of heat demand of the Square Mile is clear, the main constraint to heat network development is the current availability of low carbon heat to meet the scale of demand. The work undertaken through the AZP programme recommends a phased approach to the delivery of heat networks across the Square Mile which combines both short-term and long-term scenarios for heat supply:

- Short-term development: prioritising access to local/neighbouring heat sources – the River Thames, and datacentres.
- Long-term development: access to larger scale waste heat from outer London sources (such as Energy From Waste facilities) via new large-scale cross-London strategic heat pipe mains.

The Thames and the riverside area play a critical role in both short-term and long-term scenarios to enable large-scale heat network development in the Square Mile. In the short-term a major opportunity is the provision of heat via thermal barges from the Riverside Energy from Waste plant in Bexley. A longer-term option is a strategic heat main from Bexley to central London which would follow the Thames corridor. In combination, these scenarios constitute a major strategic opportunity for supplying a substantial amount of low cost, low carbon heat to the Square Mile and Central London.

In August 2025, the strategic heat main project, proposed by Cory, was recognised as a project of national significance by the Secretary of State for the Department of Energy Security and Net Zero.

The City of London Corporation's adopted Local Plan 2015, the London Plan 2021 and the draft City Plan 2040 all seek to deliver greater use of the river Thames for river-based transport of freight (which would include the transport of low carbon heat on thermal barges) and seek to facilitate the infrastructure requirements of the Square Mile. The City Plan 2040 is aligned with the City Corporation's Climate Action Strategy in seeking to ensure that the City is environmentally sustainable and transitions to a net zero carbon City by 2040.

The following sets out the main considerations from the work undertaken to date on strategic heat supply planning for the City:

- Swan Lane foreshore has been identified as the priority location for the mooring of thermal barges and the discharge of heat to a wider City network.

- Several other sites have been identified as potential / priority sites for thermal barges. These are:
  - HMS President – vacant jetty site
  - Area west of Blackfriars jetty
  - East of Blackfriars jetty
  - West of Walbrook Wharf
  - Walbrook Wharf
  - LB PLA Upper Moorings

- The proposal for a strategic heat main from Cory's Riverside campus in Bexley to the south east and central London has been designated a project of national significance by the UK government.

Planning advice:

Development proposals within the Thames Policy Area should consult City of London Corporation and other relevant stakeholders on any plans which may affect:

- the use of Swan Lane foreshore for the use of thermal barges;

- the use of other priority sites identified as potential mooring locations for thermal barges;

- the development of the strategic heat main project as a project of national significance

2. Introduction

The development of heat networks in the UK is being shaped by a rapidly evolving regulatory landscape aimed at accelerating the decarbonisation of heat. This Planning Advice Note sets out the relevant policies, regulations and studies which collectively set the framework for heat network development in the City of London, with a particular focus on the planning considerations for the supply of low carbon heat to the City.

The Energy Act 2023 introduced powers for the UK Government to implement heat network zoning in England, with the first zones expected to be designated from 2026. This is widely seen as the most significant regulatory driver for heat network development.

Key features of the zoning framework include:

- **Designated Zones**: Local areas will be identified where heat networks are the most cost-effective and low-carbon solution for heating.
- **Mandatory Connection**: Certain building types - such as large commercial buildings, public sector sites, and new developments - may be required to connect to a heat network within a designated zone.
- **Zone Coordinators**: Local authorities or appointed bodies will oversee planning and delivery within each zone.
- **Demand Assurance**: Zoning will provide certainty to developers by securing anchor loads and enabling long-term investment planning.
- **Unlocking Waste Heat**: Zoning supports the use of otherwise inaccessible heat sources, such as waste heat from industry or data centres.

This regulatory framework is designed to accelerate the rollout of heat networks, particularly in dense urban areas like the Square Mile, where heat demand is concentrated and infrastructure can be efficiently shared. It also aligns with the Government's ambition for heat networks to supply up to 18–20% of UK heat demand by 2050, up from around 3% today.

A key challenge for heat network development in the Square Mile is the supply of low carbon heat. Whilst there are potential local sources of waste heat in the City and in neighbouring areas which should be prioritised, supplying heat to match the scale of demand in the City requires access to larger scale waste heat.

A major source of potential waste heat is from the Riverside Energy from Waste plant in Belvedere, Bexley. The City of London already transports a significant amount of its residual waste by barge from a waste transfer facility at Walbrook Wharf down the River Thames to the Bexley Energy from Waste facility. Work is underway to assess the potential for utilising this waste heat, via mobile thermal barges as well as a strategic heat main.

This document provides guidance on the material planning considerations arising from the strategic infrastructure required to supply waste heat from Riverside Energy from Waste facility to the City.

3. Heat Networks - National Policy and Regulatory context

Key points:

- UK Government policies identify low carbon heat networks as making a critical contribution to the delivery of its legally-binding target of net zero by 2050.
- The Energy Act 2023 established the legal basis for regulating heat networks in Great Britain.
- The UK Government's forthcoming Heat Network Zoning regulations will designate Heat Network Zones where heat networks are expected to be the lowest cost, low carbon heating option; create Zone Coordination bodies; and require certain buildings to connect to a heat network.

3.1 National Planning Policy Framework

The National Planning Policy Framework says:

"Strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for.. b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)." (section 20).

"To help increase the use and supply of renewable and low carbon energy and heat, plans should:

a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, and their future re-powering and life extension, while ensuring that adverse impacts are addressed appropriately (including cumulative landscape and visual impacts);

b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and

c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co- locating potential heat customers and suppliers." (section 165)

"Local planning authorities should also give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic." (section 167)

3.2 Climate and Energy Policy

Climate Change Act

The Climate Change Act 2008 (2050 Target Amendment) Order 2019 made the UK the first major economy to commit to a 'net zero' target. The new target requires the UK to bring all greenhouse gas emissions to net zero by 2050.

Sixth Carbon Budget

In April 2021, the government legislated for the sixth carbon budget (6BC), which requires the UK to reduce GHG emissions by 78 per cent by 2035 compared to 1990 levels. The 6CB published by the Climate Change Committee in December 2020 makes clear that the actions required to meet the budget and the UK's Nationally Determined Contribution.

6CB expects low carbon heat networks to be built imminently, 'through 2020-2050, with scaling up through to 2028, from which point around 0.5% of total heating demand is converted per year. By 2050, around a fifth of heating is distributed through heat networks.' (page 115)

The Seventh Carbon Budget ('7CB'), published in February 2025 and due to be set by Government in 2026, continues to see a key role for low-carbon heat networks', delivering '22% of heat demand in non-residential buildings by 2040' (page 254).

Minimum Energy Efficiency Standards (MEES)

The MEES regulations, introduced in 2018 and updated in 2023, currently require all privately rented non-domestic buildings in England and Wales to meet a minimum EPC rating of E. However, the Government has proposed a phased tightening of these standards:

- By 2027: EPC rating of C required for all non-domestic rented buildings.
- By 2030: EPC rating of B proposed, with a two-year compliance window.

While MEES does not directly mandate low-carbon heat, it is expected to drive long-term demand for energy-efficient and low-emission heating systems. Heat networks can support compliance, especially in buildings where on-site upgrades (e.g. heat pumps) are limited by space, cost, or grid constraints. With around 28% of commercial properties currently rated D or lower, the tightening of MEES will create a strong incentive for building owners to explore shared, low-carbon heating solutions.

Energy Act 2023

The Energy Act 2023 establishes the legal framework for regulating heat networks in Great Britain, introducing measures to create an effective heat network zoning system and ensure technical standards are met to help reduce energy costs and reach Net Zero.

Heat networks will become a key part of the energy system, with powers granted to the Secretary of State to create secondary legislation and for local authorities to designate zoning areas where buildings must connect to the networks. This regulation aims to foster market growth, provide consumer protections, unlock investment, and simplify development for heat networks.

- **Regulatory Framework**: The Act provides powers for the government to establish a regulatory framework for heat networks, which are communal heating and cooling systems that supply multiple buildings from a central source.
- **Heat Network Zoning**: The Act contains legislation to introduce heat network zoning in England, a system that allows local authorities to designate areas where buildings will be required to connect to a heat network.
- **Technical Standards**: The Act also empowers the government to set technical standards for heat networks to ensure they are efficient and effective.

Energy Policy 2024

In May 2024, Government published 'Strategy and Policy Statement for Energy Policy in Great Britain' ('Energy Policy 2024') demonstrating its intent to deliver strategic policies for energy supply.

Energy Policy 2024 makes clear that 'Government expects private sector investment of around £100 billion in the energy sector in the period to 2030, with the expectation that this will support up to 480,000 jobs in 2034. Through the effective pursuit of their statutory objectives, undertaken with reference to this SPS, Ofgem and NESO will help grow the economy, facilitate the net zero transition, and keep bills down for energy consumers, while maintaining a secure supply of energy.' (paragraph 7)

This includes through the development of heat networks that, with heat pumps, are recognised as 'established technologies that will be the primary means for decarbonising heating over the next decade and play a key role in all 2050 scenarios.' (paragraph 66)

Energy Policy 2024 confirms 'heat networks are a crucial aspect of the path towards decarbonising heat and reaching net zero by 2050. In the right circumstances, they can reduce bills, support local regeneration and be a cost-effective way of reducing carbon emissions from heating.' (paragraph 67)

The development of heat networks in the UK is being shaped by a rapidly evolving regulatory landscape aimed at accelerating the decarbonisation of heat. The Figure below illustrates key national policy and regulatory milestones that are expected to influence the sector between now and 2026. This timeline highlights key developments including:

- The Energy Act 2023 and Ofgem's new regulatory role.
- The launch of the Heat Network Technical Assurance Scheme (HNTAS).
- The rollout of consumer protection measures and mandatory registration for heat network operators.
- The commissioning of the National Energy System Operator (NESO) and the Clean Power 2030 initiative.

Figure 1 below provides a summary of the main policy and regulatory developments relating to heat networks.

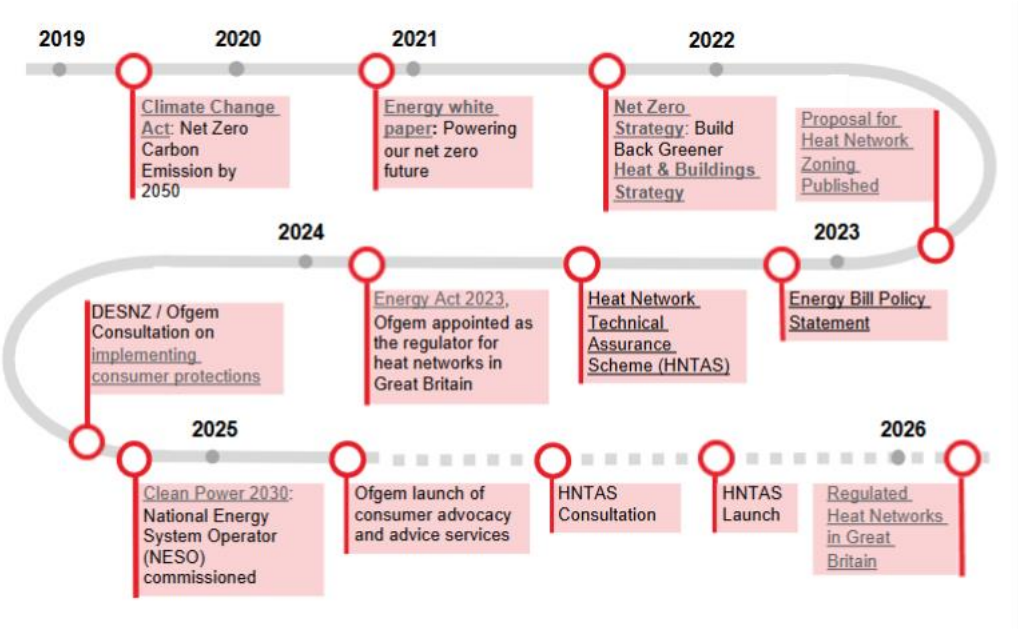

Figure 1: main policy and regulatory developments relating to heat networks

3.3 Heat Network Policy and Regulation

The Energy Act 2023 introduced powers for the UK Government to implement heat network zoning in England, with the first zones expected to be designated from 2026. This is widely seen as the most significant regulatory driver for heat network development.

Key features of the zoning framework include:

- **Designated Zones**: Local areas will be identified where heat networks are the most cost-effective and low-carbon solution for heating.
- **Mandatory Connection**: Certain building types - such as large commercial buildings, public sector sites, and new developments - may be required to connect to a heat network within a designated zone.
- **Zone Coordinators**: Local authorities or appointed bodies will oversee planning and delivery within each zone.
- **Demand Assurance**: Zoning will provide certainty to developers by securing anchor loads and enabling long-term investment planning.
- **Unlocking Waste Heat**: Zoning supports the use of otherwise inaccessible heat sources, such as waste heat from industry or data centres.

The Heat Networking Zoning regulation is expected to come into effect in early 2026.

4. Heat Networks - London context

Key points:

- The **London Plan** identifies Heat Network Priority Areas where the heat density is sufficient for heat networks to provide a competitive solution for supplying heat to buildings and consumers.
- The **Sub-regional Local Area Energy Plan for Central, Inner East and North** (CIEN) London identifies Central London as one of the top five priority areas in the sub-region for heat network development. The relatively small scale of local heat sources 'means transmission of heat into the area is a major subregional consideration which will require a significant amount of cross-borough coordination.'
- The **London Waste Heat Study** focuses on London's largest known recoverable waste heat sources: Energy Recovery Facilities, Sewage Treatment Plants and Data Centres, and illustrates how they could catalyse the development of seven strategic multi-borough heat networks.

4.1 London Environment Strategy 2018

The London Environment Strategy (LES) presents a policy framework for heat networks, identifying them as 'an effective and low carbon means of supplying heat in London, and offer opportunities to transition to zero carbon heat sources faster than individual building approaches.' (page 256). Policy 6.2.1 of the LES is to deliver more decentralised energy to London, moving from the current position of meeting just 2% to 15% by 2030.

4.2 London Plan 2021

The London Plan sets out a series of policies to inform the development of decentralised energy systems and heat networks.

Policy SI 3 Energy Infrastructure:

"London will need to shift from its reliance on using natural gas as its main energy source to a more diverse range of low and zero-carbon sources, including renewable energy and secondary heat sources. Decentralised energy and local secondary heat sources will become an increasingly important element of London's energy supply and will help London become more self-sufficient and resilient in relation to its energy needs." (Paragraph 9.3.2)

"The Mayor has identified **Heat Network Priority Areas**, which can be found on the London Heat Map website. These identify where in London the heat density is sufficient for heat networks to provide a competitive solution for supplying heat to buildings and consumers." (Paragraph 9.3.4)

The Square Mile is covered in its entirety by a Heat Network Priority Area, as displayed in Figure 2 below.

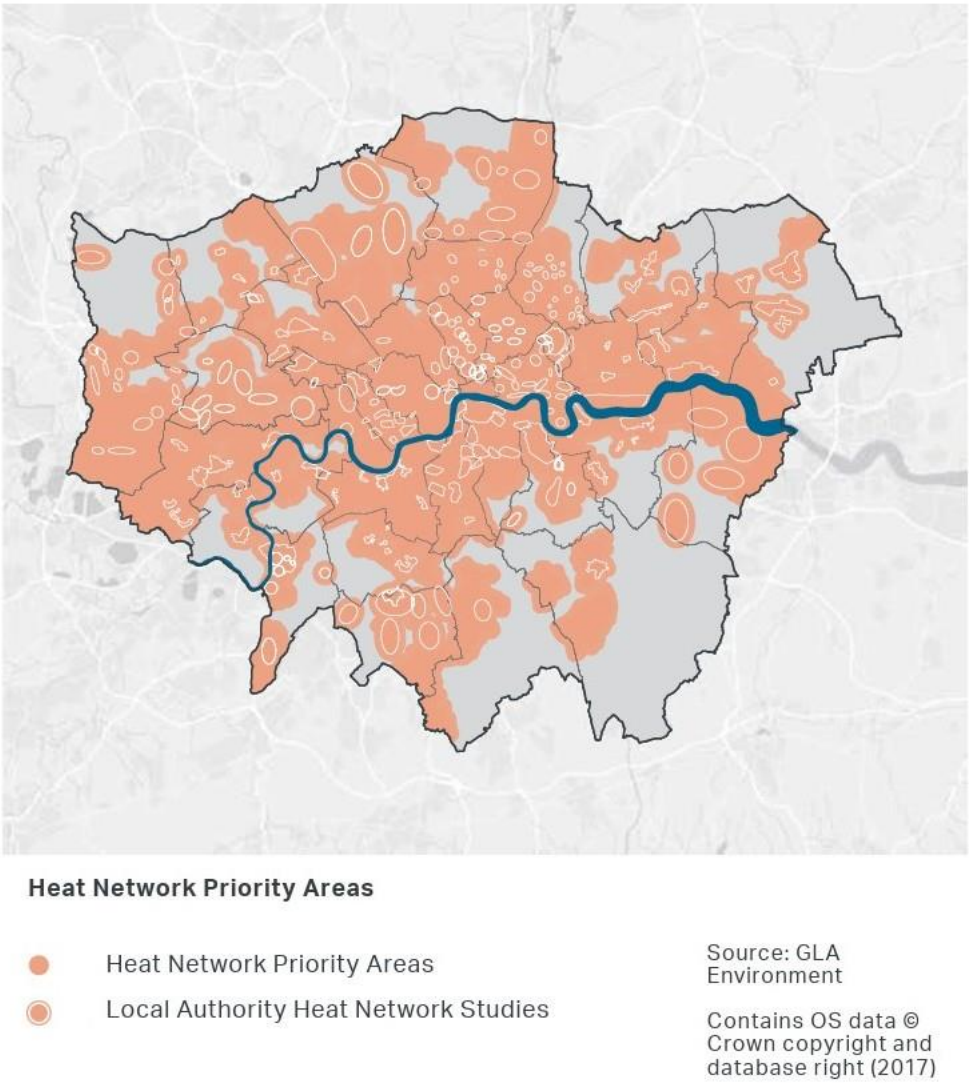

Figure 2: Heat Network Priority Areas (London Plan 2021)

4.3 Sub-regional Local Area Energy Plans

In 2024, the GLA funded Sub-regional Local Area Energy Plans ('LAEP') across London intended to identify the most effective route to decarbonise a local area's energy system. The LAEP is based on a data driven approach considering a range of technologies, including heat networks.

The Central, Inner East and North (CIEN) London Local Area Energy Plan identifies 5 initial cross-borough heat network focus areas, set out in Figure 3 below.

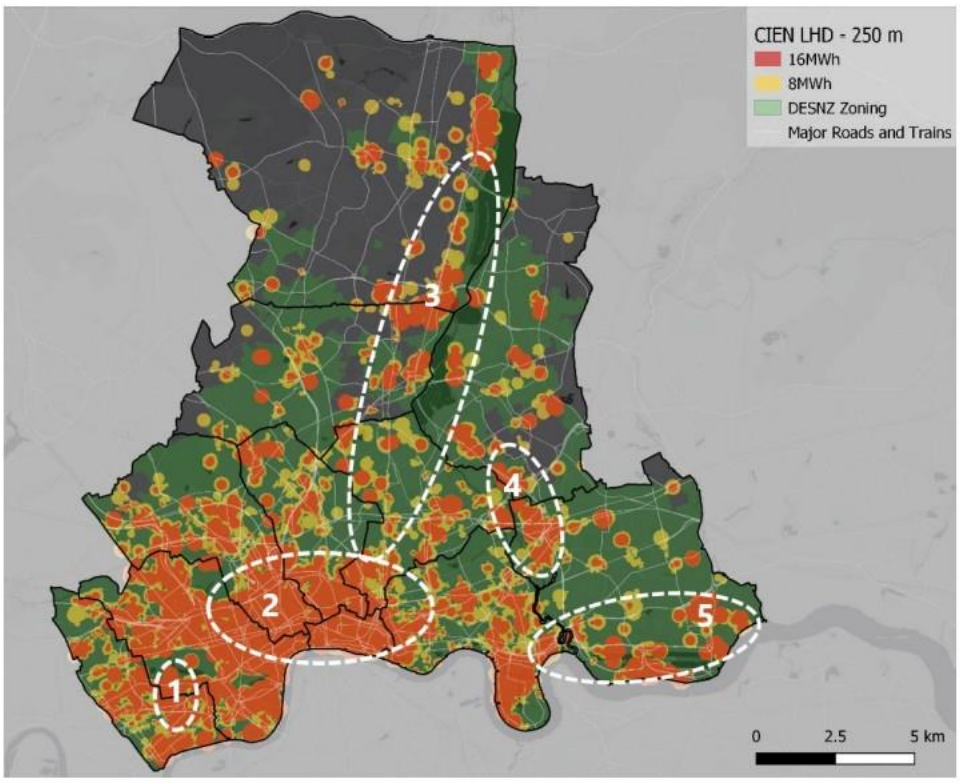

Figure 3: overview of initial cross-authority heat network focus areas (Central, Inner East, North London Sub-regional Local Area Energy Plan , 2024)

Area 2 - "This is the single densest area of heat demand in the subregion and in the UK. It is dominated by non-domestic demands and includes three AZP areas (Westminster, Islington and City of London). The main challenges are the limited space for large energy centres and, although there are heat sources such as sewers, vent shafts, the Thames, data centres and pumping stations, they are not of the same scale as the calculated heat demand. This means transmission of heat into the area is a major subregional consideration which will require a significant amount of cross-borough coordination." (section 4.3.1)

4.4 London Waste Heat Strategic Areas

In December 2024, the GLA published its report 'London Energy Accelerator. Waste Heat Strategic Areas Summary'. The report takes London's largest known recoverable waste heat sources and examines how they could catalyse the development of strategic multi-borough heat networks that can support the decarbonisation of heat supply in London.

The study identified significant waste heat sources including but not exclusive to Energy from Waste (EfW) facilities, Waste Water Treatment Works (WWTW), industrial processes, and data centres. These sources and their relative waste heat potential, along with heat demands, were used to develop seven strategic areas:

- Strategic Area A: North London Waste Authority
- Strategic Area B: Beddington
- Strategic Area C: Royal Dock
- Strategic Area D: Mogden & Twickenham
- Strategic Area E: Hayes & West Drayton

- Strategic Area F: Crossness & South Bermondsey
- Strategic Area G: Old Oak Common and Park Royal Development Corporation

Figure 4 below shows the studied Strategic Area Networks and the strategic goal of capturing and distributing this heat with long range transmission mains.

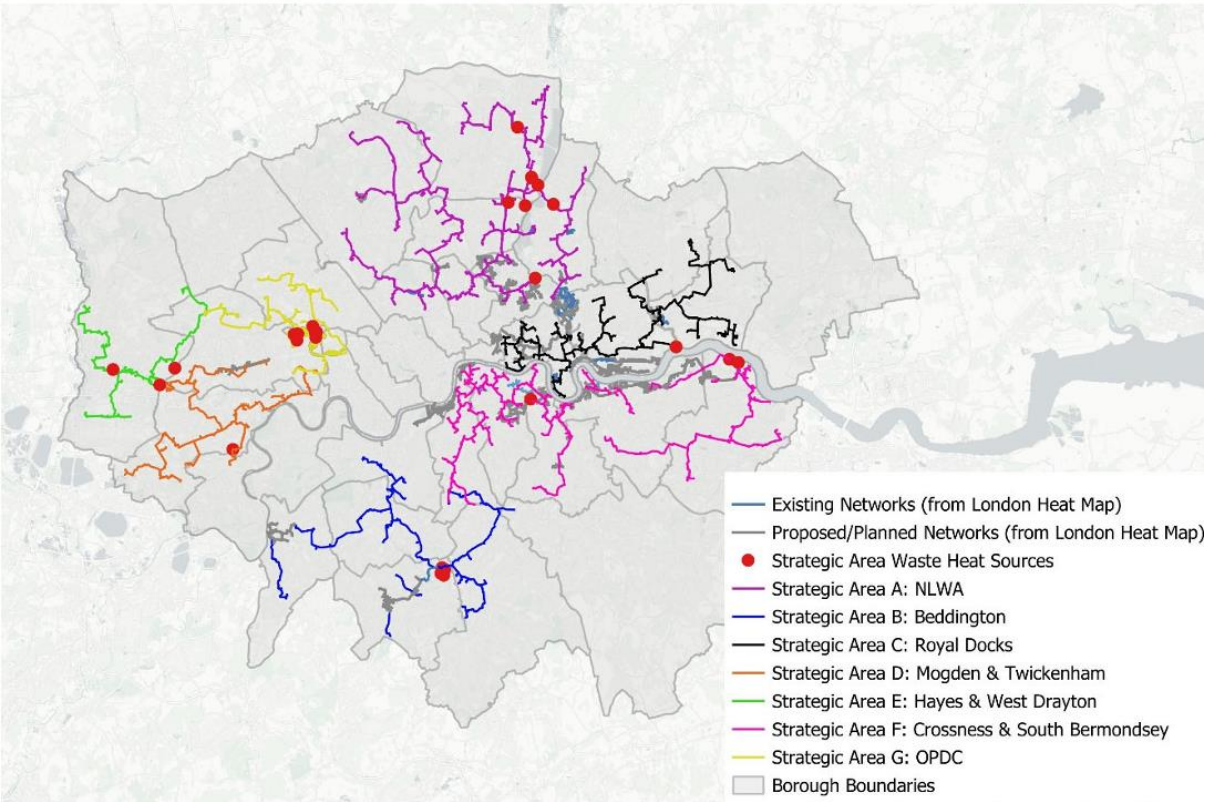

Figure 4: All Strategic Area Potential Networks (Waste Heat Strategic Areas Summary, 2024)

Strategic Area F (Crossness & South Bermondsey Strategic) is of particular relevance to the City of London. The area consists of the following main waste heat sources:

Heat Source	Type	Annual Heat Rejected (GWh/yr)	Peak Heat Output (MW)
Riverside Energy Park (Sites 1+2)	Energy Recovery Facility	2952*	369
SELCHP EFW	Energy Recovery Facility	401	60
Crossness Sewage Treatment Works (STW)	Sewage Treatment Plant	652	78
Total		**4,005**	**507**

(*Annual heat updated June 2025 after verification with Cory Riverside)

Table 1: Crossness & South Bermondsey Waste Heat Sources (Waste Heat Strategic Areas Summary, 2024)

"These sources are:

- Cory Riverside Heat Network, which utilises the Riverside Energy from Waste Facility. Vattenfall are currently partners with Cory to bring this heat to the area. The Vattenfall arrangement looks at local export only (the agreement is geographically specific) and they are also working with a range of other ESCOs in other areas.
- A planned network extending into Greenwich has been identified.

- SELCHP Future Heat Network which will utilise the SELCHP heat from waste facility with ~7km of new piping. This is being brought forward by Southwark and Veolia. A planned network extending into the North Lewisham area is also planned.

These networks are on a local level but in combination with the two other waste heat sources in the area, the three waste sources could stretch to serve a wider area. This strategic area has been modelled to serve a wider region, and in combination with these heat networks have the potential to be a large sub-regional district heat network." (section 11.2)

"To realise this opportunity requires a partnership approach and a 'departure from the current development model which is largely happening at an individual borough level and led, in most cases, by the relevant London Borough. This is often constraining the ambition and size of London's district heat networks and with the introduction of heat network zoning in 2025, there is real opportunity for London Government – the GLA, London Councils and London Boroughs -to coordinate and develop these strategic opportunities." (chapter 13).

4.5 Local Energy Accelerator: River Thames Study

This report complements the 'Waste Heat Strategic Areas' report as part of the strategic work undertaken for the GLA within the Local Energy Accelerator Programme. This report undertakes an initial assessment of the potential energy capacity of the River Thames, from Teddington Lock in the west to Dartford Creek in the east. It also looks at the licensing processes and permissions required for developing open-loop schemes.

The study identified that approximately 444 MW of thermal energy could be extracted from the river using Water Source Heat Pumps (WSHPs) - equating to 600 MW of delivered heat once electrical input is accounted for. This capacity could supply around 5% of London's annual heat demand, making it a strategic resource for urban decarbonisation.

A Strategic Zone was identified with a total of six clusters with a high potential for district networks were identified, set out in Figure 5 below and an indicative annual and peak heat demand has been summarised in Table 2 below.

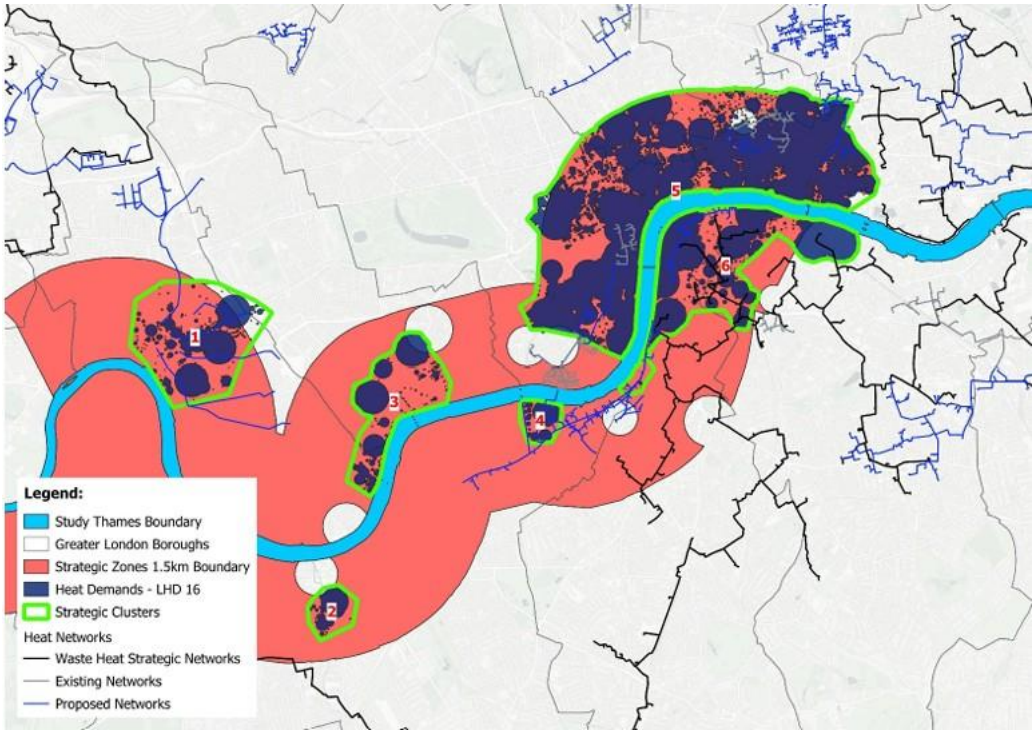

Figure 5: strategic zones that offer a high potential for connection to a district heat network based off their heat demand

Cluster ID	London Boroughs included	Annual heat (MWh)	Peak (undiversified) (MW)
1	Hammersmith & Fulham	116,000	70
2	Wandsworth	18,000	10
3	Hammersmith & Fulham and Kensington & Chelsea	121,000	70
4	Wandsworth	16,000	10
5	Westminster, Camden, Islington, and City of London	1,110,000	610
6	Lambeth and Southwark	221,000	120
Total		**1,598,000**	**870**

Table 2: Annual and peak heat per cluster identified in Strategic Zone

This initial analysis suggests that there is good alignment with heat availability from the Thames and that the 6 identified strategic zones each have good potential for supporting a viable heat network.

5. Heat Networks - City of London context

Key points:

- **City Plan** encourages the development of district heating systems
- **Climate Action Strategy** includes a target of a net zero Square Mile by 2040.
- In preparation for the UK Government's Heat Network Zoning regulations, the City Corporation's participation in the **Advanced Zoning Programme (AZP)** suggests the whole of the Square Mile will be confirmed as part of a Central London heat zone and 1000+ buildings within this zone may be required to connect to a heat network.

The City of London has the highest heat demand density of any local authority in the UK. Despite its small geographic footprint, the Square Mile's dense, vertical development - where nearly 90% of buildings are five storeys or more - results in a highly concentrated thermal load.

While neighbouring boroughs such as Islington, Camden, and the City of Westminster have anchor loads distributed across their areas, the Square Mile demonstrates a notably higher heat demand density. Its heat density exceeds that of neighbouring London boroughs, including those already recognised as high-density urban environments. This makes the Square Mile particularly well-suited for heat networks, as shorter pipe runs can serve more buildings, reducing infrastructure costs and improving overall efficiency.

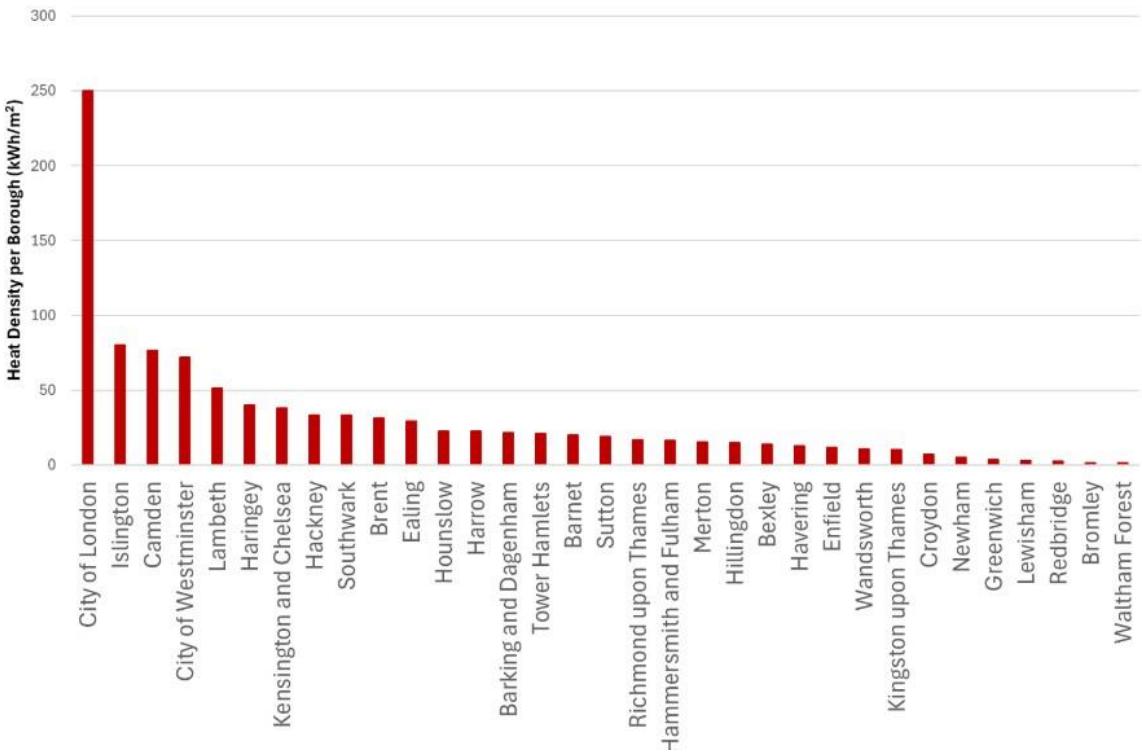

Figure 6: heat density per London borough and City of London (source: London Heat Map)

5.1 City Plan 2015

The current City Plan 2015 sets out policies which are relevant to heat network development in the City:

- **Policy DM 2.1 Infrastructure provision and connection:** Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for: heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable.
- **Core Strategic Policy CS15: Sustainable Development and Climate Change:** Requiring development to minimise carbon emissions and contribute to a City wide reduction in emissions: (ii) enabling the use of decentralised energy, including the safeguarded Citigen Combined Cooling Heating and Power (CCHP) network, CCHP ready designs in areas where CCHP networks are not yet available, and localised renewable energy technologies.

5.2 City Plan 2040

The new City Plan 2040 sets out the long-term spatial and development vision for the Square Mile, guiding planning decisions up to 2040. It prioritises sustainable growth, infrastructure resilience, and the transformation of the Square Mile into a vibrant cultural and economic hub.

Key strategic policies include:

- **Policy DE1 Sustainable Design**: Proposals for major development will be required to Incorporate collective infrastructure such as heating and cooling networks, smart grids and collective renewable energy storage (for example batteries) wherever possible, to contribute to a net zero carbon, zero-waste, climate resilient City; and Prioritise the objectives of the City of London Local Area Energy Plan (LAEP) to create or link into local energy networks and waste heat sources, and include opportunities for heat and cooling transfer to/from nearby developments
- **Policy IN1: Infrastructure provision and connection**: Utility infrastructure and connections must be designed into and integrated with the development. The following infrastructure requirements should be planned for…Heating and cooling demand and viability of provision. Designs should incorporate connections to existing decentralised energy networks where feasible.

5.3 Sustainability Supplementary Planning Document (SPD)

The Sustainability Supplementary Planning Document (SPD) sets out practical guidance for developments in relation to heat network development:

“Applicants for new development in the City are strongly advised to consider the implications of UK government heat network regulations. It is likely that all future new developments and major refurbishments will be required to connect to a nearby heat network within a defined timeframe.

To prepare in advance, the City Corporation is encouraging new developments to assess the cost and carbon advantages of heat networks, and to mitigate any future risks of mandated connection (with respect to any future necessary re-design or change of heating/cooling strategy). The City Corporation strongly encourages applicants to take a pro-active approach by:

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

5.4 Climate Action Strategy

The Climate Action Strategy (CAS) sets the foundation for the City's commitment to achieving net zero carbon emissions by 2040. It outlines a comprehensive approach across several key areas:

- Net Zero Targets:
  - Achieve net zero emissions from the Corporation's own operations by 2027 and across the full value chain by 2040.
  - Support the Square Mile in reaching net zero by 2040.
- Climate Resilience:
  - Integrate resilience into buildings, infrastructure, and public spaces to prepare for climate-related risks
- Investment in Sustainability:
  - £68 million allocated over six years to fund climate action initiatives. This investment is fully allocated through to 2027 and supports a detailed action plan with annual targets to ensure measurable progress.
  - A programme of 13 fully funded projects has been developed, structured around four key themes: Buildings, Supply Chain, Financial Investments, Open Spaces.

5.5 Local Area Energy Plan (LAEP)

Initiated under the Climate Action Strategy and adopted in 2023, the Local Area Energy Plan is a spatial, data-driven roadmap for decarbonising the energy system in the Square Mile.

The LAEP sets out seven targeted intervention areas, each designed to accelerate progress toward net zero. These include maximising building energy efficiency, expanding rooftop solar PV, decarbonising transport and heat, reinforcing the electricity distribution network, harnessing waste heat, and deploying energy system flexibility. Together, these interventions form a coherent framework that enables place-based, data-driven decision-making.

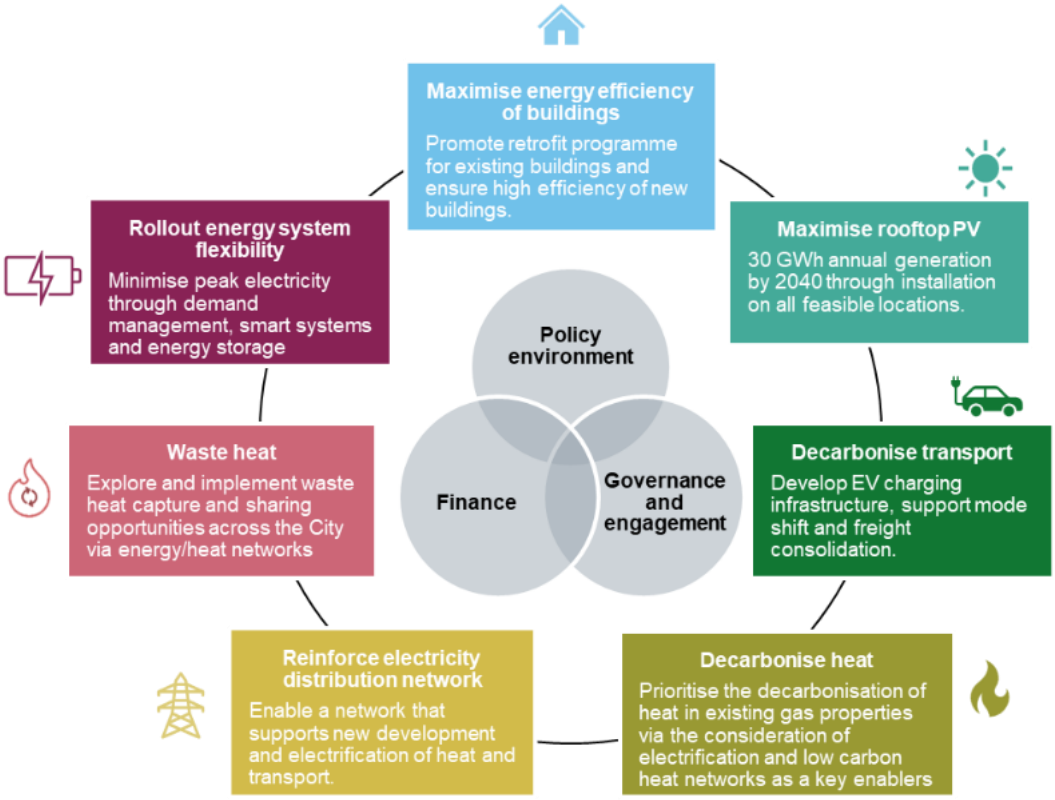

Figure 7: summary of key action areas in City of London Local Area Energy Plan, 2023

In 2023, Policy and Resources Committee agreed that the "recommended pathway to a net-zero energy system by 2040 is a blend of deep retrofit interventions applied to the City's building stock and heat networks, using both centralised and decentralised heat pumps" as part of the Local Area Energy Plan.

5.6 Heat Network development - Advanced Zoning Programme (AZP)

The Advanced Zoning Programme (AZP) is a pioneering initiative aimed at accelerating the development and implementation of heat networks as part of the government's Heat Network Zoning pilot program for 19 cities. Through its participation in AZP, the City Corporation has worked in collaboration with government consultants to explore the implication of the forthcoming Heat Network Zoning Regulations for the Square Mile and how they may support delivery of large-scale heat networks.

AZP has identified the whole of the City of London (Square Mile) will likely be designated as part of a wider central London Heat Zone where the new regulations would apply.

Figure 8: refined heat network zone (shaded area) created in the National Zoning Model.

High-level modelling through the AZP has identified circa.1,200 buildings which could be required to connect to a heat network under the regulations, highlighted in green in Figure 9 below. These buildings collectively have a heat demand of c.1,000 GWh and the development of heat network infrastructure to supply them would cost in the region of £1.26 billion CAPEX.

Figure 9: all buildings within the Square Mile which have been identified as Required to Connect under the Heat Network Zoning Regulations (AZP Stage 1 Technical Report – City of London)

6. Strategic heat supply to the City – the role of the Thames Policy Area

Key points:

- Analysis of heat supply options for the City underlines the importance of the river in the phased development of heat networks across the Square Mile, as a source of heat itself, transporter of heat and in support of a strategic heat main corridor.
- The river/riverside offers both short-term development opportunities, via thermal barges, as well as longer-term access via strategic heat mains, particularly from Cory's Riverside Energy from Waste facility in Bexley.
- An appraisal of the short-term thermal barges option has explored various mooring options along the riverside. The preferred option would be to utilise the Swan Lane pier, east of Walbrook Wharf.
- A series of other mooring locations have also been identified and should be recognised
- In August 2025, Cory received direction by the Secretary of State under section 35(1) of the Planning Act 2008 for its Heat Main 1 project to be brought under the Nationally Strategic Infrastructure Projects and Development Control Order Regime.

6.1 Analysis of strategic heat supply options for the City

The main constraint to heat network development is the current availability of low carbon heat to meet the significant demand within the Square Mile.

The London Waste Heat Study (2024) identified the large sources of waste heat available within the London area. These have been provisionally assessed for their viability to supply the Square Mile, based on their available heat and understanding of current plans for their utilisation.

Figure 10 below presents an extract from the study with highlights added on three priority sources for the Square Mile:

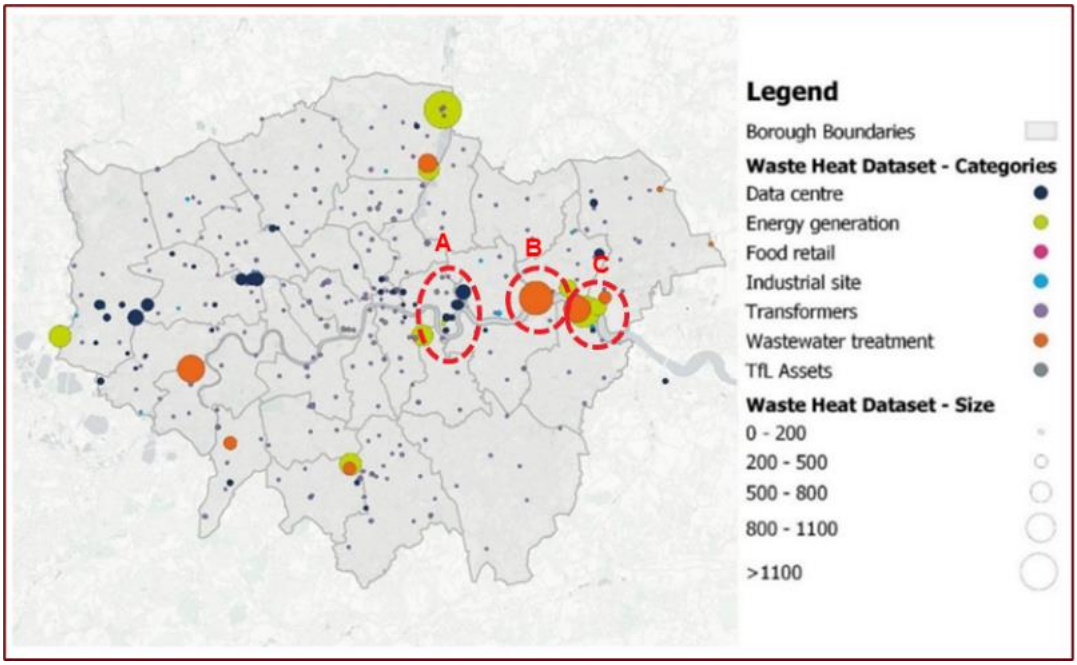

Figure 10: strategic heat sources across Greater London (London Waste Heat Study, 2024) with highlights added on three priority sources for the Square Mile.

The three priority sources are:

A. Datacentres located in Tower Hamlets (combined waste heat rejection to be confirmed).
B. Beckton Sewage Treatment Works (1029 GWh/yr heat rejection), an operational Thames Water site and is the largest sewage treatment works in Europe
C. Riverside Energy Park - Energy from Waste facility (917 GWh/yr heat, increasing to c.3,000 GWh/yr heat following planned enlargement). Owned and operated by Cory.

Looking more specifically at the Square Mile, Table 3 below summarises the identified local low-carbon heat sources, including Cory's proposed heat supply opportunities from its Riverside Energy Park.

Local Low Carbon Heat Source	Square Mile Annual Heat Potential, GWh	Neighbouring Area* Annual Heat Potential, GWh	Source
Data Centre	-	95.2	AZP1
Office Cooling **	40 – 50	-	AZP2
Electrical Transformers	-	123	AZP1
TfL Vent Shaft	4	58.2	AZP1 & AZP2
Sewers **	10 - 210	-	AZP1 & AZP2
London Aquifer	4	-	AZP2
River Thames ***	100 – 350	-	GLA River Thames Study
Cory EfW Heat Transfer (Conceptual Estimates)	40 – 240 (via thermal barge) 917 – 3,000 (via SHMs)	-	Cory

* The cross-boundary heat opportunity identified in the AZP Phase 1 Technical Report is limited to the Square Mile and Islington areas.
** The annual heat potential has undergone further evaluation.
*** Findings from the Greater London Authority's River Thames Study have been incorporated to inform the river source potential.

Table 3: summary of identified local low-carbon heat source for Square Mile and neighbouring areas.

In collaboration with the Advanced Zoning Programme, these potential energy sources located within or around the Square Mile have been assessed using a RAG (Red-Amber-Green) rating system to evaluate their suitability for integration into a future heat network. The assessment considered the potential scale of energy which could be provided; technical feasibility; CAPEX and OPEX. These are set out in Table 4 below.

Source	Scale	CAPEX	OPEX	Technical	Preferred Option Indicator
Data Centres					✓✓▪
Office Cooling					✓✓▪
Electrical Transformers					-
TfL Vent Shaft					-
Sewers					✓▪
London Aquifer					-
River Thames					✓✓✓▪
Large-scale ASHP					✓✓▪
Cory - Thermal Barge					✓✓▪
Cory - Strategic Heat Mains					✓✓▪

Table 4: RAG assessment of potential energy sources to evaluate their suitability for future integration into a future network, including preferred options

The Preferred Option Indicator column reflects the overall outcome of the RAG assessment across all evaluation criteria. It highlights which energy sources are most suitable for further consideration and should be prioritised for development in zonal-scale heat networks across the Square Mile.

The five most preferred options – data centres; office cooling; river source; thermal barge; and strategic heat main - are presented in spatial form in Figure 11 below.

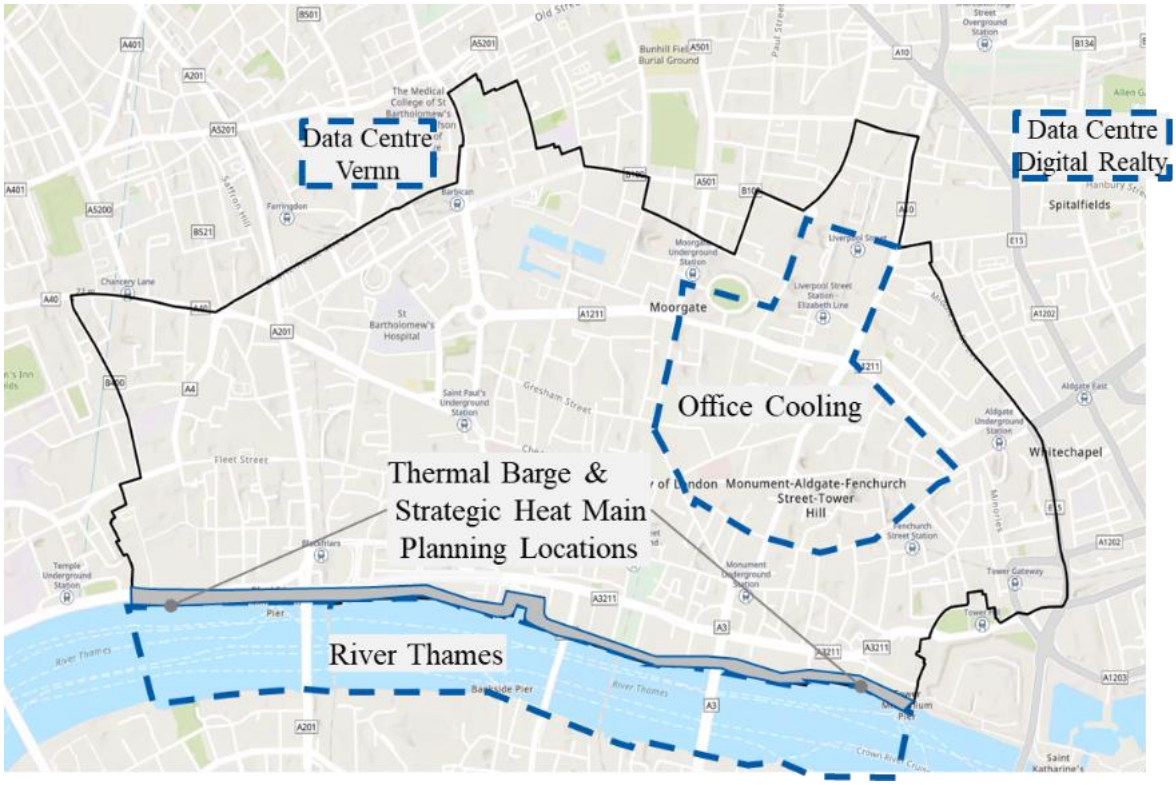

Figure 11: spatial allocation of the five most preferred heat source options.

It is clear from the analysis of potential heat sources that the river and riverside have the potential to provide the most substantial amount of heat for the development of heat networks in the Square Mile and Central London. As well as being a direct source of heat via Water Source Heat Pumps (WSHP), accessing heat from Cory's Riverside Energy from Waste facility offers the potential scale of heat supply to meet the City's decarbonisation objectives.

Cory has been responsible for managing the City of London's waste since 1996. Cory processes residual waste from the City of London at the waste transfer station at Walbrook Wharf. From there, the waste is transported by barge down the Thames to Cory's Riverside Energy Recovery Facility (ERF) in Belvedere, Bexley.

Cory operates the Riverside 1 Energy-from-Waste (EfW) facility and is currently constructing Riverside 2, which will double its processing capacity. Together, these facilities are expected to generate up to 3 TWh of waste heat annually - sufficient to meet the entire heating demand of the Square Mile (approximately 1,200 GWh) and half of Westminster (around 4,000 GWh per year). Cory are also developing a Carbon Capture and Storage project at the Riverside site which will involve the installation of technology to capture 90% of the emissions from Cory's existing and new facilities.

The work undertaken AZP programme recommends a phased approach to the delivery of heat networks across the Square Mile which combines both short-term and long-term perspectives:

- Short-term development: prioritising access to local/neighbouring heat source – the River Thames, datacentres, electrical transformers and sewer heat.
- Long-term development: access to larger scale waste heat from outer London sources (such as Energy from Waste facilities) via new large-scale cross-London strategic heat pipe mains.

The following sections

6.2 Short-term heat supply – River Source and Thames Mobile Heat

River source – Water Source Heat Pumps (WSHPs)

The River Thames presents a significant and underutilised opportunity for low-carbon heat supply within the Square Mile. Heat can be extracted using Water Source Heat Pumps (RSHPs), which operate by abstracting water from the river, transferring its thermal energy via a heat exchanger, and discharging the slightly cooled water downstream.

As part of the Advanced Zoning Programme, a single site with a 16 MWth RSHP was assessed as feasible to supply heat to Square Mile. With substantial thermal storage, this installation could meet approximately 10% of the Square Mile's total heating demand.

Thames Mobile Heat

The Square Mile has a unique opportunity to harness low-carbon heat transported via the River Thames using thermal barges. This innovative approach enables the transfer of waste heat from energy-intensive areas - such as Cory's Riverside Energy from Waste (EfW) plant in Belvedere - to high-demand zones like the City of London, supporting its decarbonisation goals.

The City has commenced engagement with Cory on opportunities to deliver waste heat via river barges utilising thermal storage which could supply the Square Mile in the short-term while considering a longer-term piping option.

Thermal barges are floating platforms equipped with thermal storage systems that can transport waste heat. Waste heat is collected from sources like energy-from-waste plants or industrial processes, or other heat-generating facilities. The heat is transferred to a thermal storage medium, such as water or phase change materials, using heat exchangers. The captured heat is stored in insulated thermal storage tanks on the barge. The barge is transported via waterways to the discharge location and upon arrival, the stored heat it transferred from the barge to the heat network via heat exchangers. This leverages the mobility of barges to deliver heat efficiently and sustainability, making use of the existing water ways to transport thermal energy from source to areas where it is needed.

Mobile Heat enables the direct delivery of waste heat from Riverside Campus to heat networks along the River Thames, by moving barges filled with heated water to discharge locations, each holding 120MWh of thermal energy. Each barge carries up to 2,000 m^3 of water heated to 125°C using a steam bleed from the EfW plant - a standard method for heat recovery in UK and international networks. Travelling with the tide, a barge can deliver up to 120 MWh of usable thermal energy per discharge, with a maximum of 240 MWh per day.

With approximately 2 km of accessible river frontage, the City is well-positioned to receive heat deliveries by barge. However, realising the full potential of this system will require careful evaluation across spatial, technical, and environmental dimensions:

Spatial Considerations

- Berthing & Jetty Access: Discharge requires jetty infrastructure to connect pipes to onboard heat exchangers. Site selection must consider tidal access, vessel clearance, and proximity to heat network infrastructure.
- Containerised Design: Batteries are housed in standardised shipping containers, simplifying logistics and enabling flexible deployment across multiple sites.

- Navigation & Safety: Barges must comply with Port of London Authority regulations, including safe navigation, mooring permissions, and visibility protocols.

Technical Considerations:

- System Integration: Thermal barges are compatible with 4th and 5th Generation heat networks.
- Grid Independence: Unlike electric heat pumps, thermal barges do not require grid connections, reducing infrastructure costs and avoiding grid congestion.

Environmental Considerations:

- Carbon Intensity: Heat supplied via thermal barges is modelled at 12 gCO_2/kWh, significantly lower than gas-based systems (~216 gCO_2/kWh)[10].
- Water Quality & Temperature: Discharge operations must monitor thermal impacts on local water bodies, especially in sensitive ecological zones.
- Tidal Scheduling: Operations must align with tidal cycles to ensure consistent berthing and discharge performance.
- Ecological Safeguards: Intake and discharge systems must be designed to avoid harm to aquatic life, with consideration for flow velocity and temperature gradients.

An initial assessment has been undertaken of suitable mooring and discharge sites. The following sets out the locations considered
:

- HMS President – vacant jetty site
- Area west of Blackfriars jetty
- East of Blackfriars jetty
- West of Walbrook Wharf
- Walbrook Wharf
- Swan Lane pier / East of Walbrook Wharf
- LB PLA Upper Moorings

Figure 12 and 13 below sets out the location of the sites assessed in both aerial view and map formats

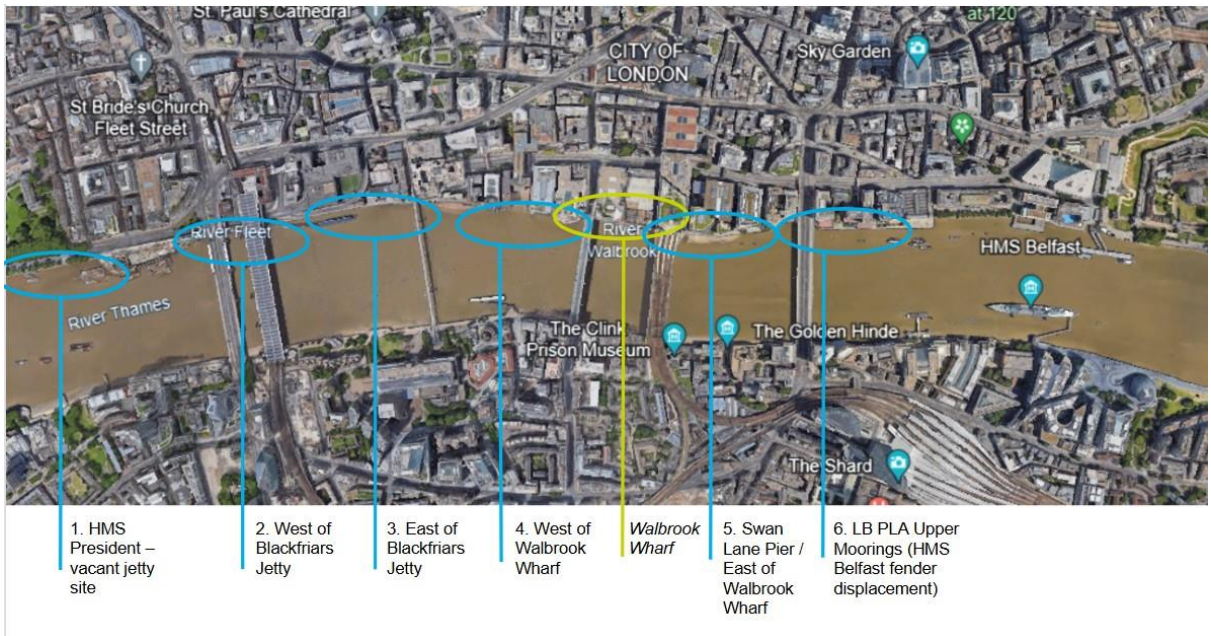

Figure 12: aerial view of potential mooring locations for thermal barges

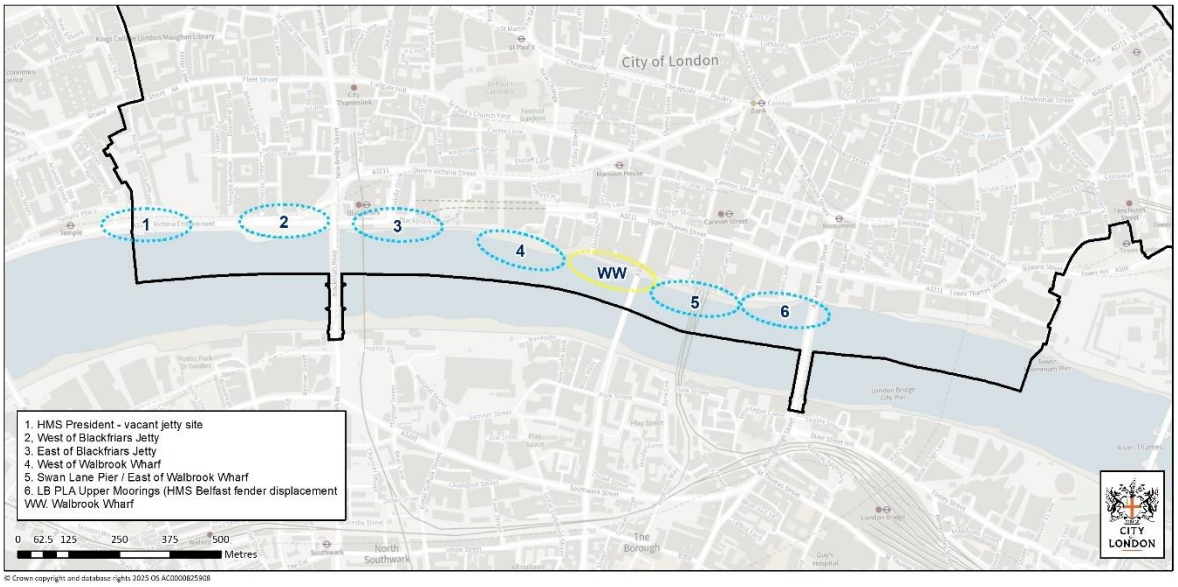

Figure 13: map view of potential mooring locations for thermal barges

Swan Lane foreshore, east of Walbrook Wharf has been identified as the strongly preferred site, in part due to the relatively good condition of the existing campsheds but also due to its proximity to Walbrook Wharf as a potential energy centre for distributing heat across the Square Mile. The viability of heat supply via thermal barges would be put at risk if the Swan Lane foreshore location would be lost to other uses.

The following aerial images set out the notional location of the static barges at Swan Lane foreshore, highlighted as a blue box.

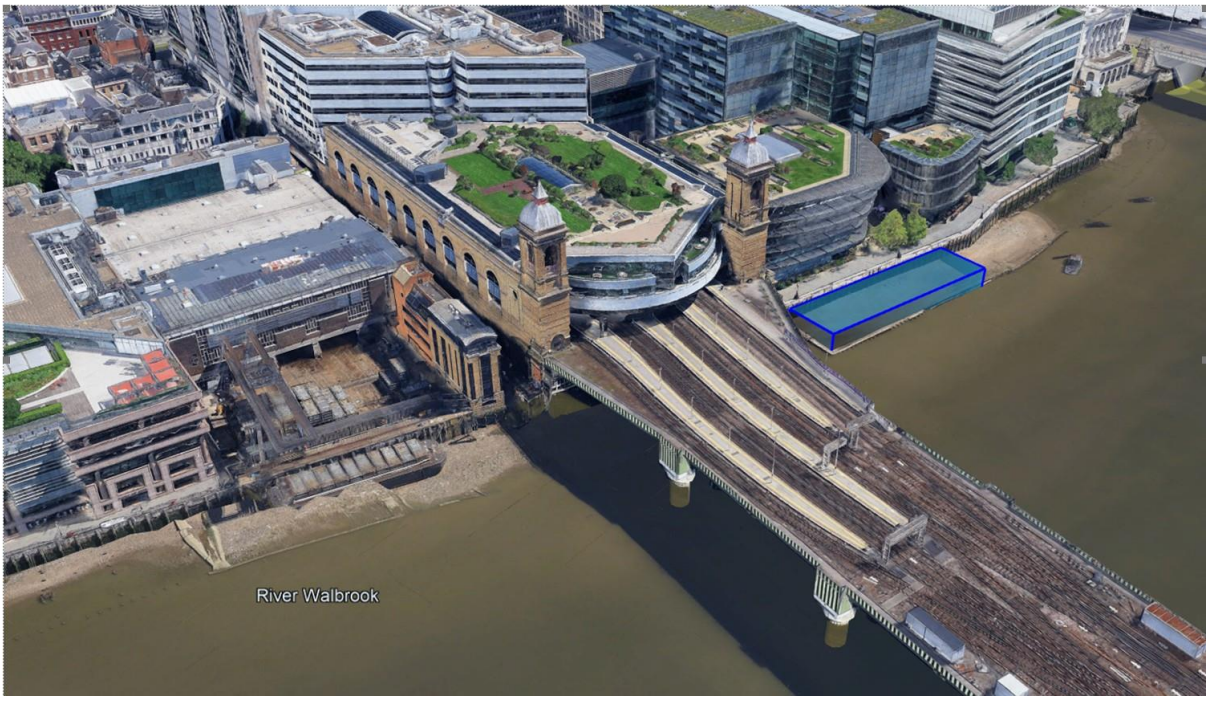

Figure 14: location of static barge (highlighted as blue box) on the Swan Lane foreshore, as seen from west of Cannon Street Railway Bridge

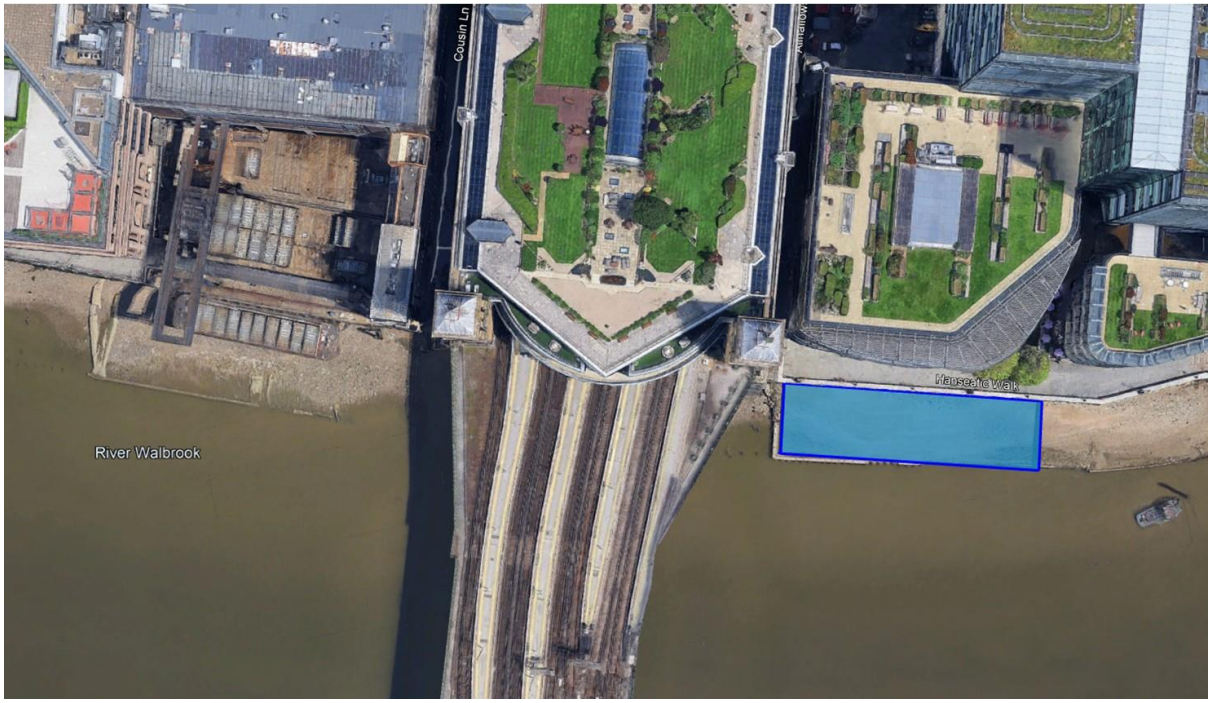

Figure 15: location of static barge (highlighted as blue box) on the Swan Lane foreshore, as seen from above Cannon Street Railway Bridge

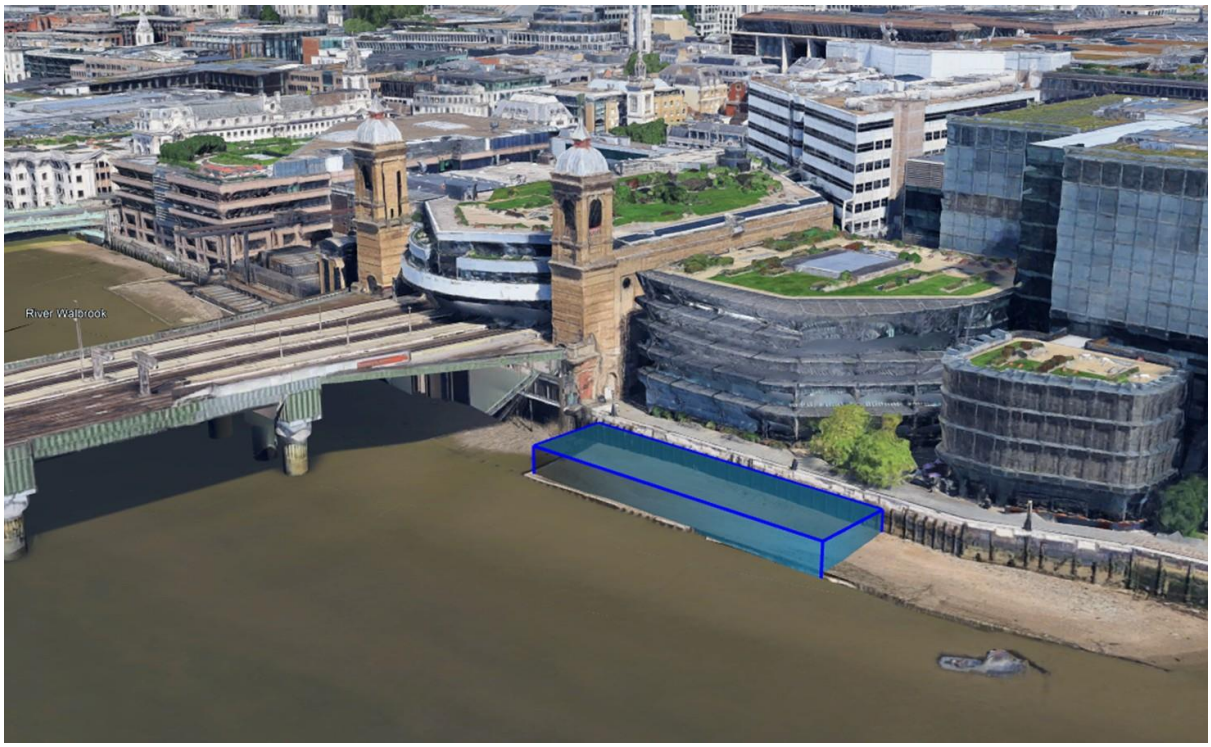

Figure 16: location of static barge (highlighted as blue box) on the Swan Lane foreshore, as seen from the east of Cannon Street Railway Bridge

6.3 Longer term heat supply - Strategic Heat Main

In addition to the development of mobile heat on the river, Cory's longer-term vision includes the development of a Strategic Heat Main (SHM) crossing the River Thames to deliver low-carbon heat directly into Central London. A high-level strategic review of routing scenarios - led by the City Surveyor's Department - has explored the feasibility of delivering this infrastructure via pipe jack tunnelling, referred to as Small Bore Tunnels (SBTs).

At the end of August 2025, the Secretary of State for Energy Security and Net Zero provided direction under Section 35 of the Planning Act 2008 for the Cory Heat Main Project 1 to be classified as a National Significant Infrastructure Project (NSIP) and has been consented through a Development Consent Order (DCO). The Secretary of State is of the opinion that the Direction should be issued because:

"The Applicant's existing energy from waste facilities at the Riverside Campus play an important and strategic role in treating residual waste and will have the capacity to supply significant amounts of hot water to central London. The Proposed Development is intended to create a transmission route to enable connection for heat distribution networks and operators.

The Proposed Development will play an important role in enabling an energy system that meets the UK's commitment to reduce carbon emissions and the Government's objectives to create a secure, reliable and affordable energy supply for consumers."

The project has the support a number of stakeholders as seen in the letters of support enclosed with the application, including from the GLA, heat network developers, several London boroughs and the City of London Corporation.

An indicative route for the project is shown in Figure 17 below. This indicative route covers a distance of some 30km and runs through six London boroughs (Bexley, Greenwich, Lambeth, Lewisham, Southwark, City of Westminster) and the City of London that would readily be served by the project.

The indicative Heat Main 1 route set out in Cory's application is for both a trunk (the green line) and branches (blue arrows) that could serve district heat networks and/or other off-takers. It is noted that this plan does not constitute a red line boundary for the Project at this stage, and the 'Request for Direction' from the Secretary of State did not set out a specific route.

Figure 17: indicative route of strategic heat main for both trunk (green line) and branches (blue line)

As with the use of thermal barges, the strategic heat main would need to connect to foreshore infrastructure. It will require a reception shaft location as well as multiple further shafts as the heat

would be piped onwards through the Square Mile and Central London. Potential site options are currently being considered.

6.4 Local Policy considerations for use of the Thames and the Riverside

The current City Plan 2015 has a series of policies which relate to the Thames and the Riverside.

Core Strategic Policy CS9: Thames and the Riverside (page 85)

The policy seeks "to ensure that the City capitalises on its unique riverside location, sustaining the river's functional uses in transport, navigation and recreation, whilst minimising risks to the City's communities from flooding."

"It seeks to do this by "promoting the functional uses of the River Thames and its environs for transport, navigation and recreation, particularly through:

- encouraging the use of the River Thames for the transport of construction and deconstruction materials and waste;
- retaining Blackfriars Pier, and access to Tower Pier, and encouraging the reinstatement of Swan Lane Pier and the use of these facilities for river transport. Applications to remove these facilities will be refused unless suitable replacement facilities of an equivalent or higher standard are provided;
- refusing development on or over the River, except for structures which specifically require a waterside location for river-related uses;
- resisting the permanent mooring of vessels; if moored vessels are exceptionally permitted they must be of national importance, have a special connection with the City and the River Thames, be used for a river related purpose and not have a detrimental impact on navigation, river regime or environment."

Policy DM 16.8 River transport

"River piers, steps and stairs to the foreshore, the Walbrook Wharf safeguarded site, and other river-based transport infrastructure will be safeguarded and improvements will be supported.

Development adjacent to or over the River Thames must be supported by a Transport Assessment and a Construction Logistics Plan addressing the potential for the use of the river for the movement of construction materials and waste."

A Transport Assessment and Construction Logistics Plan would be required for the use of thermal barges to transport waste heat.

Core Strategic Policy CS17: Waste

"Enabling the sustainable transport of materials including waste and recyclables by river: safeguarding Walbrook Wharf as a wharf suitable for river transport of materials including waste; exploring the potential for further use of waterways for the transport of waste and construction materials subject, where appropriate, to the potential impact on Natura 2000 sites."

Key City Places: Thames and the Riverside (page 21)

"There is significant potential for increased transport use of the River, making greater use of existing piers for passenger services, the movement of construction and deconstruction materials, and

continuing to make full use of Walbrook Wharf for the movement of materials including waste." (page 21)

Thermal barges would provide an opportunity for increased use of the river, making use of existing piers for the movement of waste heat.

City Plan 2040 has an objective of "Promoting greater use of the River Thames for passenger and freight transport, increased enjoyment of the City's riverside and improvements to flood defences."

Policy VT2: Freight and Servicing (page 158)

"Developers should minimise congestion and emissions caused by servicing and deliveries through ensuring, last mile deliveries are made by foot, cycle or zero emission vehicle, and should seek opportunities to support deliveries to the City by river and rail freight. Developers will be encouraged to identify opportunities for last mile logistic hubs where appropriate."

Policy VT4: River Transport (162)

1. The City Corporation will support improvements to river piers, steps and stairs to the foreshore.

2. Improvements to piers and other river-based transport infrastructure to enable an increase in passenger and freight transport by river will be supported, alongside opportunities for new river-based transport.

3. The City Corporation will seek the reinstatement of Swan Lane Pier for river transport uses. Development that prejudices this reinstatement will not be permitted.

4. The permanent mooring of vessels along the riverfront will be resisted in order to maintain views of the river and heritage assets, allow public enjoyment of the riverfront and minimise potential impacts on archaeology, ecology, and amenity.

5. The City Corporation will continue to safeguard Walbrook Wharf as a river wharf and waste transfer site, support improvements to Walbrook Wharf that would improve its operation, and seek opportunities for the use of the wharf for transfer of goods, where this would not undermine its safeguarded role.

6. All development within the City must consider use of the River Thames for the movement of construction materials and waste. Development adjacent to, or over, the river must be supported by a Transport Assessment and a Construction Logistics Plan addressing the potential of using the river for the movement of construction materials and waste and servicing of the development.

Strategic Policy S17: Thames Policy Area

3. Promoting the use of the River Thames and its environs for transport, navigation and recreation, particularly through:

a. safeguarding Walbrook Wharf for waste and river related freight traffic, including freight consolidation;

b. encouraging the use of the River Thames for the transport of construction and deconstruction materials and waste;

c. retaining Blackfriars Pier, and access to Tower Pier, and encouraging the reinstatement of Swan Lane Pier and the use of these facilities for river transport. Applications to remove these facilities will be refused unless suitable replacement facilities of an equivalent or higher standard are provided;

d. refusing development on or over the River Thames, except for structures that specifically require a waterside location for river related uses;

e. resisting the permanent mooring of vessels;

f. and maintaining and enhancing access points to the River Thames foreshore, from both land and water, for public or private use as appropriate, subject to health and safety and environmental safeguards.

Summary

The overarching objective of the Local Plan 2015, City Plan 2040 and London Plan 2021 is to protect and enhance the value of the Thames and to support river freight. Thermal barges would meet this overarching objective as well as providing a substantial amount of low cost, low carbon heat to enable the development of heat networks at scale by

The City Plan 2040 seeks to resist permanent mooring of vessels in order to maintain views of the river and heritage assets, allow public enjoyment of the riverfront and minimise potential impacts on archaeology, ecology, and amenity. Any scheme for permanent mooring – including thermal barges – would need to overcome these issues. When considering relevant applications, decision-makers would need to consider the merits of delivering low cost, low carbon heat via thermal barges to enable heat networks in the City and the increased use of the river Thames for freight in the overall planning balance.

6.5 Roles and responsibilities of relevant agencies

In addition to the City Corporation, the following bodies have specific regulatory roles and responsibilities relating to the Thames and the Riverside:

Environment Agency

The Environment Agency [EA] is an executive non-departmental public body, sponsored by the Department for Environment, Food and Rural Affairs (DEFRA). The EA are the regulatory body responsible for water quality and resources, fisheries, ecology, and flood risk.

The Port of London Authority (PLA)

The PLA is the statutory harbour authority for the Port of London, with responsibility for maintaining safe access and managing the safety of vessels, the public and all users of the tidal River Thames. They are also responsible for consenting all works and dredging. The PLA own the majority of the riverbed of the tidal Thames. The PLA is not a statutory consultee on planning applications.

The Marine Management Organisation (MMO)

The MMO is an executive non-departmental public body of DEFRA. The MMO licence and regulate marine activities in the seas around England and Wales. In relation to the potential for open loop heat pumps in the River Thames, the MMO are responsible for planning and licencing for marine construction. The MMO is a statutory consultee on planning applications.

These agencies would need to be closely involved in the strategic heat supply schemes as they develop. The following table sets out the main regulatory requirements of each body (GLA River Thames, page 16)

		Regulatory Body			
		Local Authority (Local Planning Authority)	**The Environmental Agency**	**The Port of London Authority**	**Marine Management Organisation**
Project Stage	**Consultation**	Pre-application consultation recommended.	Pre-application consultation (charged advice service) recommended.	Consultation not required but recommended on inlet/outlet location and design.	Pre-application consultation not required (the MMO are statutory consultees for the Local Authority and EA) but beneficial to ensure EIA includes relevant additional studies (it is a charged service).
	Planning Requirements	Environmental Impact Assessment – (screening / scoping / assessment)			
	*Associated documents or modelling requirements**	Requirements include: • Land Contamination Desk Study • Noise Assessment • Air Quality Assessment • Transport Assessment • Visual and Heritage Impact Assessment • Archaeological Desk Study *(Plus those adjacent)*	Requirements include: • Flood Risk Assessment. • Water Framework Directive Assessment (screening, scoping, assessment). • Biodiversity Assessment - including intertidal / benthic ecology. • River wall condition survey. • Flood defence consents would be required for certain infrastructure within proximity of the flood defences (usually the river wall/Embankment).	Requirements include: • Navigational risk assessment. • Hydrodynamic assessment. • Riparian life-saving equipment proposals. • Water Framework Directive Assessment.	Requirements include: • Scour modelling of riverbed. • Biodiversity Assessment - including intertidal / benthic ecology, underwater noise.
	Construction Permits		Environmental Permit - Flood Risk	River works licence required for construction works including temporary works and dredging license if any bed disturbance.	Marine Licence for construction works including temporary works.
	Operation / ongoing permits or licences		Abstraction Licence Discharge consent	River works licence and ongoing charge.	*None, unless requested as part of EIA.*
Decommissioning			Depending on the detail of the works, possible EIA and associated documents required.	River works licence and associated documents required for construction works to remove in-river structures; continue in perpetuity if structures remain under the bed.	Marine Licence for construction works to remove in-river structures.

*In the event that an EIA is found not to be required through the screening process, the supplementary documents suggested may still be required by the regulatory authorities, just as standalone documents rather than as appendices to the EIA

7. Conclusions

Securing a supply of waste heat is a critical aspect of enabling the City of London to decarbonise and achieve its climate goals over the coming year. The work undertaken to date, through the government's Advanced Zoning Programme and other actions, has identified key heat supply sources to enable the delivery of heat networks in the Square Mile.

The Thames and the riverside play a crucial role within the plans. The river has a role to play as both a source of heat as well as a transporter of heat via thermal barges. The river and riverside area also act as a corridor for the delivery of strategic heat supply infrastructure into central London. The amount of heat available from these sources is substantial and is at a scale which aligns with the needs of the Square Mile.

The following sets out the main considerations from the work undertaken to date on strategic heat supply planning for the City:

- Swan Lane foreshore has been identified as the priority location for the mooring of thermal barges and the discharge of heat to a wider City network.

- Several other sites have been identified as potential / priority sites for thermal barges. These are:
  - HMS President – vacant jetty site
  - Area west of Blackfriars jetty
  - East of Blackfriars jetty
  - West of Walbrook Wharf
  - Walbrook Wharf
  - LB PLA Upper Moorings

- The proposal for a strategic heat main has been designated a project of national significance by the UK government.

Planning advice:

Development proposals within the Thames Policy Area should consult City of London Corporation and other relevant stakeholders on any plans which may affect:

- the use of Swan Lane foreshore for the use of thermal barges;

- the use of other priority sites identified as potential mooring locations for thermal barges;

- the development of the strategic heat main project as a project of national significance

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Committee(s): Planning and Transportation Committee	**Dated:** 21 October 2025
Subject: Infrastructure Funding Statement CIL/S106 2024-25	**Public** **For Decision**
This proposal: • **delivers Corporate Plan 2024-29 outcomes** • **provides statutory duties**	Leading Sustainable Environment, Vibrant Thriving Destination, Providing Excellent Services, Flourishing Public Spaces, Diverse Engaged Communities, Dynamic Economic Growth, Statutory Reporting under CIL Regulations 2010 (as amended)
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Gwyn Richards, Planning and Development Director – Environment Department	
Report author: Lewis Robinson, Planning Obligations Officer – Environment Department	

Summary

The report presents the City's Community Infrastructure Levy (CIL) and Section 106 (S106) planning obligations infrastructure funding statement at the end of the financial year 2024/25. The report summarises the City's CIL and S106 balances, allocations and spend at the end of the financial year and updates the list of infrastructure projects or types of infrastructure the city will be wholly or partly funding by CIL. The CIL regulations require collecting authorities to produce an annual Infrastructure Funding Statement (IFS) for publication on the City's website.

CIL highlights for 2024/25:

- £31.05m receipts in Mayoral CIL
- £21.19m receipts for City CIL
- £24.63m potential City CIL (CIL Liability Notices issued in 2024/25)
- £27.67m allocated to projects
- £11.73m spend in the year
- £46.86m unspent City CIL allocations as at 31 March 2025

S106 Highlights for 2024/25:

- £9.84m in S106 receipts
- £45.90m in S106 spend
- £28.90m potential S106 contributions secured from twenty-six agreements signed in the reporting year
- £73.27m remaining S106 balance as at 31 March 2025

Recommendation(s)

Members are asked to:

- note the content of this report and Infrastructure Funding Statement (found in Appendix 1), and

- approve the infrastructure list at paragraph 20, repeated at section 4 of the Infrastructure Funding Statement, for publication on the City's website.

Main Report

Background

1. All local planning authorities have a duty to publish an Infrastructure Funding Statement (IFS) at least annually in accordance with Regulation 121A of the Community Infrastructure Levy Regulations 2010 (as amended). The report must include the total CIL receipts for the reported year, CIL expenditure and receipts retained at the end of the reporting year as set out in the regulations. The IFS is to also include a section 106 report for each year providing information on contributions to be provided under any planning obligation entered into in the year, contributions received, allocated and spent on relevant infrastructure projects in the financial year 2024/25.

2. This report provides information on the Community Infrastructure Levy and developer contributions which have been secured in section 106 agreements, received, allocated and spent in the financial year 2024/25 (01 April 2024 - 31 March 2025).

Key Data - Community Infrastructure Levy

3. The compact nature of the City, intense development activity and employment place considerable demands on City services, our infrastructure and environment. The City Corporation utilises the Community Infrastructure Levy (CIL), attaches planning conditions and negotiates section 106 agreements (also known as planning obligations) with developers, to secure the best and most sustainable use of land and to mitigate the impact of these demands.

4. The London Plan, City of London Local Plan 2015, Core Strategic Policy CS4: Planning Contributions sets out the policy and background for securing contributions and setting the CIL Levy for the delivery of the infrastructure necessary to enable development in the area. The policy is set out below in Figure 1. Furthermore, at the time of writing, the emerging City Plan 2040 continues and builds upon this policy.

Figure 1: Core Strategic Policy CS4: Planning Contributions

To manage the impact of development, seeking appropriate developer contributions:

1. Requiring contributions through the Community Infrastructure Levy to assist in the delivery of the infrastructure necessary to support implementation of the Local Plan.
2. Requiring s106 planning obligations, having regard to the impact of the obligation on the viability of development, for:
   (i) site specific mitigation meeting statutory tests;
   (ii) affordable housing;
   (iii) local training, skills and job brokerage;
   (iv) local procurement in the City and City Fringe.
3. Requiring qualifying development to make an additional contribution to meeting the costs of Crossrail construction in accordance with the provisions of the London Plan.

5. CIL helps fund the infrastructure needed to deliver the City's Local Plan and address the cumulative impact of development across the City of London. A development is liable for CIL if it is creating one or more dwellings, or new floorspace of 100sqm or more.

6. The levy is payable either within 60 days of the commencement of a development, or within the terms of an instalment policy set by the CIL charging authority. The City Corporation has an Instalment Policy in place set out below:

    - Where the payable amount of CIL is £100,000 or less, the whole amount shall be paid in a single instalment not more than 60 days after commencement of the development.
    - Where the payable amount is more than £100,001, developers have the option to pay two instalments:
    - The greater of £100,001 or half the value of the total payable amount is due within 60 days after commencement, and
    - The remainder is due within 240 days after commencement.

7. As a result of the Instalment Policy, CIL Demand Notices issued during the year do not necessarily equate to the CIL sums likely to be received that year. In addition, developments can be altered through further applications for planning permissions, often resulting in revised Demand Notices.

8. In addition to the above, CIL regulation 9(4) allows for payments to be phased on phased developments, whereby each phase is a 'chargeable development. Therefore, if a phased development commences where there is no new floorspace created as part of the first phase, the CIL payment will not need to be made during that phase. The principle of phasing a development for CIL purposes will only be allowed in exception circumstances with sufficient evidence that shows impacts on viability. As a result, a phased development may commence without CIL being paid at that point.

9. Re-issued notices are not double counted in this report. If a demand notice is issued and re-issued in the same reporting year, only the re-issued notice is relevant. Figure 2 below sets out the CIL highlights for financial year 2024/25.

Figure 2 2024/25 CIL highlights

City CIL Highlights	2024/25
City CIL Receipts	£21,188,581
Outstanding Demand Notices (City CIL) from FY24/25	£1,246,998
Total value of City CIL Liabilities issued in FY24/25	£24,633,139
CIL allocated to projects	£27,677,291
CIL Spend	£11,725,484

10. CIL receipts in 2024/25 for both City (£21,188,581) and Mayoral CIL (£31,050,239) were collected from twenty-four developments.

Outstanding CIL

11. At the time of writing, a total £1,246,998 of City CIL was outstanding from several developments which commenced in 2024/25. These liabilities can be due up to 8 months after commencement of the development (if the instalments policy is applied) and therefore due to be received in 2025/26.

12. Figure 3 below provides details of the City CIL received in the year 2024-2025 sorted by ward. Please note that if a ward had no CIL receipts, it is not shown.

Figure 3 CIL Receipts by Ward in 2024-2025

Wards	CIL Receipts in FY2024-25
Aldgate	£8,277,109.67
Bassishaw	£30,248.85
Billingsgate	£184,242.99
Bridge and Bridge Without	£35,887.77
Broad Street	£1,094,996.39
Candlewick	£22,352.23
Cheap	£204,024.00
Coleman Street	£1,053,683.99
Farringdon Within	£834,486.05
Farringdon Without	£159,359.31
Lime Street	£5,274,454.90
Tower	£4,017,735.57
Grand Total	**£21,188,581.72**

Potential CIL

13. CIL Liability Notices with a total value of £62,351,948 were issued to twenty-eight chargeable developments in 2024/25. Of this, £24,633,139 was for City CIL and £37,718,809 for Mayoral CIL. Fifteen of these developments have since commenced.

CIL Allocations

14. National Planning Practice Guidance states that CIL is required to be spent on infrastructure projects to support the delivery of the growth envisaged in the Local Plan. The City will spend the levy on infrastructure needed to support the development of the area. The priorities board consider infrastructure projects necessary to deliver growth envisioned by the policies in the City Plan and

Infrastructure Delivery Plan. Recommendations for allocation of CIL is made on this basis to the relevant Committees.

15. As at 31 March 2025, a total of £123,419,795 was allocated to projects, Neighbourhood CIL grants, and CIL Administration as set out in Figure 4 below and Table 3 of the IFS document.

Figure 4 CIL Allocations and Expenditure up to 31 March 2025

Description	Type	Allocated (£)	Spend (£)	Balance (£)
Becket Pageant for London, acting through the Skinners' Malmesbury Foundation	NCIL	£24,500.00	£24,500.00	£0.00
Maggie Keswick Jencks Cancer Caring Centres Trust	NCIL	£116,910.21	£116,910.21	£0.00
St Vedast-alias-Foster	NCIL	£25,000.00	£25,000.00	£0.00
Bevis Marks Synagogue Heritage Foundation	NCIL	£240,000.00	£220,000.00	£20,000.00
Fleet Street Sundial CIC	NCIL	£29,650.00	£29,650.00	£0.00
Age UK City of London	NCIL	£48,171.00	£48,171.00	£0.00
Barbican Centre Trust Limited	NCIL	£191,067.00	£191,067.00	£0.00
Globe Studios Limited	NCIL	£134,973.70	£134,973.70	£0.00
Learning Through The Arts	NCIL	£49,984.00	£49,984.00	£0.00
Repowering Limited	NCIL	£33,660.00	£33,660.00	£0.00
City Property Association Limited	NCIL	£100,000.00	£100,000.00	£0.00
The Worshipful Company of Chartered Architects	NCIL	£24,600.00	£24,600.00	£0.00
Golden Lane Estate Residents' Association	NCIL	£49,399.69	£49,399.69	£0.00
Parochial Church Council of the Ecclesiastical Parish of St Mary-le-Bow, Cheapside	NCIL	£18,274.00	£18,274.00	£0.00
Barbican Centre Trust Limited	NCIL	£39,663.00	£39,663.00	£0.00
New Diorama	NCIL	£154,640.00	£154,640.00	£0.00

Description	Type	Allocated (£)	Spend (£)	Balance (£)
Royal Society for Blind Children	NCIL	£48,646.00	£48,646.00	£0.00
TEMPLE BAR TRUST	NCIL	£250,000.00	£150,000.00	£100,000.00
The World Reimagined Limited	NCIL	£100,000.00	£100,000.00	£0.00
Outset Contemporary Art Fund	NCIL	£110,932.00	£110,932.00	£0.00
Historical Royal Palaces	NCIL	£300,000.00	£300,000.00	£0.00
Pollinating London Together	NCIL	£230,000.00	£230,000.00	£0.00
CurvingRoad	NCIL	£24,000.00	£24,000.00	£0.00
XLP	NCIL	£46,824.00	£46,824.00	£0.00
St. Michael Cornhill	NCIL	£7,855.00	£7,855.00	£0.00
Barts Heritage	NCIL	£774,000.00	£359,638.67	£414,361.33
The Temple Church	NCIL	£408,500.00	£187,297.00	£221,203.00
Barbican Centre Trust Limited	NCIL	£273,370.00	£273,370.00	£0.00
St Botolph without Aldgate	NCIL	£50,000.00	£50,000.00	£0.00
St Stephen Walbrook	NCIL	£25,067.00	£25,067.00	£0.00
The Worshipful Company of Carmen St Dunstan Heritage Trust	NCIL	£49,791.00	£0.00	£49,791.00
The Parochial Church Council of The Ecclesiastical Parish of St Andrew by the Wardrobe, London	NCIL	£250,000.00	£250,000.00	£0.00
LIFT	NCIL	£124,292.00	£124,292.00	£0.00
New Diorama	NCIL	£181,000.00	£181,000.00	£0.00
Tempo Time Credits	NCIL	£24,934.00	£24,934.00	£0.00
London Diocesan Fund	NCIL	£150,000.00	£150,000.00	£0.00
Museum of London	NCIL	£650,605.00	£382,812.00	£267,793.00
Ramadan Tent Project Limited	NCIL	£13,550.00	£13,550.00	£0.00
St Giles without Cripplegate	NCIL	£17,336.00	£17,336.00	£0.00
Urban Learners Ltd	NCIL	£49,250.00	£49,250.00	£0.00
Age UK City of London	NCIL	£40,950.00	£40,950.00	£0.00
ARTBASH & be	NCIL	£75,210.00	£75,210.00	£0.00

Description	Type	Allocated (£)	Spend (£)	Balance (£)
Barbican Centre Trust Limited	NCIL	£233,707.00	£233,707.00	£0.00
Whizz-Kidz	NCIL	£10,200.00	£10,200.00	£0.00
Barbican Association	NCIL	£449,550.00	£0.00	£449,550.00
East London Dance	NCIL	£49,922.00	£49,922.00	£0.00
Aveo Group Ltd	NCIL	£49,975.00	£49,975.00	£0.00
St Bartholomew Gatehouse Trust	NCIL	£24,000.00	£24,000.00	£0.00
Tavistock Relationships	NCIL	£49,952.00	£49,952.00	£0.00
The Lord Mayor's Appeal	NCIL	£90,000.00	£70,000.00	£20,000.00
The Running Charity	NCIL	£42,652.00	£42,652.00	£0.00
SIMPLICIOUS (Good Living) CIC	NCIL	£25,161.00	£25,161.00	£0.00
NLA	NCIL	£65,000.00	£65,000.00	£0.00
Tempo Time Credits	NCIL	£24,935.00	£24,935.00	£0.00
Ramadan Tent Project Limited	NCIL	£38,800.00	£38,800.00	£0.00
Pollinating London Together	NCIL	£270,000.00	£165,000.00	£105,000.00
Partnership for Young London	NCIL	£53,000.00	£9,600.00	£43,400.00
Ozero Arts	NCIL	£59,927.00	£59,927.00	£0.00
Thames Reach Charity	NCIL	£80,089.00	£26,542.75	£53,546.25
West Ham Park charity	NCIL	£20,000.00	£20,000.00	£0.00
Urban Learners Ltd	NCIL	£56,000.00	£56,000.00	£0.00
Hackney Council for Voluntary Service	NCIL	£76,565.00	£57,423.75	£19,141.25
Age UK City of London	NCIL	£99,000.00	£49,500.00	£49,500.00
Friends of City Gardens	NCIL	£19,700.00	£19,700.00	£0.00
London Symphony Orchestra	NCIL	£454,642.00	£0.00	£454,642.00
Publica Community and Research	NCIL	£69,000.00	£51,750.00	£17,250.00
WeSwim CIC	NCIL	£13,311.00	£9,984.00	£3,327.00
Forget me Not Memory Cafe	NCIL	£54,022.00	£19,727.25	£34,294.75
SocietyLinks Tower Hamlets	NCIL	£90,238.00	£15,040.00	£75,198.00
Livery Committee	NCIL	£12,000.00	£0.00	£12,000.00
Union Street Consulting Limited	NCIL	£78,750.00	£59,062.50	£19,687.50
Aldgate Business Partnership Ltd	NCIL	£65,848.00	£19,330.00	£46,518.00

Description	Type	Allocated (£)	Spend (£)	Balance (£)
Tower Hamlets Youth Sport Foundation	NCIL	£84,868.00	£13,728.50	£71,139.50
Maggie Keswick Jencks Cancer Caring Centres Trust	NCIL	£145,500.00	£35,600.00	£109,900.00
City of London Crime Prevention Association	NCIL	£101,600.00	£25,400.00	£76,200.00
Mental Fight Club	NCIL	£195,971.00	£12,798.00	£183,173.00
CoL Housing - New Developments & Special Projects Team	NCIL	£390,419.00	£0.00	£390,419.00
Family Action	NCIL	£162,184.00	£11,690.50	£150,493.50
Family Emocional Wellbeing Project CIC	NCIL	£13,810.00	£0.00	£13,810.00
Global Healthcare Projects GHP	NCIL	£78,189.00	£56,189.00	£22,000.00
Intergenerational Music Making	NCIL	£25,845.00	£6,461.00	£19,384.00
Ramadan Tent Project Limited	NCIL	£44,422.00	£44,422.00	£0.00
Thames Festival Trust	NCIL	£96,960.00	£0.00	£96,960.00
Shoreditch Trust	NCIL	£97,030.00	£19,403.00	£77,627.00
Portsoken Activities Group	NCIL	£28,105.00	£2,228.75	£25,876.25
Churchyards Enhancement Programme	General	£84,061.00	£84,060.80	£0.20
Bloomberg Place Highway changes	General	£182,323.64	£182,323.64	£0.00
HVM Security Programme	General	£4,431,000.00	£2,975,062.43	£1,455,937.57
Beech Street Transport & Public Realm Improvements	General	£2,023,000.00	£1,828,478.80	£194,521.20
Golden Lane Community Centre	General	£632,625.00	£632,625.00	£0.00
City Mental Health Centre	General	£502,534.00	£502,534.00	£0.00
Relocation of Adult Skills & Education Services (ASES)	General	£25,000.00	£25,000.00	£0.00
Expanding Citigen Energy Network	General	£17,000.00	£17,000.00	£0.00

Description	Type	Allocated (£)	Spend (£)	Balance (£)
Secure City Programme	General	£17,672,000.00	£10,676,283.22	£6,995,716.78
Public Realm Security Programme	General	£225,000.00	£225,000.00	£0.00
St Pauls Cathedral External Lighting	General	£1,160,000.00	£535,154.72	£624,845.28
Finsbury Circus Reinstatement	General	£2,558,000.00	£2,557,977.00	£23.00
Barbican and Golden Lane Healthy Streets Plan	General	£250,000.00	£115,000.00	£135,000.00
St Paul's Gyratory	General	£2,915,000.00	£675,759.18	£2,239,240.82
Museum of London	General	£44,600,000.00	£44,085,918.00	£514,082.00
Walbrook Wharf	General	£380,000.00	£0.00	£380,000.00
West Smithfield and Charterhouse Street Highway strengthening	General	£3,500,000.00	£0.00	£3,500,000.00
Barbican Library Refresh	General	£775,812.00	£0.00	£775,812.00
Sculpture in the City	General	£196,000.00	£80,000.00	£116,000.00
City Cluster Programme	General	£5,900,000.00	£31,334.58	£5,868,665.42
Transforming Fleet Street	General	£9,000,000.00	£2,555.44	£8,997,444.56
MOL Highways Strengthening works	General	£4,660,000.00	£4,406,344.13	£253,655.87
Golden Lane Leisure Centre (GLLC) (podium drainage)	General	£750,000.00		£750,000.00
Refurbishment of Golden Lane Leisure Centre	General	£10,349,000.00		£10,349,000.00
Admin	Admin	£883,986.58	£883,986.58	£0.00
General CIL Summary	-	£112,788,355.64	£69,638,410.94	£43,149,944.70
Neighbourhood CIL Summary	-	£9,747,453.60	£6,034,268.27	£3,713,185.33
Grand Total	-	£123,419,795.82	£76,556,665.79	£46,863,130.03

CIL Expenditure

16. A total of £11,725,484 of City CIL was spent in 2024/25 comprising of £9,639,386 of general CIL funds, £2,086,098 of Neighbourhood CIL funds, and £202,482 of the City CIL administration.

17. At the end of March 2025, a total of £76,556,665 City CIL had been spent since the City introduced its charging schedule (consisting of £69,638,410 of General

CIL Funds, £6,034,268 of Neighbourhood CIL Funds and £883,986 of City CIL Administration Funds).

18. Spend on infrastructure projects can sometimes span more than one financial year, therefore the allocations reported in this financial year may be spent in the next financial year(s).

Infrastructure Projects

19. CIL Regulations require the authority to publish a statement of the infrastructure projects or types of infrastructure which the charging authority intends will be, or may be, wholly or partly funded by CIL.

20. The City of London Infrastructure List consists of the following projects to deliver the vision of the adopted City Plan, Emerging City Plan and the Infrastructure Delivery Plan (IDP) 2020. The IDP is utilised for prioritising and determining bids for allocation of Community Infrastructure Levy funds.

<u>Public realm and streets, including:</u>

- City Cluster public realm improvements
- Beech Street transport and public realm improvements
- Transforming Fleet Street
- St Paul's Gyratory
- HVM Security Programme
- Secure City programme
- St Paul's Cathedral external lighting
- Barbican and Golden Lane Healthy Streets Plan
- Museum of London highway strengthening works

<u>Cultural and community services, including:</u>

- Barbican Library refresh
- Golden Lane Leisure Centre

<u>Infrastructure and utilities, including:</u>

- Walbrook Wharf

Key data - S106 Financial Obligations

21. The City's Planning Obligations Supplementary Planning Document (SPD) sets out how S106 planning obligations in the City of London will be applied and explains how planning obligations are operated, within the context of the City of London Local Plan. Some Section 106 agreements secure wider obligations that achieve site specific mitigation measures, which cannot be bound by condition, such as Wind Mitigation Surveys and Security/Counter Terrorism Measures to make the development acceptable in planning terms.

22. Financial contributions for Affordable Housing and Local Training Skills & Job Brokerage contributions are pooled to fund City-wide programmes of works and

initiatives, including development on City Corporation housing estates outside of the City. Other obligations are site specific and can only be used for the measures set out in each legal agreement. Many of these relate to highways, public realm, and environmental improvements. These are listed under the title Local Community, Environment and Transport Improvements in the table below and include sums secured on the behalf of TfL for cycle hire and network improvements, and other transport infrastructure improvements. The S106 Highlights for 2024/25 are listed below in Figure 5.

Figure 5: 2024/2025 S106 Highlights

S106 Highlights	2024/25
Total Agreements Completed 2024/25	26*
Value of Contributions secured	£28,920,441
Receipts in the year	£9,846,843
Allocation in the year	£12,277,028
Spend in the year, inc. monitoring	£45,908,371

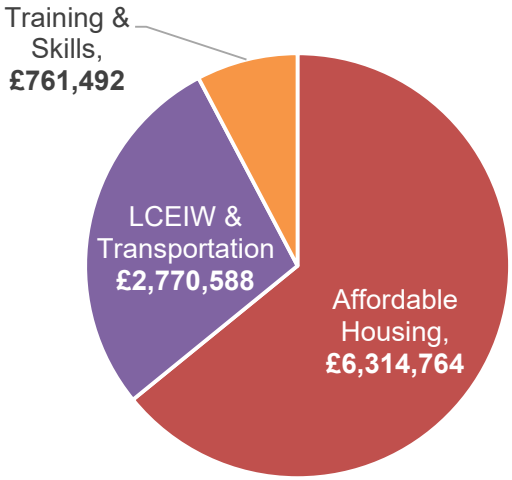
* - Includes deeds of variations to original S106 agreements

S106 Spend

23. A total of £45,565,618 was spent on projects (excluding S106 monitoring) in 2024/25. This is an increase over the previous financial year total spend of £5,890,675.

24. Figures 6a and 6b provide an illustration of receipts and spend for 2024/25 by covenant type and includes interest. Figure 6a provides an analysis of the contributions received in the financial year by covenant type, including interest and Figure 6b provides an illustration of S106 expenditure.

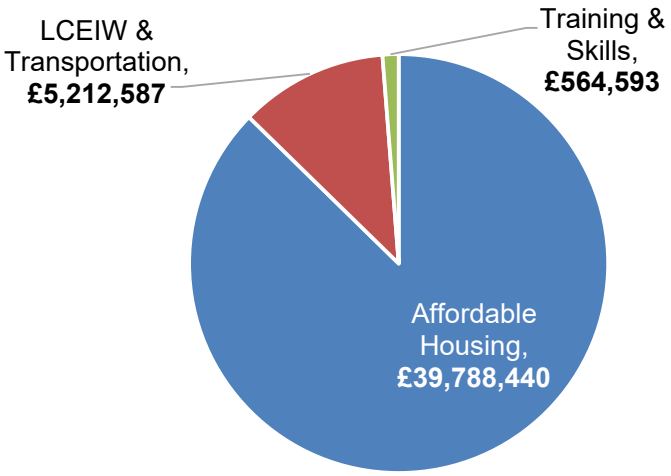
Figure 6a Contributions received 2024/25



25. Of the twenty-six agreements signed in 2024/25, eight have commenced in the reporting year resulting in contributions received totalling £4.6m. Other contributions received in this financial year were received from agreements signed in previous years. Seven of the twenty-six agreements made this year were variations of previously made agreements.

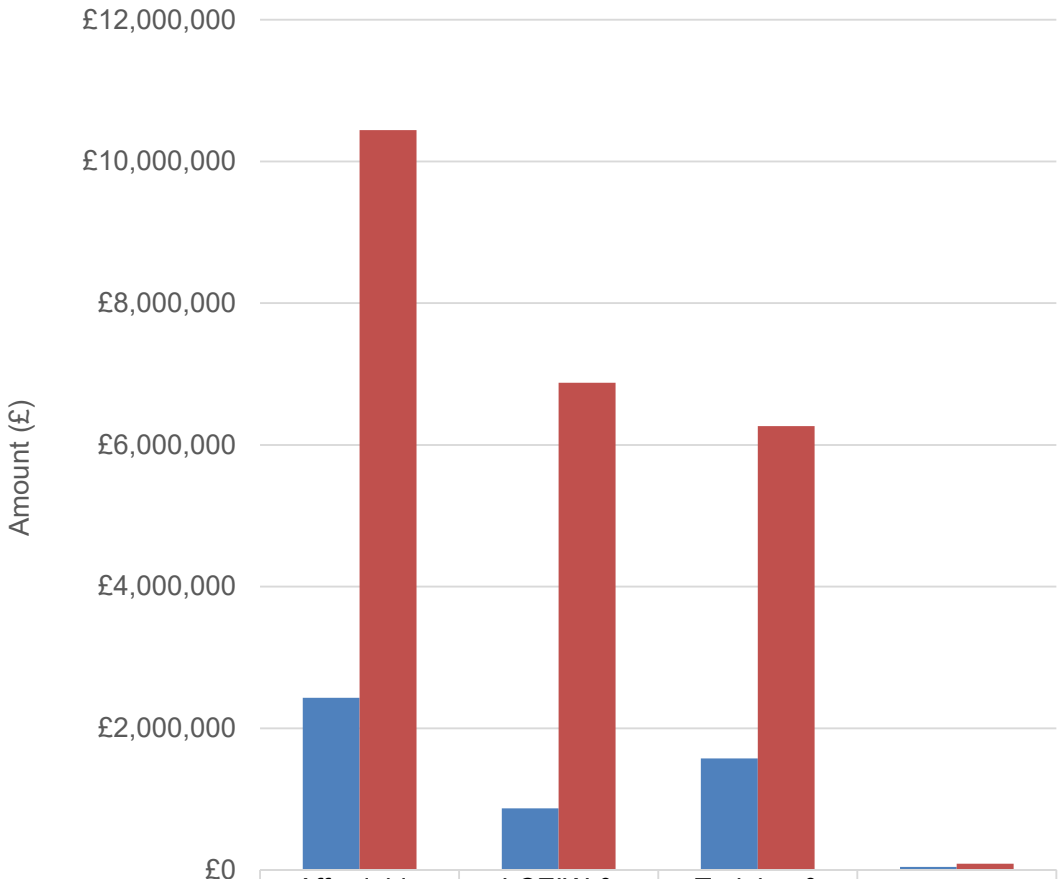
26. Spend on projects usually span more than one financial year. Therefore, allocations reported in this financial year may be spent in the next financial year. For example, the total allocations in this reporting year are £12,277,028 and total spend stands at £45,565,618. This is because of projects which may have been commenced in previous years but are ongoing in this financial year.

Figure 6b S106 Spend 2024/25



27. Potential contributions from the further eighteen agreements completed but not triggered – as well as untriggered contributions from triggered agreements – total £24m. However, we cannot be certain whether these developments will commence in the next financial year, and we will likely see developments commence from this and previous financial years. Figure 7 below illustrates the potential contributions secured from the nine agreements signed and triggered in the reporting year and a forecast of potential receipts in the next financial year based on agreements signed but not triggered in this reporting year.

Figure 7 Contributions from agreements signed and triggered in 2024/25, and potential receipts from untriggered agreements



	Affordable Housing	LCEIW & Transport	Training & Skills	Other
Triggered 2024-25	£2,430,814	£871,735	£1,573,529	£45,000
Projected	£10,442,401	£6,876,808	£6,265,439	£90,000

Remaining Balance

28. The remaining balance of S106 contributions held by the City currently totals £73,265,710 at the end of 2024/25 and relates to contributions allocated but not spent in the financial year. Planning obligations are secured for site specific mitigation measures therefore, all money received under planning obligations as identified in the legal agreement can only be used for those purposes and are considered allocated for those purposes. A detailed breakdown, along with allocations to infrastructure projects in the pipeline, can be seen in IFS.

Corporate & Strategic Implications

29. Strategic implications – The projects listed at paragraph 20 of this report (duplicated in Section 4 of the appended Infrastructure Funding Statement) sets out projects to deliver the vision of the adopted City Plan, Emerging City Plan and the Infrastructure Delivery Plan (IDP) 2020. By extension, it would also help to

deliver the aims and objectives of the Corporate Plan 2024-2029. Additionally, publishing an IFS on an annual basis is a requirement of the Community Infrastructure Levy Regulations 2010 (as amended).

30. Financial implications – There are no direct financial implications to the City Corporation from this report. However, it should be noted that references in this report to receipts relate to actual monies received between the period April 2024 and March 2025. These amounts will differ from the invoiced amounts appearing on the general ledger for this same period as a customer may be invoiced in one period and the monies received in the subsequent period.

31. Resource implications – None.

32. Legal implications – None.

33. Risk implications – None.

34. Equalities implications – No direct implications. This report and appended IFS have been written with Corporate guidance on accessible documents in mind.

35. Climate implications – None.

36. Security implications – None.

Conclusion

37. Regulation 62 of the CIL Regulations 2010 as amended requires the charging authority to report on CIL receipts and expenditure on infrastructure projects at the end of a financial year. The detailed Infrastructure Funding Statement for the 2024-25 reporting year is appended to this report and will be published on the City's website in accordance with the regulations.

Appendices

Infrastructure Funding Statement 2024-25

Background Papers
None

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Infrastructure Funding Statement 2024-2025

CITY OF LONDON

Planning and Development Division, Environment Department, City of London Corporation – October 2025

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Section 1 - Introduction

1.1. The compact nature of the City and the intensification of development and employment place demands on the City's services, infrastructure and environment. The City Corporation utilises the Community Infrastructure Levy (CIL), attaches planning conditions and negotiates planning obligations (also known as S106 agreements) with developers, to secure the best and most sustainable use of land and to mitigate the impact of these demands.

1.2. The policy is set out in the City of London Local Plan Core Strategic Policy CS4: Planning Contributions:

Strategic Policy CS4—Planning Contributions

To manage the impact of development, seeking appropriate developer contributions:

1. Requiring contributions through the Community Infrastructure Levy to assist in the delivery of the infrastructure necessary to support implementation of the Local Plan.

2. Requiring S106 planning obligations, having regard to the impact of the obligation on the viability of development, for:

i) site specific mitigation meeting statutory tests;

ii) affordable housing;

iii) local training, skills and job brokerage;

iv) local procurement in the City and City Fringe.

1.3. In accordance with amendments made to the Community Infrastructure Levy (CIL) Regulations in 2019, any authority that receives a contribution from development through CIL or Section 106 Planning Obligations must prepare an Infrastructure Funding Statement (IFS). The IFS is published annually to provide information on developer contributions that have been received, allocated and spent on infrastructure priorities from the previous financial year - the 'reported year'.

1.4. This report provides information on developer contributions from the Community Infrastructure Levy and Section 106 Agreements that have been secured, received, allocated and spent for financial year 2024/25 (01 April 2024 - 31 March 2025).

1.5. This Infrastructure Funding Statement Includes:

Section 2 - The CIL Report for financial year 2024/25 as set out in CIL Regulation (2019 Amendment) 121A Schedule 2 Paragraph 1.

Section 3 - The S106 Report for financial year 2024/25 as set out in CIL Regulation (2019 Amendment) 121A Schedule 2 Paragraph 3;

Section 4 - A list of infrastructure projects or types of infrastructure that the authority intends to fund wholly or partly by City CIL, in accordance with CIL Regulation 121A(1)(a).

1.6. CIL Regulation (2019 Amendment) 121A Schedule 2 Paragraph 4 provides the option for a local authority to provide summary details of any funding or provision of infrastructure which was secured and/or provided through a highway agreement under section 278 of the Highways Act 1990 during the reported year.

1.7. Section 278 Agreements (S278) are legally binding agreements made under the Highways Act 1990 between the City of London and developers. S278 agreements are required for remedial and/or improvements to the highways and footways as a result of the new development.

1.8. The City of London Corporation will look into including information for S278 agreements within future versions of the IFS.

Section 2 - Community Infrastructure Levy (CIL) Report 2024-2025

2.1. The Community Infrastructure Levy (CIL) is a set charge, based on the gross internal area floorspace of buildings, on most new development to help fund the infrastructure needed to address the cumulative impact of development across the City of London. The City's CIL Charging Schedule was approved by the Court of Common Council on 1st May 2014 and was implemented from 1st July 2014.

2.2. A development is liable for a CIL charge if it is creating one or more dwellings, or new floorspace of 100sqm or more. When a CIL liable development is granted planning permission, the amount of CIL required is calculated and sent to the planning applicant and/or landowner of the development on a CIL Liability Notice.

2.3. Some developments are able to claim exemption or relief from their CIL liability. This relates to development that is self-build housing, residential annexes and extensions, social housing and charitable development. Where a developer successfully claims one of these reliefs/exemptions, the development is not required to pay any CIL.

2.4. A CIL charge is payable either within 60 days of the commencement of a development, or within the terms of an instalment policy set by the CIL charging authority. The City Corporation has the following Instalment Policy in place:

- Where the payable amount of CIL is £100,000 or less, the whole amount shall be paid in a single instalment not more than 60 days after commencement of the development.

- Where the payable amount is more than £100,001, developers have the option to pay two instalments: The greater of £100,000 or half the value of the total payable amount is due within 60 days after commencement, and

- The remainder is due within 240 days after commencement.

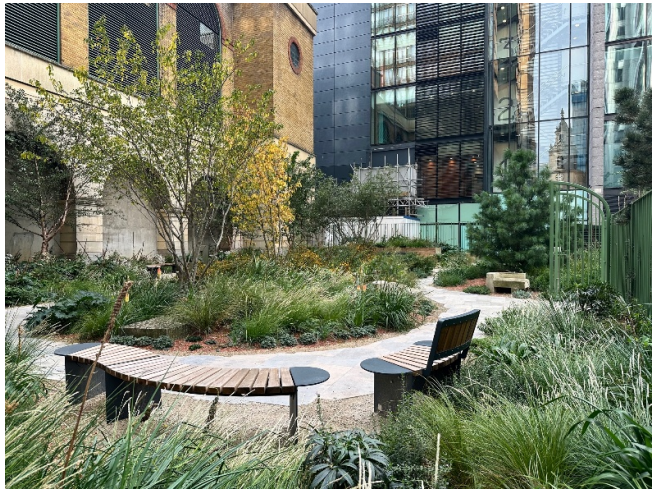
2.5. As a result of having an Instalment Policy, the CIL Demand Notices issued during a particular year do not necessarily equate to the CIL sums likely to be received during that year. In addition, developments can be altered through further planning permissions over time, often resulting in revised Demand Notices needing to be issued. Any such re-issued Notices are not double counted in this report; if a Demand Notice is issued and then re-issued in the same reporting year, only the re-issued Notice would be included within the figure for CIL invoiced during the year. Tables 1 to 3 provide a range of information for the financial year 2024/25 as set out in CIL Regulation (2019 Amendment) 121A Schedule 2 Paragraph 1:

- Table 1: Sets out the CIL Reporting Requirements - 1a to 1l.

- Table 2: Details of City CIL Expenditure in 2024/25 - 1g(i).
- Table 3: Details City CIL Allocated but not Spent as of 31 March 2025 - 1f and 1h
- Table 4: Details of Neighbourhood CIL Allocated and Spent in 2024/2025 - 1j(ii).

2.6. The City of London Corporation uses CIL to fund a variety of infrastructure projects, a full list of which can be seen below in Table 2. In the year 2024-25, projects include:

- The City Cluster Vision Project ("*L5-City Cluster Vision - Phase 1*", £31,334.58 in expenditure).



A multi-year project to improve and upgrade spaces in and around the eastern City Cluster area of the City of London. CIL funds have been used on smaller sub-projects, such as the improvement works to Jubilee Gardens and new public seating and planters throughout the area.

- The Reinstatement of Finsbury Circus ("*Finsbury Circus Reinstatement*", £2,268,000.00 in expenditure)

Following the completion of Crossrail/the Elizabeth line – which utilised Finsbury Circus Gardens as a construction site – CIL funds have been utilised to reimagine and reinstate Finsbury Circus as a public garden.

2.7. A proportion of CIL receipts (15%) are set aside for neighbourhood projects, details of which can be seen below in Table 2. Full details of how these funds get allocated, as well as details about the projects themselves, can be found on our website (https://www.cityoflondon.gov.uk/about-us/working-with-community/community-infrastructure-levy-

neighbourhood-fund). Highlights of neighbourhood CIL projects funded in this financial year include:

- West Ham Park exhibit ("*West Ham Park charity*", £20,000.00 expenditure)

  £20,000 over one year towards the design, development, and production of an installation in the City of London celebrating West Ham Park 150th Anniversary and its historic connections to the Square Mile.

- Forget Me Not Memory Café ("*Forget me Not Memory Cafe*", £54,022.00 expenditure)

  £54,022 for a two-year programme of creative activity, social eating and exercise to reduce social isolation and improve health, happiness and social connections at the Golden Lane Community Centre.

- Bats and Black Redstarts survey ("*Friends of City Gardens*", £19,700 expenditure)

  A project by Friends of City Gardens to record data on abundance and temporal behaviour of bats and Black Redstarts on green roofs in the City in order to inform conservation and management priorities. *(Image by László Glatz)*

Table 1—CIL Reporting Requirements for Financial Year 2024-2025

Reporting Requirement—CIL Regulation (2019 Amendment) 121A Schedule 2, Paragraph 1	Amount	Comments/Details
1(a). The total value of CIL set out in all demand notices issued in the reported year	£19,641,599.10	-
1(b). The total amount of CIL receipts for the reported year	£21,188,581.72	-
1(c). The total amount of CIL receipts, collected by the authority, or by another person on its behalf, before the reported year but which have not been allocated in the reported year	£0.00	-
1(d). The total amount of CIL receipts, collected by the authority, or by another person on its behalf, before the reported year and which have been allocated in the reported year	£2,852,911.79	-
1(e). The total amount of CIL expenditure for the reported year	£11,725,484.34	-
1(f). The total amount of CIL receipts, whenever collected, which were allocated but not spent during the reported year	£46,863,130.03	-
1(g). in relation to CIL expenditure for the reported year, summary details of— (i) the items of infrastructure on which CIL (including land payments) has been spent, and the amount of CIL spent on each item;	(i) Please see Table 6 below.	-

Reporting Requirement—CIL Regulation (2019 Amendment) 121A Schedule 2, Paragraph 1	Amount	Comments/Details
(ii) the amount of CIL spent on repaying money borrowed, including any interest, with details of the items of infrastructure which that money was used to provide (wholly or in part); (iii) the amount of CIL spent on administrative expenses pursuant to regulation 61, and that amount expressed as a percentage of CIL collected in that year in accordance with that regulation;	(ii) £0.00 (iii) £202,482.12; 1.73%	
1(h). in relation to CIL receipts, whenever collected, which were allocated but not spent during the reported year, summary details of the items of infrastructure on which CIL (including land payments) has been allocated, and the amount of CIL allocated to each item;	Please see Table 3 below.	-
1(i). The amount of CIL passed to: (i) any parish council under Regulation 59A or 59B; (ii) any person under Regulation 59(4);	 (i) £0.00 (ii) £0.00	There are no parish councils within the City of London.
1(j). summary details of the receipt and expenditure of CIL to which regulation 59E or 59F applied during the reported year including— (i) the total CIL receipts that regulations 59E and 59F applied to; (ii) the items of infrastructure to which the CIL receipts to which regulations 59E and 59F applied have been allocated or spent, and	 (i) Not applicable. (ii) Not applicable.	-

Reporting Requirement—CIL Regulation (2019 Amendment) 121A Schedule 2, Paragraph 1	Amount	Comments/Details
the amount of expenditure allocated or spent on each item;		
1(k). summary details of any notices served in accordance with regulation 59E, including— (i) the total value of CIL receipts requested from each parish council; (ii) any funds not yet recovered from each parish council at the end of the reported year;	(i) Not applicable. (ii) Not applicable.	-
1.(l) The total amount of: (i) CIL receipts for the reported year retained at the end of the reported year; (ii) other than those to which regs 59E and 59F applied; (iii) CIL receipts from previous years retained at the end of the reported year other than those to which regs 59E and 59F applied; (iv) CIL receipts for the reported year to which regs 59E and 59F applied retained at the end of the reported year; (v) CIL receipts from previous years to which regs 59E and 59F applied retained at the end of the reported year.	(i) £ 21,188,581.72 (ii) £ 19,304,965.72 (iii) £ 26,171,639.01 (iv) £ 3,147,914.94 (v) £ 8,782,201.16	-

Table 2—Details of CIL Expenditure in 2024-2025 - 1(g)(i)

CIL Project	Project Type	Expenditure
L5-St Paul's Gyratory Transformation	General	£675,759.18
L5-Beech Street Transport & Public Realm Improvements	General	£23,281.80
L5-Fleet St Quarter - Seating & Planting Improvements	General	£2,555.44
L5-Finsbury Circus Reinstatement	General	£2,268,000.00
L5-Secure City Programme - CCTV & Telecommunications	General	£928,220.59
L5-Secure City Programme - Video Management System	General	£824,750.63
L5-Secure City Programme - Vulnerable People	General	£9,975.00
L5-Charterhouse Street - CIL Funding	General	£2,096,344.13
L5-Museum of London Relocation	General	£2,310,000.00
L5-City Cluster Vision - Phase 1	General	£31,334.58
L5-Hostile Vehicle Mitigation Security Programme - Building I OH	General	£2,540.92
L5-Hostile Vehicle Mitigation Security Programme (SRP)	General	£20,257.95
L5-Hostile Vehicle Mitigation Security Programme - Building I	General	£4,616.56
L5-St Pauls Cathedral External Re-Lighting	General	£180,874.72
L5-St Pauls Cathedral External Re-Lighting	General	£180,874.72
Sculpture in the City	General	£80,000.00
Ozero Arts	NCIL	£59,927.00
Thames Reach Charity	NCIL	£80,089.00
Partnership for Young London	NCIL	£53,000.00
Urban Learners Ltd	NCIL	£56,000.00
West Ham Park charity	NCIL	£20,000.00
Hackney Council for Voluntary Service	NCIL	£76,565.00
Age UK City of London	NCIL	£99,000.00
Friends of City Gardens	NCIL	£19,700.00
Publica Community and Research	NCIL	£69,000.00
WeSwim CIC	NCIL	£13,311.00
Forget me Not Memory Cafe	NCIL	£54,022.00

CIL Project	Project Type	Expenditure
SocietyLinks Tower Hamlets	NCIL	£90,238.00
Livery Committee	NCIL	£12,000.00
Union Street Consulting Limited	NCIL	£78,750.00
Maggie Keswick Jencks Cancer Caring Centres Trust	NCIL	£145,500.00
Aldgate Business Partnership Ltd	NCIL	£19,330.00
Tower Hamlets Youth Sport Foundation	NCIL	£84,868.00
Family Emocional Wellbeing Project CIC	NCIL	£13,810.00
Global Healthcare Projects GHP	NCIL	£78,189.00
Intergenerational Music Making	NCIL	£25,845.00
City of London Crime Prevention Association	NCIL	£101,600.00
Mental Fight Club	NCIL	£195,971.00
Ramadan Tent Project Limited	NCIL	£44,422.00
Family Action	NCIL	£162,184.00
Shoreditch Trust	NCIL	£97,030.00
Thames Festival Trust	NCIL	£96,960.00
Portsoken Activities Group	NCIL	£28,105.00
Artbash & Be Ltd	NCIL	£34,200.00
Bevis Marks Synagogue Heritage Foundation	NCIL	-£100,000.00
St Bartholomew Gatehouse Trust	NCIL	£24,000.00
St Botolph Without Bishopsgate	NCIL	£50,000.00
General CIL Administration	Administration	£85,576.85
Neighbourhood CIL Administration	Administration	£116,905.27
General CIL Total	-	**£9,639,386.22**
Neighbourhood CIL Total	-	**£2,086,098.12**
Administration Total	-	**£202,482.12**
CIL Expenditure Grand Total	-	**£11,725,484.34**

Table 3 – Details of CIL allocated but not spent as at 31 March 2025 – 1(f) and 1(h)

Project	Type	Total allocations to 31/03/2025	Total CIL expenditure to 31/03/2025	Unspent CIL allocations
Becket Pageant for London, acting through the Skinners' Malmesbury Foundation	NCIL	£24,500.00	£24,500.00	£0.00
Maggie Keswick Jencks Cancer Caring Centres Trust	NCIL	£116,910.21	£116,910.21	£0.00
St Vedast-alias-Foster	NCIL	£25,000.00	£25,000.00	£0.00
Bevis Marks Synagogue Heritage Foundation	NCIL	£240,000.00	£220,000.00	£20,000.00
Fleet Street Sundial CIC	NCIL	£29,650.00	£29,650.00	£0.00
Age UK City of London	NCIL	£48,171.00	£48,171.00	£0.00
Barbican Centre Trust Limited	NCIL	£191,067.00	£191,067.00	£0.00
Globe Studios Limited	NCIL	£134,973.70	£134,973.70	£0.00
Learning Through The Arts	NCIL	£49,984.00	£49,984.00	£0.00
Repowering Limited	NCIL	£33,660.00	£33,660.00	£0.00
City Property Association Limited	NCIL	£100,000.00	£100,000.00	£0.00
The Worshipful Company of Chartered Architects	NCIL	£24,600.00	£24,600.00	£0.00
Golden Lane Estate Residents' Association	NCIL	£49,399.69	£49,399.69	£0.00
Parochial Church Council of the Ecclesiastical Parish of St Mary-le-Bow, Cheapside	NCIL	£18,274.00	£18,274.00	£0.00
Barbican Centre Trust Limited	NCIL	£39,663.00	£39,663.00	£0.00
New Diorama	NCIL	£154,640.00	£154,640.00	£0.00
Royal Society for Blind Children	NCIL	£48,646.00	£48,646.00	£0.00
TEMPLE BAR TRUST	NCIL	£250,000.00	£150,000.00	£100,000.00
The World Reimagined Limited	NCIL	£100,000.00	£100,000.00	£0.00
Outset Contemporary Art Fund	NCIL	£110,932.00	£110,932.00	£0.00
Historical Royal Palaces	NCIL	£300,000.00	£300,000.00	£0.00
Pollinating London Together	NCIL	£230,000.00	£230,000.00	£0.00
CurvingRoad	NCIL	£24,000.00	£24,000.00	£0.00
XLP	NCIL	£46,824.00	£46,824.00	£0.00
St. Michael Cornhill	NCIL	£7,855.00	£7,855.00	£0.00
Barts Heritage	NCIL	£774,000.00	£359,638.67	£414,361.33

Project	Type	Total allocations to 31/03/2025	Total CIL expenditure to 31/03/2025	Unspent CIL allocations
The Temple Church	NCIL	£408,500.00	£187,297.00	£221,203.00
Barbican Centre Trust Limited	NCIL	£273,370.00	£273,370.00	£0.00
St Botolph without Aldgate	NCIL	£50,000.00	£50,000.00	£0.00
St Stephen Walbrook	NCIL	£25,067.00	£25,067.00	£0.00
The Worshipful Company of Carmen St Dunstan Heritage Trust	NCIL	£49,791.00	£0.00	£49,791.00
The Parochial Church Council of The Ecclesiastical Parish of St Andrew by the Wardrobe, London	NCIL	£250,000.00	£250,000.00	£0.00
LIFT	NCIL	£124,292.00	£124,292.00	£0.00
New Diorama	NCIL	£181,000.00	£181,000.00	£0.00
Tempo Time Credits	NCIL	£24,934.00	£24,934.00	£0.00
London Diocesan Fund	NCIL	£150,000.00	£150,000.00	£0.00
Museum of London	NCIL	£650,605.00	£382,812.00	£267,793.00
Ramadan Tent Project Limited	NCIL	£13,550.00	£13,550.00	£0.00
St Giles without Cripplegate	NCIL	£17,336.00	£17,336.00	£0.00
Urban Learners Ltd	NCIL	£49,250.00	£49,250.00	£0.00
Age UK City of London	NCIL	£40,950.00	£40,950.00	£0.00
ARTBASH & be	NCIL	£75,210.00	£75,210.00	£0.00
Barbican Centre Trust Limited	NCIL	£233,707.00	£233,707.00	£0.00
Whizz-Kidz	NCIL	£10,200.00	£10,200.00	£0.00
Barbican Association	NCIL	£449,550.00	£0.00	£449,550.00
East London Dance	NCIL	£49,922.00	£49,922.00	£0.00
Aveo Group Ltd	NCIL	£49,975.00	£49,975.00	£0.00
St Bartholomew Gatehouse Trust	NCIL	£24,000.00	£24,000.00	£0.00
Tavistock Relationships	NCIL	£49,952.00	£49,952.00	£0.00
The Lord Mayor's Appeal	NCIL	£90,000.00	£70,000.00	£20,000.00
The Running Charity	NCIL	£42,652.00	£42,652.00	£0.00
SIMPLICIOUS (Good Living) CIC	NCIL	£25,161.00	£25,161.00	£0.00
NLA	NCIL	£65,000.00	£65,000.00	£0.00

Project	Type	Total allocations to 31/03/2025	Total CIL expenditure to 31/03/2025	Unspent CIL allocations
Tempo Time Credits	NCIL	£24,935.00	£24,935.00	£0.00
Ramadan Tent Project Limited	NCIL	£38,800.00	£38,800.00	£0.00
Pollinating London Together	NCIL	£270,000.00	£165,000.00	£105,000.00
Partnership for Young London	NCIL	£53,000.00	£9,600.00	£43,400.00
Ozero Arts	NCIL	£59,927.00	£59,927.00	£0.00
Thames Reach Charity	NCIL	£80,089.00	£26,542.75	£53,546.25
West Ham Park charity	NCIL	£20,000.00	£20,000.00	£0.00
Urban Learners Ltd	NCIL	£56,000.00	£56,000.00	£0.00
Hackney Council for Voluntary Service	NCIL	£76,565.00	£57,423.75	£19,141.25
Age UK City of London	NCIL	£99,000.00	£49,500.00	£49,500.00
Friends of City Gardens	NCIL	£19,700.00	£19,700.00	£0.00
London Symphony Orchestra	NCIL	£454,642.00	£0.00	£454,642.00
Publica Community and Research	NCIL	£69,000.00	£51,750.00	£17,250.00
WeSwim CIC	NCIL	£13,311.00	£9,984.00	£3,327.00
Forget me Not Memory Cafe	NCIL	£54,022.00	£19,727.25	£34,294.75
SocietyLinks Tower Hamlets	NCIL	£90,238.00	£15,040.00	£75,198.00
Livery Committee	NCIL	£12,000.00	£0.00	£12,000.00
Union Street Consulting Limited	NCIL	£78,750.00	£59,062.50	£19,687.50
Aldgate Business Partnership Ltd	NCIL	£65,848.00	£19,330.00	£46,518.00
Tower Hamlets Youth Sport Foundation	NCIL	£84,868.00	£13,728.50	£71,139.50
Maggie Keswick Jencks Cancer Caring Centres Trust	NCIL	£145,500.00	£35,600.00	£109,900.00
City of London Crime Prevention Association	NCIL	£101,600.00	£25,400.00	£76,200.00
Mental Fight Club	NCIL	£195,971.00	£12,798.00	£183,173.00
CoL Housing - New Developments & Special Projects Team	NCIL	£390,419.00	£0.00	£390,419.00
Family Action	NCIL	£162,184.00	£11,690.50	£150,493.50
Family Emocional Wellbeing Project CIC	NCIL	£13,810.00	£0.00	£13,810.00
Global Healthcare Projects GHP	NCIL	£78,189.00	£56,189.00	£22,000.00

Project	Type	Total allocations to 31/03/2025	Total CIL expenditure to 31/03/2025	Unspent CIL allocations
Intergenerational Music Making	NCIL	£25,845.00	£6,461.00	£19,384.00
Ramadan Tent Project Limited	NCIL	£44,422.00	£44,422.00	£0.00
Thames Festival Trust	NCIL	£96,960.00	£0.00	£96,960.00
Shoreditch Trust	NCIL	£97,030.00	£19,403.00	£77,627.00
Portsoken Activities Group	NCIL	£28,105.00	£2,228.75	£25,876.25
Churchyards Enhancement Programme	General	£84,061.00	£84,060.80	£0.20
Bloomberg Place Highway changes	General	£182,323.64	£182,323.64	£0.00
HVM Security Programme	General	£4,431,000.00	£2,975,062.43	£1,455,937.57
Beech Street Transport & Public Realm Improvements	General	£2,023,000.00	£1,828,478.80	£194,521.20
Golden Lane Community Centre	General	£632,625.00	£632,625.00	£0.00
City Mental Health Centre	General	£502,534.00	£502,534.00	£0.00
Relocation of Adult Skills & Education Services (ASES)	General	£25,000.00	£25,000.00	£0.00
Expanding Citigen Energy Network	General	£17,000.00	£17,000.00	£0.00
Secure City Programme	General	£17,672,000.00	£10,676,283.22	£6,995,716.78
Public Realm Security Programme	General	£225,000.00	£225,000.00	£0.00
St Pauls Cathedral External Lighting	General	£1,160,000.00	£535,154.72	£624,845.28
Finsbury Circus Reinstatement	General	£2,558,000.00	£2,557,977.00	£23.00
Barbican and Golden Lane Healthy Streets Plan	General	£250,000.00	£115,000.00	£135,000.00
St Paul's Gyratory	General	£2,915,000.00	£675,759.18	£2,239,240.82
Museum of London	General	£44,600,000.00	£44,085,918.00	£514,082.00
Walbrook Wharf	General	£380,000.00	£0.00	£380,000.00
West Smithfield and Charterhouse Street Highway Strengthening	General	£3,500,000.00	£0.00	£3,500,000.00
Barbican Library Refresh	General	£775,812.00	£0.00	£775,812.00
Sculpture in the City	General	£196,000.00	£80,000.00	£116,000.00
City Cluster Programme	General	£5,900,000.00	£31,334.58	£5,868,665.42
Transforming Fleet Street	General	£9,000,000.00	£2,555.44	£8,997,444.56
MOL Highways Strengthening works	General	£4,660,000.00	£4,406,344.13	£253,655.87

Project	Type	Total allocations to 31/03/2025	Total CIL expenditure to 31/03/2025	Unspent CIL allocations
Golden Lane Leisure Centre (GLLC) (podium drainage)	General	£750,000.00	£0.00	£750,000.00
Refurbishment of Golden Lane Leisure Centre	General	£10,349,000.00	£0.00	£10,349,000.00
Administration	Administration	£883,986.58	£883,986.58	£0.00
General CIL Summary	**-**	**£112,788,355.64**	**£69,638,410.94**	**£43,149,944.70**
Neighbourhood CIL Summary	**-**	**£9,747,453.60**	**£6,034,268.27**	**£3,713,185.33**
Grand Totals	**-**	**£123,419,795.82**	**£76,556,665.79**	**£46,863,130.03**

Section 3 – Section 106 Planning Obligations Report 2024-2025

3.1. S106 planning obligations are legal agreements with developers for the provision of affordable housing, local training and jobs, and site-specific mitigation measures to alleviate the impacts of a development proposal. A S106 agreement is intended to make a development acceptable that would otherwise be deemed as unacceptable, by offsetting harm by making specific location improvements.

3.2. The legislative basis for planning obligations is contained within the TCPA 1990 (as amended), the Community Infrastructure Levy Regulations 2010 (as amended) and the National Planning Policy Framework (Dec 2024). Paragraph 58 of the NPPF sets out three statutory and policy tests for the use of such legally enforceable planning obligations:

National Planning Policy Framework

58. Planning obligations must only be sought where they meet all of the following tests:

a) necessary to make the development acceptable in planning terms;

b) directly related to the development; and

c) fairly and reasonably related in scale and kind to the development.

3.3. The City's Planning Obligations Supplementary Planning Document (SPD) sets out how S106 planning obligations in the City of London will be applied and explains how obligations are operated, within the context of the City of London Local Plan.

3.4. Some Section 106 agreements secure wider obligations that achieve other mitigation measures, which cannot be bound by condition, such as Wind Mitigation Surveys and Security/Counter Terrorism Measures.

3.5. Some S106 contributions such as Affordable Housing and Local Training Skills & Job Brokerage contributions are pooled to fund a City-wide programme of works and initiatives.

3.6. Tables 4-6 and Appendix 1 provide the S106 Report for financial year 2024-2025 as set out in CIL Regulation (2019 Amendment) 121A Schedule 2 Paragraph 3:

- Table 4: Reporting requirements for Section 106 3a to 3i.
- Table 5: Details of Section 106 Allocated but not Spent in 2024/25 - 3e and 3g.
- Table 6: Details of Section 106 Spent - 3h(i).
- Appendix 1: Details of Section 106 Agreements Secured - 3a.

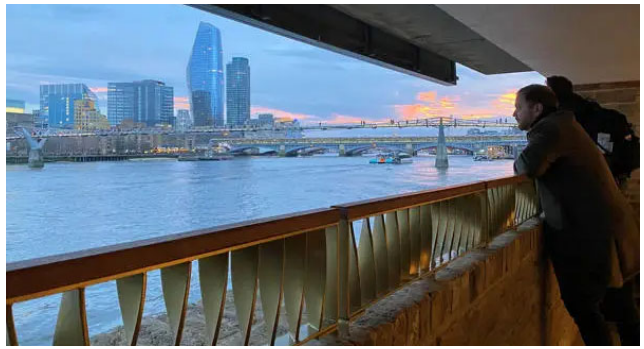
3.7. A full breakdown of projects funded by S106 contributions can be found below, though highlights include:

- Affordable Housing at Sydenham Hill ("*L5-Sydenham Hill - Provision of Social Housing*", £23,756,806.75 in expenditure).

  The construction of 110 new affordable 1-, 2-, 3- and 4-bedroom homes on the Sydenham Hill Estate, operated by the City of London Corporation in Lewisham. The project also includes a community room, estate office, amenity and play space. *(Image from Hawkins/Brown)*

- New riverside walkway ("*L5-RWE:Globe View Walkway*", £976.60 in expenditure).

  This project saw the construction of the Globe View walkway, the final part of the Riverside Walkway connecting the Tower of London in the east with Blackfriars in the west along the north bank of the Thames. The multi-year project received S106 contributions from nearby developments.



- Local Training and Skills ("*Training and Skills*", £564,592.50 expenditure)

  The City Corporation collects financial contributions for Local Training, Skills and Job Brokerage projects. In this financial year, S106 funds have been used to support the 'Skills for a Sustainable Skyline' initiative which seeks to identify and fill skills gaps that affect central London's sustainable built environment sector. It does this by helping Londoners to reskill and retain themselves for new green jobs in the construction sector.

3.8. The City Corporation may also secure contributions for maintenance of newly adopted assets for a certain period, or to fund ongoing studies on how to further improve highways and the public realm.

Table 4 – Section 106 Reporting Requirements for Financial Year 2024-2025

Reporting Requirement—CIL Regulation (2019 Amendment) 121A Schedule 2, Paragraph 1	Amount	Comments/Details
3(a). the total amount of money to be provided under any planning obligations which were entered into during the reported year;	£29,088,948.19	Please see appendix 1 for further details
3(b). the total amount of money under any planning obligations which was received during the reported year;	£9,846,843.82	-
3(c). the total amount of money under any planning obligations which were received before the reported year which has not been allocated by the authority;	£3,050,529.48	-
3(d). summary details of any non-monetary contributions to be provided under planning obligations which were entered into during the reported year, including details of— (i) in relation to affordable housing, the total number of units which will be provided; (ii) in relation to educational facilities, the number of school places for pupils which will be provided, and the category of school at which they will be provided;	(i) None (ii) None	-
3(e). the total amount of money (received under any planning obligations) which was allocated but not spent during the reported year for funding infrastructure;	£73,265,710.80	-
3(f). the total amount of money (received under any planning obligations) which was spent by the authority (including transferring it to another person to spend);	£45,908,371.39	-

Reporting Requirement—CIL Regulation (2019 Amendment) 121A Schedule 2, Paragraph 1	Amount	Comments/Details
3(g). in relation to monies (received under planning obligations) which were allocated by the authority but not spent during the reported year, summary details of the items of infrastructure on which the money has been allocated, and the amount of allocated to each item;	Please see Table 5	-
3(h). in relation to monies (received under planning obligations) which were spent by the authority during the reported year (including transferring it to another person to spend), summary details of— (i) the items of infrastructure on which monies (received under planning obligations) were spent, and the amount spent on each item; (ii) the amount of monies (received under planning obligations) spent on repaying money borrowed, including any interest, with details of the items of infrastructure which that money was used to provide (wholly or in part); (iii) the amount of monies (received under planning obligations) spent in respect of monitoring (including reporting under regulation 121A) in relation to the delivery of planning obligations.	(i) Please see Table 6 (ii) None (iii) £342,752.47	-
3(i). the total monies (received under any planning obligations) during any year which were retained at the end of the reported year, and where any of the retained monies have been allocated for the purposes of longer-term maintenance ("commuted sums"), also identify separately the total amount of commuted sums held.	**Total Commuted Sum held at 31/03/2024:** £1,518,124.67 **Total Commuted Sum spent at 31/03/2025:** £54,636.91 **Commuted Sum retained for future maintenance:** £1,463,487.76	-

Table 5 – Details of Section 106 allocated but not spent as at 31 March 2025 – 3(e) and 3(g)

Infrastructure Type	Total S106 allocations as at 31/03/2025	Unspent S106 allocations as at 31/03/2025
Local Training, Skills and Job Brokerage Initiatives	£10,955,116.22	£4,271,629.16
Local Community Environment and Transport Improvements	£96,195,582.72	£23,193,885.83
Affordable Housing Schemes	£126,661,537.77	£45,800,195.81
Total	**£233,812,236.71**	**£73,265,710.80**

Table 6 – Details of Section 106 spend in FY2024-25 – 3(h)(i)

Project	Type	Category	S106 Spend in FY2024-25
L5-RWE:Globe View Walkway	Capital	LCE & Transport	£976.60
L5-Moor Lane Environmental Enhancements S106	Capital	LCE & Transport	£8,753.35
L5-Billiter Street	Capital	LCE & Transport	£53,830.56
L5-2-6 Cannon Street Public Realm Improvements	Capital	LCE & Transport	£142,402.92
L5-Mark Lane Phase 2	Capital	LCE & Transport	£3,043.30
L5-Breams Buildings R&E S106	Capital	LCE & Transport	£2,520.17
L5-Cursitor St Improvements	Capital	LCE & Transport	£4.74
L5-Middlesex Street Area Project	Capital	LCE & Transport	£208,596.43
L5-Mansion House Station Public Realm Improvements	Capital	LCE & Transport	£382,353.74
L5-Holborn Viaduct & Snow Hill Pipe Subways	Capital	LCE & Transport	-£570.00
L5-HVM Security Programme	Capital	LCE & Transport	£213,980.03
L5-Greening of Cheapside Area	Capital	LCE & Transport	£13,939.79
L5-Greening of Cheapside Area	Capital	LCE & Transport	£182,307.32
L5-Mark Lane Phase 3	Capital	LCE & Transport	£11,627.56
L5-City Cluster Vision - Well-being & Climate Change	Capital	LCE & Transport	£434,666.41
L5-City Cluster Vision - Well-being & Climate Change	Capital	LCE & Transport	£23,706.40
L5-Creechurch Lane Area Improvements - CCV	Capital	LCE & Transport	£19,431.94
L5-Finsbury Circus Access Improvements	Capital	LCE & Transport	£104,560.82
L5-Salisbury Square Development Highway Works	Capital	LCE & Transport	£13,589.74
L5-2-6 Cannon Street Public Realm Improvements	SRP	LCE & Transport	£4,343.81
L5-21 Moorfields & Fore Street Avenue	SRP	LCE & Transport	£2,018.98

L5-Billiter Street	SRP	LCE & Transport	£894.31
L5-Breams Buildings R&E S106	SRP	LCE & Transport	£1,011.15
L5-City Greening & Biodiversity Project	SRP	LCE & Transport	£5,225.80
L5-City Greening & Biodiversity Project	SRP	LCE & Transport	£2,695.06
L5-Climate Action Strategy - Cool Streets and Greening Programme	SRP	LCE & Transport	£2,857.80
L5-Creechurch Lane Area Improvements - CCV	SRP	LCE & Transport	£7,629.82
L5-Creechurch Lane Area Improvements - CCV	SRP	LCE & Transport	£4,473.12
L5-Creechurch Lane Area Improvements - CCV	SRP	LCE & Transport	£18,373.47
L5-Crossrail Moorgate Urban Integration	SRP	LCE & Transport	£5,250.06
L5-Cursitor St Improvements	SRP	LCE & Transport	£3.24
L5-Eastern City Cluster CCTV Works	SRP	LCE & Transport	£3,030.11
L5-Eastern City Cluster Security	SRP	LCE & Transport	£1,423.55
L5-Eastern City Cluster Security	SRP	LCE & Transport	£4,822.72
L5-Fenchurch Street Healthy Streets Plan	SRP	LCE & Transport	£12,114.76
L5-Fenchurch Street Healthy Streets Plan	SRP	LCE & Transport	£53,570.91
L5-Finsbury Circus Access Improvements	SRP	LCE & Transport	£16,844.72
L5-Leadenhall Street Improvements - City Cluster Vision Programme	SRP	LCE & Transport	£20,539.98
L5-Leadenhall Street Improvements - City Cluster Vision Programme	SRP	LCE & Transport	£129,018.60
L5-London Wall Corridor Study	SRP	LCE & Transport	£4,854.69
L5-London Wall Corridor Study	SRP	LCE & Transport	£137,806.73
L5-Mansion House Station Public Realm Improvements	SRP	LCE & Transport	£25,856.01
L5-Mark Lane Phase 3	SRP	LCE & Transport	£1,476.28
L5-Middlesex Street Area Project	SRP	LCE & Transport	£8,809.37
L5-Middlesex Street Estate Eastern Base Highway Works	SRP	LCE & Transport	£1,447.90
L5-Middlesex Street Estate Eastern Base Highway Works	SRP	LCE & Transport	£3,899.27
L5-Moor Lane Environmental Enhancements S106	SRP	LCE & Transport	£3,752.41
L5-RWE:Globe View Walkway	SRP	LCE & Transport	£616.88
L5-Salisbury Square Development Highway Works	SRP	LCE & Transport	£5,990.29
L5-Salisbury Square Development Highway Works	SRP	LCE & Transport	£24,278.32
L5-Salisbury Square Development Highway Works	SRP	LCE & Transport	£95,789.70
L5-Temple Avenue Improvements	SRP	LCE & Transport	£4,171.06
L5-Temple Avenue Improvements	SRP	LCE & Transport	£21,302.15
L5-Sydenham Hill - Provision of Social Housing	Capital	Affordable Housing	£23,756,806.75
L5-Richard Cloudesley Housing	Capital	Affordable Housing	£3,857.00
L5-Isleden House Additional Housing	Capital	Affordable Housing	£93,272.28
L5-Richard Cloudesley Housing	Capital	Affordable Housing	-£812,582.80
L5-York Way Estate Provision of Social Housing	Capital	Affordable Housing	£16,386,332.39
L5-Richard Cloudesley Housing	Capital	Affordable Housing	£139,390.71
L5-36 Proctor House Avondale Square	Capital	Affordable Housing	£185,000.00

Childcare Affordability Scheme	Revenue	Affordable Housing	£36,363.24
Training and Skills	Revenue	Training and Skills	£564,592.50
OS Establishment Maintenance Costs 2024-25 - 16100488 - EC Planters	Revenue	LCE & Transport	£13,097.60
OS Establishment Maintenance Costs 2024-25 - 16100317 - 60-70 St Mary Axe - 60-70 St Mary Axe S106 (LCE)	Revenue	LCE & Transport	£1,997.70
Financing At Bartholomew Close provide and install C3/D3 bollards. Supplementary order. All work as discussed	Revenue	LCE & Transport	£3,169.70
OS Establishment Maintenance Costs 2024-25 - 16100298 - Barts Close Public Realm Enhancements S106 (LCE)	Revenue	LCE & Transport	£3,500.00
Financing Monument area de-cluttering works	Revenue	LCE & Transport	£2,363.41
OS Establishment Maintenance Costs 2024-25 - 16100316 - Cursitor Street Improvements - 12-14 New Fetter Lane S106 (LCE)	Revenue	LCE & Transport	£2,800.00
LCE - Fleet Street and Ludgate Hill Corridor Study	Revenue	LCE & Transport	£853.00
Transportation - Fleet Street and Ludgate Hill Corridor Study	Revenue	LCE & Transport	£5,243.00
OS Establishment Maintenance Costs 2024-25 - 16100227 - Lime Street	Revenue	LCE & Transport	£3,000.00
LCE - Fleet Street and Ludgate Hill Corridor Study	Revenue	LCE & Transport	£18,904.00
OS Establishment Maintenance Costs 2024-25 - 16100312 - Mark Lane Environmental Enhancements Phase 2 - Mariner House S106 (Transport)	Revenue	LCE & Transport	£3,200.00
OS Establishment Maintenance Costs 2024-25 - 16100359 - Bloomberg Place Highway Works - Bucklersbury House S106 (LCE)	Revenue	LCE & Transport	£1,485.00
OS Establishment Maintenance Costs 2024-25 - 16100334 - Middlesex St Phase B- Artizan Street - 100 Bishopsgate (LCE)	Revenue	LCE & Transport	£3,500.00
Cleansing Charges-Project-16100318-Annual Order: Section 108/278 2024/25: Angel Court	Revenue	LCE & Transport	£368.64
OS Establishment Maintenance Costs 2024-25 - 16100313 - Southampton Buildings - 40-45 Chancery Lane S106 (LCE)	Revenue	LCE & Transport	£1,154.86
OS Establishment Maintenance Costs 2024-25 - 17100009 - Seething Lane Gardens - 10 Trinity Square S106 (LCE)	Revenue	LCE & Transport	£15,000.00
S106 Monitoring and Administration	Revenue	S106 Monitoring and Administration	£342,752.47
Total	**-**	**-**	**£43,231,336.30**

Section 4 – City of London CIL Infrastructure List

4.1. Regulation 121A (1) requires the Infrastructure Funding Statement to include:

(a) a statement of the infrastructure projects or types of infrastructure which the charging authority intends will be, or may be, wholly or partly funded by CIL (other than CIL to which regulation 59E or 59F applies) ("the infrastructure list")

4.2. The City of London Infrastructure List consists of the following projects to deliver the vision of the adopted Local Plan, emerging City Plan and Infrastructure Delivery Plan 2020:

<u>Public realm and streets, including:</u>

- City Cluster public realm improvements
- Beech Street transport and public realm improvements
- Transforming Fleet Street
- St Paul's Gyratory
- HVM Security Programme
- Secure City programme
- St Paul's Cathedral external lighting
- Barbican and Golden Lane Healthy Streets Plan
- Museum of London highway strengthening works

<u>Cultural and community services, including:</u>

- Barbican Library refresh
- Golden Lane Leisure Centre

<u>Infrastructure and utilities, including:</u>

- Walbrook Wharf

Section 5 – Contacts

Sources:

Environment Department, City of London Corporation

Chamberlain's Department, City of London Corporation

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Guildhall

London EC2P 2EJ

Appendix 1 – Details of S106 Contributions Secured in 2024-25 – Question 3(a)

Application Number	Address	Date Deed Signed	Deed Type	Affordable Housing	Local Training Skills & Job Brokerage	S106 Monitoring	ECC Security Measures	Eval & Design S278 / Public Realm	Eval & Design Security	St Paul's External Lighting Project	Legible London	Other 1	Other 2	Cycle Hire / Cycling Improvements	TfL Transport Contribution
23/01260/FULMAJ	100 New Bridge Street, London, EC4V 6JA	2024-04-15	DoV-S73	£ 19,250.00	£ 11,550.00	£ 308.00	-	-	-	-	-	-	-	-	-
23/00882/FULL	Middlesex Street Estate, Gravel Lane, London, E1 7AF	2024-05-01	UU	-	-	£ 906.36	-	£ 75,000.00	-	-	-	-	-	-	-
23/01254/FULMAJ	5-10 Great Tower Street, London, EC3R 5AA	2024-06-07	S106	£ 77,050.00	£ 45,767.70	£ 4,733.00	-	£ 50,000.00	-	-	-	£ 175,000.00 (Churchyard Contribution)	-	-	-
23/01270/FULMAJ	Winchester House, 75 London Wall, London, EC2M 5ND	2024-06-07	S106	£ 906,692.00	£ 544,015.00	£ 17,904.00	-	£ 50,000.00	-	-	-	-	-	£ 60,000.00	-
23/01115/FULL	Alban Gate, 125-130 London Wall, London, EC2	2024-06-21	S106	-	-	£ 1,000.00	-	-	-	-	-	£ 2,317,000.00 (City Walkways Bond)	-	-	-
22/00981/FULEIA	55 Bishopsgate, London, EC2N 3AS	2024-07-10	S106	£ 4,831,299.00	£ 2,898,779.00	£ 98,462.00	£ 966,260.00	-	-	£ 198,000.00	-	£ 247,500.00 (St Paul's Orb and Cross Contribution)	£ 11,880.00 (Section 278 Monitoring Fee)	£ 220,000.00	£ 1,500,000.00
22/00753/FULMAJ	6 Devonshire Square, London, EC2M 4YE	2024-07-17	S106	£ 109,395.00	£ 65,637.00	£ 4,989.00	£ 21,879.00	£ 50,000.00	-	-	-	-	-	-	-
22/00298/FULL	23-26 Austin Friars, London, EC2N 2QP	2024-08-07	S106	£ 31,630.00	£ 18,978.00	£ 2,011.00	-	-	-	-	-	-	-	-	-
23/01379/NMA	10 King William Street (Bank OSD)	2024-08-19	DoV	-	-	£ 1,500.00	-	£ 46,000.00	-	-	-	-	-	-	-
22/00970/FULMAJ	Millennium Bridge House, 2 Lambeth Hill, London, EC4V 4AG	2024-09-05	DoV-S73	-	-	-	-	-	-	-	-	-	-	-	-
24/00332/FULL	150 Cheapside, London, EC2V 6ET	2024-09-27	DoV-S73	-	-	-	-	-	-	-	-	-	-	-	-
23/00867/FULMAJ	40 Holborn Viaduct, London, EC1N 2PB	2024-09-27	S106	£ 176,962.00	£ 106,177.00	£ 5,610.00	-	£ 50,000.00	-	-	-	-	-	-	-

Application Number	Address	Date Deed Signed	Deed Type	Affordable Housing	Local Training Skills & Job Brokerage	S106 Monitoring	ECC Security Measures	Eval & Design S278 / Public Realm	Eval & Design Security	St Paul's External Lighting Project	Legible London	Other 1	Other 2	Cycle Hire / Cycling Improvements	TfL Transport Contribution
22/01200/FULMAJ	1 Appold Street, London, EC2A 2UU	2024-10-07	S106	£ 1,138,698.00	£ 683,218.00	£ 21,903.00	-	£ 50,000.00	-	-	-	-	-	-	-
23/00686/FULL	3 Queen Victoria Street, London, EC4N 4TQ	2024-10-18	DoV	-	-	-	-	-	-	-	-	-	-	-	-
23/01304/FULEIA	London Wall West (140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, EC2Y 5DN)	2024-12-11	UU	£ 1,635,118.00	£ 981,071.00	£ 29,926.00	-	£ 210,000.00	-	-	-	-	-	£ 100,000.00	-
23/00926/FULMAJ	The Broadgate Tower, 20 Primrose Street, London, EC2A 2EW	2024-12-17	S106	£ 119,146.00	£ 71,488.00	£ 4,426.00	-	£ 50,000.00	-	-	-	-	-	-	-
24/00648/FULMAJ	65 Fleet Street, London, EC4Y 1HT	2024-12-18	S106	-	£ 115,502.70	£ 6,905.03	-	£ 50,000.00	-	-	-	£ 45,000.00 (NHS Contribution)	-	-	-
23/00469/FULEIA	55 & 65 Old Broad Street, London, EC2M 1RX	2024-12-19	S106	£ 1,308,676.00	£ 785,206.00	£ 29,044.00	£ 261,735.00	£ 100,000.00	-	-	-	-	-	-	-
24/00126/FULMAJ	21 Lombard Street, London, EC3V 9AH	2025-02-27	S106	£ 136,768.50	£ 82,061.10	£ 5,236.70	-	£ 75,000.00	-	-	-	-	-	-	-
24/00287/NMA	2-3 Finsbury Avenue, London, EC2M 2PF	2025-03-19	DoV-NMA	-	-	-	-	-	-	-	-	-	-	-	-
24/00504/FULL	54 King William Street London EC4R 9AD	2025-04-01	S106	-	-	£ 250.00	-	-	-	-	-	-	-	£ 14,000.00	-
24/00737/FULL	Atlas House 1 - 7 King Street London EC2V 8AU	2025-03-19	S106	-	-	£ 250.00	-	-	-	-	-	-	-	£ 10,800.00	-
24/01044/FULL	47-50 Mark Lane London EC3R 5AS	2025-03-25	DoV-S73	£ 84,150.00	£ 50,490.00	£ 2,360.00	-	-	-	-	-	-	-	-	-
23/00365/FULMAJ	30-33 Minories & Writers' House, 13 Haydon Street, London, EC3N 1DB	2025-03-25	S106	£ 697,208.00	£ 418,325.00	£ 16,268.00	-	£ 100,000.00	-	-	-	-	-	-	-

Application Number	Address	Date Deed Signed	Deed Type	Affordable Housing	Local Training Skills & Job Brokerage	S106 Monitoring	ECC Security Measures	Eval & Design S278 / Public Realm	Eval & Design Security	St Paul's External Lighting Project	Legible London	Other 1	Other 2	Cycle Hire / Cycling Improvements	TfL Transport Contribution
23/01102/FULMAJ	Hill House, 1 Little New Street, London, EC4A 3JR	2025-03-28	S106	£ 1,601,171.55	£ 960,703.00	£ 35,362.21	£ 323,489.00	£ 100,000.00	-	-	£ 45,000.00	£ 90,000.00 (SME Workspace and Apprentice Hub Contribution)	-	£ 220,000.00	-
24/00021/FULEIA	1-4, 31-34 Bury Street, London, EC3A 5AR	2025-03-20	S106	-	-	-	-	-	-	-	-	-	-	-	-

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Committees: Streets & Walkways Sub-committee (For Decision) Planning & Transportation Committee (For Information)	**Dates:** 16 September 2025 21 October 2025
Subject: Aldgate to Blackfriars Cycleway **Unique Project Identifier:** 699	**Gateway 3/4** Regular **Progress Report**
Report of: Executive Director Environment **Report Author:** Albert Cheung, Street Space Planning	**For Decision**
PUBLIC	

1. Status update	**Project Description:** 1.1 The Transport Strategy identifies a core network of cycling routes in the City. To be delivered in phases, it aims to make the Square Mile a safe, attractive, and accessible place for people to cycle by applying a minimum standard for cycling provision. 1.2 In October 2024, the Streets & Walkways Sub-committee approved the Aldgate to Blackfriars Cycleway Gateway 3/4 report. This included proposals for two-way protected cycle lanes on Queen Victoria Street along the northern kerbside between Puddle Dock and Friday Street, with people cycling separated from traffic by central islands. 1.3 This side of Queen Victoria Street was selected because it has the least number of side streets and vehicle accesses and was therefore considered the most optimal for safety and quality. Parking for disabled and coach users has been retained but the bays on the northern kerbside are displaced to the southern side of Queen Victoria Street and Friday Street. 1.4 Bus stop bypasses, also known as a floating bus stop,

	have been incorporated into design. This is where a protected cycle lane runs between the pavement and the bus stop. The primary purpose of a bus stop bypass is to continue the protection for people cycling from motorised vehicles by maintaining the cycle track through the bus stop area. People boarding or alighting from the bus do so using an island which is accessed by crossing the cycle lane/s. 1.5 Along all other sections of the Aldgate to Blackfriars Cycleway, conventional single direction protected cycle lanes on each side of the road are provided. Where traffic volumes are low enough and considered safe, people cycling will mix with motorised vehicles. 1.6 The whole route has been assessed and designs developed to meet current design guidance and standards, which aim to ensure that no one feels excluded from cycling due to safety concerns. The cycleway scheme layout plan is shown in Appendix 1. 1.7 Transport for London (TfL) cycleway funding is available to schemes which meet TfL's new cycle route quality criteria. To date, TfL has fully funded the evaluation and design development through grants provided to the City Corporation. The current design, which includes fully protected cycle lanes, meets TfL's requirements. 1.8 TfL confirms and releases cycleway funding in stages. Future funding for detailed design and traffic modelling will depend on the outcomes and approvals of this report (in terms of whether the cycleway design continues to meet TfL's quality criteria). Currently, the exclusion of bus stop bypasses would fall short of providing fully protected cycle lanes where they are needed to meet TfL's requirements and therefore would not be successful in obtaining future TfL cycleway funding. 1.9 While TfL have indicated that they will continue to fund the project, subject to it meeting their design standards, the City Corporation is expected to match fund the cycleway's construction. This contribution is likely to come from OSPR or CIL funding. This funding strategy remains subject to a future bid and approval through the Priorities Board / RASC. As the OSPR and CIL funds are currently fully committed, future funding will only be possible as and when opportunities and circumstances allow. An extension to the project programme is expected to enhance the likelihood of a successful funding bid, as it would allow time for the OSPR and CIL funds to build up.

	RAG Status: Green at last report to Committee **Risk Status:** Medium at last report to committee **Total Estimated Cost of Project (excluding risk):** £4.0-£4.5M **Spend to Date:** £323,188 (fully funded by TfL) **Costed Risk Provision Utilised:** None
2. Key points to note	**Next Gateway:** Gateway 5 - Authority to Start Work (Regular) **Key Points:** • Following Gateway 3/4 approval, a public consultation on the cycleway scheme was carried out. Overall, the public consultation results show 79% of participants (466 respondents) expressed a positive view on the proposed changes to deliver the cycleway, whilst 18% of consultation participants (106 respondents) expressed a negative view and 3% of consultation participants were neutral. • A bus stop bypass is an essential facility for delivering continuous protected cycle lanes, which are critical to creating a safe, attractive and inclusive cycle route. They enable more people, including women, children, and some disabled people to cycle. However, bus stop bypasses do cause difficulties for other groups, particularly visually impaired people, who may feel excluded from safely accessing the bus stop. • The focus group of disabled people was overall supportive of the cycleway proposals, however, there was concern that bus stop bypasses do cause difficulty for visually impaired people. Concerns about the impact of the bus stop bypasses, particularly on people who are blind and visually impaired were also raised by the Royal National Institute of Blind People (RNIB) and the National Federation of Blind People UK (NFBUK). • The analysis of the latest collision data available showed that there was not a significant collision issue along the proposed cycle route. In 2024, traffic counts on Queen Victoria Street recorded two-way motorised vehicle volumes of over 600 vehicles per hour during both the morning and evening peak periods. These volumes exceed the design guidance threshold for which protected space for cycling is required. • In June 2025, a Members' briefing was held at which representatives from a range of stakeholder groups

	discussed the implications of bus stop bypasses. Organisations representing blind people called for the delivery of bus stop bypasses to be stopped or deferred until new guidance is published and a fully inclusive solution identified. In contrast, other groups, including those representing disabled people who use a cycle as a mobility aid, expressed support for progressing with the delivery of the cycleway without delay. • The Aldgate to Blackfriars Cycleway equalities impact assessment has been updated following extensive stakeholder engagement. The outcome has indicated that, while there are negative impacts, these do not constitute unlawful discrimination, and the cycleway proposal is considered to be objectively justified. • Five options have been considered for taking the Cycleway project forward. These range from proceeding as proposed to cancelling the project due to the implications of bus stop by passes. • London and national guidance on bus stop bypasses is currently being updated, with publication expected in early 2026. A short pause to the project to allow for the release and review of this updated guidance, ensures the cycleway scheme is aligned, is considered reasonable and responsible. **Requested Decisions:** Members of the Streets and Walkways Sub-committee are asked to: 1. Agree to defer the project (Option 2) until updated guidance on bus stop bypasses is published, as detailed in Section 6.
3. Reporting period	Between November 2024 and September 2025
4. Progress to date	<u>Public Consultation</u> 4.1 A public consultation on the proposals for the Aldgate to Blackfriars Cycleway opened on 9 December 2024 and ran for nine weeks, with the online survey closing on Sunday 9 February 2025. Commonplace, a specialist consultant was commissioned to host the public consultation. The online consultation survey page was viewed over 6,500 times and resulted in over 1,200 survey contributions, made by over 560 people.

4.2 Engagement prior and during the consultation included:

- Pre-engagement meetings with key stakeholders, including affected local occupiers, London Cycling Campaign and Transport for London.
- Promotion via Business Improvement Districts.
- Email communication to stakeholders and interest groups.
- 2,100 leaflets distributed to building occupiers along the proposed cycle route.
- 30 large on-street publicity posters.
- Drop-in sessions where the public could discuss the proposals with the project team.

4.3 The public consultation received a high proportion of responses from people who cycle as well as a significant proportion of respondents that did not specify what mode(s) of transport they use. Responses have been separated in the summary below.

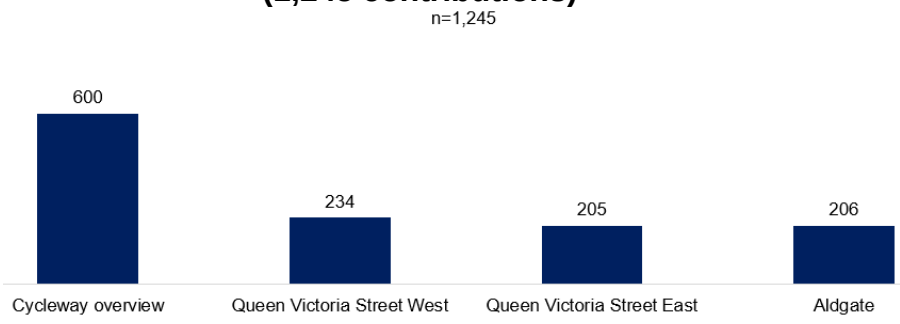
4.4 The online consultation split the proposed cycleway into four sections.

- Queen Victoria Street - west (western section)
- Queen Victoria Street - east (eastern section)
- Aldgate
- Whole route overview

4.5 This enabled people to provide feedback on a specific area of interest, different areas or to comment on the whole cycle route.

4.6 A breakdown of the 1,245 survey contributions by area, made by over 560 people (some people made more than one contribution) is shown in Chart 1 below.

Chart 1: Public Consultation Survey Contributions (1,245 contributions)



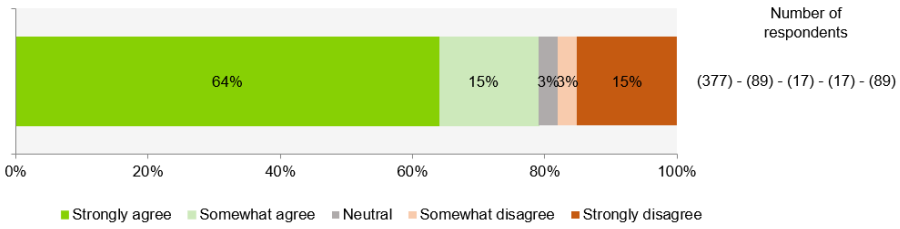
4.7 In addition to the questions on the four sections of the cycle route, each respondent was also asked a series of optional demographic and travel questions.

4.8 The consultation responses for the three sections (Queen Victoria Street west, Queen Victoria Street east and Aldgate) were consistent with responses on the cycleway overview which are discussed in paragraphs 4.19 to 4.30. The results for each of the three sections can be found in Appendix 2.

Cycleway Overview – consultation findings

4.9 This referred to the whole cycleway between Aldgate and Blackfriars.

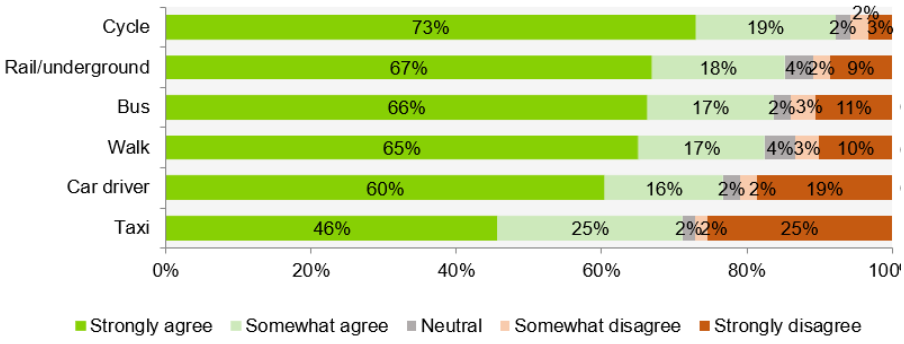
Chart 2: Levels of agreement with the proposed changes (589 respondents)



4.10 The results show 79% of consultation participants (466 respondents) expressed a positive view of the proposed changes to deliver the cycleway, whilst 18% of consultation participants (106 respondents) expressed a negative view and 3% of consultation participants were neutral.

4.11 Analysis has been carried out to examine how agreement with the proposed changes varied based on respondents' reported modes of travel. Respondents were able to select multiple modes of transport. However, certain travel modes, such as private hire vehicle drivers and passengers, motorcyclists, and van or lorry drivers, had too few responses to support meaningful analysis.

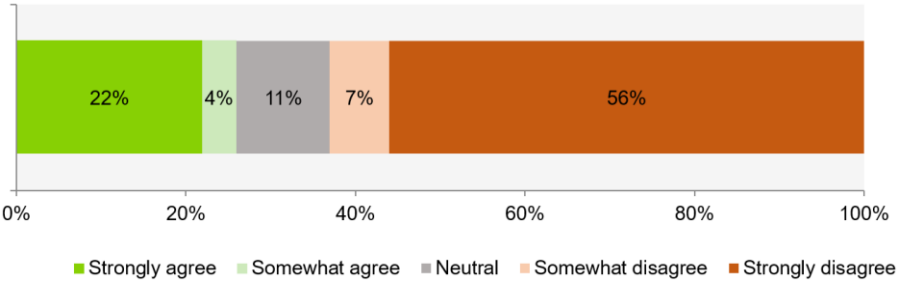
Chart 3: Agreement with the proposed changes by travel mode (326 respondents)



4.12 Noting that people could select multiple answers, Chart 3 shows there was agreement for the proposed changes across all modes of travel. Support was highest among those who cycle (92% or 259 respondents), followed by users of rail/underground (85% or 219 respondents), bus users (84% or 174 respondents), and people who walk (82% or 222 respondents). In contrast, opposition was limited. While still supportive overall, 21% of those identifying as car drivers (9 respondents) and 27% of taxi users (16 respondents) expressed disagreement with the proposed changes.

4.13 Further analysis considered responses from those who did not select cycling as a mode of travel. The number of people who answered the mode of travel question and do not cycle is comparatively low with 45 respondents. Chart 4 below shows their level of agreement.

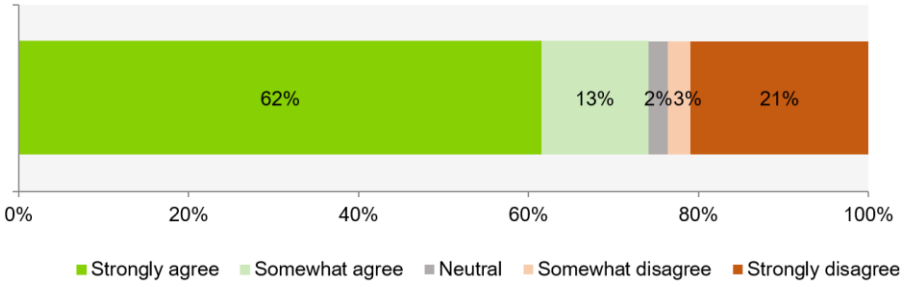
Chart 4: Agreement with the proposed changes from non-cyclists (45 respondents)



4.14 Over 60% (28 respondents) disagreed with the proposed changes. For many, this disagreement was strong. In contrast, just 26% (12 respondents) agreed, while 11% expressed a neutral opinion.

4.15 263 respondents did not provide an answer for how they travelled through the area. This is a significant proportion, 45% of the total number of consultation participants. Chart 5 below shows the levels of agreement with the proposed changes for respondents with an unspecified travel mode.

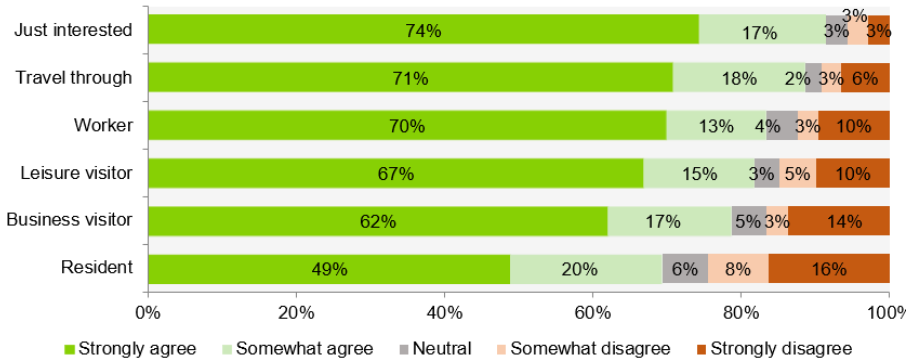
Chart 5: Agreement with the proposed changes for those not answering the travel mode question (263 respondents)



4.16 75% of consultation participants (197 respondents) who did not specify a travel mode, agreed with the proposed changes. For many, this agreement was strong. 24% (63 respondents) disagreed, while 3 respondents expressed a neutral opinion.

4.17 Analysis has also been carried out to examine how agreement with the proposed changes varied based on respondents' relationship to the area. Respondents were able to select multiple relation types, where applicable. However, certain types, such as business owners, drivers/riders, and students, had too few responses to support meaningful analysis.

Chart 6: Agreement with the proposed changes by relation to the area (358 respondents)

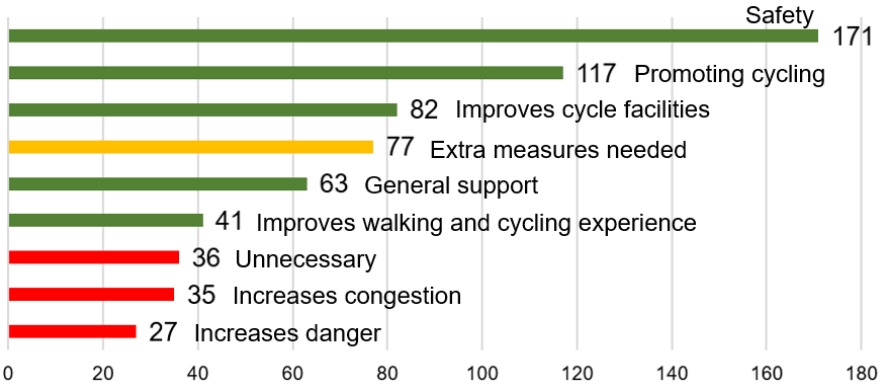


4.18 Chart 6 shows agreement for the scheme consistently above 65%. The highest level of

disagreement was from local residents with 24% disagreeing with the proposed changes.

4.19 464 respondents provided additional comments. Some respondents made more than one comment. The key themes emerging from these comments and the number of comments made are shown in Chart 7 below. Those responses in green, amber and red represents favorable, neutral or negative views of the proposals respectively.

Chart 7: Reason for supporting or not supporting the proposed changes (464 respondents)



4.20 Among the 77 respondents who mentioned that extra measures were needed, 14 responses called for an alternative to the proposed bus stop bypasses, due to safety concerns for people walking or wheeling who would need to cross the cycle track to access the bus stop. Similar concerns were also received in a letter from the Royal National Institute of Blind People (RNIB). The National Federation of the Blind UK (NFBUK) did not respond directly to the consultation but contacted Members to highlight their concerns about bus stop bypasses.

4.21 In addition to the consultation survey, a letter was received from the City of London School, which raised concerns regarding changes to the coach parking. These concerns were subsequently resolved following a meeting with the school. The College of Arms also raised concerns about the potential impact of the cycle track on their access and property. However, officers consider that these matters can be addressed during the detailed design stage of the scheme.

Accessibility Review

4.22 Transport for All, a pan-disability disabled-led organisation supporting inclusive transport, were commissioned to undertake an accessibility review of the Aldgate to Blackfriars Cycleway. The review included focus group engagement with disabled people and local stakeholders, and an independent accessibility design review. The findings are summarised below.

4.23 The focus group with disabled people was attended by 10 people (both online and in person), who reviewed the cycleway proposals from a variety of perspectives, taking a pan-disability approach. Reviewing the proposal plans and cycleway visualisations, the focus group discussed current and potential barriers, with their lived experience at the centre of the conversations. A summary of the focus group feedback is provided in Table 4.1 below. Full details are included in Appendix 3

Table 4.1 – Lived Experience Focus Group - Feedback

Topic	Description
Navigation and Wayfinding	Accessible wayfinding for neurodivergent and blind people. Signage should be consistent and at an accessible height Use materials and infrastructure with high colour contrast and tactile wayfinding features.
Physical Design and Infrastructure	Shared walking and cycling areas are problematic particularly for disabled people. Support for dedicated protected cycle lanes which allow adapted cycles and mobility scooters. Preference varies between bollards, kerbs, and concrete separators but agreement on physical separation reduces risk and improves clarity.
Safety and Risk Mitigation	Speed and quiet operation of cycles and scooters were major safety risks, especially for blind/visually impaired people.

	Poorly designed junctions and bus stop bypasses increase safety risk, particularly in shared areas. Suggested mitigations included: audible crossings, tactile paving, speed limits, visual cues for safe crossing, countdown timers, good lighting, and safe refuge zones at crossings.
Public Education and Behaviour	Support for education campaigns, especially around bus stop bypasses, cycleway rules, and use of mobility devices in cycle lanes. Need for considerate cycling. Better understanding / signage on who (mobility scooters) can use cycleways. Regulation of rental e-bike parking and speed enforcement
Environment and Accessibility Barriers	Pavements and drop kerbs blocked with parked rental e-bikes Inadequate lighting, poor maintenance of tactile paving, and improperly placed greenery were flagged as hazards Planters, trees, and soft landscaping are welcome but must not compromise accessibility

4.24 Only two organisations responded to the invitation to the focus group with external stakeholders – the City River Partnership and local representatives from the London Cycling Campaign. Their main recommendations were to prioritise physically separated, inclusive, and accessible cycleways with clear wayfinding, safe junctions, and measures to reduce speed in shared areas.

4.25 Emphasis was placed on delivering high quality infrastructure along the full route to serve a diverse range of users including women, children, disabled people using adapted cycles, and cargo bike riders. This should be supported by enforcement against misuse of cycle infrastructure by powered two-wheelers and better management of rental e-bike parking. They also highlighted the need for careful construction planning to minimise disruption and

maintain safe cycling conditions during construction. Full details are included in Appendix 3.

4.26 An accessibility design review was also carried out by Transport for All to ensure that the proposed design is as inclusive as possible. A summary of the recommendations is provided in Table 4.2 and in full in Appendix 3.

Table 4.2 – Accessibility Design Review Summary

Topic	Description
Pavement	Ensure a minimum 2.0 metre unobstructed pavement width. Standard reference in: - Inclusive Mobility, BS 8300
Signal Crossings	Crossings should include tactile paving, audible signals, adequate crossings times for slow moving people. Standard reference in: - Inclusive Mobility, BS 8300, Highway Code
Clearly separated cycling and walking areas	At the bus stop by passes ensure that tactile delineators and surface contrast are used. Standard reference in: - Inclusive Mobility, BS 8300, LTN 1/20
Accessible wayfinding and rest areas	Along the cycle route tactile or audio signage and maps should be installed. Seating ideally with cover/ shade should be provided at regular intervals for rest stops. Standard reference in: - Inclusive Mobility, BS 8300, LTN 1/20
Parking	Ensure that relocated disabled and coach parking does not obstruct any walking routes or reduce visibility at crossings. Standard reference in: - Inclusive Mobility, BS 8300, LTN 1/20
Mobility scooter	The cycleway should be appropriately designed to accommodate mobility scooters in terms of width, quality, step free access, safe transitions, and gradients. Standard reference in: - Inclusive Mobility, BS 8300, LTN 1/20

General best practices	The cycleway should be designed to include accessibility features such as: - High contrast markings and non-slip surfaces - Shadow free lighting - Consistent design along the route - Visual enhancements on street furniture

4.27 The outcomes of all the accessibility review, including the focus group feedback, has informed the Aldgate to Blackfriars Cycleway equalities impact assessment which is discussed later in this report. In addition, the accessibility review will support the detailed design of the cycleway scheme subject to approval to progress the project.

<u>Collision Data Review</u>

4.28 A collision analysis update has been carried out for the cycle route using five-year data up to March 2025. All collision data post December 2023 is provisional and may change.

4.29 Along Queen Victoria Street (between Blackfriars Court and Queen Street), which includes four signalised junctions and a standalone signalised pedestrian crossing, 13 collisions were recorded, an average of 2.6 collisions per year. This average equates to one collision every two years at each set of traffic signals. This is considered relatively low and does not indicate a significant road safety issue.

4.30 In the Aldgate area, which comprises two signalised junctions and a standalone signal pedestrian crossing, 11 collisions were recorded over five years, an average of 2.2 collisions per year, equating to fewer than one collision per year at each set of traffic signals. This also does not indicate a significant road safety issue.

4.31 Although the data does not indicate a current road safety issue, the proposed cycleway is expected to improve safety and perceptions of safety for people walking, wheeling, and cycling. It is therefore still expected to reduce road collisions and encourage more people to cycle. As noted below, traffic volumes on Queen Victoria Street exceed the design guidance threshold (500 vehicles per hour), after which protected space for cycling is required.

4.32 In addition, as the number of people cycling is expected to steadily increase, the absence of protected space for cycling may result in a corresponding rise in collisions involving people cycling. The delivery of the cycleway is expected to mitigate this risk and further encourage growth of people cycling in the City.

4.33 Tables 4.3 and 4.4 show a summary of the collisions between March 2020 and February 2025 along the proposed cycleway.

Table 4.3 – Collisions on Queen Victoria Street (5 years)

Location on Queen Victoria St	Collision Type	Severity
Blackfriars Ct	Pedestrian & Cycle	Serious
St Andrews Hill	Cycle & Taxi	Slight
St Andrews Hill	Motorcycle & LGV	Slight
White Lion Hill	Motorcycle	Serious
White Lion Hill	Pedestrian & Car	Slight
White Lion Hill	Pedestrian & Bus	Slight
White Lion Hill	Pedestrian & Motorcycle	Serious
Godliman St	Motorcycle & LGV	Slight
St Peter's Hill	Pedestrian & Cycle	Serious
Cannon Street	Cycle & Car	Slight
Cannon Street	Pedestrian & Car	Slight
Queen Street	Cycle & Taxi	Slight
Queen Street	Motorcycle & Taxi	Slight

4.34 Along Queen Victoria Street between Blackfriars Court and Queen Street, five of 13 collisions involved a person cycling, of the five collisions: three collisions involved a motorised vehicle and two collisions were with a person walking.

Table 4.4 – Collisions around Aldgate (5 years)

Location around Aldgate	Collision Type	Severity
Fenchurch St	Cycle & Car	Slight
Fenchurch St	Cycle & Motorcycle	Slight
Leadenhall St	Taxi & Cycle	Serious
Jewry St	Motorcycle & Motorcycle	Slight
Minories	Motorcycle & Taxi	Slight
Minories	Cycle & HGV	Slight
Duke's Place / St Botolph	Motorcycle & Car	Slight

St Botolph Crossing	Pedestrian & Cycle	Slight
St Botolph Crossing	Pedestrian & Car	Slight
St Botolph Crossing	Pedestrian & Car	Serious
St Botolph Crossing	Pedestrian & Car	Slight

4.35 Around Aldgate along the proposed cycle route, five of 11 collisions involved a person cycling. Of these, four collisions involved a motorised vehicle, and one collision was with a person walking.

Traffic volumes

4.36 The Department for Transport's (DfT) design guidance states that in order to make a street fully accessible and comfortable for most people to cycle protected space for people cycling (which may include bus stop bypasses) is necessary on streets where motor traffic exceeds lightly trafficked conditions during peak times. This typically means streets carrying more than 2,000 motor vehicles per day (two-way) or over 500 motor vehicles per hour during the peak (two-way).

4.37 The DfT's motorised vehicle volume threshold and its application on when to provide protected cycle lanes is reflected in the Transport Strategy and in Transport for London's (TfL) New Cycle Route Quality Criteria. Meeting the Route Quality Criteria is a condition of TfL's funding to deliver cycleway projects such as the proposed Aldgate to Blackfriars Cycleway.

4.38 On Queen Victoria Street, the peak hour motorised vehicle volumes are over 600 vehicles per hour which is above the 500 vehicle per hour threshold indicating protected space for cycling is needed. As a comparison, traffic volumes on Leadenhall Street are 446 motor per hour during the peak hour, which does not require protected cycle lanes.

Equalities Impact Assessment (EQIA)

4.39 The equalities impact assessment of the Aldgate to Blackfriars Cycleway has been updated with Census 2021 data, Square Mile's workforce data 2023, Office National Statistics Data 2024, feedback from the public

consultation, accessibility design review and Member briefing. The updated EQIA is in Appendix 4.

4.40 The outcome of the EQIA indicates that, while there are negative impacts, these do not constitute unlawful discrimination, and the Aldgate to Blackfriars cycleway proposal is considered to be objectively justified.

4.41 It is acknowledged that certain groups may experience exclusion. However, the scheme is expected to improve inclusivity for other groups who currently feel excluded from cycling due to existing road conditions. As part of the scheme design, mitigation measures will be investigated and delivered where possible to remove or minimise potential negative impacts on affected groups. Post delivery monitoring will continue and where appropriate and possible, further measures could be considered.

4.42 The EQIA will be reviewed and updated as the cycleway design progresses, where considered appropriate, to take account of any new data or emerging information. This will include, for example, significant changes arising from the publication of updated guidance on bus stop bypasses.

<u>Bus Stop Bypasses Members' Briefing</u>

4.43 On 18 June, a Members' briefing was held in the form of a round table discussion with representatives of different organisations. The purpose of the briefing was to allow Members to participate in a broad discussion on the implications of bus stop bypasses.

4.44 The organisations which attended were:

- London Cycling Campaign (LCC)
- Living Streets
- National Federation of the Blind UK (NFBUK)
- Royal National Institute of Blind People (RNIB)
- Wheels for Wellbeing (WfW)

4.45 All the attendees were invited to submit a short briefing paper which was circulated in advance of the briefing. All organisations except for NFBUK provided a paper. Guide Dogs for the Blind were unable to attend but also provided briefing paper. A summary of the key points made by each organisation is below and the briefing papers are included in Appendix 5.

	4.46 Guide Dogs key points: • Their research study found that blind and visually impaired people have real difficulty detecting people cycling at bus stop bypasses. • The higher the speed at which people cycle also increases the fear of a collision. • Investigate ways to make the size of the island at bus stops safer and to slow the speed of people cycling. • Ensure audible announcements are in place to inform passengers of a bus stop bypass. • Requests the delivery of bus stop bypasses to be paused until further research is completed. 4.47 London Cycling Campaign key points: • Strongly supported the Transport Strategy with particular emphasis on reducing road danger and inclusive cycling. • Bus stop bypasses are a necessary feature for cycle safety that are essential to reduce conflict with motor vehicles. • Delivery of bus stop bypasses should not be deferred as delay could result in a serious or fatal collision and have an adverse impact on the delivery of the Transport Strategy. • Evidence that a protected cycle route increases diversity in cycling and that safety concerns are a significant barrier to people taking up cycling • Acknowledge that City streets are complex which need to be designed carefully and sensitively with an evidence-based approach. • Continue collaborative design so that the cycleway is as safe as possible. 4.48 Living Streets key points: • Acknowledged that bus stop bypasses are not perfect but are necessary for cycle safety. • Visually impaired people can have difficulty when crossing the cycle track at bus stop bypasses. • There is no adequate design alternative. • Encouraged the City to lead on design mitigations measures rather than omitting bus stop bypasses. • Signalised crossings to be considered for busiest bus stops.

	4.49 NFBUK key points: • Strongly opposed to bus stop bypasses as they impede independent travel for blind people. • Current design guidance has ignored and excluded blind people. • Safety concerns as moving micromobility vehicles can be difficult to hear with background noise. • Cycle routes should avoid busy bus corridors. • Current cycle infrastructure design guidance should be reviewed. • Cycleway design should be reviewed with extensive engagement with disabled groups. • Do not believe it is possible to make bus stop bypasses safe and accessible for blind people and that alternative designs that do not provide a continuous cycle lane should be developed. 4.50 RNIB key points: • Research findings showed that 87% of respondents find bypasses harder to use; 13% avoid travel altogether. • In some cases, people encountered psychological stress and reduced travel freedom. • Requested the delivery of bus stop bypasses to be paused until an inclusive design solution is found. • Referenced the Equalities Act 2010 and Public Sector Equality Duty 4.51 WfW key points: • Buses and cycles as mobility aids are both vital for different disabled users. • Some disabled people rely on cycles and adapted cycles to travel. Noted that people travelling by mobility scooter can also use cycle tracks, and that bi-directional tracks allow overtaking of people using adapted bikes or mobility scooters who may travel more slowly. • Opposed to pausing the delivery of bus stop bypasses as a delay would endanger disabled people cycling. • Supports innovative and inclusive design at bus stop bypasses. 4.52 The conclusions from the round table discussion were that both the NFBUK and RNIB requested a deferral of the cycleway's delivery until updated

	guidance was published and a fully inclusive design solution for bus stops was identified. In contrast, LCC, Living Streets, and WfW supported proceeding with the delivery of the cycleway, including bus stop bypasses, while continuing collaborative engagement with user groups to develop suitable mitigation measures addressing the concerns of people with visual impairments. <u>Bus Stop Bypass Policy Position</u> 4.53 The Transport Strategy includes proposals for a network of cycle routes made up of streets with lower traffic volumes or, where traffic volumes are higher, protected space for cycling in line with national and London guidance. 4.54 While the Transport Strategy does not explicitly refer to bus stop bypasses current guidance is that they are included where protected cycle lanes are installed on bus routes. 4.55 There are currently seven bus stop bypasses in the City, all of them on the TfL Road Network. TfL's bus stop bypass review in 2024 identified that there were no collisions recorded at bus stop bypasses in the City. See Appendix 6 for full details and bus stop locations. 4.56 One bus stop bypass will be installed as part of the St Paul's Gyratory Transformation. This is part of a short stretch of bi-directional cycle track on St Martin Le Grand that allows people cycling to safely navigate the Newgate Street / St Martin Le Grand / Cheapside junction. This has been designed in accordance with current guidance. 4.57 Other than those proposed as part of the Aldgate – Blackfriars Cycleway there are no other current proposals to install bus stop bypasses in the City. Bus stop bypasses may be considered as part of future cycleways, but these are unlikely to be delivered within the next five years. 4.58 At the July meeting of the Planning & Transportation Committee there was a request to consider the need to adopt a general policy position on bus stop bypasses.

4.59 Guidance on the design of bus stop bypasses (and cycle infrastructure more generally) has been produced by both TfL and Department for Transport (DFT) / Active Travel England (ATE). Both organisations are currently reviewing guidance, with updates expected in early 2026.

4.60 While there are benefits and disbenefits associated with the use of bus stop bypasses (summarised in Appendix 6) it is expected that they will remain part of the design toolkit for cycle infrastructure.

4.61 Any future proposals for use of bus stop bypasses will continue to be considered on a case-by-case basis reflecting context and project objectives and informed by an assessment of equalities impacts. This will ensure we retain the flexibility to incorporate appropriate infrastructure.

4.62 Given this, and the broader commitment in the Transport Strategy to create a safe cycling network that enables more people to choose to cycle, it is not considered necessary at this time to develop a separate policy position on bus stop bypasses. This report recommends pausing the cycleway scheme until the updated guidance is published and has been reviewed, to ensure the scheme remains aligned to guidance. The review will also determine whether the guidance substantiates the position of not adopting a fixed policy on bus stop bypasses.

5. Next steps

5.1 Officers have carefully reviewed the extensive feedback received on the proposed cycleway, including detailed engagement on the issue of bus stop bypasses. As a result, five options have been considered for taking the Aldgate to Blackfriars Cycleway project forward. A summary of these options is provided in Table 5.1 below.

Table 5.1 – Summary of Project Options

Project Options	Description
Option 1 – Proceed as proposed	Proceed to detailed design for construction but with further engagement, particularly with disabled people and representative groups, to explore how to mitigate the impacts of bus stop bypasses.

Option 2 – Pause (Recommended)	DfT and TfL are reviewing and updating their guidance on bus stop bypasses. This option would pause the project until the guidance is published which is expected to be in early 2026. The cycleway project will then proceed in line with guidance.
Option 3 – Part proceed and part pause	This option is a combination of Options 1 and 2. Sections of the cycle route that do not require bus stop bypasses would proceed as proposed while sections involving bus stop bypasses are paused pending the publication of the updated bus stop bypass guidance, expected to be in early 2026.
Option 4 – Explore alternative options	This option would revisit previously ruled out options to explore alternative designs to bus stop bypasses such as conventional with-flow cycle lanes which end at bus stops and therefore people cycling are unprotected through bus stop areas.
Option 5 – Cancel project	This option ends the project which could be restarted in the future when opportunities and circumstances allow.

5.2 The advantages and disadvantages of each of the five project options are outlined in the following paragraphs. Options 1, 2, and 3 are considered the most practical for advancing the project based on the previously agreed approach, reflecting the support expressed through public consultation and aligning with the Transport Strategy. Option 2 is recommended.

Option 1 – Proceed as Proposed

5.3 Option 1 enables the project to proceed without further delay and offers the greatest opportunity to secure future TfL cycleway funding. However, delivery will remain subject to a successful future OSPR / CIL bid, enabling the City Corporation to provide match funding for the scheme's construction.

	5.4 Further engagement during the detailed design phase is included with the aim of mitigating the impacts of the bus stop bypasses. 5.5 Option 1 has been designed in accordance with current guidance. However, as new guidance is currently in development, any changes to these standards may result in elements of the scheme no longer aligning with best practice. Option 2 – Pause (Recommended) 5.6 Option 2 ensures the design aligns with the updated guidance from the DfT and TfL. As the project will comply with the updated guidance, potential negative impacts should be mitigated and risks, such as legal challenges, are significantly reduced. As this option reflects national and local guidance, it is likely that TfL will continue to provide funding contributions. This option is also dependent on a successful future OSPR / CIL bid to part fund the scheme's construction. 5.7 However, Option 2 would delay both project delivery and the realisation of its benefits. Updated DfT and TfL guidance is not expected until early 2026, after which the project would resume. However, the new guidance could be delayed, and this timeline is beyond the City's control. Choosing this option would also incur additional costs for reviewing the new guidance and potentially redesigning sections. This short pause to the project would not present a major safety concern. Option 3 – Part proceed and part pause 5.8 Option 3 enables parts of the project to be delivered without delay, including key improvements at the Cannon Street junction. The sections that can proceed would still offer meaningful improvements. 5.9 If the updated DfT and TfL guidance recommend a different design for sections involving bus stop bypasses, it is highly likely that the designs can be adapted to integrate with the already designed or delivered sections without incurring significant abortive costs. 5.10 By pausing the sections involving bus stop bypasses, this option ensures alignment with forthcoming guidance, while allowing some sections of the project to proceed without delay.

	5.11 However, this option delays the delivery of a complete route. The updated guidance from DfT and TfL is expected to be published in early 2026 but could be delayed, and this timeline is beyond the City's control. There would also be additional costs associated with reviewing the new guidance and potentially redesigning sections. Furthermore, the potential for future funding from TfL may be at risk, as this option does not deliver, or guarantee the delivery of, a continuous route with protected cycle lanes where they are needed. Therefore, this option may require the City Corporation to fully fund both the detailed design and construction of the scheme. As OSPR / CIL funds are already fully committed to other projects, it is likely that insufficient CoL funding will be available to complete the scheme's detailed design in the short term. This option will therefore be subject to an enforced delay due to funding constraints. Option 4 – Explore alternative options 5.12 Option 4 addresses the concerns with bus stop bypasses. This option would provide some improvements for people cycling, walking, and wheeling. The overall cost of delivering the revised scheme may be lower, as it would likely require fewer traffic signals and less complex infrastructure. 5.13 However, this option represents a sub-optimal solution based on previously ruled out designs, offering reduced benefits for people cycling, walking, and wheeling. Most of the evaluation and design work carried out to date would be abortive. Furthermore, the scheme is unlikely to qualify for future TfL cycleway funding unless an alternative proposal delivers fully protected cycle lanes where they are needed. Option 5 – Cancel Project 5.14 Option 5 addresses the concerns with bus stop bypasses but would not deliver improvements for people walking, wheeling or cycling. There is a risk of reputational damage from cancelling the project and not supporting cycling in the City as this is contrary to the Transport Strategy. Proceeding with this option may also undermine the City's credibility with key stakeholders and could negatively impact the likelihood of securing future funding from TfL for other cycling infrastructure projects.

6. Recommendation	6.1 Option 2 to defer the project until updated guidance is published is recommended. 6.2 Although Option 2 requires delaying the delivery of the cycleway, an expected six to nine month delay is not considered too significant or unreasonable to wait for DfT's and TfL's emerging guidance. 6.3 This approach presents a responsible, inclusive, and future-proofed solution. It balances the ambition to deliver a high-quality cycle route with the need to reflect updated guidance, address equalities issues, and maintain public and institutional confidence. 6.4 For these reasons, Option 2 is considered the most appropriate and sustainable approach for progressing with the Aldgate to Blackfriars Cycleway project.

Appendices

Appendix 1	Cycleway Scheme Layout Plan
Appendix 2	Public Consultation Outcomes Report
Appendix 3	Accessibility Review Report
Appendix 4	Equalities Impact Assessment
Appendix 5	Members' Briefing Paper Submissions
Appendix 6	Bus Stop Bypass Supplementary Information
Appendix 7	Project Coversheet

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Aldgate to Blackfriars Cycleway

Appendix 1

New protected cycle lane

New bus stop by-pass with raised table zebra crossing

Junction improvements for walking and cycling

New signalised pedestrian crossing

Dedicated signal stage for cycling

New two-way cycle track

Taxi rank and loading bay retained

Pavement widened and left turn vehicle lane removed

New cycle gate to improve cycling conditions and road safety

Cycle lane crossover for people cycling westbound

Relocated disabled parking bays (x2) and taxi rank

New bus stop by-pass with raised table zebra crossing

Road closure except for cycles retained

Pavement width narrowed to 4.4 metres wide

New two-way cycle track

Relocated coach parking bay (x1)

Right turn ban into White Lion Hill retained

Relocated coach parking bays (x2)

Pavement width narrowed

Key:

- Existing pavement or traffic island
- Existing road marking
- Existing kerb line removed
- New Pavement or traffic island
- New white road marking
- New yellow road marking
- Tactile paving
- Signalised pedestrian crossing

Aldgate to Blackfriars Cycleway

Bracken House

Relocated coach parking bays (x2)

Police stopping bay modified

New two-way cycle track

New protected eastbound cycle lane

No entry except for cycles retained

Cycle lane crossover for people cycling westbound to access two-way cycle track

New protected westbound cycle lane

CUTLINE

QUEEN VICTORIA STREET

CANNON STREET

FRIDAY STREET

BREAD STREET

LAMBETH HILL

GT TRINITY LANE

Old Change House

The Guild Church of St Nicholas Cole Abbey

Old Fish Street Hill

Church (site of)

BUS STOP

BUS STAND

N

New cycle gate to improve cycling conditions and road safety

Pavement widened to improve walking and cycling conditions

New westbound cycle lane protected with flexible posts

New cycle gate to improve cycling conditions and road safety

WATLING STREET

QUEEN STREET

BOW LANE

GARLICK HILL

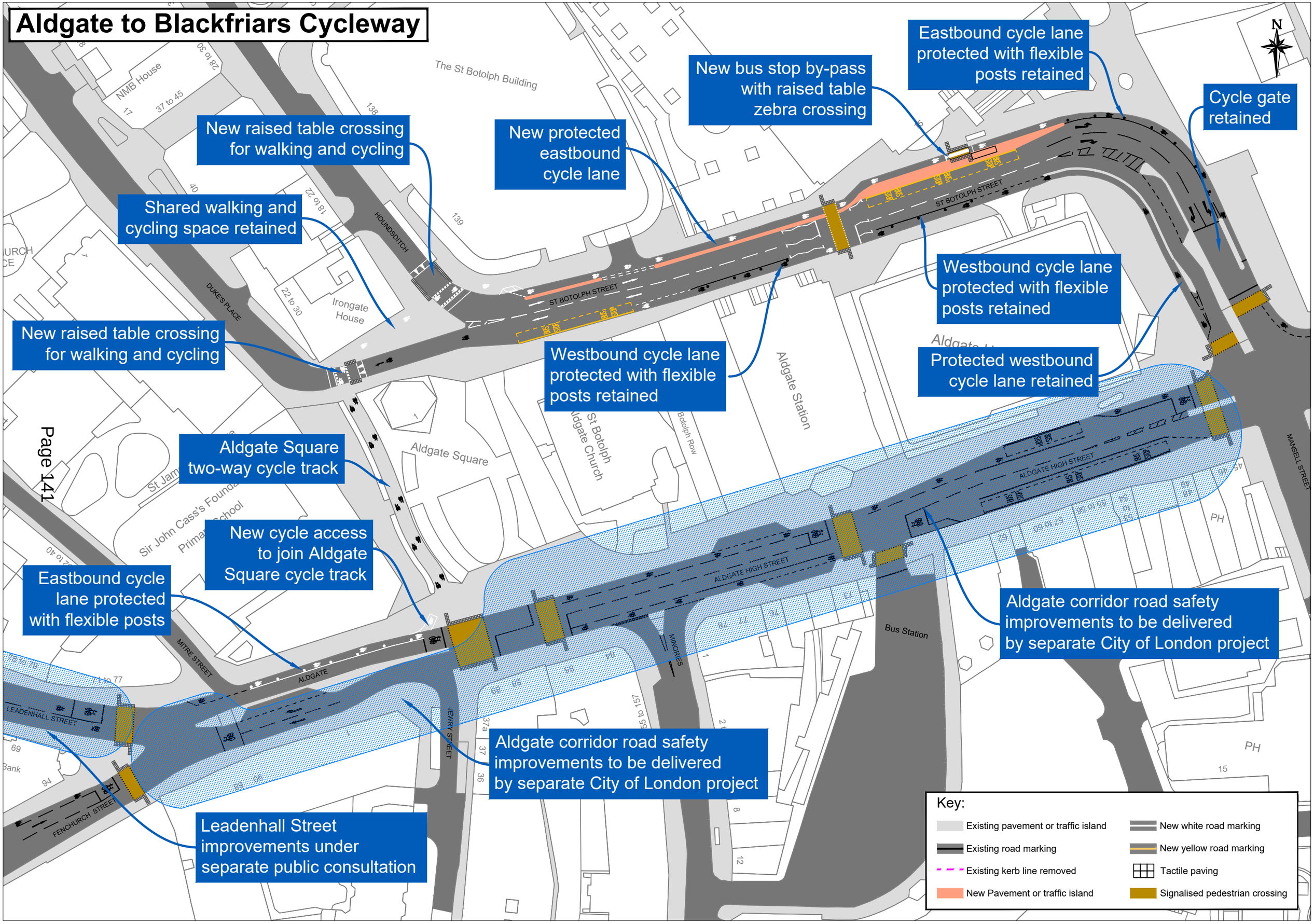
St Mary

Mansion House (Underground Station)

Key:

- Existing pavement or traffic island
- Existing road marking
- Existing kerb line removed
- New Pavement or traffic island
- New white road marking
- New yellow road marking
- Tactile paving
- Signalised pedestrian crossing

Aldgate to Blackfriars Cycleway



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Appendix 2

Aldgate to Blackfriars Bridge cycleway proposals

Public consultation feedback report

Independently compiled by Commonplace for the City of London Corporation

February 2025

CITY OF LONDON

Commonplace

Contents (and quick hyperlinks)

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Executive summary

Summary of key findings

The City of London Corporation, working with Transport for London, has produced proposals for a high-quality east-west cycle route linking Aldgate to Blackfriars. The aim is to make cycling along the route safe, more attractive and more accessible.

A nine-week consultation on the proposals was undertaken from December 2024 to February 2025, utilising the Commonplace consultation platform, together with a series of public drop-ins. The consultation – which was open to anyone with a connection to, or interest in the area – collected feedback from more than 1,200 respondents.

This feedback highlighted agreement with the proposals which was both strong and broad. Almost 80% of respondents agreed with the proposals – with almost two-thirds voicing strong agreement. Majority agreement was evident across those using different travel modes and with differing relationships with the City of London.

Agreement was particularly high among younger respondents (aged up to 54) and those identifying as public transport users and pedestrians. Note also that over 70% of those identifying as car users and taxi users agreed with the proposals. Those working and travelling through the area, were also notably supportive of the proposals.

Similarly high levels of support were evident in relation to the proposals for Queen Victoria Street West (83% supporting), Queen Victoria Street East (88%) and Aldgate (81%).

Common themes, threading across of each of the proposals, focused on perceptions of the benefits of a safer environment in which cycling and walking was both encouraged and enabled via a strengthened cycle infrastructure and improved walking and wheeling experience. Respondents often detailed difficulties experienced – particularly as cyclists – while currently travelling through these areas. In this context, their agreement and support was frequently offered on the basis of both envisaged personal gain and perceived area improvement. A number of practical suggestions for enhancement of the proposals were made – with some respondents suggesting extended or alternative measures alongside their overall support. In contrast, criticism of the proposals was far less evident.

Introducing the Aldgate to Blackfriars Bridge cycleway proposals and their consultation

Queen Victoria Street looking east

Queen Victoria Street looking east

The Aldgate to Blackfriars Bridge cycleway proposals

The City of London Corporation is working to improve the experience of cycling, walking and wheeling on the City's streets. Working with Transport for London, the proposal is for a high-quality east-west cycle route linking Aldgate to Blackfriars. The aim is to make cycling along the route safe, more attractive and more accessible. The cycleway would connect with five other routes at Aldgate (C2), Queen Street (C1 and CS7) and Blackfriars (C3 and C6), and City destinations such as the City Cluster.

At Aldgate:

Proposed improvements would include:

- An eastbound cycle lane protected with flexible posts on Aldgate
- New raised side street crossings for cycling, walking and wheeling on Duke’s Place and Houndsditch
- Upgrading the eastbound cycle lane with traffic island separators on St Botolph Street
- A new eastbound bus stop by-pass for cycling incorporating a raised zebra crossing on St Botolph Street

Between Aldgate and Queen Street:

- On Cornhill, Bank Junction and the eastern end of Queen Victoria Street, traffic levels are low due to the traffic restrictions at Bank Junction and Bishopsgate. No changes are proposed on these streets as part of the cycleway.
- Improvements to Leadenhall Street are being developed and under consultation as part of a separate City of London project.

Further improvements on Aldgate and Aldgate High Street are also being explored and would be delivered separately.

The Aldgate to Blackfriars Bridge cycleway proposals

Queen Victoria Street between Queen Street and New Bridge Street:

On these streets, it is proposed that people cycling would be separated from general traffic by:

- Single lane cycle tracks protected by traffic island separators or flexible posts.
- A two-way cycle track protected with traffic island separators.
- Dedicated traffic light stages or early ‘green’ traffic lights for cycling to separate people cycling from general traffic at junctions.

Bus stops:

Three bus stop bypasses are included in these proposals. These allow people cycling to pass between the bus stop and the pavement. These have been designed according to TfL’s Accessible Bus Stop Design Guidance and TfL’s Guidance Note - Pedestrian Crossings at Bus Stop Bypasses. They will include a raised zebra crossing and a large waiting area of pavement space on either side of the cycle track.

The locations of the bus stops bypasses include:

- St Botolph Street - Bus Stop B.
- Queen Victoria Street (Millennium Bridge) – Bus Stop SG.
- Queen Victoria Street (Blackfriars) – Bus Stop A.

The Aldgate to Blackfriars Bridge cycleway proposals

Walking and wheeling:

The proposals include a number of improvements to make walking and wheeling (such as wheelchairs, mobility scooters and rollators) safer, easier and more accessible along the route. This includes raised side-street crossings at Duke's Place and Houndsditch and straight-across traffic-light-controlled crossings on Queen Victoria Street at Puddle Dock and St Andrew's Hill. The improved crossings are in addition to the subways at Puddle Dock which are being retained.

The pavements on Queen Victoria Street at St Peter's Hill will need to be narrowed to 4.2 metres wide to accommodate the two-way cycle track. Our assessment suggests that the comfort of people waiting to cross would not be impacted and crowding will be avoided by retaining the default 'green person' traffic light for people crossing at St Peter's Hill (between the Millenium Bridge and St Paul's). This means that people generally can cross the road without waiting or after only a short wait.

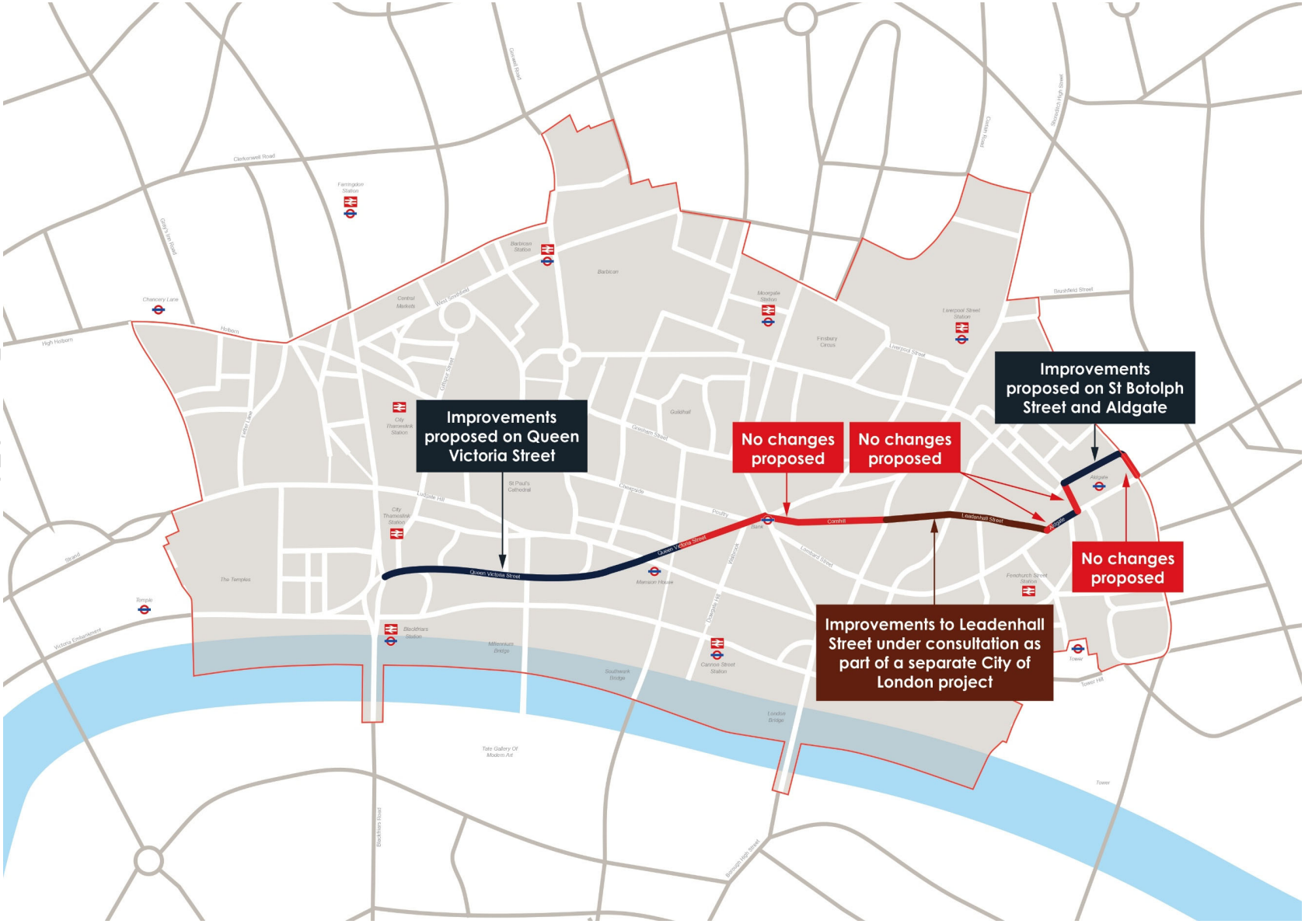
Pavements on Queen Victoria Street between Cannon Street and Queen Street would be widened by up to 2.3 metres on both the north and south sides, providing more space for people walking and wheeling.

An overarching map of the proposals is shown overleaf.

Please click these links to see more detailed plans for:

Queen Victoria Street West
Queen Victoria Street East
Aldgate

Aldgate to Blackfriars Bridge cycleway plan



Engagement and consultation

Utilising the Commonplace engagement platform, a nine-week consultation on the draft Aldgate to Blackfriars Bridge cycleway proposals ran from Monday 9 December 2024 to Sunday 9 February 2025 (inclusive).

The consultation was open to anyone (group or individual), whether a resident, business owner, worker or visitor, with an interest in the area. Those interested could use the Commonplace online platform, which invited people to view and comment on the individual elements of the proposals. Respondents could leave feedback and comments on as many proposals as they wished, with the choice of providing feedback by responding to the questions asked, and/or leaving comments as necessary. The consultation was not intended to be a referendum or 'vote' of any kind, but rather a process for exploring perceptions.

Engagement prior and during the consultation included:

- Pre-engagement meetings with key stakeholders, including affected local occupiers, London Cycling Campaign and Transport for London.
- Promotion via Business Improvement Districts.
- Email communication to stakeholders and interest groups.
- 2,100 leaflets distributed along the cycle route.
- 30 on street publicity posters.
- 3 drop-in sessions where the public could discuss the proposals with the project team.

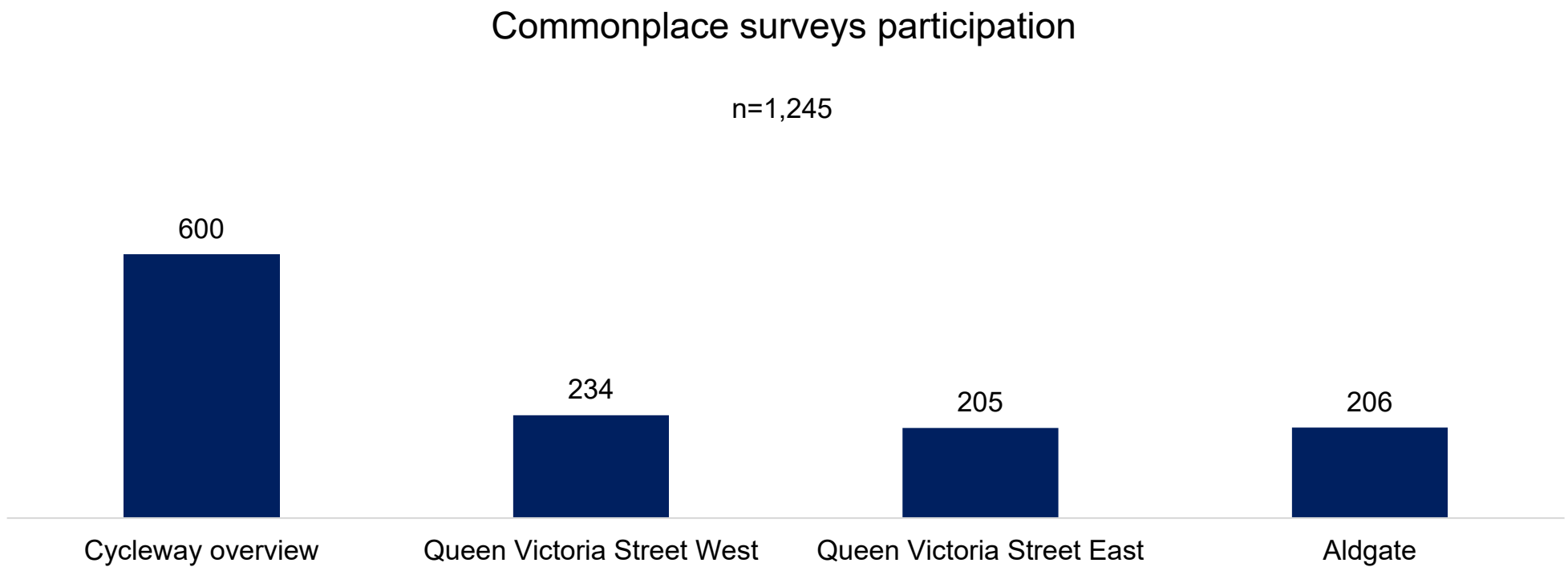
Those interested could also email or telephone the project team to give their views.

Consultation contributions

There were over 6,500 visits to the Commonplace consultation pages.

The consultation received over 1,200 Commonplace contributions, made by over 560 individuals, across the four surveys (some individuals made more than one contribution). Respondents included a wide and demographically diverse variety of workers, commuters, visitors, stakeholders, residents and others.

The chart below shows the distribution of Commonplace contributions, spotlighting the highest participation level in relation to the cycleway overview.



Presenting the collected feedback

In presenting the feedback collected, consultation contributions have been collated, analysed, detailed and summarised independently of the City of London Corporation. This ensures a clear impartiality of consideration and presentation.

Feedback has been collated by the proposals overall and individually, using the Commonplace data as the main statistical focus of this feedback.

Prior to reading this report, please refer to the notes attached as Appendix One, which provide important explanatory information on the analysis and presentation of findings.

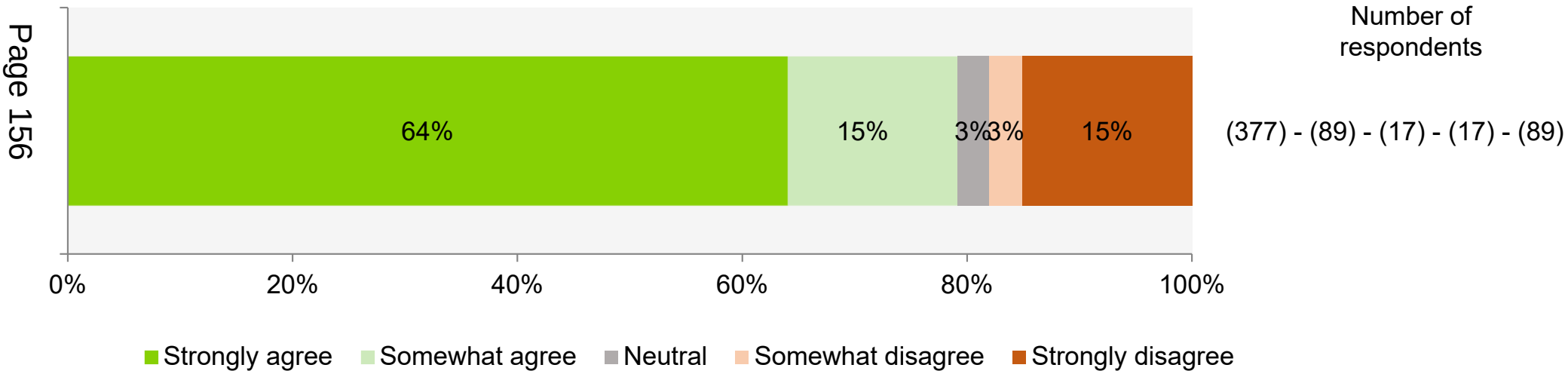
The proposed changes overall

Agreement with proposed changes overall

Just under 80% of respondents agreed with the proposed changes in overall terms. For many, this support was strong. In contrast, just 18% disagreed, with 3% expressing a neutral opinion.

n=589

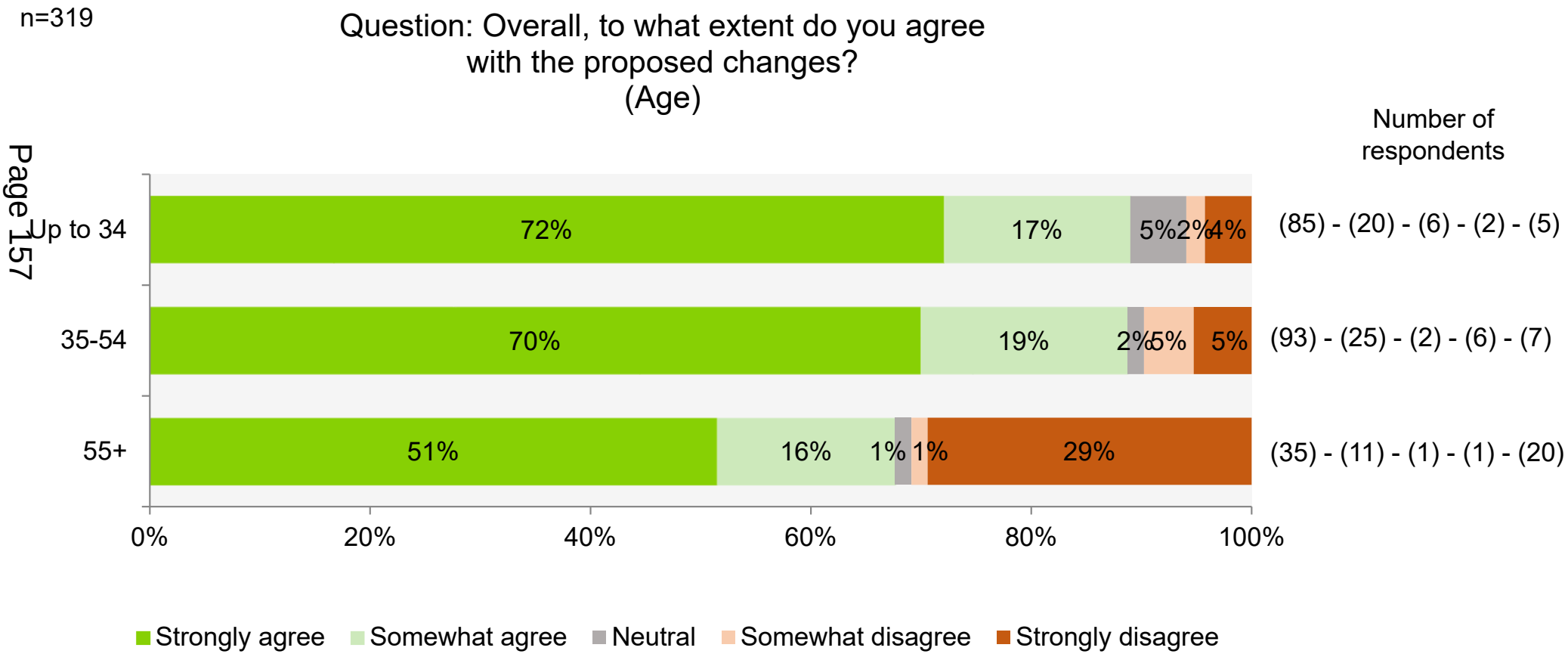
Question: Overall, to what extent do you agree with the proposed changes?



On the following pages, we see how agreement varied by respondents' age, travel mode and their relationship to the City.

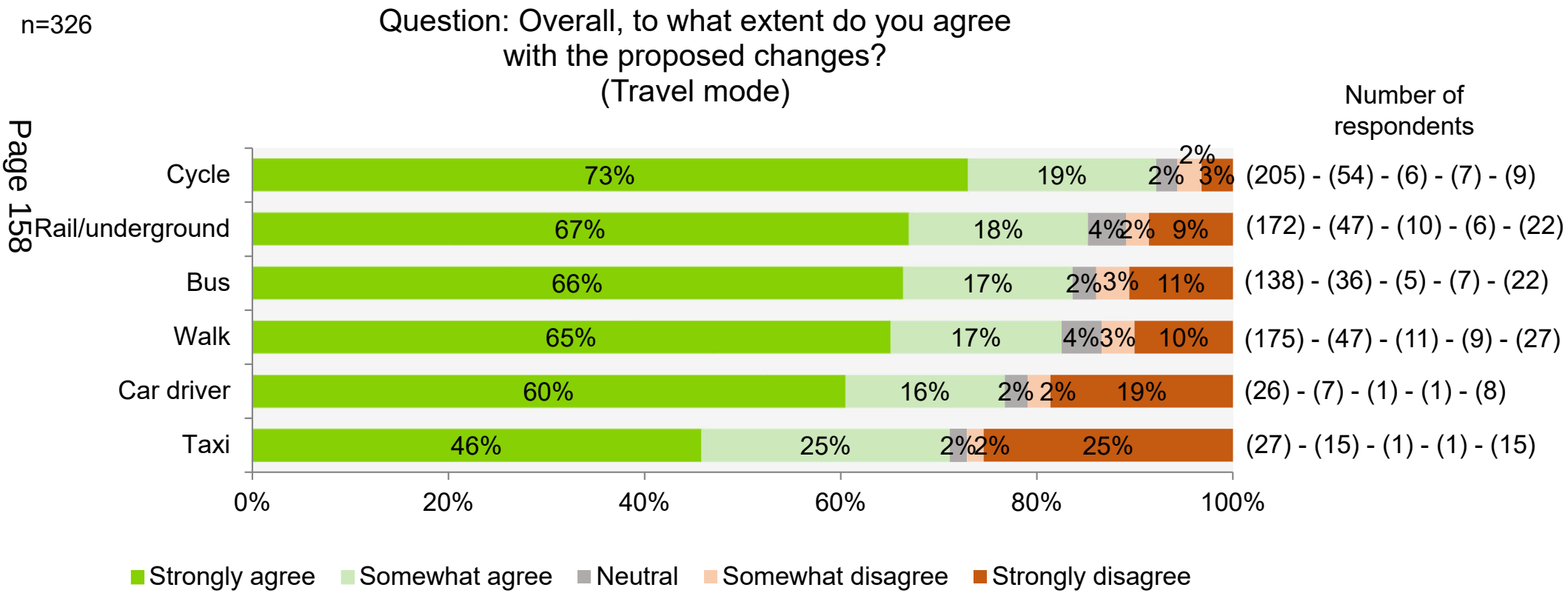
How agreement with the proposed changes overall varied in relation to respondent age

A majority of all age groups agreed with the proposed changes overall. However, strong disagreement, at 29% was notably higher among those aged 55+.



How agreement with the proposed changes overall varied in relation to how respondents identified they got around the area

Majority agreement with the proposed changes overall was evident among people travelling by all travel modes. This support peaked among those identifying as a cyclists (92%), and was also high among those identifying as using the rail/underground (85%), those identifying as bus users (84%) and those identifying as walkers (82%). Opposition was, in contrast, limited. Though note that over 20% of those identifying as car drivers and those identifying as taxi users disagreed with the proposed changes.



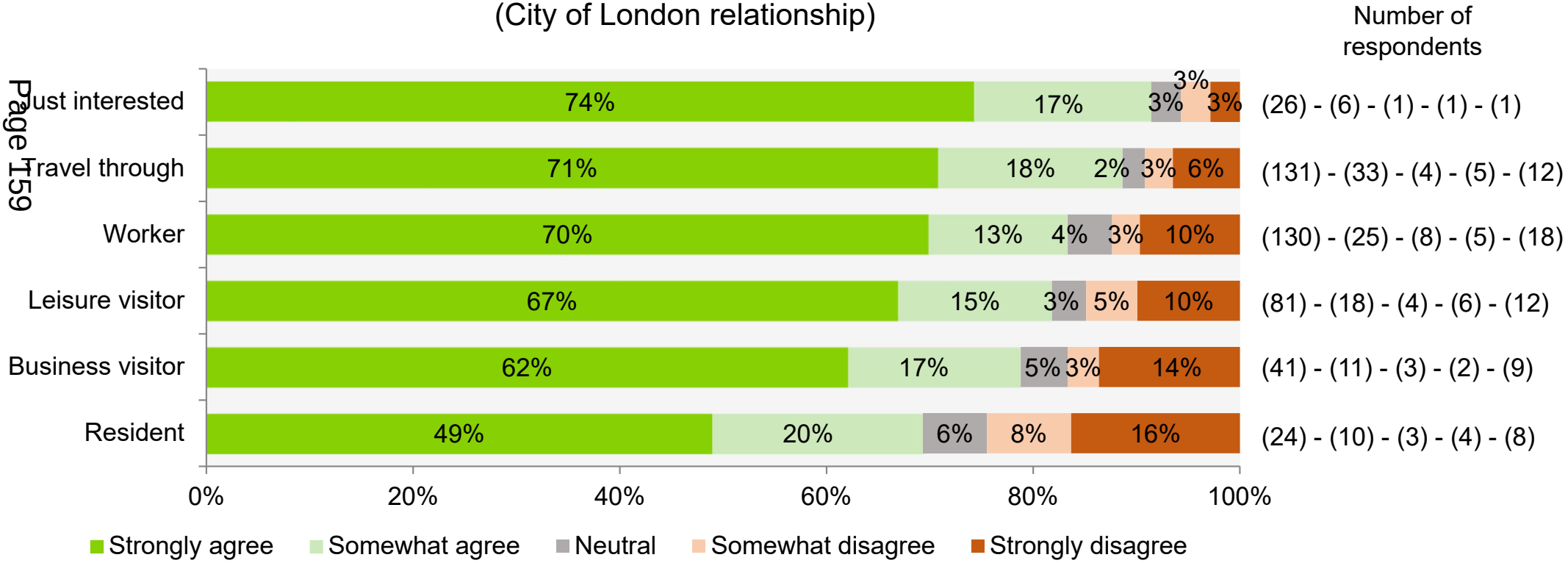
Note that some travel modes (private hire vehicle driver and passengers, motorcyclists, van/lorry drivers, car passengers, wheelchair or mobility scooter users and other travel mode users) lacked a sufficient number of respondents to allow meaningful analysis.

How agreement with the proposed changes overall varied according to City of London relationship

Majority agreement with the overall proposed changes was evident among people of all relationship types with the City of London. This support typically exceeded 80% and was highest amongst those just interested in the scheme and those passing through. In contrast, opposition was far less – peaking among residents, of whom 24% disagreed with the proposed changes.

n=358

Question: Overall, to what extent do you agree with the proposed changes? (City of London relationship)



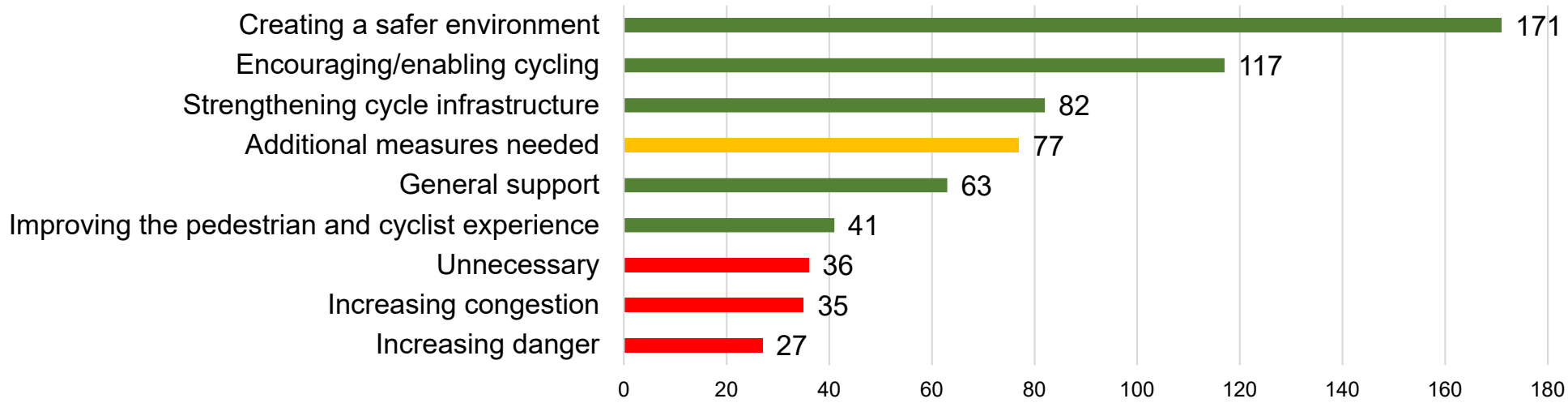
Note that some relationship types (business owners, drivers/riders and students) lacked a sufficient number of respondents to allow meaningful analysis.

Proposed changes overall - what underpins views

464 respondents left comments on the proposed changes overall. Some respondents made more than one comment. Here, we see the top comments made. The number one comment associated with the proposed changes focused on the creation of a safer environment. This was accompanied by support for cycling being encouraged/more effectively enabled, alongside a strengthened cycle infrastructure. Concerns most frequently focused on the measures felt to be unnecessary/a waste of money, potentially increasing traffic congestion and increasing danger for pedestrians. Categories in green indicate supporting comments and perceived benefits. Those in orange indicate a perceived need for additional measures (see overleaf) and those in red indicate concerns/criticisms.

n=464

Question: Can you say in a few words why you support/don't support the proposed changes overall?



Other comments most commonly focused on a perceived need to address dominant/unlawful cyclist behaviour, applause for the reprioritisation of space away from motor vehicles, and perceptions of improved air quality. (Each made by no more than 23 respondents).

Proposed changes overall – additional measures suggested

77 respondents identified additional measures which they felt to be necessary. These included:

- Segregated lanes throughout designs (for example, including westbound to Blackfriars).
- More safety work at junctions throughout, for example, inclusion of the junction adjacent to Blackfriars Station.
- A need to replace flexi wands with more substantial (concrete), permanent bollards.
- Rethink of floating bus stop designs in light of safety concerns for pedestrians.
- A cycle gate going west into the junction with Blackfriars Bridge at the far west end of the scheme.
- Repositioning in front of Aldgate Station.
- A connection from Tower Hill to Bank.
- Cyclops or Dutch style light-controlled junctions.
- Queen Victoria Street should be one narrow lane.
- The inclusion of greening/planting to coexist and mutually enhance the designs.
- Tackling Aldgate High Street.
- Increased differentiation between cycleways and footways.
- Traffic calming measures on Cornhill.
- Integration with Cycleway 6.
- A need to adopt a more radical approach generally.

Queen Victoria Street West proposals

Queen Victoria Street West cycleway proposals

On this section it is proposed to:

- Install an eastbound protected cycle lane between New Bridge Street and Puddle Dock including a bus stop bypass with a raised table zebra crossing and large waiting area at Stop A.
- Remove the left-turn traffic lane from Puddle Dock to make it easier and quicker for people to cross.
- Modify traffic lights to separate people cycling, walking and driving at the junction of Puddle Dock and Queen Victoria Street.
- Install a two-way protected cycle lane along Queen Victoria Street east of Puddle Dock including a bus stop bypass with a raised table zebra crossing and large waiting area at bus stop SG.
- Relocate two disabled parking bays, the taxi rank and two coach parking bays from the north to the south side of Queen Victoria Street.
- Narrow some pavements to 4.2 metres to make space for the new layout near St Peter's Hill.

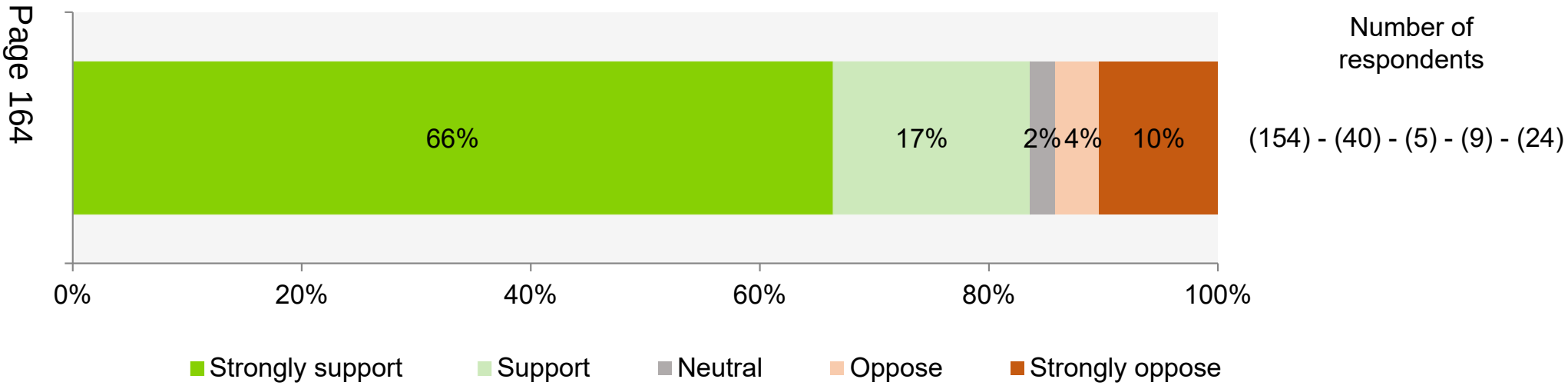
A detailed plan of proposals can be accessed by clicking here.

Queen Victoria Street West - support for the proposed walking and cycling changes

Over 80% of respondents supported the proposed walking and cycling changes. For many, this support was strong. In contrast, just 14% opposed, with 2% expressing a neutral opinion.

n=232

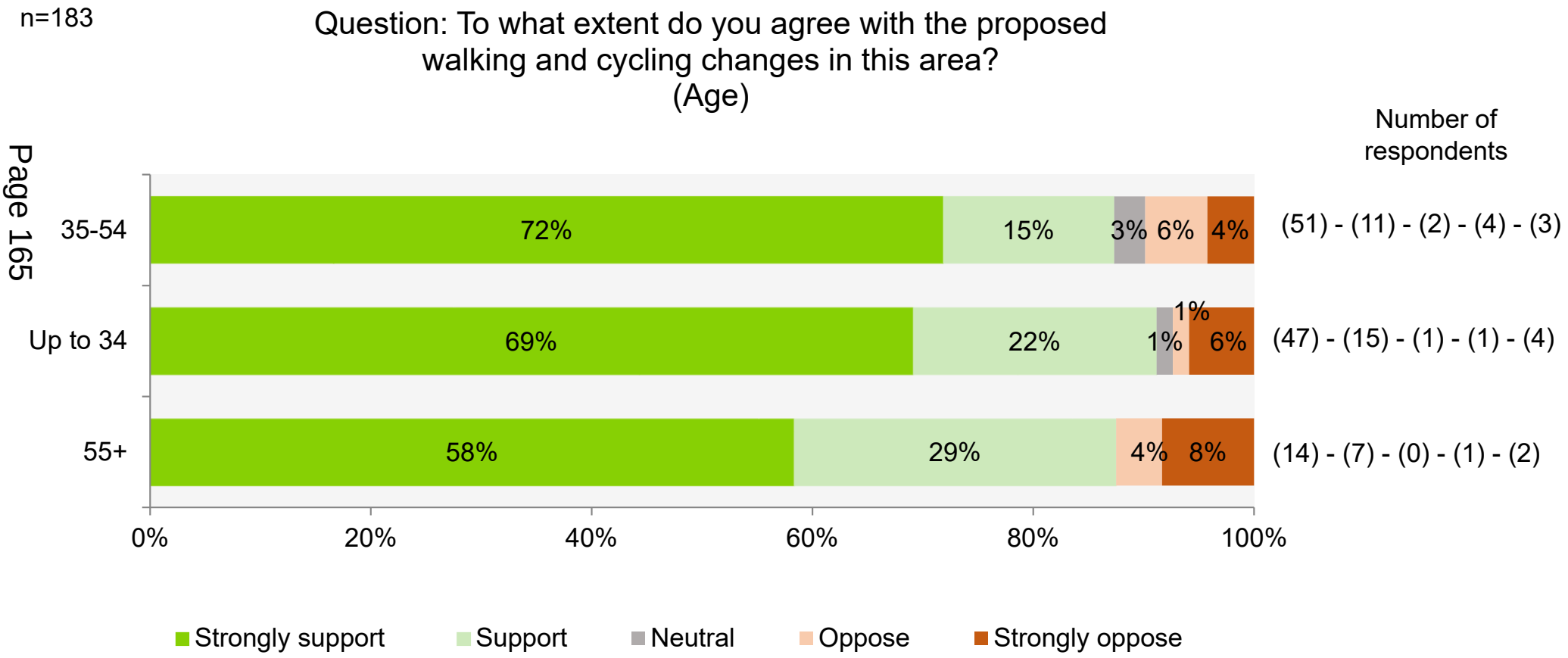
Question: To what extent do you agree with the proposed walking and cycling changes in this area?



On the following pages, we see how support varied by respondents' age, travel mode and their relationship to the City.

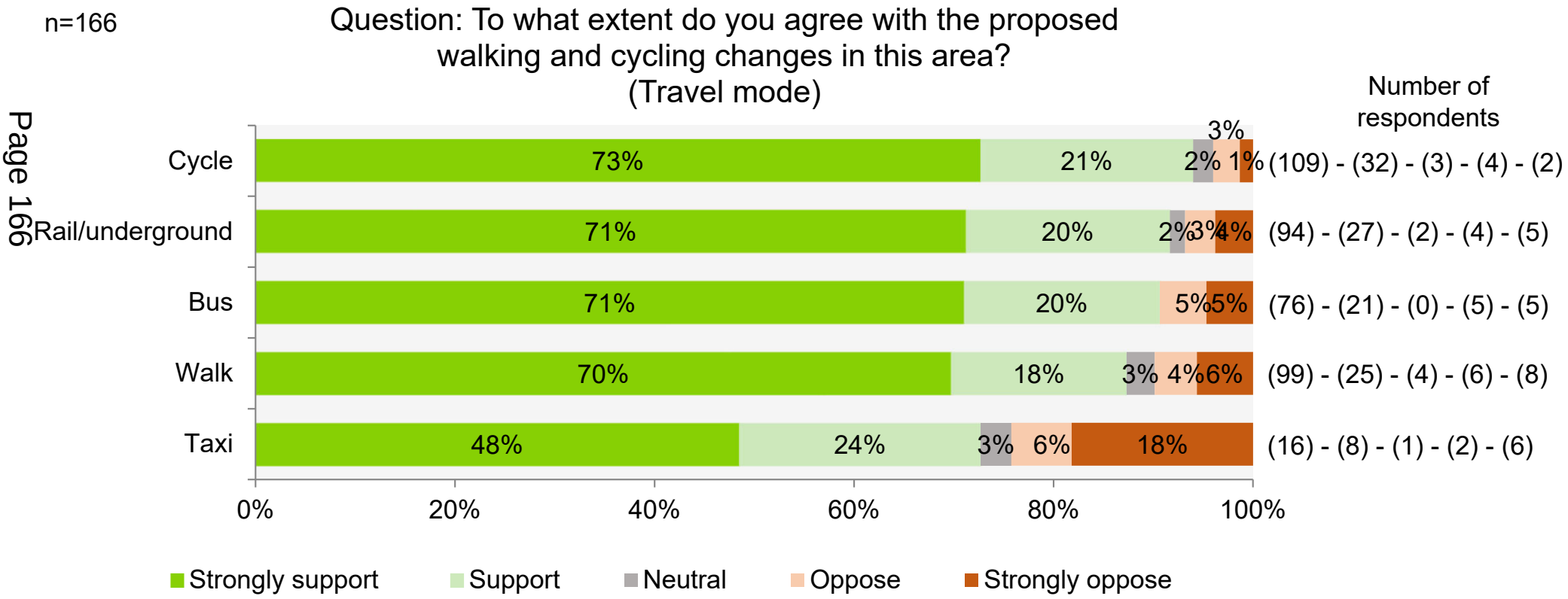
Queen Victoria Street West - how support for the proposed walking and cycling changes varied in relation to respondent age

A majority of each age group supported the walking and cycling proposals. In contrast, opposition was limited to just 7%-12%.



Queen Victoria Street West - how support for the proposed walking and cycling changes varied in relation to how respondents identified they got around the area

Majority support for the proposed changes was evident among people travelling by all travel modes. This support peaked among those identifying as cyclists at 94%, and was also high among those identifying as using the rail/underground, those identifying as bus users and those identifying as walkers. Opposition was, in contrast, limited. Though note that 24% of those identifying as taxi users opposed the proposed changes.



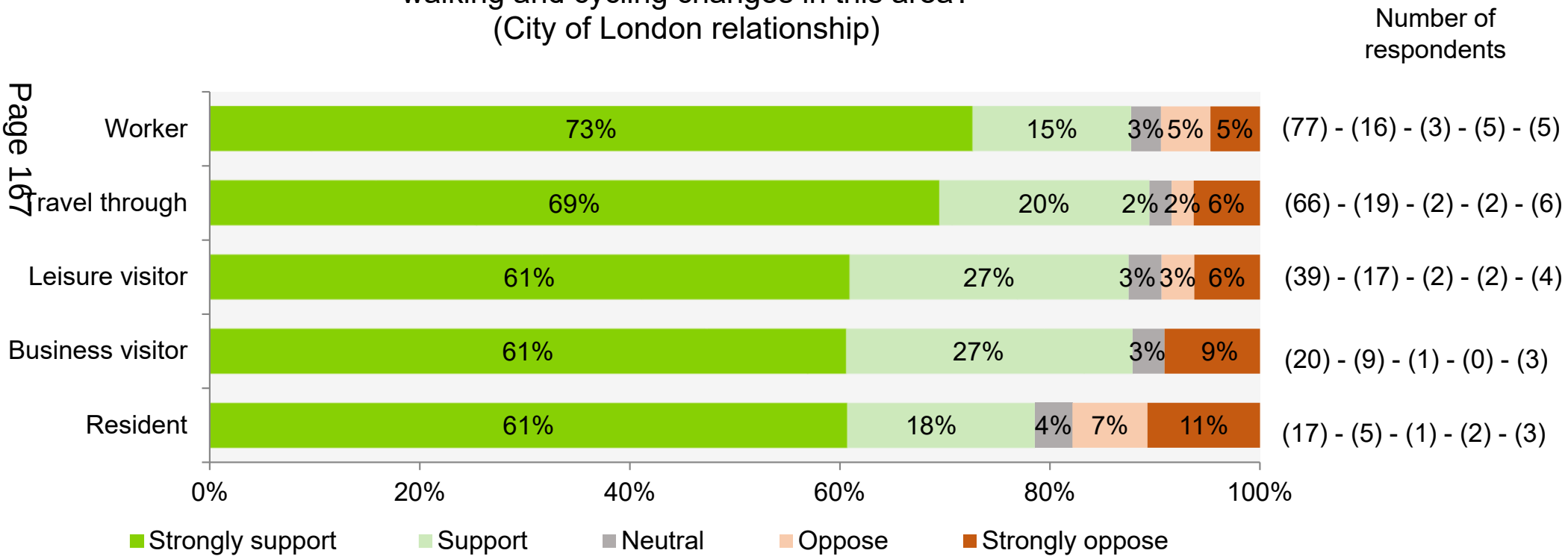
Note that some travel modes (private hire vehicle drivers and passengers, motorcyclists, van/lorry drivers, car drivers and passengers, wheelchair or mobility scooter users and other travel mode users) lacked a sufficient number of respondents to allow meaningful analysis.

Queen Victoria Street West - how support for the proposed walking and cycling changes varied in relation to City of London relationship

Majority support for the proposed changes was evident among respondents of all relationship types with the City of London. This support typically exceeded 80% and was highest amongst those working and those passing through. In contrast, opposition was far less – peaking among residents, of whom 18% opposed the proposed changes.

n=179

Question: To what extent do you agree with the proposed walking and cycling changes in this area? (City of London relationship)



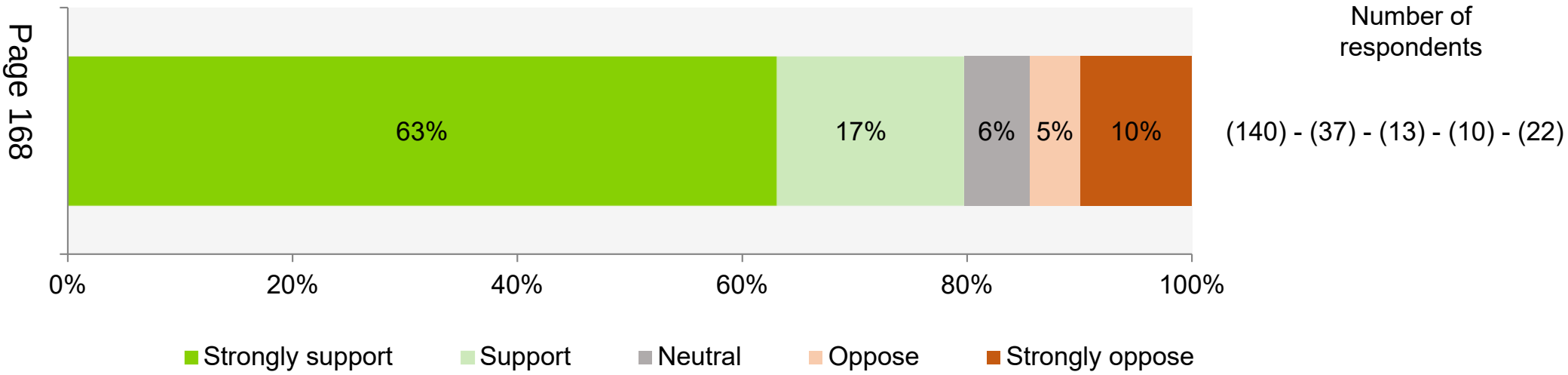
Note that some relationship types (business owners, drivers/riders, students and those just interested in the scheme) lacked a sufficient number of respondents to allow meaningful analysis.

Queen Victoria Street West - support for the proposed changes to parking, loading and kerbside access (including at bus stops)

80% of respondents supported the proposed changes to parking, loading and kerbside access (including at bus stops). For many, this support was strong. In contrast, just 15% opposed, with 6% expressing a neutral opinion.

n=222

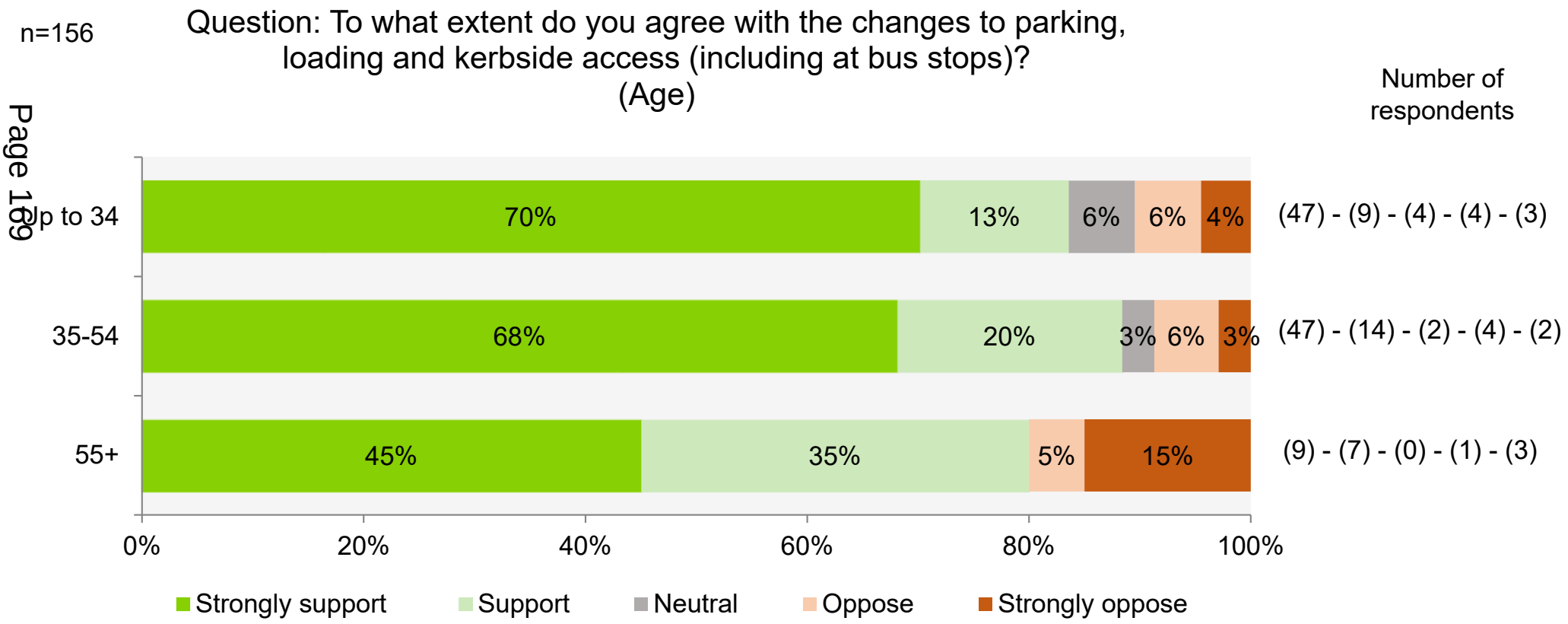
Question: To what extent do you agree with the changes to parking, loading and kerbside access (including at bus stops)?



On the following pages, we see how agreement varied by respondents' age, travel mode and their relationship to the City.

Queen Victoria Street West - how support for the proposed changes to parking, loading and kerbside access (including at bus stops) varied in relation to respondent age

A majority of all age groups supported the walking and cycling proposals. Opposition, at 20%, was highest among those aged 55+.

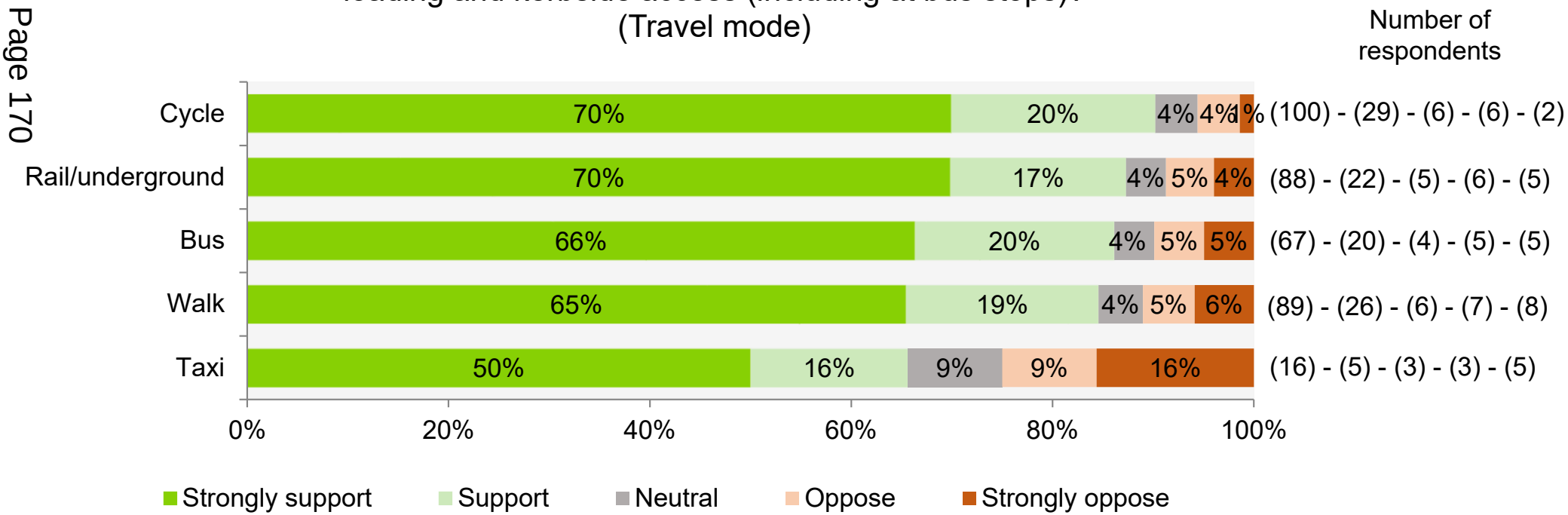


Queen Victoria Street West - how support for the proposed changes to parking, loading and kerbside access (including at bus stops) varied in relation to how respondents identified they got around the area

Majority support for the proposed changes was evident among people travelling by all travel modes. This support peaked among those identifying as cyclists at 90%, and was also high among those identifying as using the rail/underground, those identifying as bus users and those identifying as walkers. Opposition was, in contrast, limited. Though note that 25% of those identifying as taxi users opposed the proposed changes.

n=158

Question: To what extent do you agree with the changes to parking, loading and kerbside access (including at bus stops)? (Travel mode)



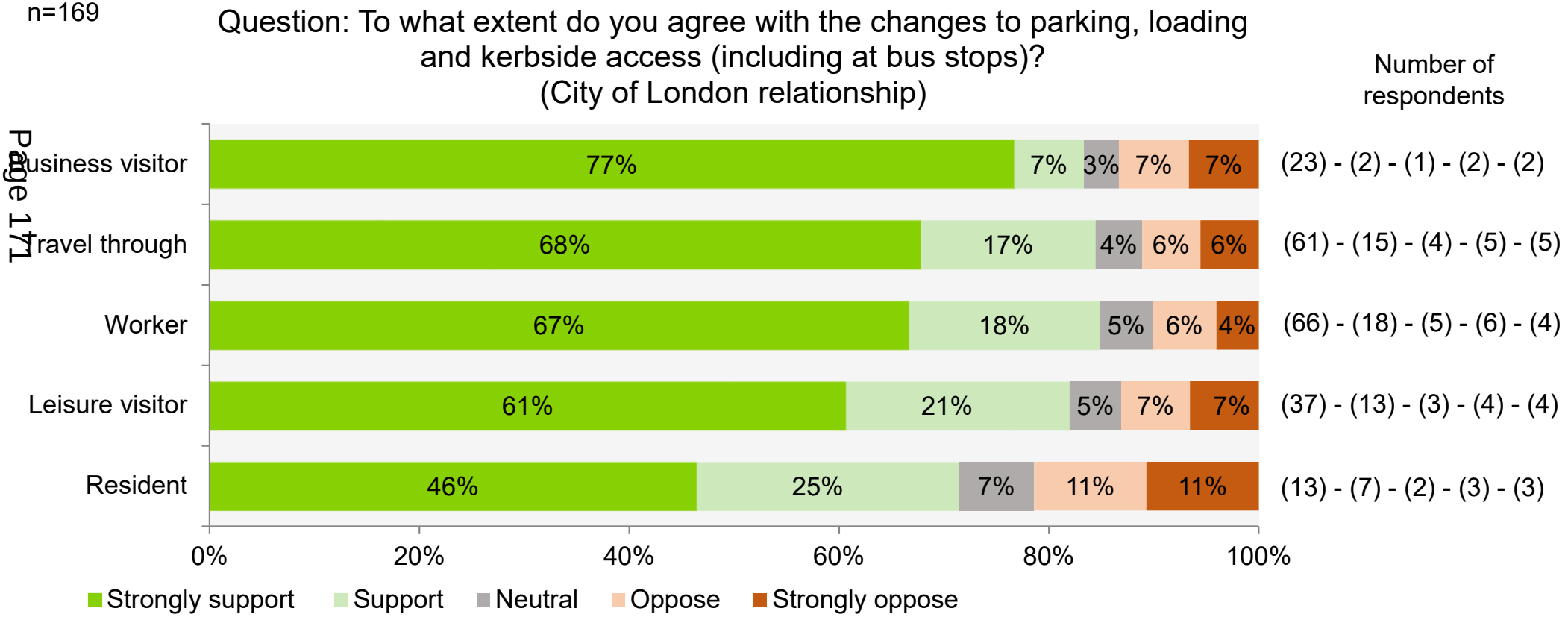
Note that some travel modes (private hire vehicle drivers and passengers, motorcyclists, van/lorry drivers, car drivers and passengers, wheelchair or mobility scooter users and other travel mode users) lacked a sufficient number of respondents to allow meaningful analysis.

Queen Victoria Street West - how support for the proposed changes to parking, loading and kerbside access (including at bus stops) varied according to City of London relationship

Majority support for the proposed changes was evident among people of all relationship types with the City of London. This support typically exceeded 80% and was highest amongst business visitors and those passing through. In contrast, opposition was far less – peaking among residents, of whom 22% opposed the proposed changes.

n=169

Question: To what extent do you agree with the changes to parking, loading and kerbside access (including at bus stops)? (City of London relationship)



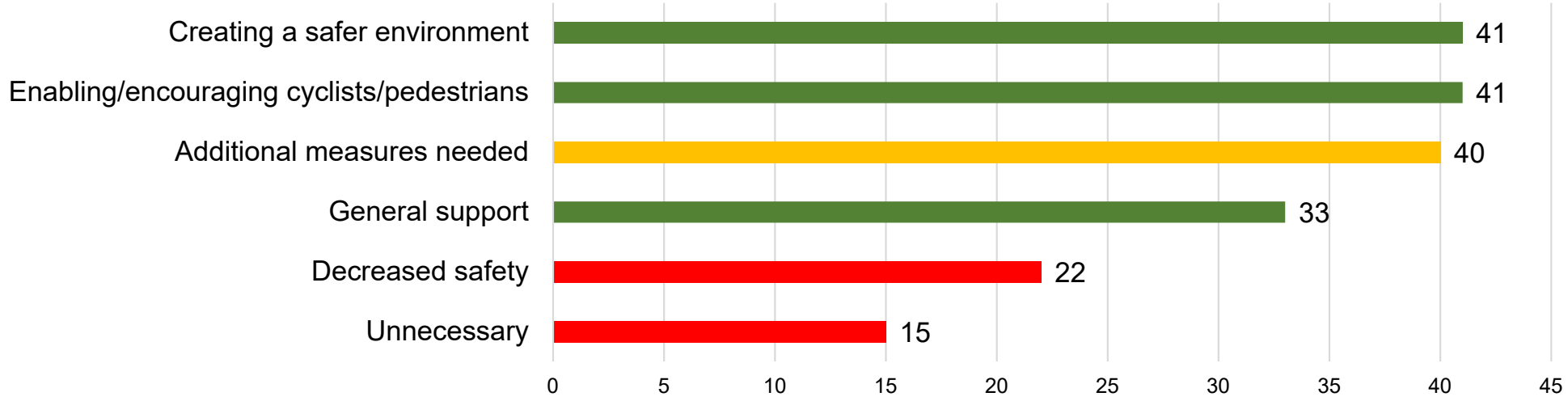
Note that some relationship types (business owners, drivers/riders, students and those just interested in the scheme) lacked a sufficient number of respondents to allow meaningful analysis.

Queen Victoria Street West - what underpins views

149 respondents left comments on the proposed Queen Victoria Street West changes. Some respondents made more than one comment. Here, we see the top comments made. The most frequent comments focused on the feeling that the proposals would create a safer environment (particularly for cyclists) and one which enabled both cyclists and pedestrians. Categories in green indicate supporting comments and perceived benefits, while those in orange indicate a perceived need for additional measures (see overleaf). Categories in red indicate concerns/criticisms.

n=149

Question: Can you say in a few words why you support/don't support the proposed changes to Queen Victoria Street West?



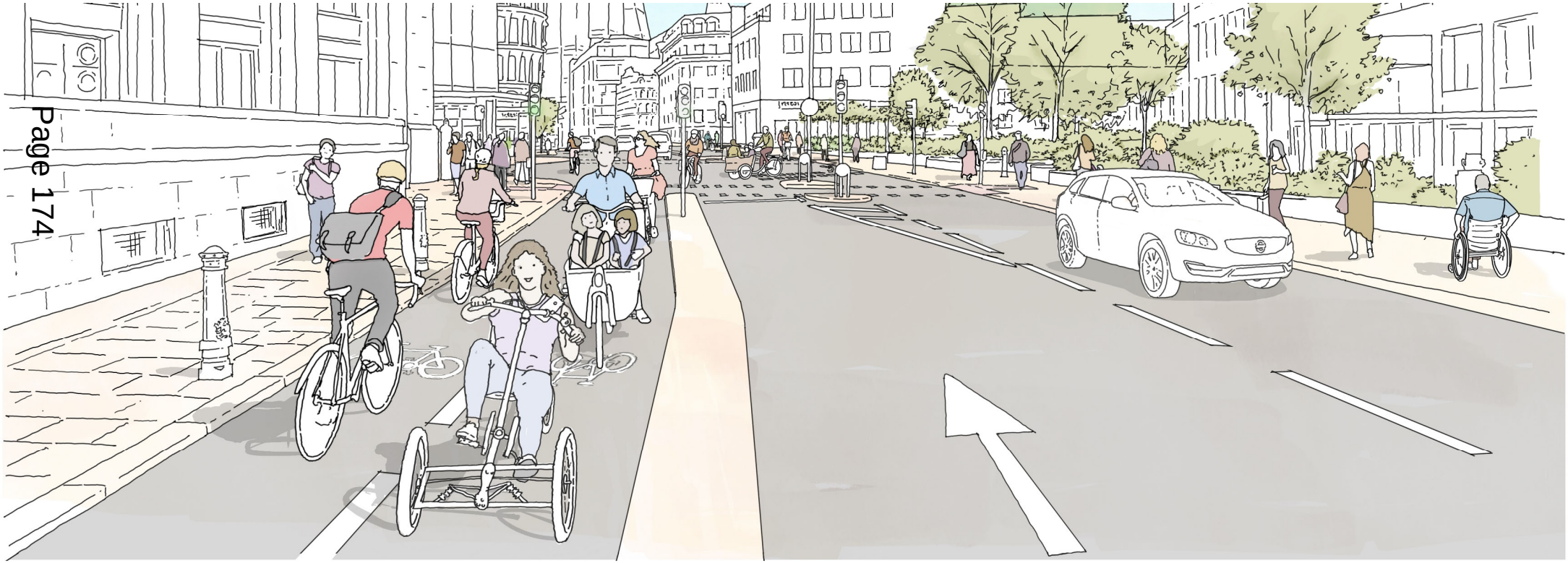
Other comments most commonly focused on concerns relating to increased traffic congestion, accessibility, dangers caused by cyclists, and economic impact. (Each made by no more than four respondents).

Queen Victoria Street West– additional measures suggested

40 respondents identified additional measures which they felt to be necessary. These included:

- Separate cycle tracks on either side of Queen Victoria Street. Or, if space is an issue, stepped or wand cycle tracks.
- Integration with Upper and Lower Thames Street and continued protection up to cycleway 6 and cycleway 3.
- The two-way track on Queen Victoria Street should continue uninterrupted westbound on the north side to directly connect with C6 at Blackfriars.
- Help cyclists going westbound through the Queen Victoria Street/New Bridge Street junction – perceived as a highly dangerous junction. Develop a two-way cycle track across the junction, separating cyclists from motor traffic.
- Separate signals for cyclists and pedestrians and cars, as they do in the Netherlands.
- Remove a vehicle traffic lane (and make it one way) to make way for the cycle lane, rather than reducing the width of the pavement.
- Be more ambitious with designs. For example, the White Lion Hill slip road needs much more dramatic action to kerb lines. Traffic is speeding up after the crossing when travelling west and turning left into White Lion Hill, cutting across cyclists.
- Western most taxi rank is not required as there is one within a short walk.
- Loading bays on the western part should be monitored by camera and limited to ten minutes maximum.
- Enforce car speed limits.
- The removal of the left-turn traffic lane from Puddle Dock to make it easier and quicker for people to cross restricts access to the taxi rank and the ability to drop passengers at Blackfriars station when travelling from Lower Thames Street. Consider a taxi exemption.
- Removal of bus bypasses – felt to be discriminatory to visually impaired people.
- Clarification of sufficient space to permit the safe loading and unloading of licensed taxi/Black Cabs passengers.
- Ensure cyclists obey the rules of the road.

Queen Victoria Street East proposals



Queen Victoria Street East cycleway proposals

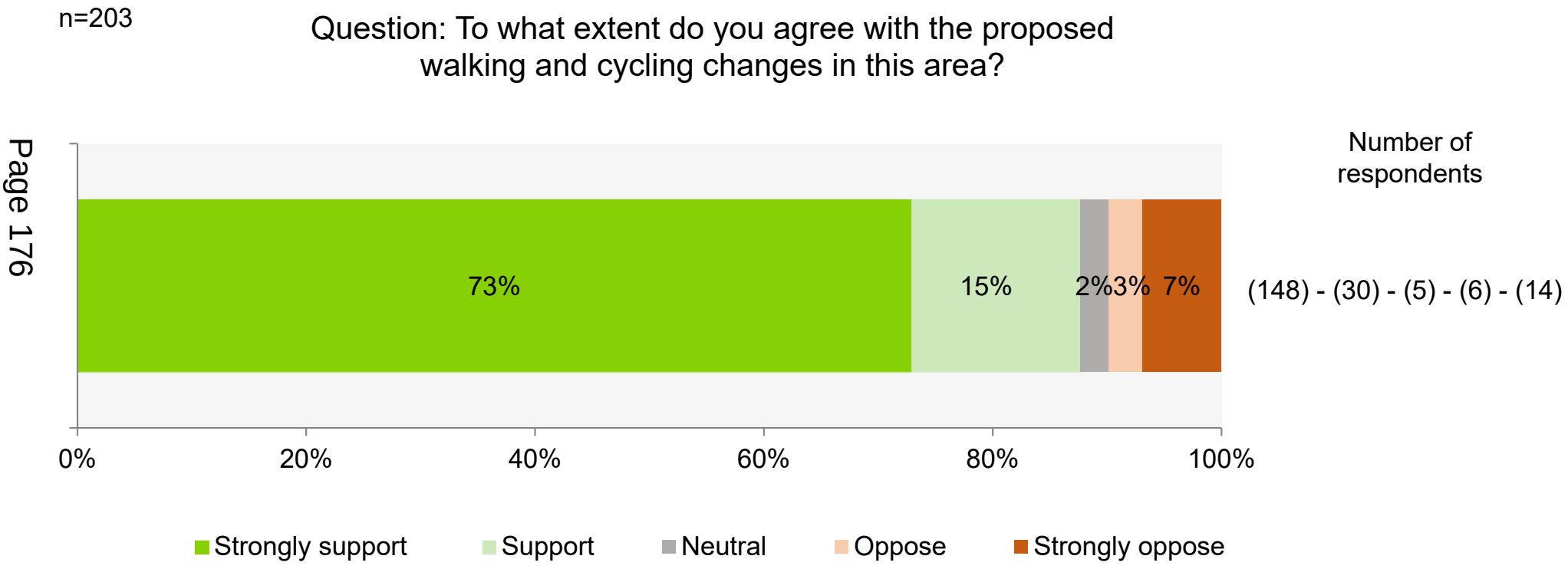
On this section it is proposed to:

- Install a two-way protected cycle lane along Queen Victoria Street east of Puddle Dock and continuing to Friday Street.
- Modify the police stopping bay.
- Modify traffic lights to separate people cycling, walking and driving at the junction of Friday Street and Queen Victoria Street.
- Relocate two coach parking bays from the northern side of Queen Victoria Street to the eastern side of Friday Street.
- Install a westbound protected cycle lane between Queen Street and Friday Street.
- Install an eastbound protected cycle lane between Friday Street and Cannon Street and improve cycling conditions eastbound between Cannon Street and Queen Street.
- Modify traffic lights to separate people cycling, walking and driving at the junction of Cannon Street and Queen Victoria Street.
- Make pavements up to 2.3 metres wider (up to 70% increase) on Queen Victoria Street between Cannon Street and Queen Street creating more space for walking and wheeling.

A detailed plan of proposals can be accessed by clicking here.

Queen Victoria Street East - support for the proposed walking and cycling changes

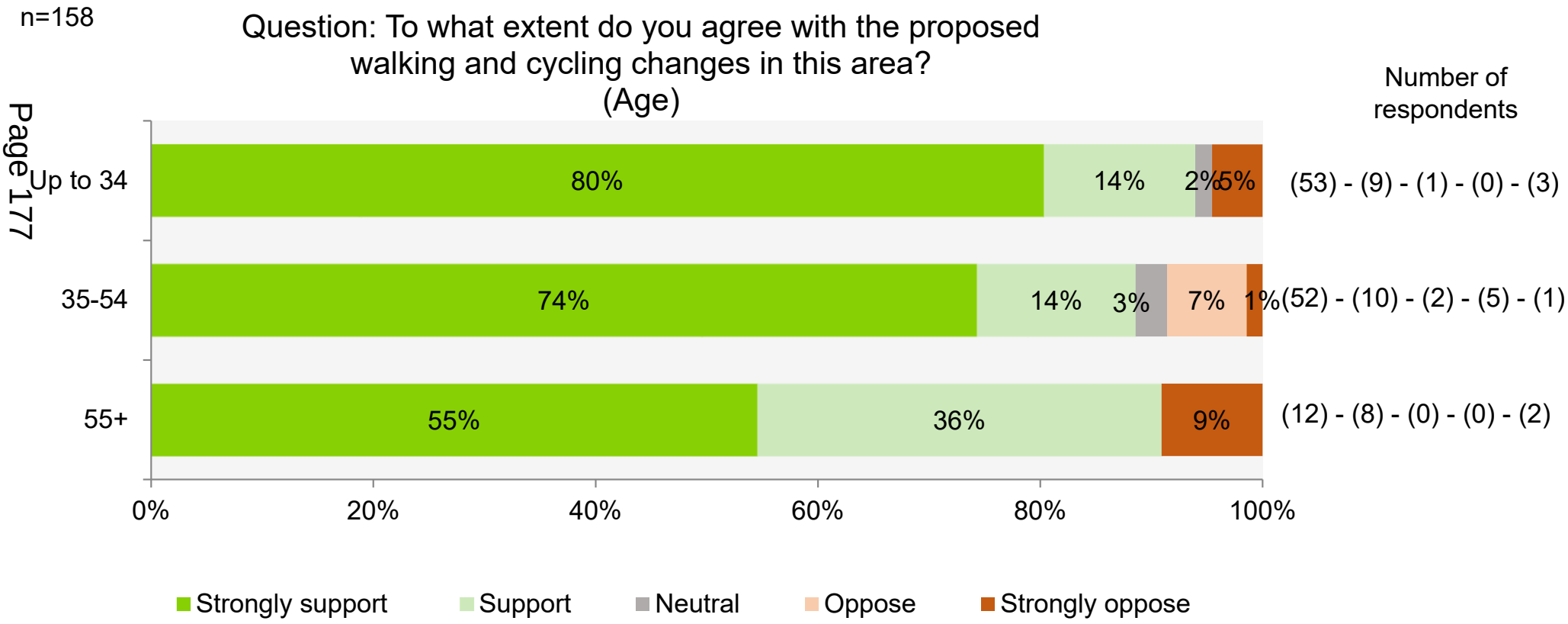
Almost 90% of respondents supported the proposed walking and cycling changes. For many, this support was strong. In contrast, just 10% opposed, with 2% expressing a neutral opinion.



On the following pages, we see how agreement varied by respondents' age, travel mode and their relationship to the City.

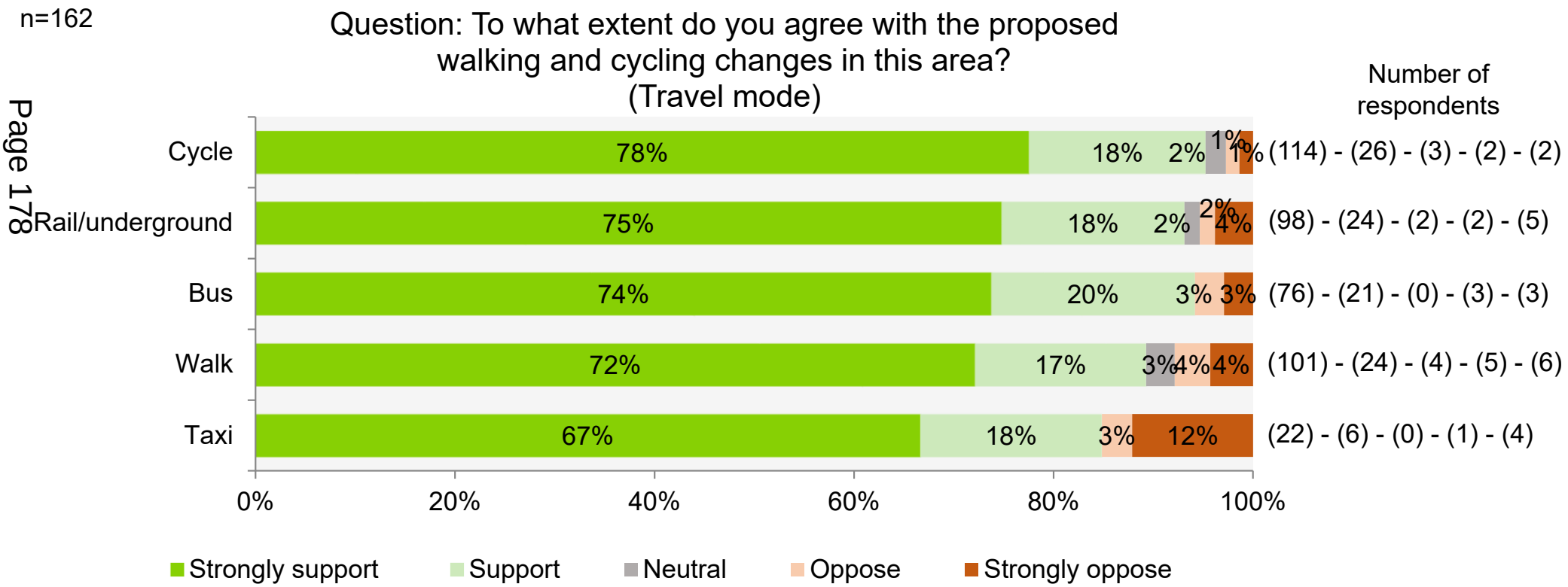
Queen Victoria Street East - how support for the proposed walking and cycling changes varied in relation to respondent age

A majority of all age groups supported the walking and cycling proposals, with opposition at just 5-9%.



Queen Victoria Street East - how support for the proposed walking and cycling changes varied in relation to how respondents identified they got around the area

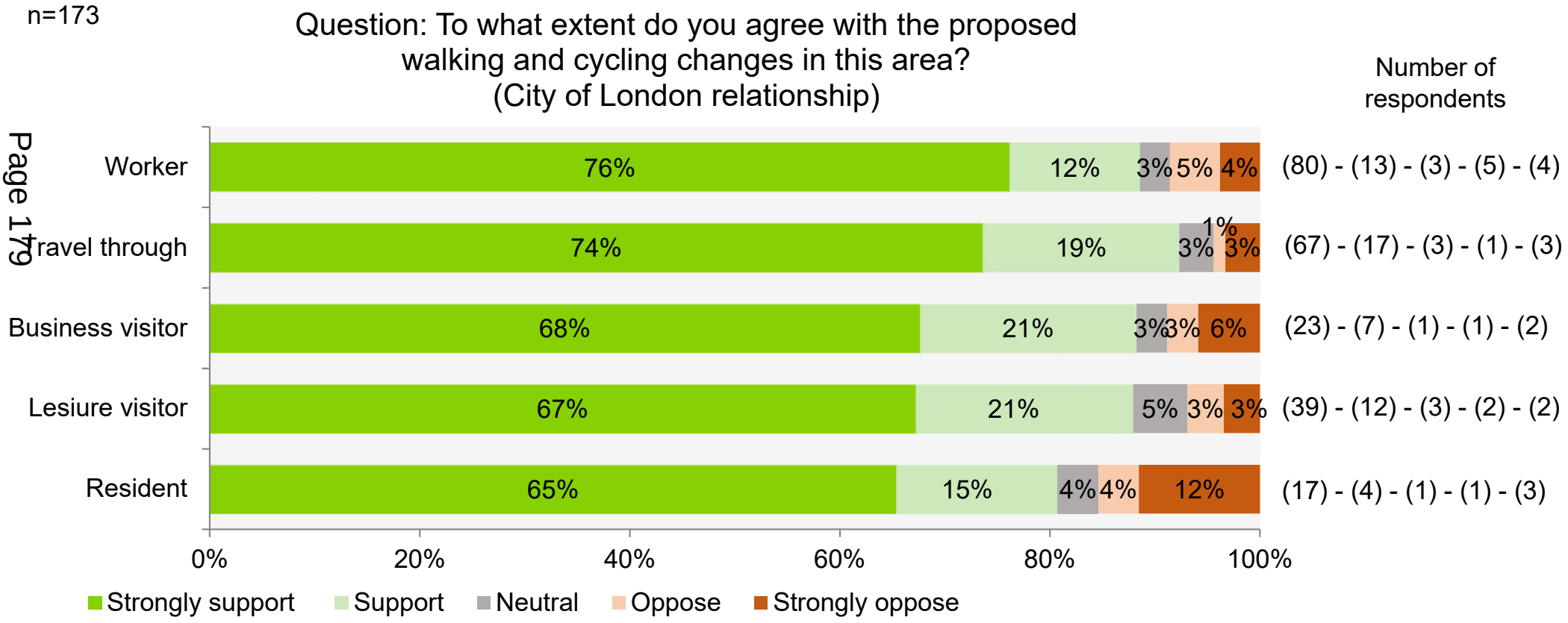
Majority support for the proposed changes was evident among people travelling by all travel modes. This support peaked among cyclists at 96%, and was also high among those using the rail/underground, bus users and walkers. Opposition was, in contrast, limited. Though note that 15% of taxi users opposed the proposed changes.



Note that some travel modes (private hire vehicle drivers and passengers, motorcyclists, van/lorry drivers, car drivers and passengers, wheelchair or mobility scooter users and other travel mode users) lacked a sufficient number of respondents to allow meaningful analysis.

Queen Victoria Street East - how support for the proposed walking and cycling changes varied in relation to City of London relationship

Majority support for the proposed changes was evident among people of all relationship types with the City of London. This support typically exceeded 80% and was highest amongst workers and those passing through. In contrast, opposition was far less – peaking among residents, of whom 16% opposed the proposed changes.



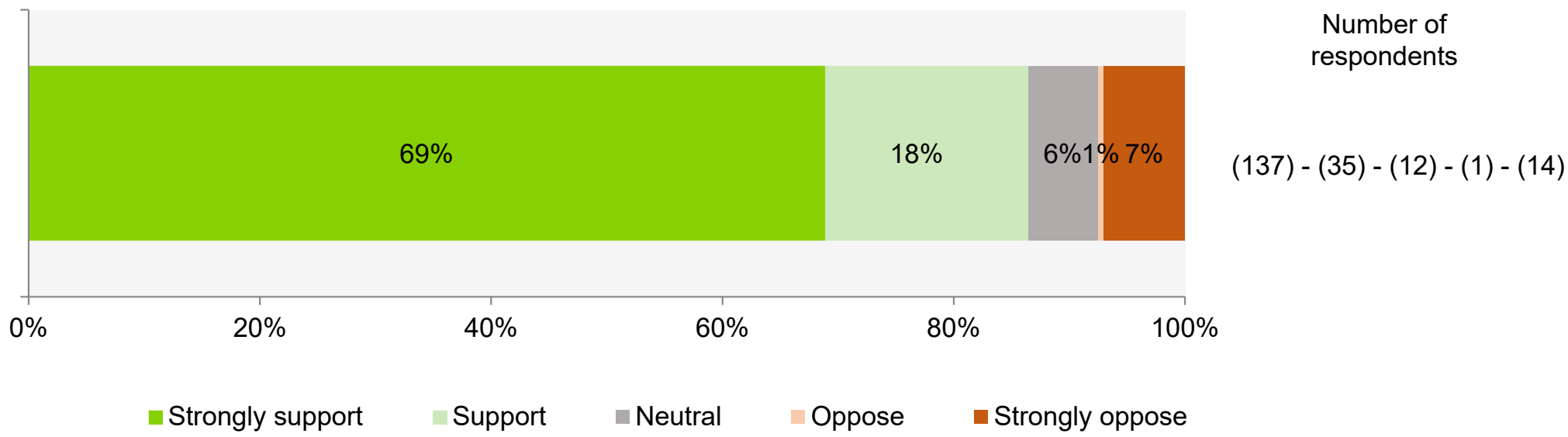
Note that some relationship types (business owners, drivers/riders, students and those just interested in the scheme) lacked a sufficient number of respondents to allow meaningful analysis.

Queen Victoria Street East - support for the proposed changes to parking, loading and kerbside access (including at bus stops)

Almost 90% of respondents supported the proposed changes to parking, loading and kerbside access (including at bus stops). For many, this support was strong. In contrast, just 8% disagreed, with 6% expressing a neutral opinion.

n=199

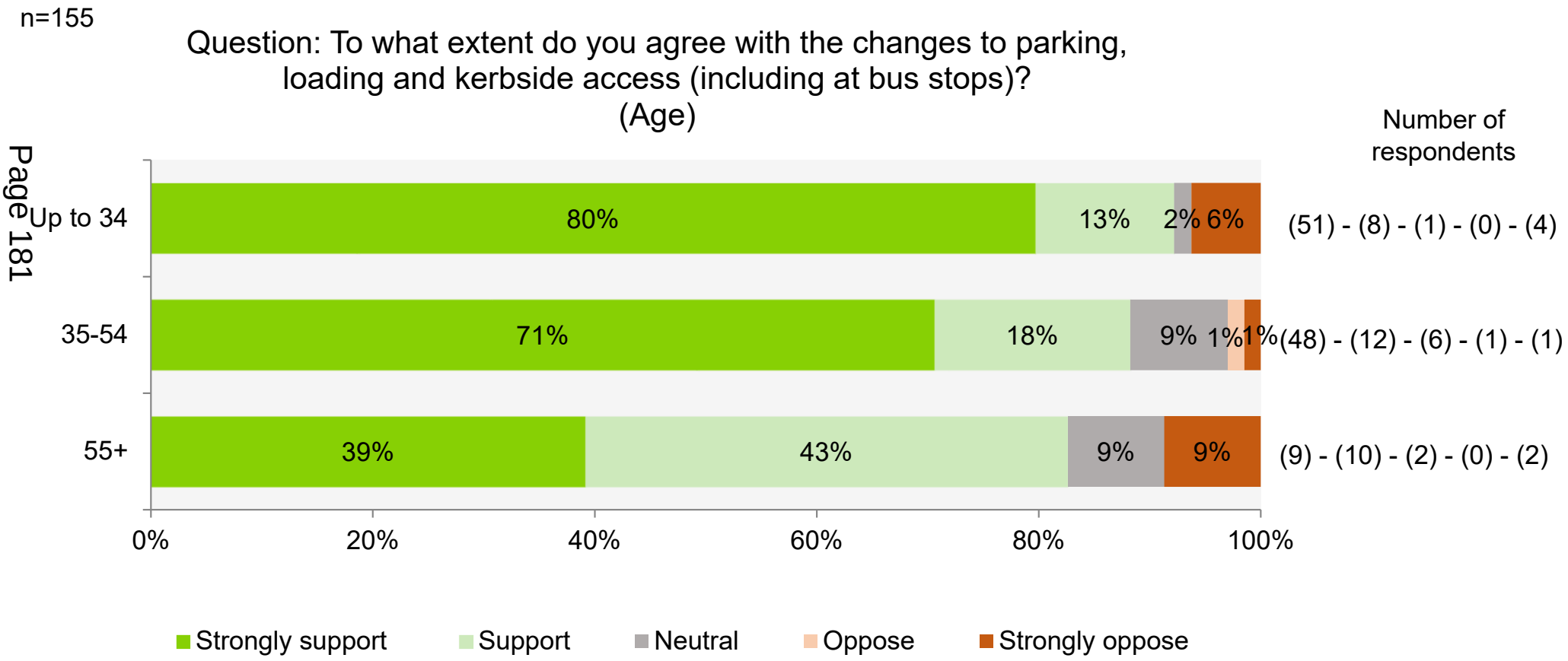
Question: To what extent do you agree with the changes to parking, loading and kerbside access (including at bus stops)?



On the following pages, we see how agreement varied by respondents' age, travel mode and their relationship to the City.

Queen Victoria Street East - how support for the proposed changes to parking, loading and kerbside access (including at bus stops) varied in relation to respondent age

A majority of all age groups supported the walking and cycling proposals, with opposition at just 2-9%.

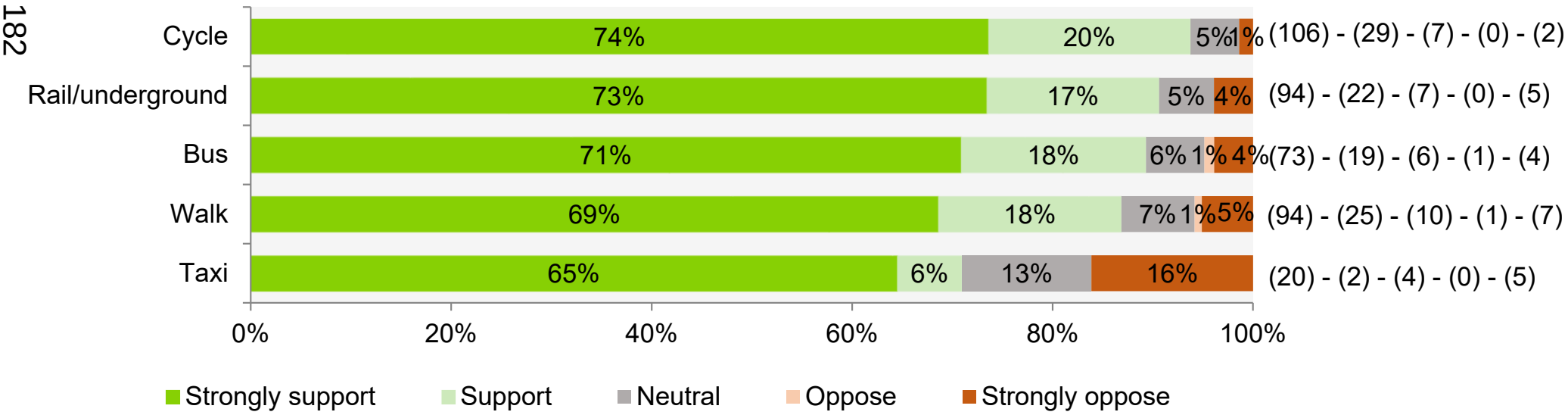


Queen Victoria Street East - how support for the proposed changes to parking, loading and kerbside access (including at bus stops) varied in relation to how respondents identified they got around the area

Majority support for the proposed changes was evident among people travelling by all travel modes. This support peaked among cyclists at 94%, and was also high among those using the rail/underground, bus users and walkers. Opposition was, in contrast, limited, peaking with taxi drivers at 16%.

n=158

Question: To what extent do you agree with the changes to parking, loading and kerbside access (including at bus stops)? (Travel mode)



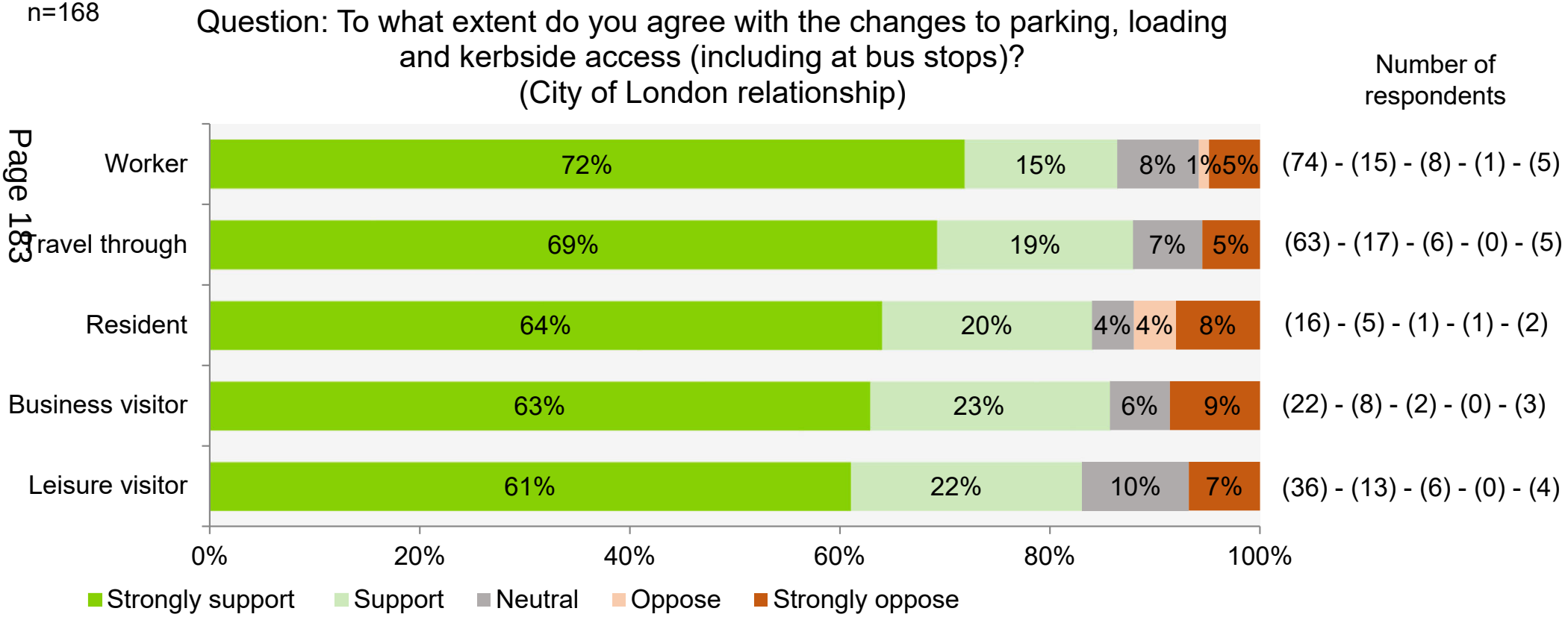
Note that some travel modes (private hire vehicle drivers and passengers, motorcyclists, van/lorry drivers, car drivers and passengers, wheelchair or mobility scooter users and other travel mode users) lacked a sufficient number of respondents to allow meaningful analysis.

Queen Victoria Street East - how support for the proposed changes to parking, loading and kerbside access (including at bus stops) varied in relation to respondent relationship to the City

Majority support for the proposed changes was evident among people of all relationship types with the City of London. This support typically exceeded 80% and was highest amongst workers and those passing through. In contrast, opposition was far less at between 5-12%.

n=168

Question: To what extent do you agree with the changes to parking, loading and kerbside access (including at bus stops)? (City of London relationship)



Note that some relationship types (business owners, drivers/riders, students and those just interested in the scheme) lacked a sufficient number of respondents to allow meaningful analysis.

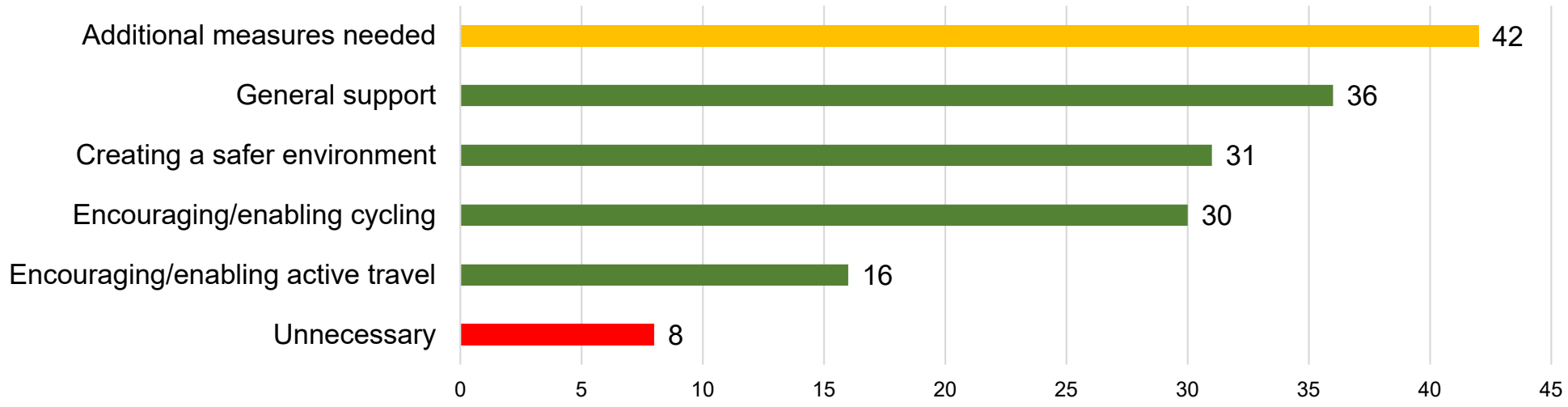
Queen Victoria Street East - what underpins views

121 respondents left comments on the proposed Queen Victoria Street (East) changes. Some respondents made more than one comment. Here, we see the top comments made. The most frequent comments suggested a need for additional measures (see overleaf). This was followed by general support for the proposals, which were felt would create a safer environment (particularly for cyclists) and one which enabled both cyclists and pedestrians. Some respondents felt that the changes were unnecessary/a waste or money.

Categories in green indicate supporting comments and perceived benefits, while those in orange indicate a perceived need for additional measures (see overleaf). Categories in red indicate concerns/criticisms.

n=121

Question: Can you say in a few words why you support/don't support the proposed changes to Queen Victoria Street East?



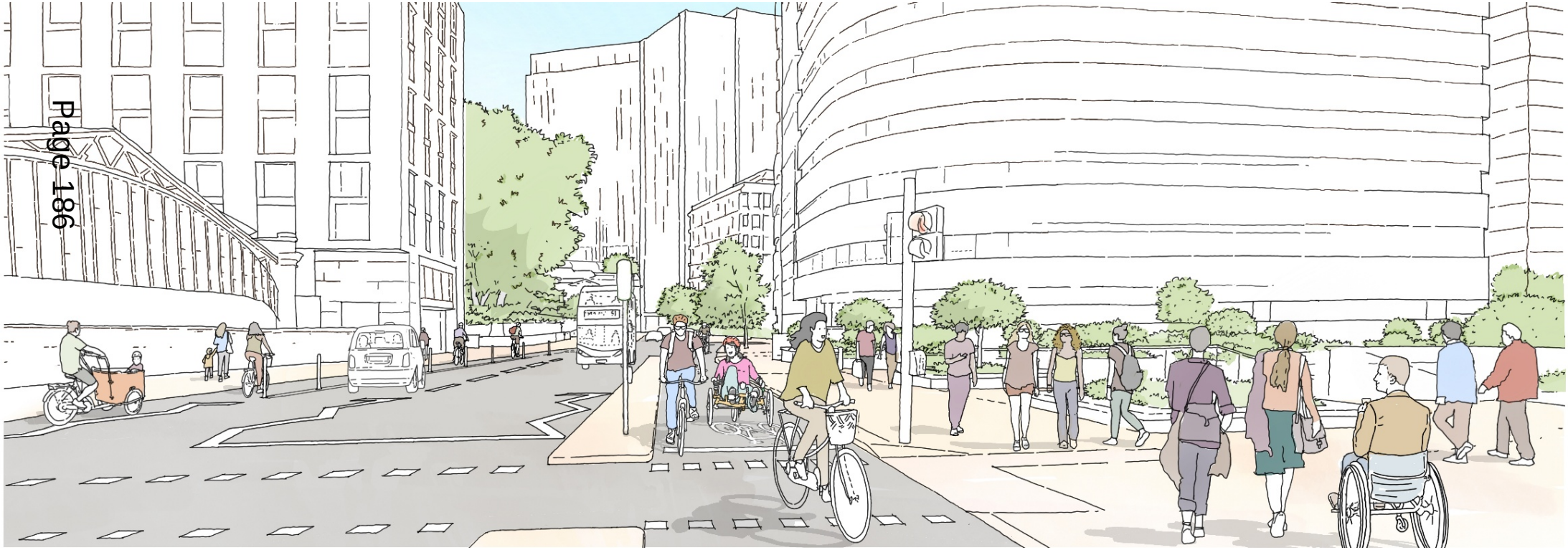
Other comments most commonly focused on the potential benefits of reduced motor traffic and better air quality, with some concerns relating to increased traffic congestion, pedestrian danger and accessibility. (Each made by no more than five respondents).

Queen Victoria Street East – additional measures suggested

42 respondents identified additional measures which they felt to be necessary. These included:

- Replacement of advisory cycle marking with mandatory cycle marking outside of Mansion House Station.
- Clarity on why two-way protected cycleways are split into two for the easterly section.
- Wider cycleways.
- Simpler traffic signalling.
- Replacement of cycle gates with advanced stop lines or a hold the left approach.
- Improvements to junctions at Cannon Street and on the eastern end of route.
- Replacement of multi-stage pedestrian crossings with direct crossings.
- Access to Lambeth Hill from the cycleway.
- Providing segregated cycleways across the whole route.
- Additional greening.
- Keep cyclists on the same side of the road and reduce signal phasing.
- The two-way cycle track could start earlier in Queen Victoria Street to cater for cyclists from Bread Street.
- Clarity on whether the stretch between Queen Victoria Street and Cannon Street is a pavement or a cycle lane.
- Closure of Bow Lane to motorised traffic (other than rubbish collection or police).
- Preventing dangerous cyclist behaviour (i.e. jumping red lights).
- A need to replace flexi wands with more substantial (concrete), permanent bollards.
- Increased signage of how to connect this route to the route a block south – making it easier to get from Queen Victoria Street to the cycleway along the river.

Aldgate proposals



Aldgate cycleway proposals

On this section it is proposed to:

- Install flexible posts along the eastbound cycle lane on Aldgate and add a cycle access from Aldgate onto the Aldgate Square cycle track.
- Install new raised table crossings for walking and cycling at Duke's Place and Houndsditch.
- Retain the shared walking and cycling space between Duke's Place and Houndsditch.
- Install traffic island separators along the eastbound cycle lane on St Botolph Street and a bus stop bypass at Stop B with a raised table zebra crossing and large waiting area.
- Retain the westbound cycle lane protected with flexible posts on St Botolph Street.

Further improvements on Aldgate and Aldgate High Street are also being explored and would be delivered separately.

A detailed plan of proposals can be accessed by clicking here.

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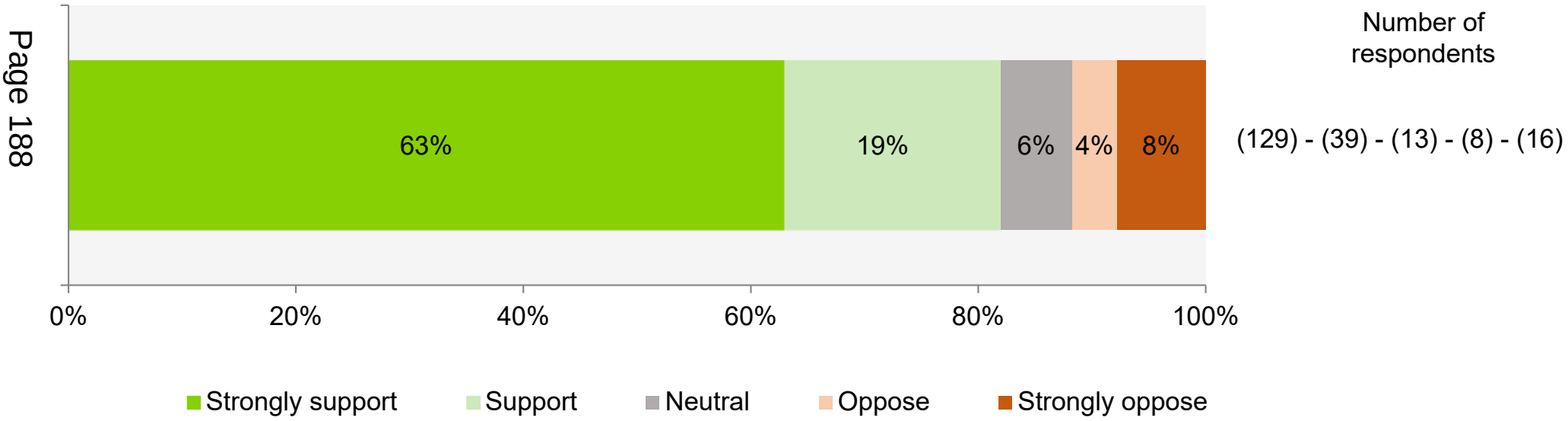
Aldgate - support for the proposed walking and cycling changes

Over 80% of respondents supported the proposed walking and cycling changes. For many, this support was strong. In contrast, just 12% disagreed, with 6% expressing a neutral opinion.

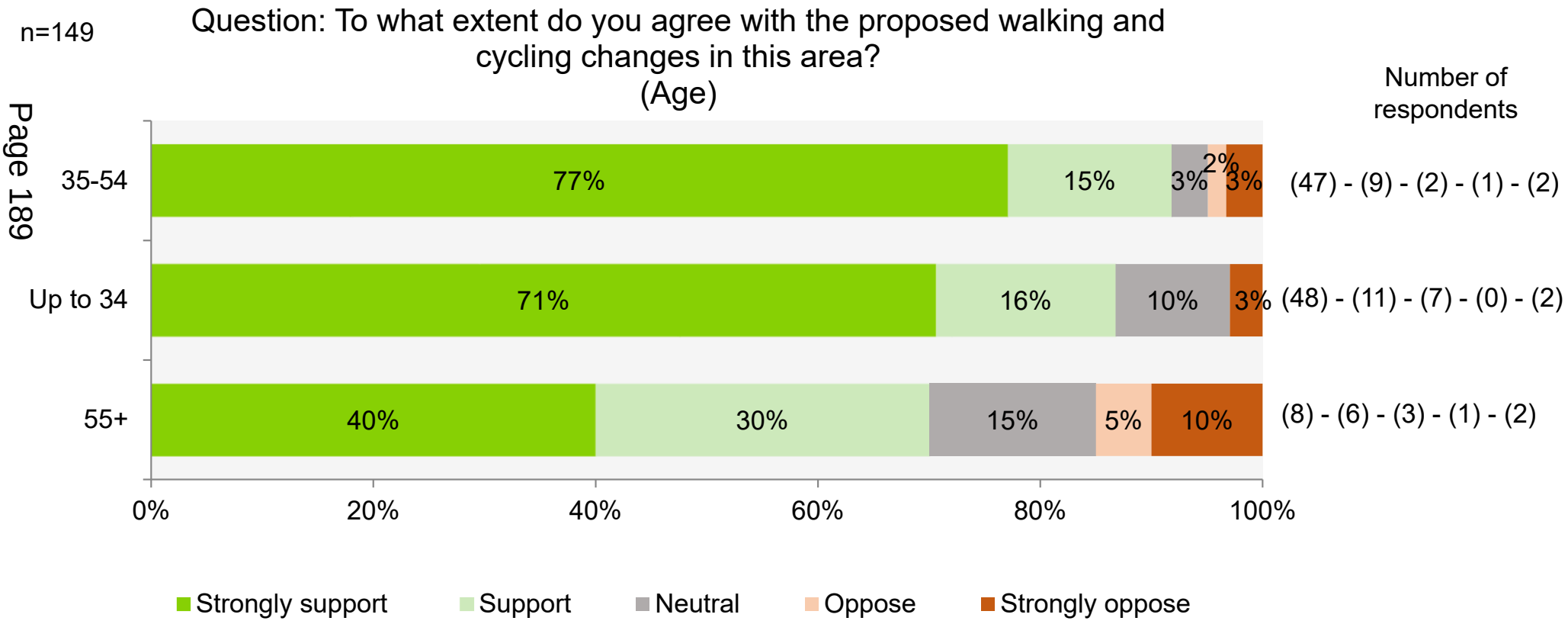
n=205 Question: To what extent do you agree with the proposed walking and cycling changes in this area?



On the following pages, we see how agreement varied by respondents' age, travel mode and their relationship to the City.

Aldgate - how support for the proposed changes to walking and cycling varied in relation to respondent age

A majority of all age groups supported the walking and cycling proposals, with opposition at just 3-15%.

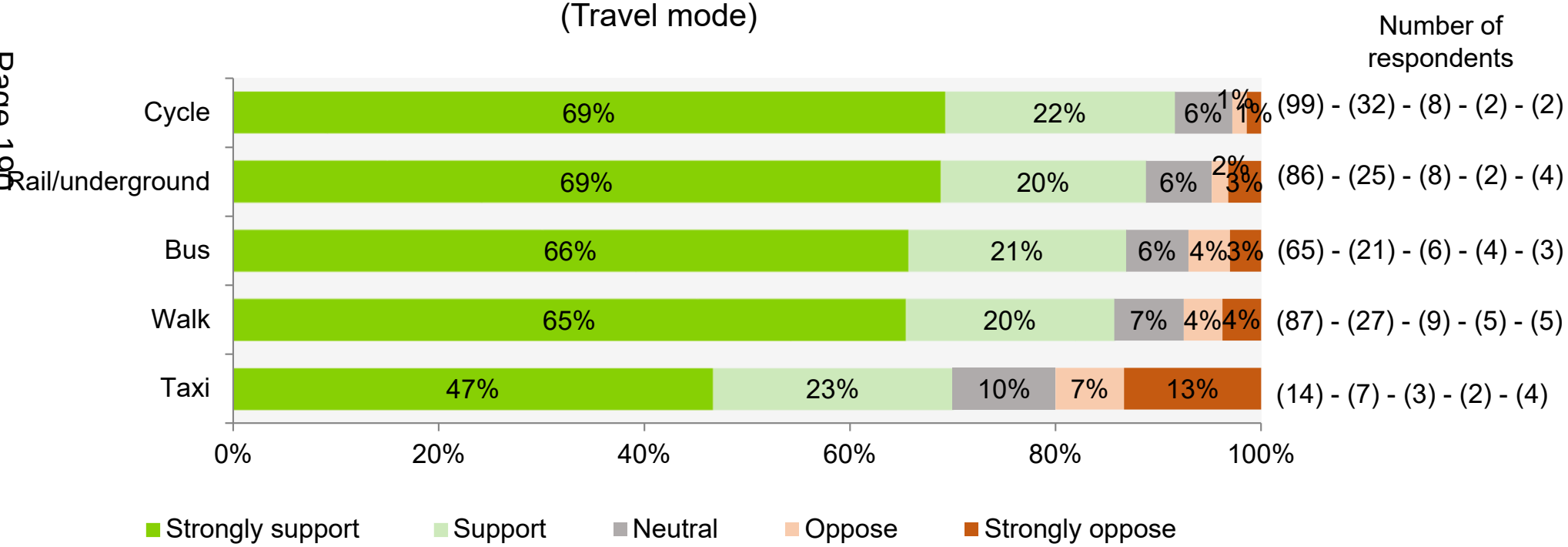


Aldgate - how support for the proposed walking and cycling changes varied in relation to how respondents identified they got around the area

Majority support for the proposed changes was evident among people travelling by all travel modes. This support peaked among cyclists at 91%, and was also high among those using the rail/underground, bus users and walkers. Opposition was, in contrast, limited. Though note that 20% of taxi users opposed the proposed changes.

n=157

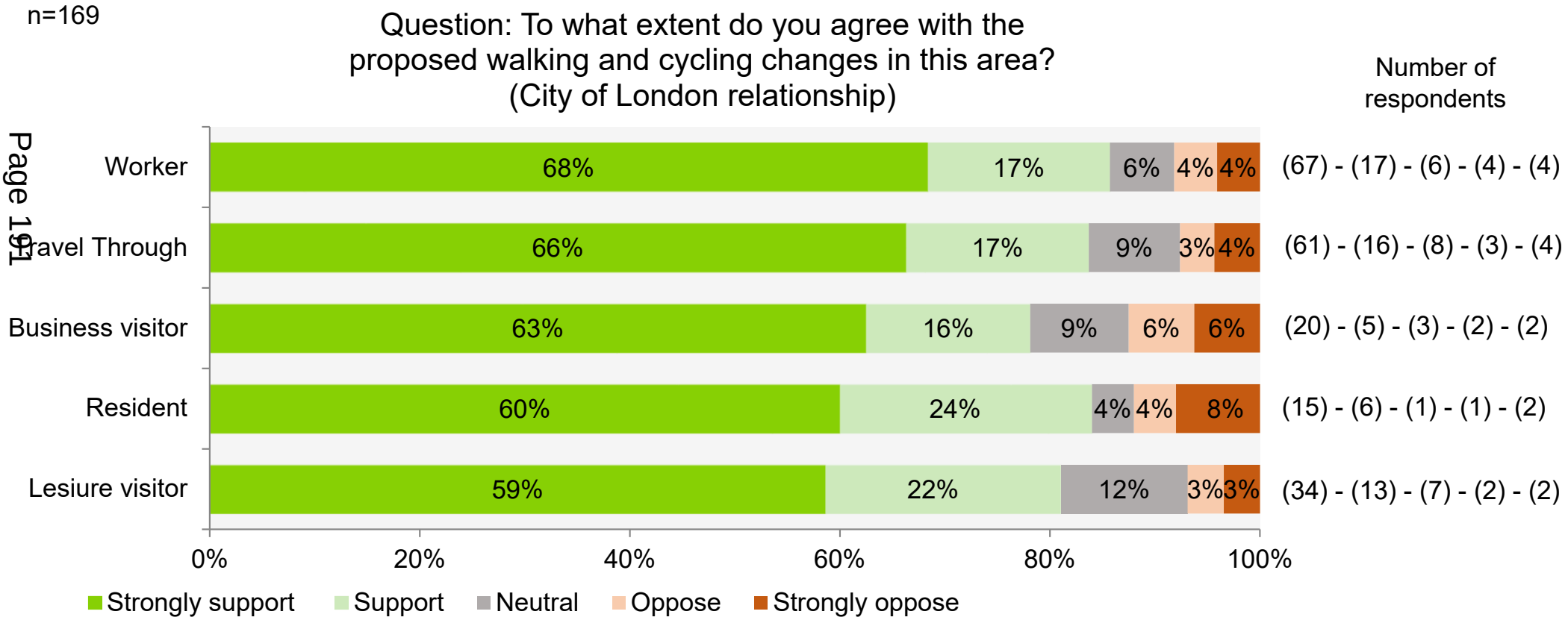
Question: To what extent do you agree with the proposed walking and cycling changes in this area?
(Travel mode)



Note that some travel modes (private hire vehicle drivers and passengers, motorcyclists, van/lorry drivers, car drivers and passengers, wheelchair or mobility scooter users and other travel mode users) lacked a sufficient number of respondents to allow meaningful analysis.

Aldgate - how support for the proposed walking and cycling changes varied according to City of London relationship

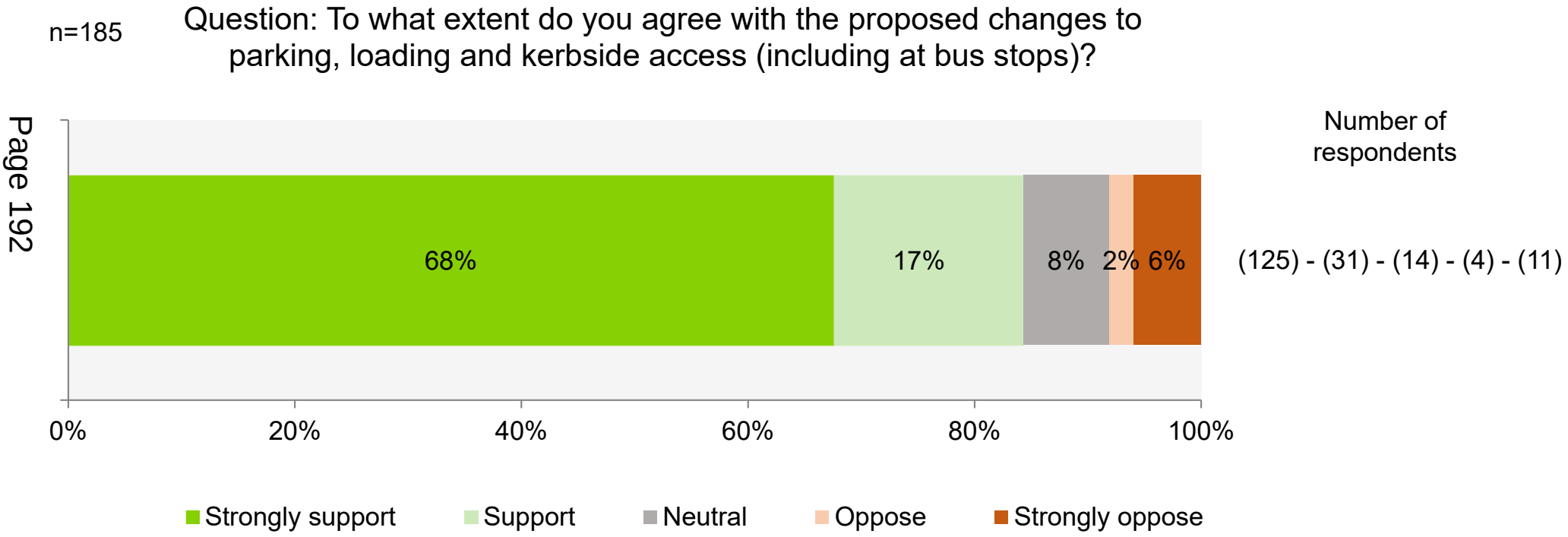
Majority support for the proposed changes was evident among people of all relationship types with the City of London. This support typically exceeded 80% and was highest amongst workers and those passing through. In contrast, opposition was far less, at between 6-12%.



Note that some relationship types (business owners, drivers/riders, students and those just interested in the scheme) lacked a sufficient number of respondents to allow meaningful analysis.

Aldgate - support for the proposed changes to parking, loading and kerbside access (including at bus stops)

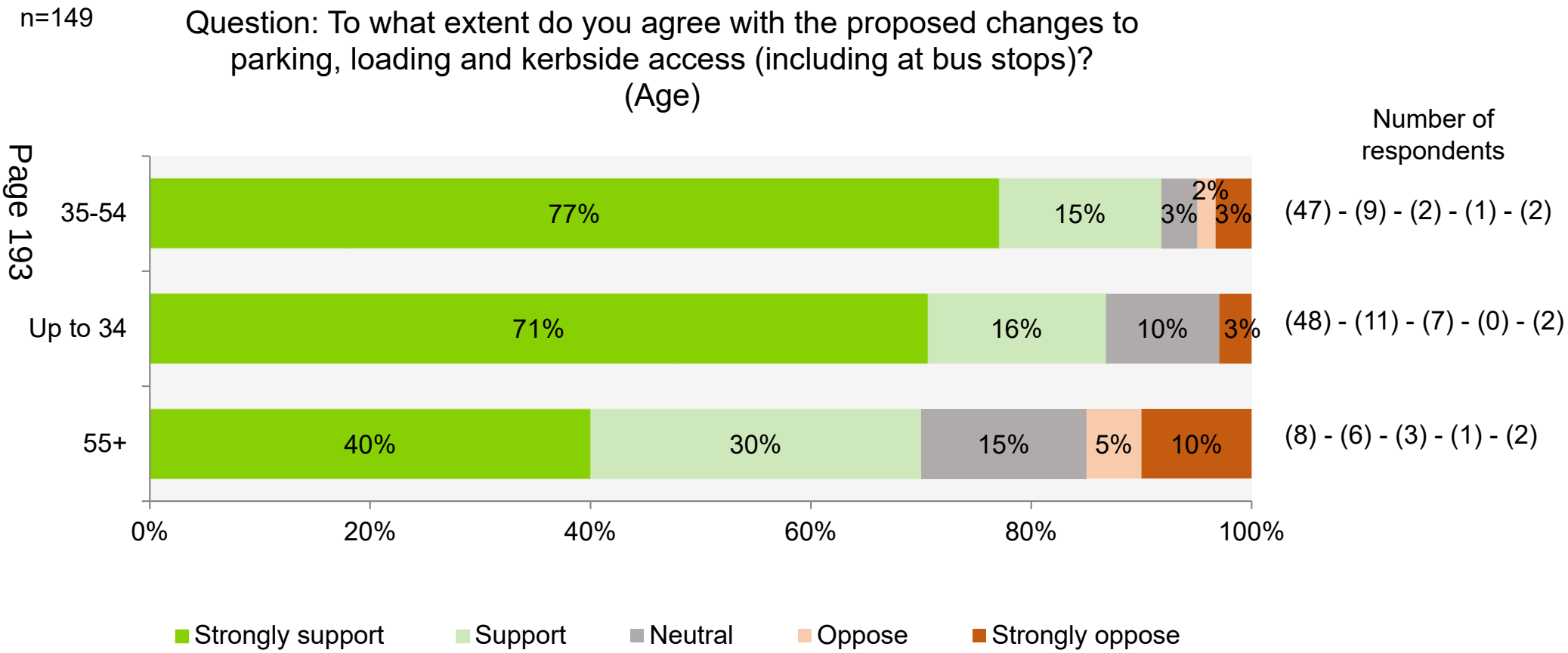
85% of respondents agreed with the proposed changes to parking, loading and kerbside access (including at bus stops). For many, this support was strong. In contrast, just 8% disagreed, with another 8% expressing a neutral opinion.



On the following pages, we see how agreement varied by respondents' age, travel mode and their relationship to the City.

Aldgate - how support for the proposed changes to parking, loading and kerbside access (including at bus stops) varied in relation to respondent age

A majority of all age groups supported the walking and cycling proposals, with opposition at just 3-15%.

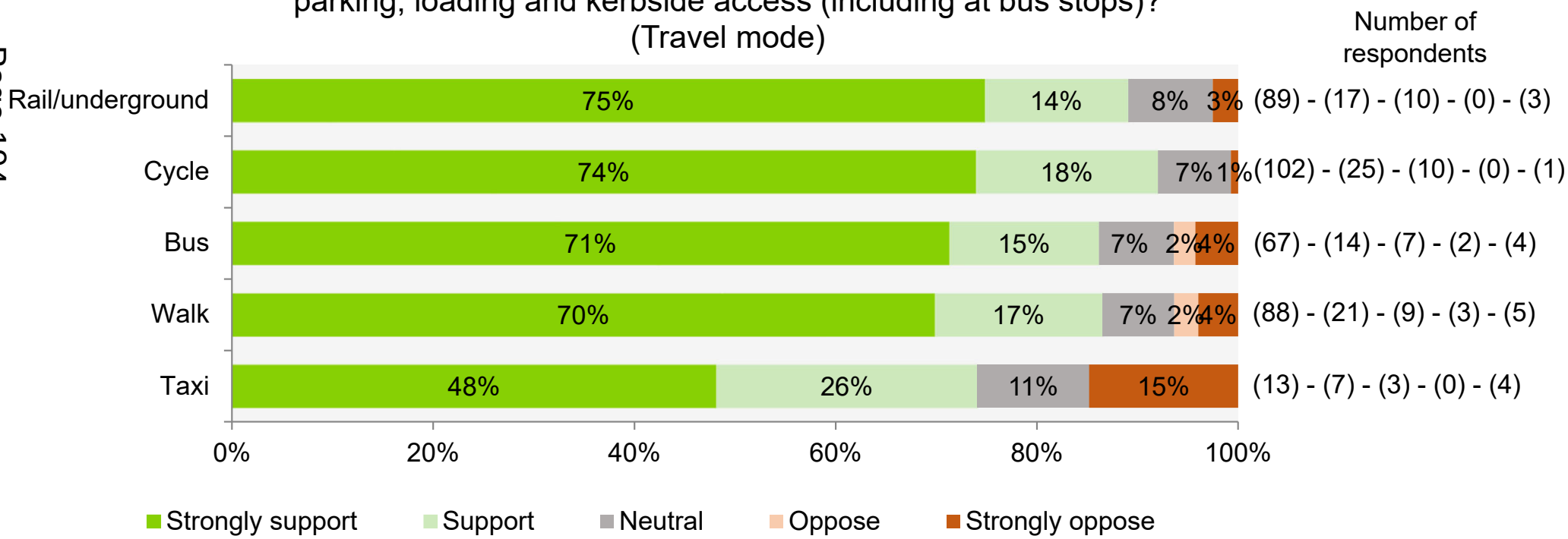


Aldgate - how support for the proposed changes to parking, loading and kerbside access (including at bus stops) varied in relation to how respondents identify they got around the area

Majority support for the proposed changes was evident among people travelling by all travel modes. This support peaked among rail/underground users at 89%, and was also high among cyclists, bus users and walkers. Opposition was, in contrast, limited at between 1-15%.

n=150

Question: To what extent do you agree with the proposed changes to parking, loading and kerbside access (including at bus stops)? (Travel mode)



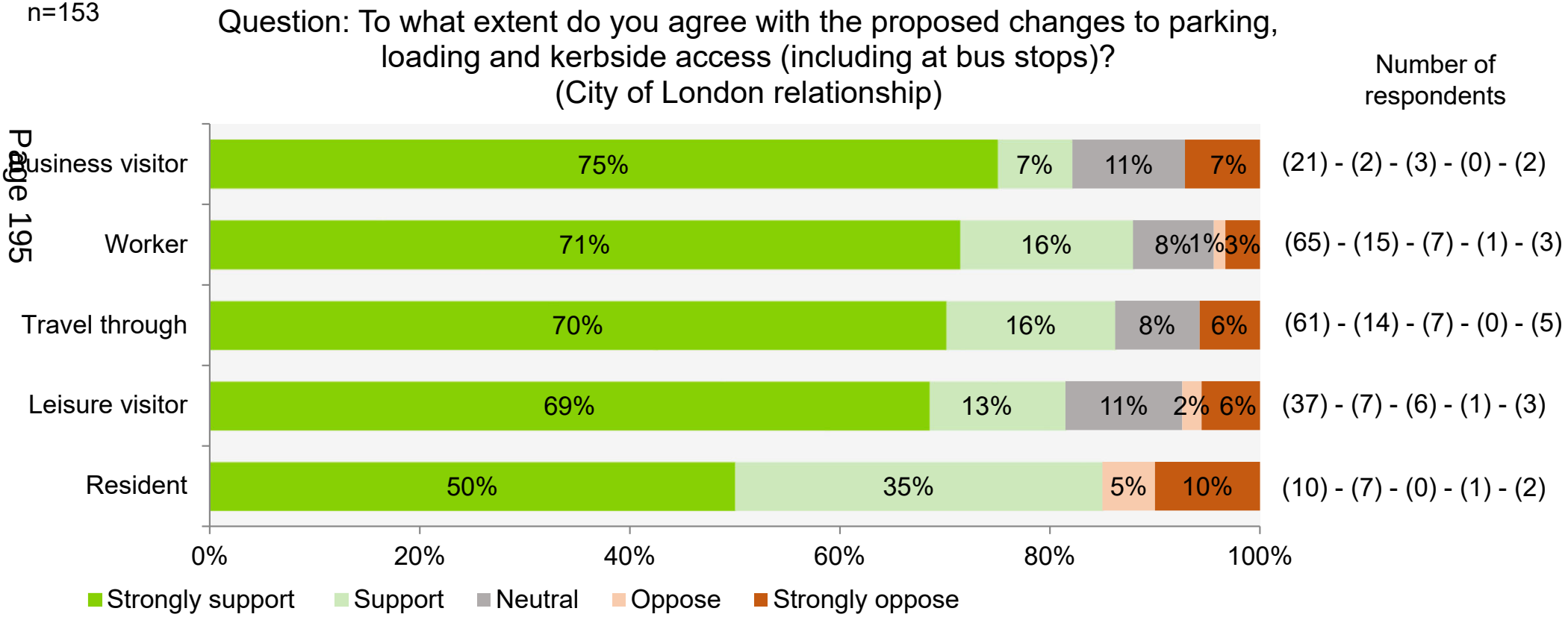
Note that some travel modes (private hire vehicle drivers and passengers, motorcyclists, van/lorry drivers, car drivers and passengers, wheelchair or mobility scooter users and other travel mode users) lacked a sufficient number of respondents to allow meaningful analysis.

Aldgate - how support for the proposed changes to parking, loading and kerbside access (including at bus stops) varied according to City of London relationship

Majority support for the proposed changes was evident among people of all relationship types with the City of London. This support typically exceeded 80% and was highest amongst business visitors and workers. In contrast, opposition was far less at between 4-15%.

n=153

Question: To what extent do you agree with the proposed changes to parking, loading and kerbside access (including at bus stops)? (City of London relationship)



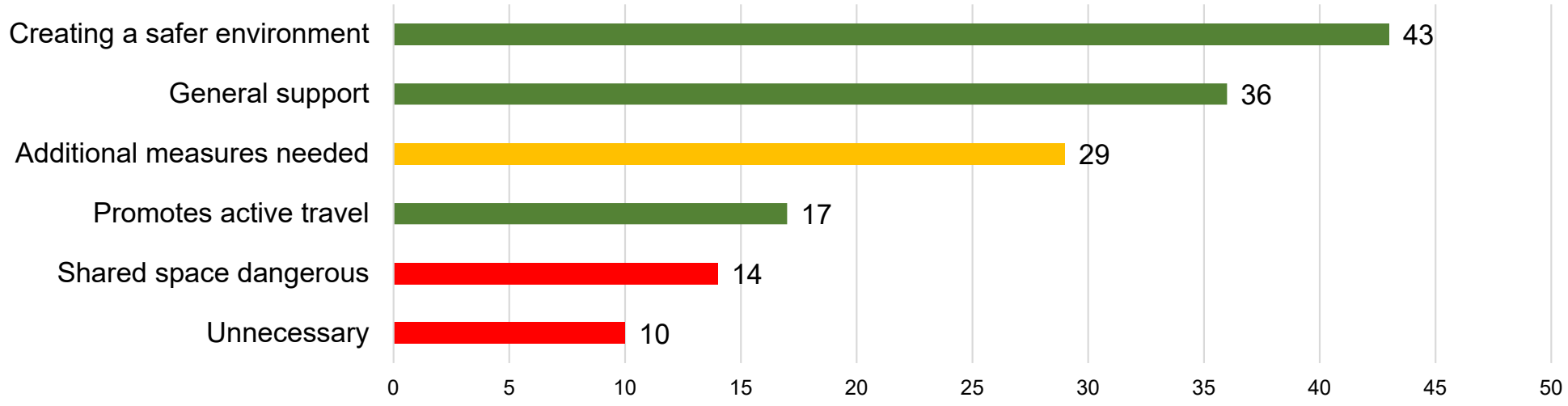
Note that some relationship types (business owners, drivers/riders, students and those just interested in the scheme) lacked a sufficient number of respondents to allow meaningful analysis.

Aldgate - what underpins views

134 respondents left comments on the proposed Aldgate changes. Some respondents made more than one comment. Here, we see the top comments made. The number one comment focused on perceptions of a safer environment for cyclists. This was followed by general applause for the proposals which were felt to promote active travel modes, though with some suggesting a need for additional measures (see overleaf). The two most frequent concerns focused on danger associated with shared cycle/pedestrian space and shared cycle/motor traffic space, and the feeling that the proposals were unnecessary. Categories in green indicate supporting comments and perceived benefits, while those in orange indicate a perceived need for additional measures (see overleaf). Categories in red indicate concerns/criticisms.

n=134

Question: Can you say in a few words why you support/don't support the proposed changes to Aldgate?



Other comments most commonly focused on applause for additional cycling infrastructure, but with a perceived need to tackle dominant/dangerous cyclist behaviour, potentially increased congestion and a decline in local commerce. (Each made by no more than seven respondents).

Aldgate - what underpins views on the proposed changes overall – additional measures suggested

29 respondents identified additional measures which they felt to be necessary. These included:

- Additional protection on the cycle lane through Aldgate park to segregate from pedestrians.
- Cycle lane segregation from motor traffic.
- A need to replace flexi wands with more substantial (concrete), permanent bollards.
- Improving the connection via Jewry Street to the CS3.
- Lowering the Aldgate Square two-way cycle track so it is at a different level to the surrounding pavements.
- Extending Aldgate corridor improvements more than just in St Botolph Street, particularly with the bus stops in Aldgate (westbound).
- A need to adopt a more radical approach generally.
- A need to rethink the use of bike gates, which are felt to be over-run with vehicular (particularly delivery) traffic.
- Wider cycle lane tracks.
- Addressing safety concerns at the turn from Aldgate in Leadenhall.
- Addressing a bigger problem South East towards Tower Bridge.
- Continuous pavements across the bus station and across the entire Aldgate High Street southside.
- Improve pedestrian cycle lane markings where St Botolph Street meets Aldgate High Street.
- Opportunity to create more permanent protection westbound in St Botolph street.
- Tackling the Mansell Street/Aldgate junction in terms of improving safety.
- Use of zebra crossings.
- A need to ensure connectivity with the remainder of the City.

Drop-in and email feedback

Feedback via drop-in sessions and emails

There were 16 contributors to the consultation via the drop-in sessions and email. These contributors included both individuals and organisations.Their feedback – leaving aside general consultation queries – highlighted the following:

- Support for what are seen as much needed proposals.

Concerns related to:

- Queen Victoria Street East - a crossover being needed rather than separate tracks on each side of the street. The latter potentially causing wayfinding difficulties and problems with traffic not clearing the lights and blocking the cycleway.
- Cycle gates on Queen Victoria Street and Cannon Street preventing a clear cycling run through the junction, with potential confusion for cyclists.
- A lack of improvement to Bank – Cornhill – Leadenhall Street - with a continuation of cyclist/vehicular traffic shared space under the assumption of fewer than 200 vehicles per hour. However, forthcoming development and the reopening of Bank junction to black cabs will result in increased traffic levels leading to more vulnerable road users feeling exposed and bullied by this large volume of traffic.
- Gaps within the scheme chiefly at each end of the route where the connections to C2 and C3/C6 are considered to be poor.
- The mixing of cycle and vehicular traffic on the Cornhill/Leadenhall falling short in ambitions for Vision Zero 2040.
- The convoluted Aldgate section of cycleway could cause many cyclists to opt for a more dangerous route.

Feedback via drop-in sessions and emails

Concerns continued…

- A major safety hazard westbound on St Botolph Street - taking the lane around the non-bypassed bus stop and merging with traffic at the bend is required in order to then turn back south across the square - so this section remains dangerous.
- Potential water ingress and contents damage to His Majesty's College of Arms library, potentially caused by physical works.
- The busy access point associated with His Majesty's College of Arms College gates/courtyard – potentially blocking the cycleway for several minutes at a time.
- Rising noise/pollution levels for residents in the dwelling at the front and side of His Majesty's College of Arms, along Godliman Street and its junction with Queen Victoria Street.
- The impact that the changes to coach parking will have upon the ability to safely and efficiently manage the off-site games programme of the City of London School – with twice daily, between two and five coaches conveying in excess of 100 pupils between the main site on Queen Victoria Street and the school's sports field. With concerns specifically related to increased construction traffic and congestion, road closures, limited and distanced coach bay parking and drop-off/pick-up locations.

Feedback via drop-in sessions and emails

Suggestions/requests:

- Ensure that consultation visuals are representative of real life (for example, showing users of Santander bikes and e-bikes).
- Make the Equality Impact Assessment for the project available.
- Clarify how the development and the movement of the coach parking will be impacted by the Puddle Dock development proposals, currently in the early stages of neighbourhood consultation.
- Revisit the design of the very short section of two-way cycle track on the east side of St Martin's le Grand at its southern end followed by a "cross-over".
- Revisit the number of pedestrian crossing points near St Paul's underground station - at four, compared with three at present.
- In the context of the Air Quality Strategy 2025-2030, a need to ensure that there is not an increase in traffic on the junction of Queen Victoria Street / Cannon Street as a result of any changes, with accompanying measures to reduce traffic and /or smooth traffic at this junction.

Acknowledgements and next steps

Thank you to everyone that took the time to share their views on the draft proposals for a safer cycle route between Aldgate and Blackfriars Bridge

There were over 6,500 visits to the Commonplace consultation website, and over 1,200 Commonplace contributions were received, alongside drop-in attendance, emails and phone calls.

The City of London Corporation would like to express their appreciation for this input to the Aldgate to Blackfriars Bridge cycleway. The feedback received was both helpful and informative to the development of the plan.

The City of London Corporation will continue to keep you updated as the project develops. If you have any questions in the interim, please do not hesitate to contact the project team.

Appendix 1: Consultation notes

The quality and reliability of the data collected

In considering the quality and reliability of the data collected, there are a number of salient points to bear in mind.

Firstly, the consultation was self-selecting, and as such, the data should be regarded as a snap-shot of possible or indicative opinion on the proposals, rather than a systematically sampled data-set. As is typical of online consultations, this self-selection may have resulted in a bias of participation by those with particular views or concerns.

Secondly, what is also uncertain, is the degree of statistical accuracy - particularly related to quoted percentages. This is in the context of the self-selection nature of the consultation, and also being unable to compare participant demographics with a baseline profile (as the consultation was open to anyone).

When interpreting the findings within this report, they should therefore be regarded as an indicative snap-shot of opinion.

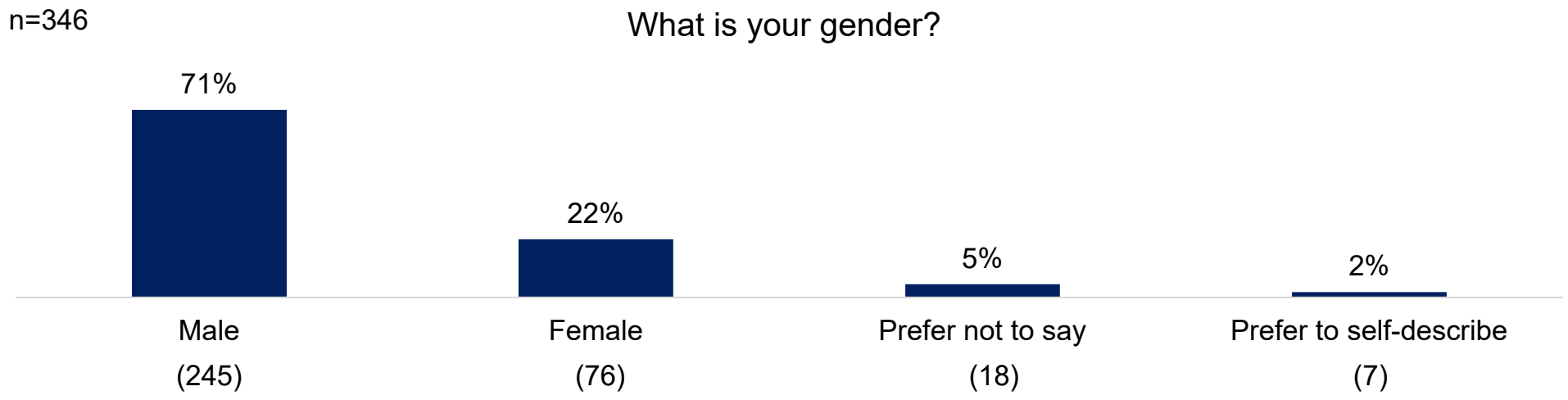
Additional notes

- The number of responses to each question is shown as n=x. This number refers to the total number of people who responded to the question. For this reason, n numbers change throughout the report, as some respondents did not answer all questions.
- Numbers are also provided in addition to percentages in all charts. These are shown either underneath, or alongside the categories on the horizontal chart axis.
- Percentages have been rounded and may therefore not total exactly 100. Percentages have also been calculated excluding missing responses.
- Some respondents did not provide demographic information or answer all survey questions. The impact of this is two-fold. Firstly, it restricts analyses by sub-groups. Secondly, it can result in overall averages (calculated including responses from those who gave no demographic information) appearing to be misaligned with demographic sub-group averages.
- Commonplace data was analysed by a range of demographic variables, where there were sufficient numbers to enable this to be meaningful. Notable differences in the views of respondents with varying demographic characteristics are highlighted throughout the report.
- In addition to selecting options or providing a level of support on proposed ideas, some respondents also provided accompanying commentary to explain the reason for their opinion. This yielded qualitative information to analyse and consider.

Appendix 2: Demographics

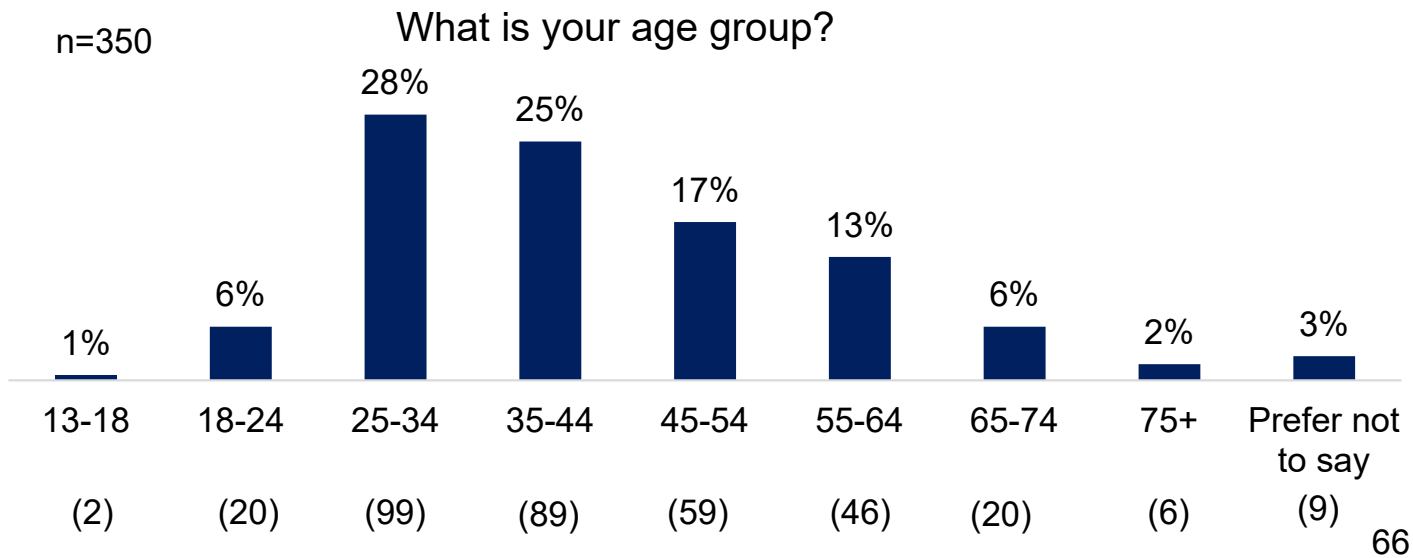
Gender

A majority of consultation respondents (71%) described themselves as a male. 22% described themselves as female, 5% preferred not to say and 2% preferred to self-describe.



Age group

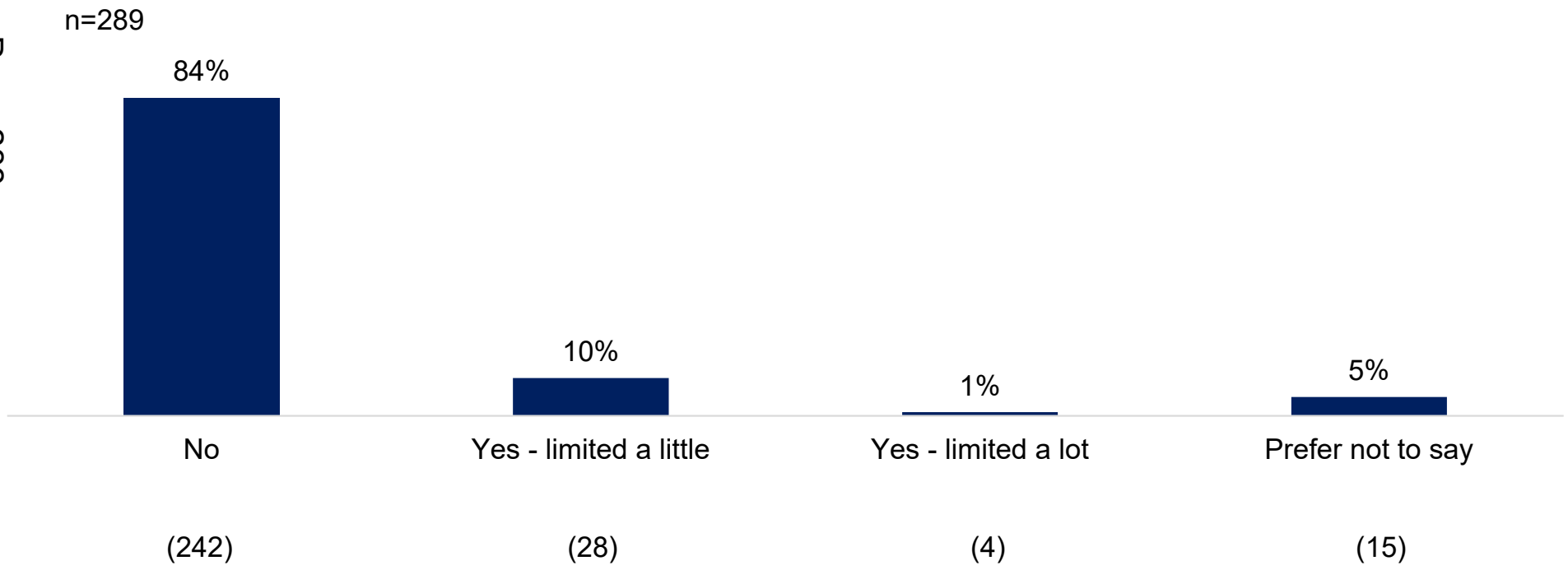
The age of consultation respondents ranged from 13 to 75+, with a wide spread of ages represented.



Day-to-day activities being limited by a physical or mental health condition or disability – lasting at least 12 months

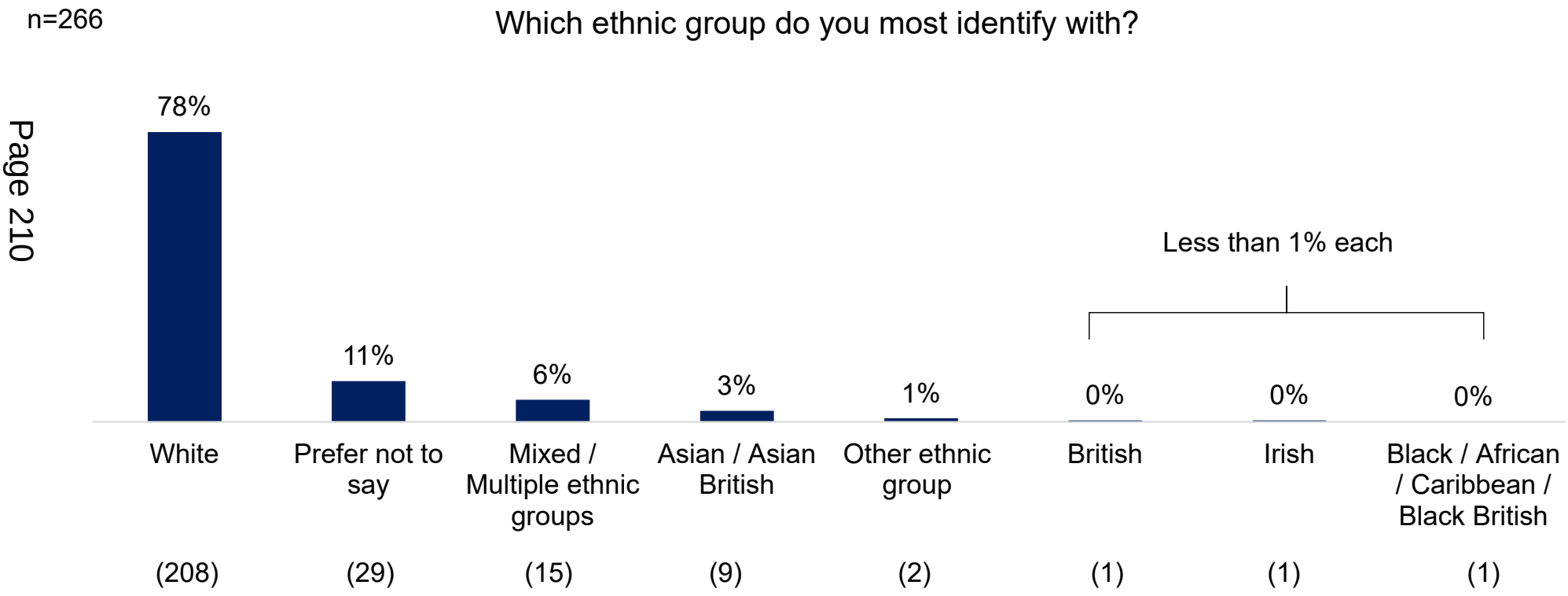
11% of consultation respondents indicated a limitation of their day-to-day activities due to a physical or mental health condition or disability.

Are your day-to-day activities limited because of a physical or mental health condition or disability which has lasted, or is expected to last, at least 12 months?



Ethnicity

Almost 80% of consultation respondents described their ethnicity as White, with 10% of another, different ethnicity – most frequently mixed or multiple ethnic groups.

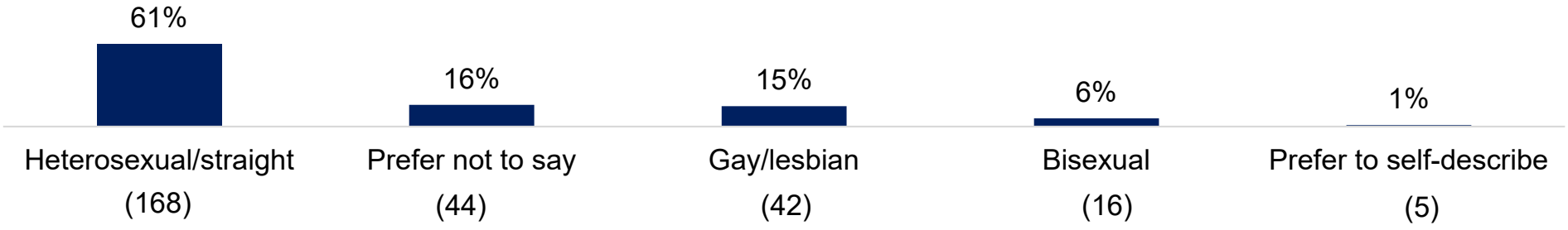


Sexuality

Just over 60% of consultation respondents identified as heterosexual/straight. 16% preferred not to say. 15% were gay or lesbian; 6% were bisexual and 1% preferred to self-describe.

n=275

What sexual orientation do you most identify with?

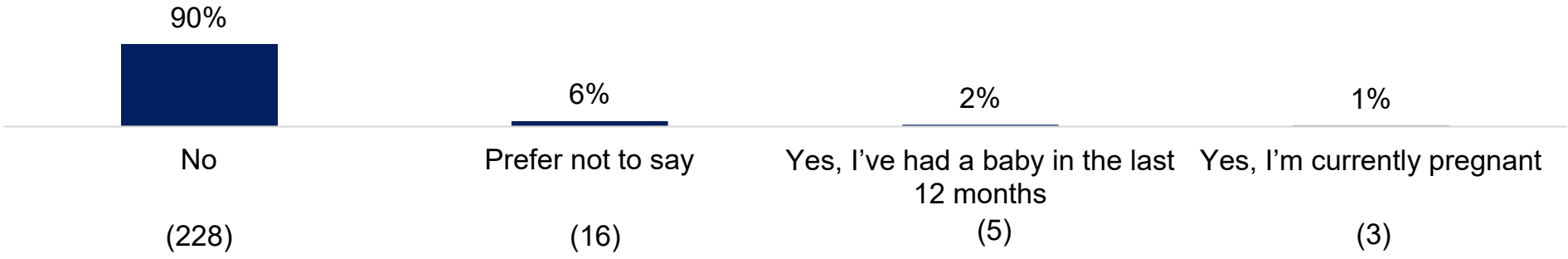


Pregnancy

90% of consultation respondents were not pregnant, nor had given birth in the last 12 months.

n=252

Have you had a baby in the last 12 months or are you currently pregnant?



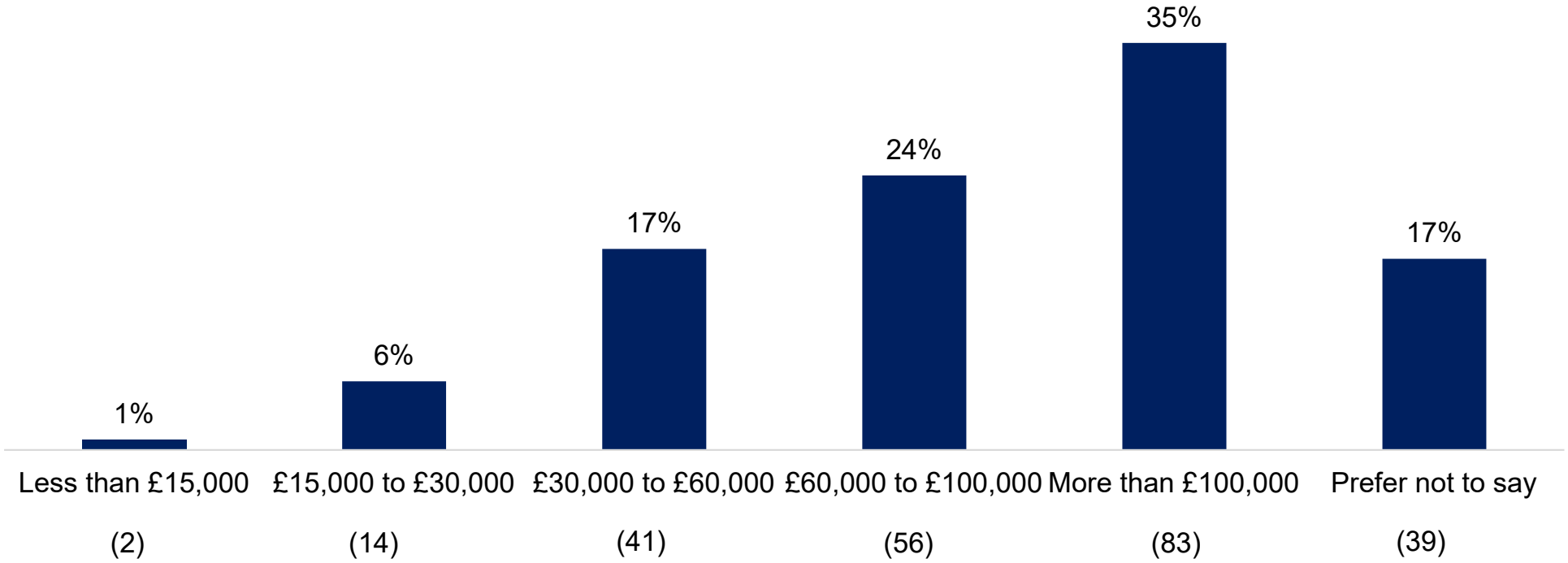
Household income

Some consultation respondents chose not to specify their household's annual income.

Among those who did, 35% were in the £100,000+ bracket.

What is your household's approximate annual income (before taxes and deduction)?

n=235

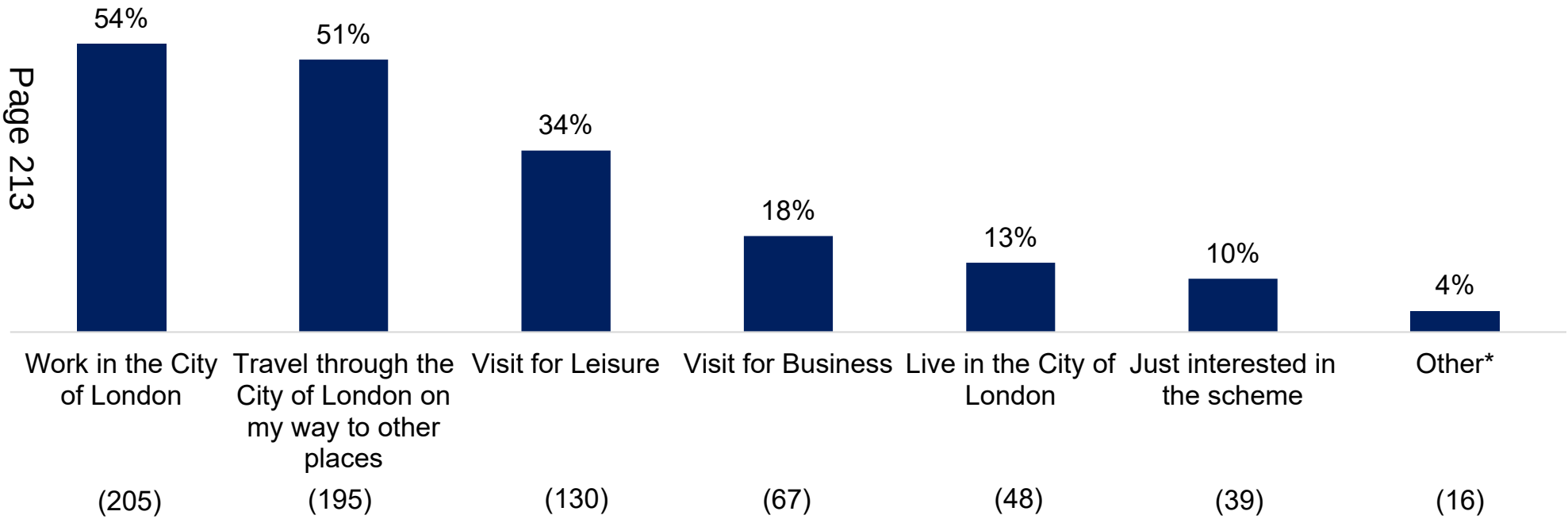


Area connection

The consultation attracted respondents with a wide range of area connections. More than half of respondents worked in the area (54%) or travelled through the City of London on their way to other places (51%). More than one area connection could be specified by respondents.

n=381

What is your relationship to the City of London?



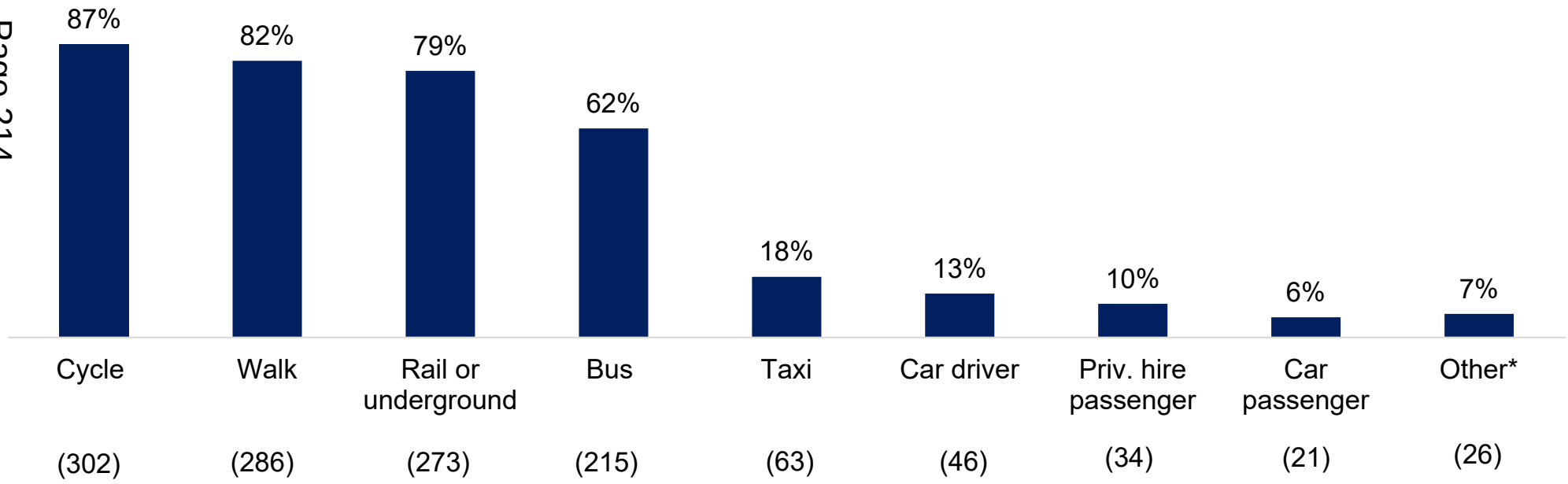
* Including business owners, those studying in the area and drivers/riders working in the area

Travelling around in the area

Respondents were frequently cycling (87%), walking (82%), using the rail or underground (79%) and/or using the bus (62%) to move around the area. More than one type of travel could be specified by respondents.

n=347

How do you get around?



* Other travel modes (each specified by fewer than 3% of respondents) included private hire vehicle as a driver, motorcycle, van or lorry, wheelchair or mobility scooter and other unspecified travel modes.

Non-cyclist views on the proposed changes overall

Please note:

Many respondents – over 400 – did not specify how they got around the area.

Among those who did, the number who DID NOT cycle was comparatively small (90). However, some of this group did not answer some of the questions asked, further reducing the number of responses.

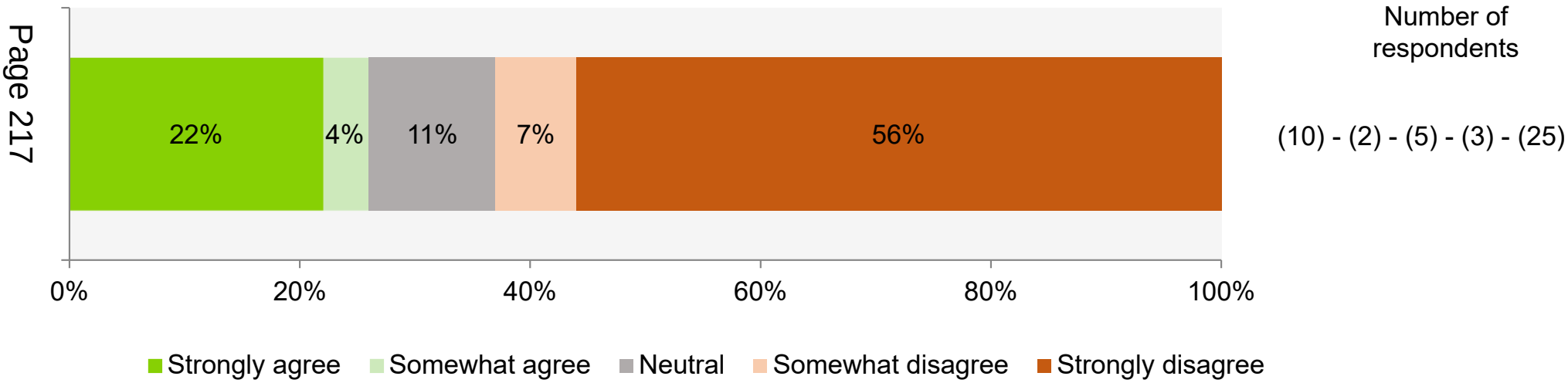
For this reason, it is advised that the findings shown from page 4 onwards are too small to give any confidence in their message.

Agreement with proposed changes overall – **non-cyclists**

Over 60% of non-cycling respondents disagreed with the proposed changes in overall terms. For many, this disagreement was strong. In contrast, just 26% agreed, with 11% expressing a neutral opinion.

n=45

Question: Overall, to what extent do you agree with the proposed changes?



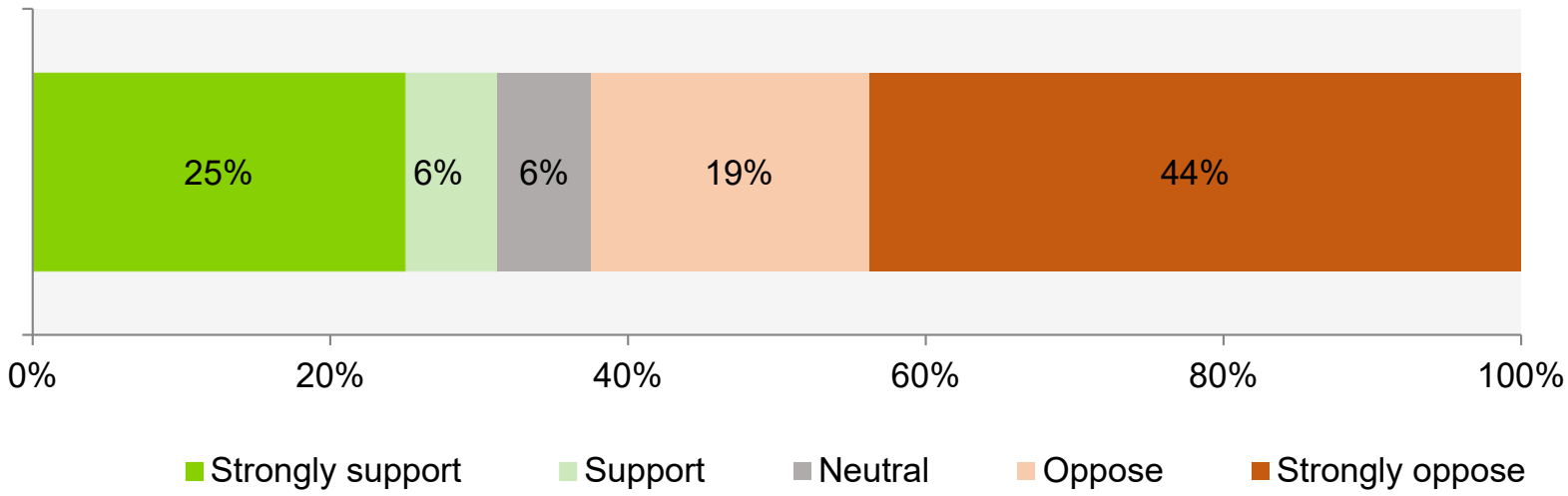
Non-cyclist views on the Queen Victoria Street West proposals

Queen Victoria Street West - support for the proposed walking and cycling changes – **non-cyclists**

63% of the small number of non-cycling respondents who gave their view opposed the proposed walking and cycling changes. For many, this opposition was strong. In contrast, just 31% voiced support, with 6% expressing a neutral opinion.

n=16

Question: To what extent do you agree with the proposed walking and cycling changes in this area?



Number of respondents

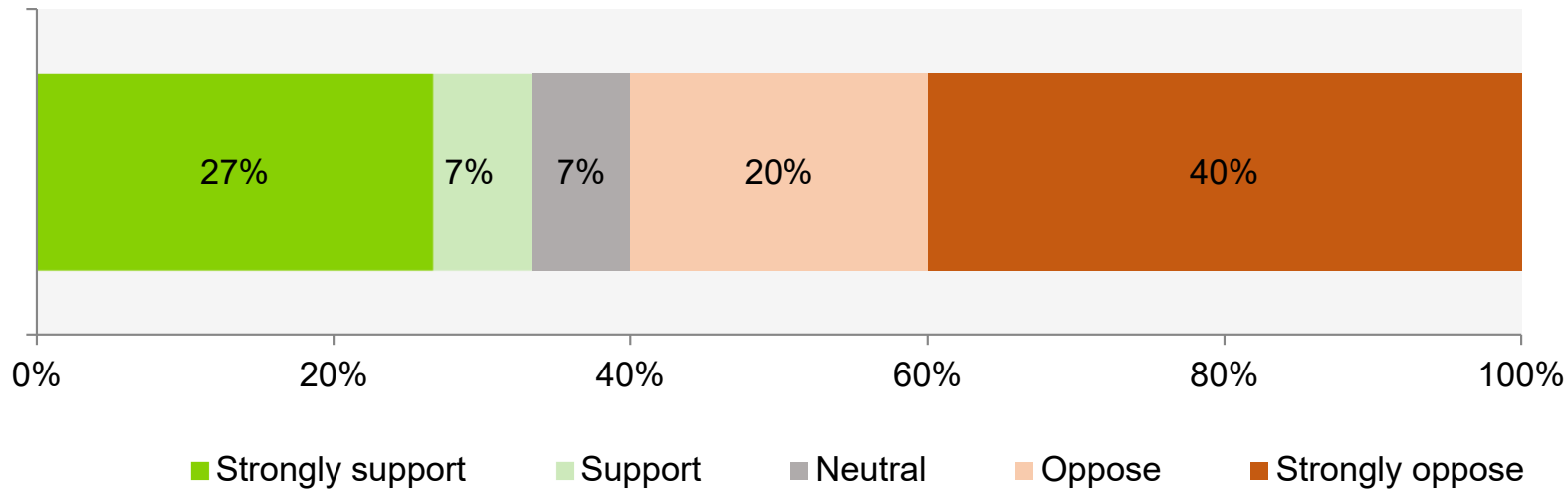
(4) - (1) - (1) - (3) - (7)

Queen Victoria Street West - support for the proposed changes to parking, loading and kerbside access (including at bus stops) – **non-cyclists**

60% of the small number of non-cycling respondents who gave their view opposed the proposed changes to parking, loading and kerbside access (including at bus stops). In contrast, 34% supported the proposed changes, with 7% expressing a neutral opinion.

n=15

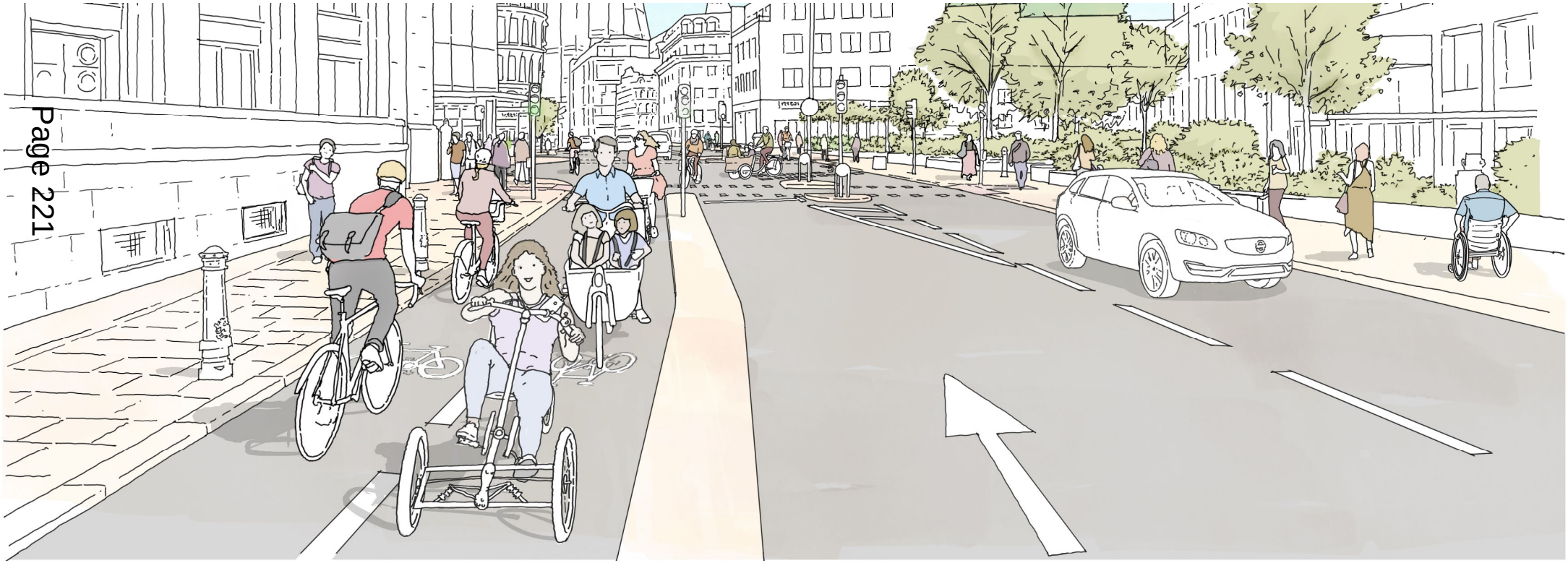
Question: To what extent do you agree with the changes to parking, loading and kerbside access (including at bus stops)?



Number of respondents

(4) - (1) - (1) - (3) - (6)

Non-cyclist views on Queen Victoria Street East proposals

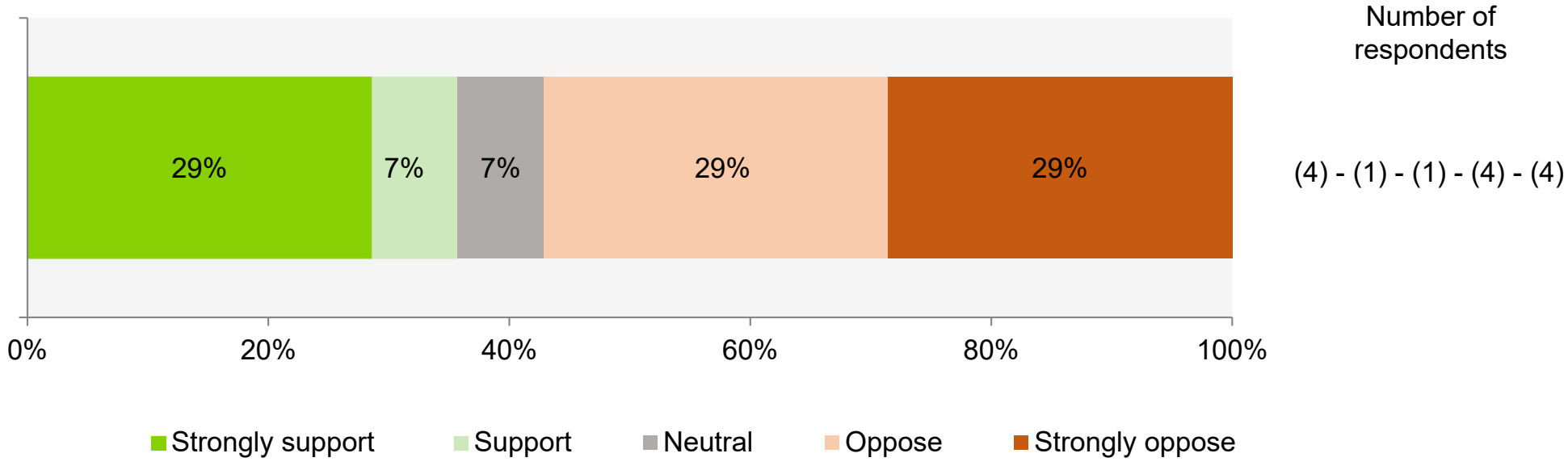


Queen Victoria Street East - support for the proposed walking and cycling changes – **non-cyclists**

Almost 60% of the small number of non-cycling respondents who gave their view opposed the proposed walking and cycling changes. In contrast, 36% supported the proposals, with 7% expressing a neutral opinion.

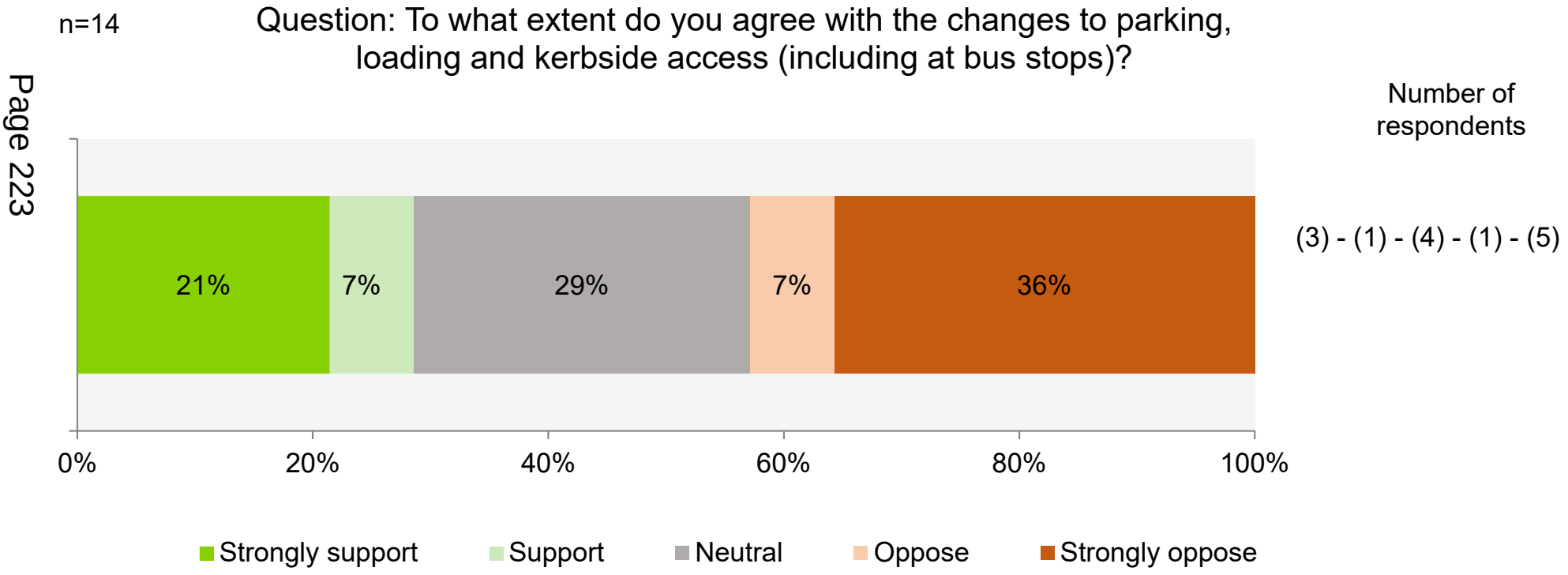
n=14

Question: To what extent do you agree with the proposed walking and cycling changes in this area?

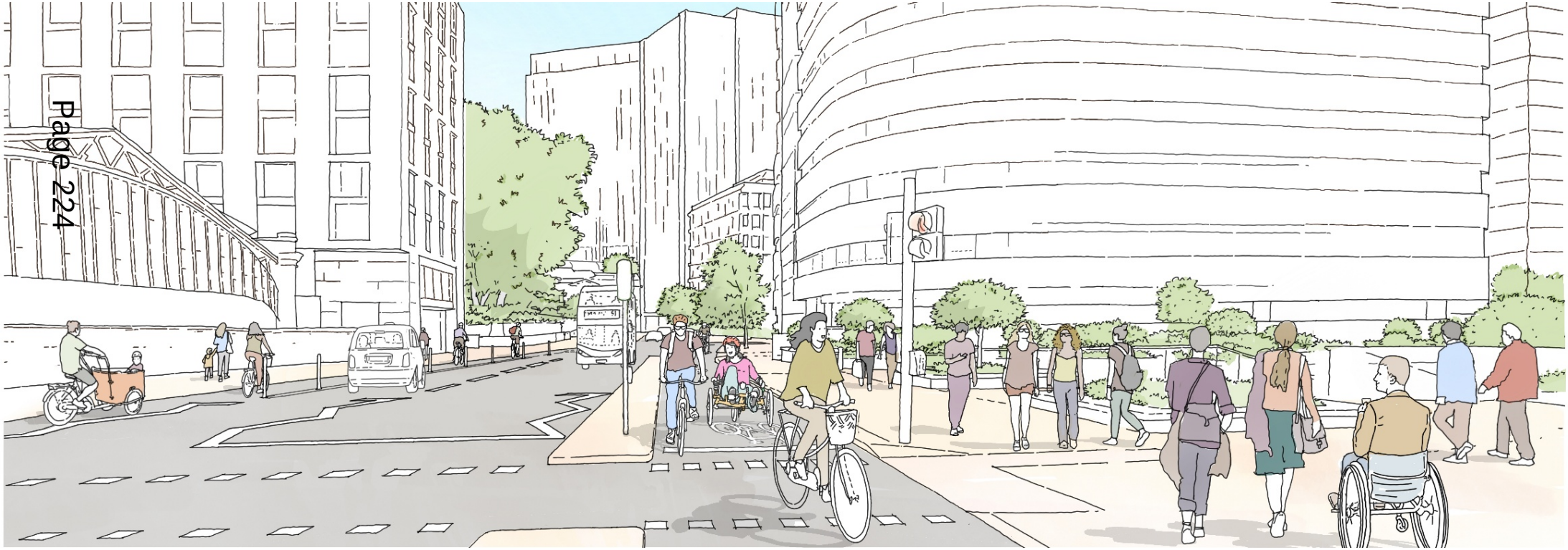


Queen Victoria Street East - support for the proposed changes to parking, loading and kerbside access (including at bus stops) – **non-cyclists**

Among non-cycling respondents, views were divided. Just under 30% supported the proposed changes to parking, loading and kerbside access (including at bus stops), with a similar figure expressing a neutral view. However, 43% opposed the changes.



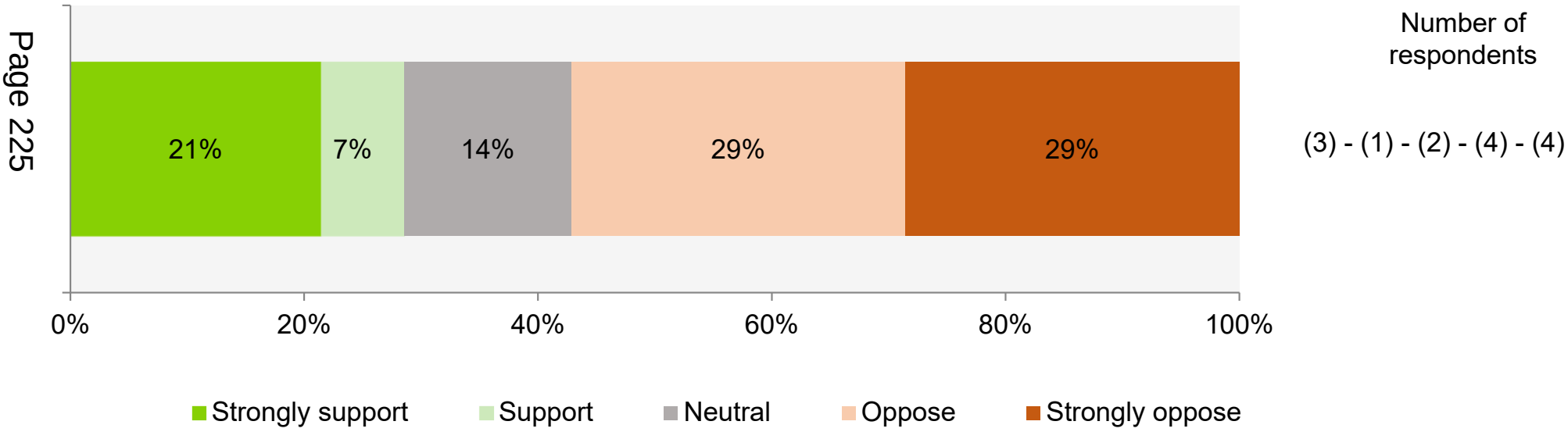
Non-cyclist views on Aldgate proposals



Aldgate - support for the proposed walking and cycling changes – **non-cyclists**

Among non-cycling respondents, views again were divided. Just under 30% supported the proposed walking and cycling changes, with 14% expressing a neutral view. However, 58% opposed the changes.

n=14 Question: To what extent do you agree with the proposed walking and cycling changes in this area?

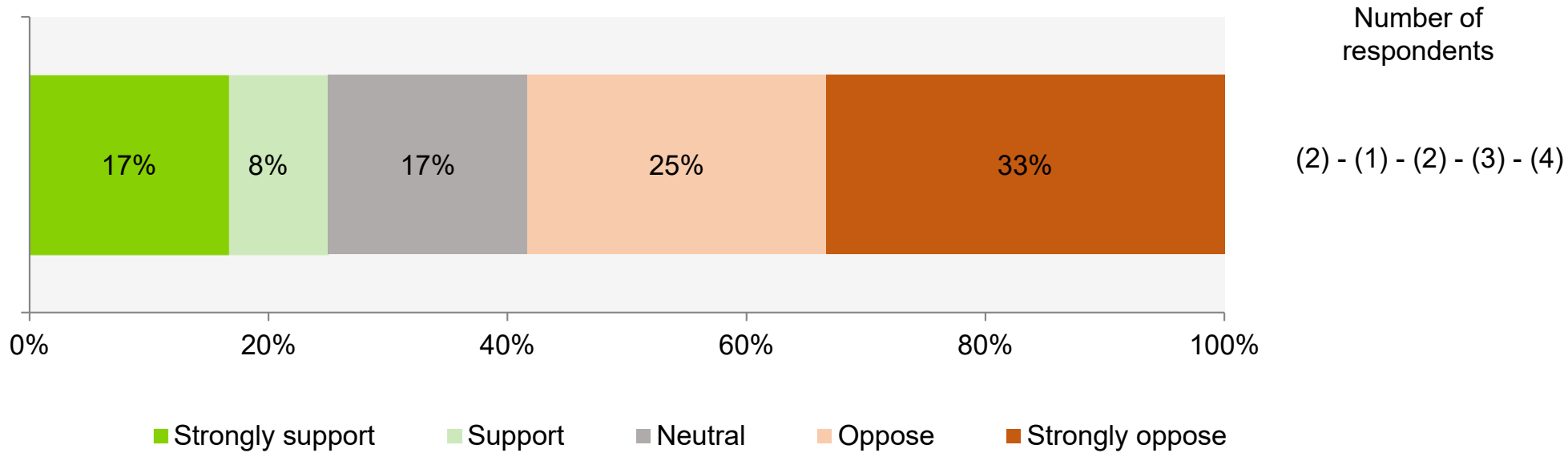


Aldgate - support for the proposed changes to parking, loading and kerbside access (including at bus stops) – **non-cyclists**

Almost 60% of non-cycling respondents opposed the proposed changes to parking, loading and kerbside access (including at bus stops). In contrast, just 25% voiced support, while 17% expressed a neutral opinion.

n=12

Question: To what extent do you agree with the proposed changes to parking, loading and kerbside access (including at bus stops)?



Unspecified travel mode – views on the proposed changes overall

Please note:

Many respondents – over 400 – did not specify how they got around the area.

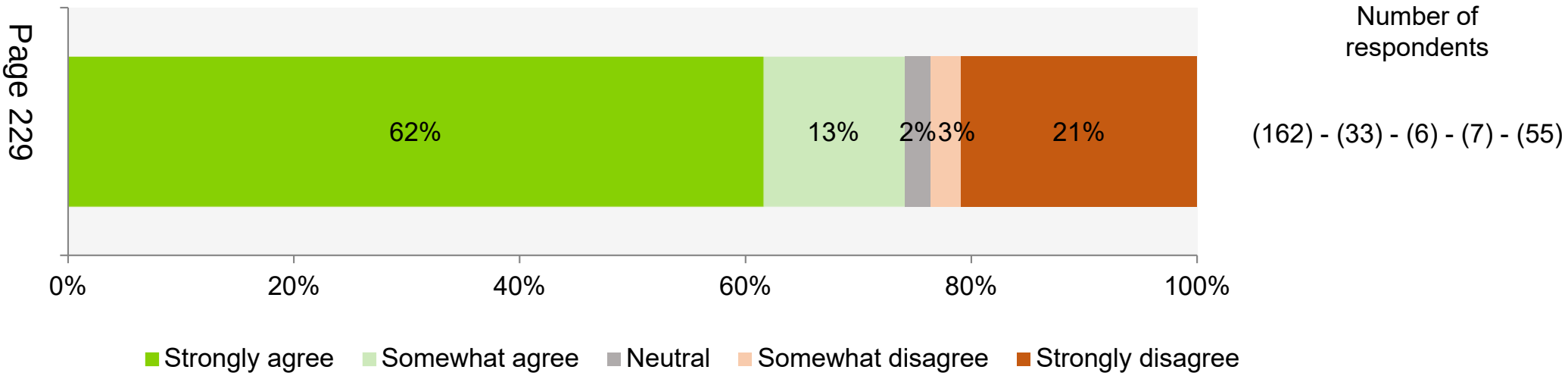
However, some of this group did not answer some of the questions asked, reducing the number of responses.

Agreement with proposed changes overall – **unspecified travel mode**

Three-quarters of respondents who did not specify a travel mode agreed and who gave their view, agreed with the proposed changes in overall terms. For many, this agreement was strong. In contrast, just 24% disagreed, with 2% expressing a neutral opinion.

n=263

Question: Overall, to what extent do you agree with the proposed changes?



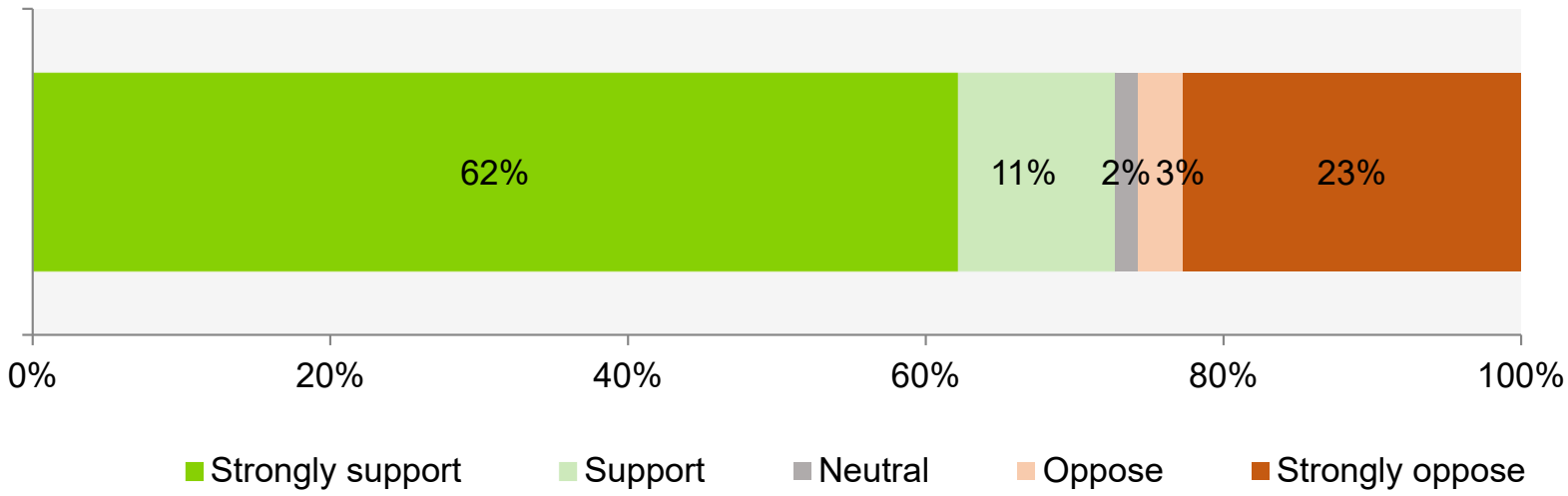
Unspecified travel mode – views on the Queen Victoria Street West proposals

Queen Victoria Street West - support for the proposed walking and cycling changes – **unspecified travel mode**

73% of respondents who did not specify a travel mode and who gave their view, supported the proposed walking and cycling changes. For many, this support was strong. In contrast, just 26% voiced opposition, with 2% expressing a neutral opinion.

n=66

Question: To what extent do you agree with the proposed walking and cycling changes in this area?



Number of respondents

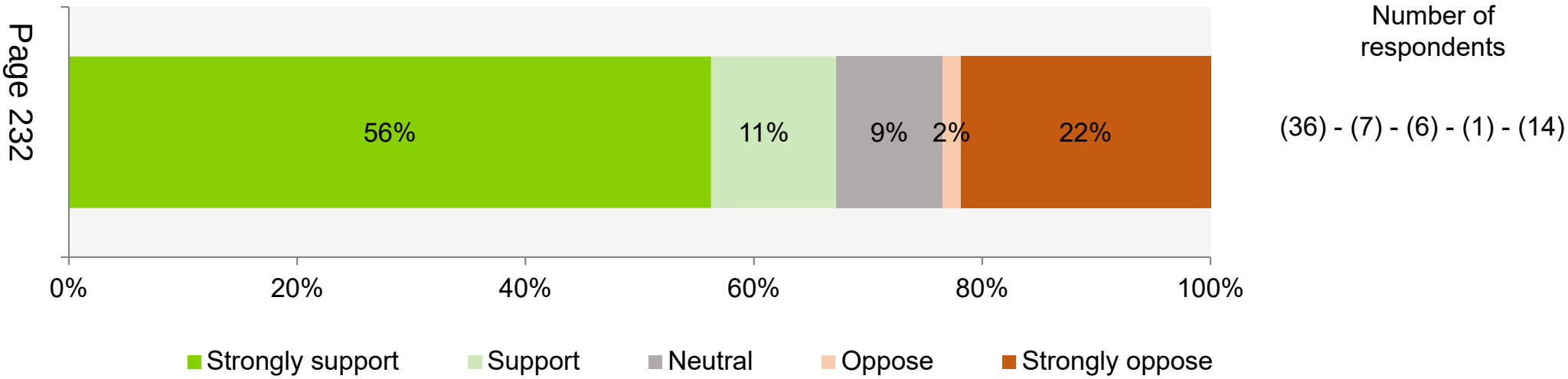
(41) - (7) - (1) - (2) - (15)

Queen Victoria Street West - support for the proposed changes to parking, loading and kerbside access (including at bus stops) - **unspecified travel mode**

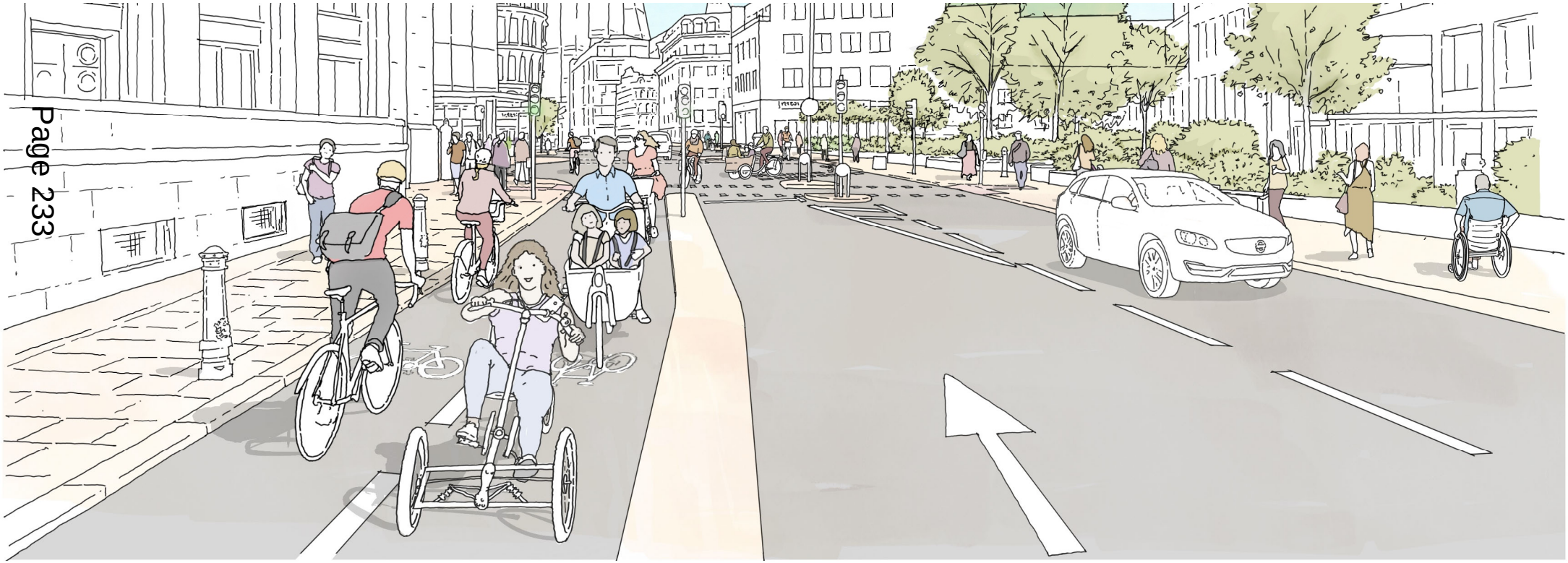
67% of respondents who did not specify a travel mode and who gave their view, supported the proposed changes to parking, loading and kerbside access (including at bus stops). In contrast, 24% opposed the proposed changes, with 9% expressing a neutral opinion.

n=64

Question: To what extent do you agree with the changes to parking, loading and kerbside access (including at bus stops)?



Unspecified travel mode – views on Queen Victoria Street East proposals

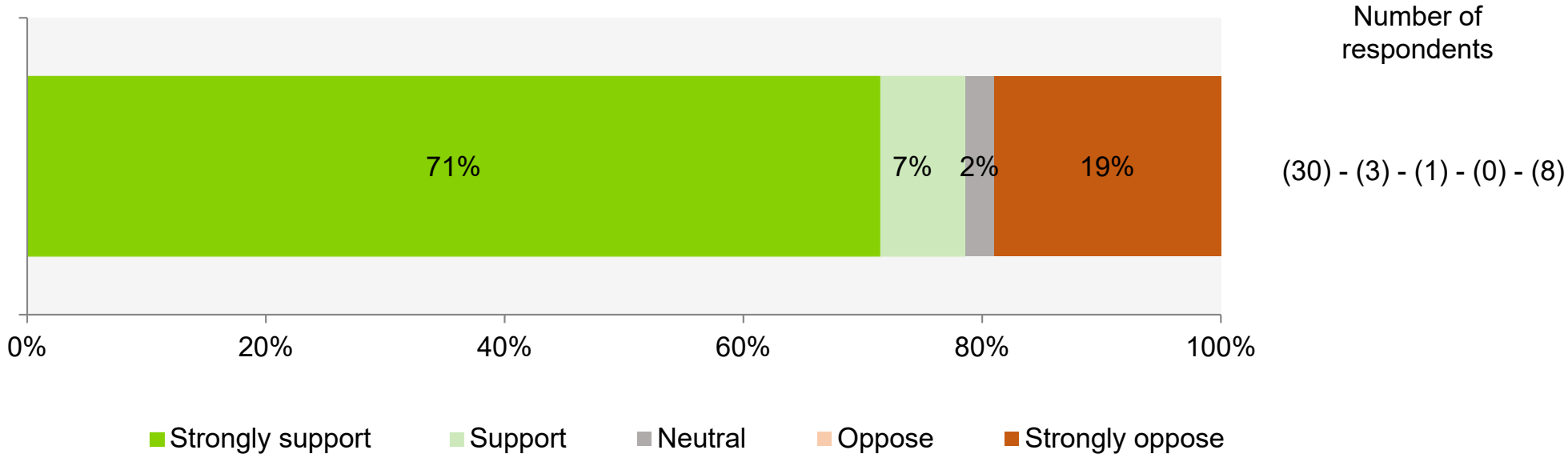


Queen Victoria Street East - support for the proposed walking and cycling changes - **unspecified travel mode**

Over three-quarters (78%) of respondents who did not specify a travel mode and who gave their view, supported the proposed walking and cycling changes. In contrast, 19% opposed the proposals, with 2% expressing a neutral opinion.

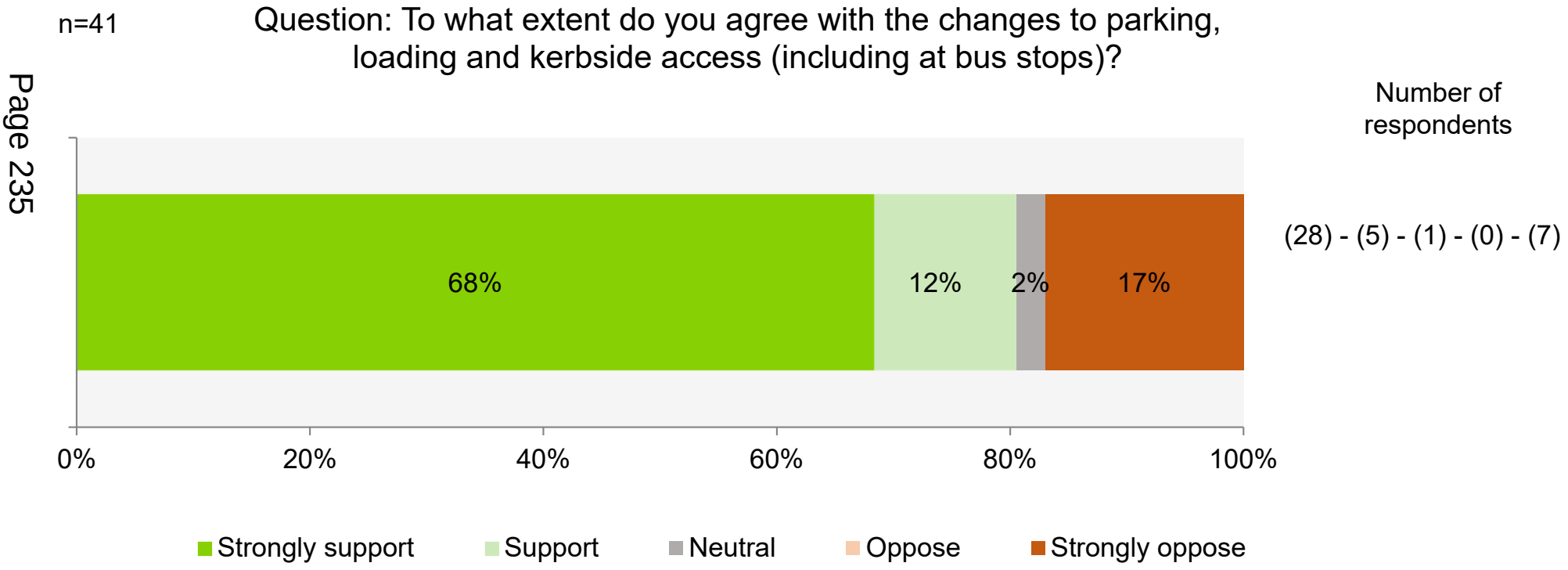
n=42

Question: To what extent do you agree with the proposed walking and cycling changes in this area?

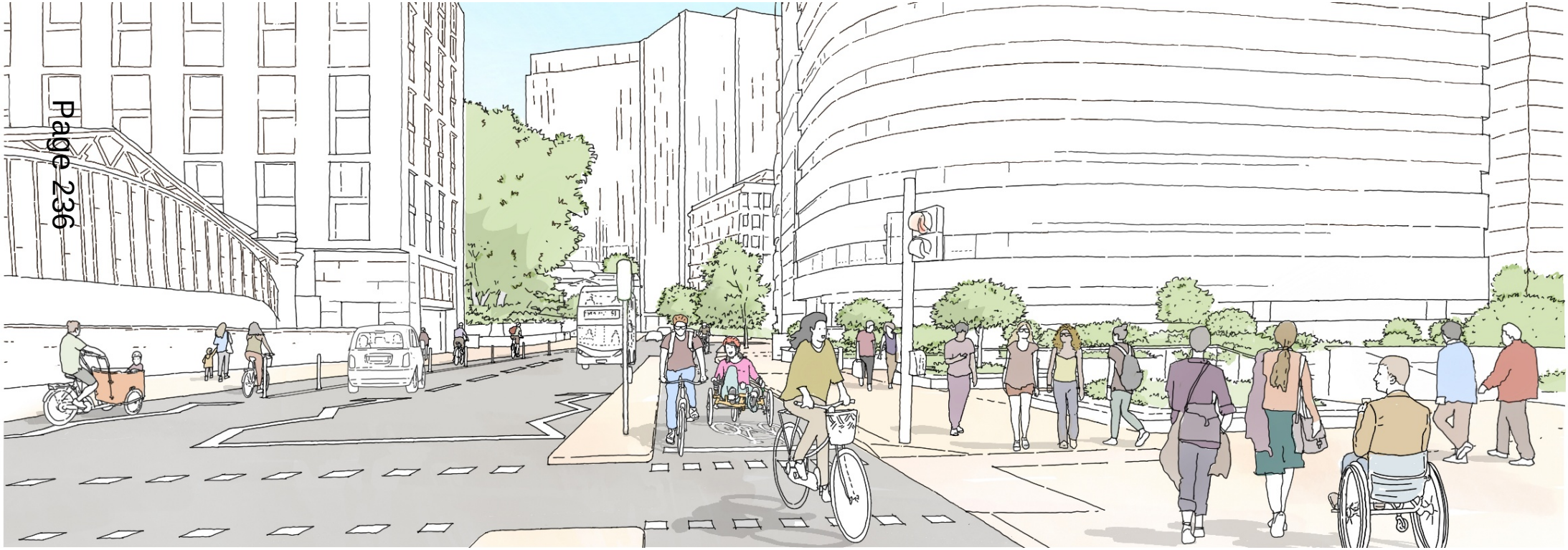


Queen Victoria Street East - support for the proposed changes to parking, loading and kerbside access (including at bus stops) – **unspecified travel mode**

80% of respondents who did not specify a travel mode and who gave their view, supported the proposed changes to parking, loading and kerbside access (including at bus stops). In contrast, 17% opposed the proposals, with 2% expressing a neutral opinion.



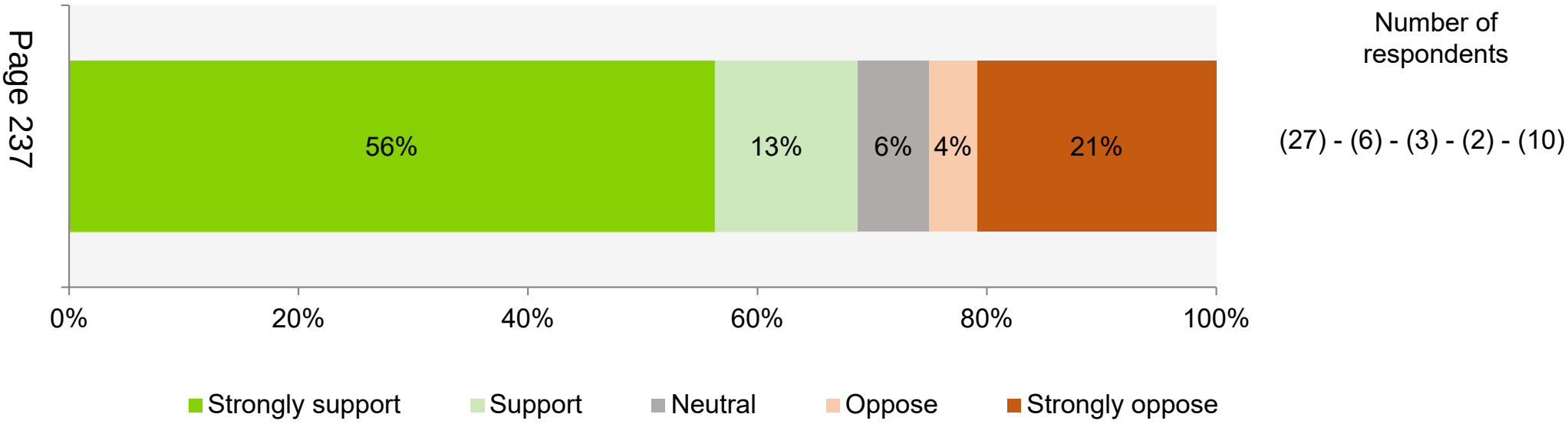
Unspecified travel mode – views on Aldgate proposals



Aldgate - support for the proposed walking and cycling changes – **unspecified travel mode**

Over two-thirds (69%) of respondents who did not specify a travel mode and who gave their view, supported the proposed walking and cycling changes. In contrast, 25% opposed the proposals, with 6% expressing a neutral opinion.

n=48 Question: To what extent do you agree with the proposed walking and cycling changes in this area?

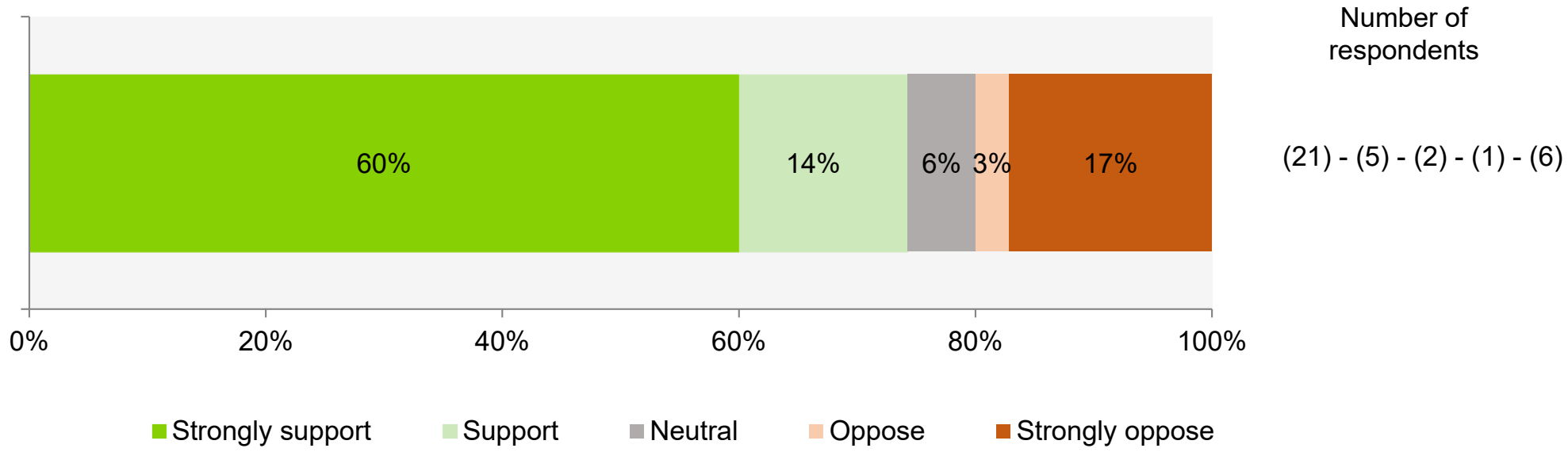


Aldgate - support for the proposed changes to parking, loading and kerbside access (including at bus stops) – **unspecified travel mode**

Almost three-quarters (74%) of respondents who did not specify a travel mode and who gave their view, supported the proposed changes to parking, loading and kerbside access (including at bus stops). In contrast, just 20% voiced opposition, while 6% expressed a neutral opinion.

n=35

Question: To what extent do you agree with the proposed changes to parking, loading and kerbside access (including at bus stops)?



Number of respondents

(21) - (5) - (2) - (1) - (6)

CITY OF LONDON

Commonplace

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Focus Groups Consultation Review

By Transport for All for City of London

May - June 2025

Disclaimer: The views expressed in this report are based on the participants with lived experience of disability, and local stakeholders. The recommendations listed are also based on their lived experience.

Dates of focus groups:

- Tuesday 20th May 2025
- Thursday 22nd May 2025
- Wednesday 4th June 2025
- Friday 6th June 2025

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Introduction

This report summarises the input from disabled people and external stakeholders; by going over the key themes and points raised in each group to help the City of London understand participants' perspectives. This report will also evaluate the impact of the participants' input and feedback, review the diversity of the participants involved to ensure that they are representative of different experiences, and outline the recommendations that have come from these consultations.

This project with City of London comprised of three different elements to review and evaluate the accessibility of the proposed plans for the cycleway between Aldgate to Blackfriars. This includes:

1. **Focus Groups with Disabled People**, gaining perspective from their lived experience
2. **Focus Groups with External Stakeholders**, engagement with key stakeholders in the local area
3. **Reports**
    a. Focus Groups Consultation Review
    b. Accessibility Design Review (see other report)

Transport for All's work is rooted in the Social Model of Disability, understanding that the design of the environment can create barriers that prevent Disabled people to fully access and participate in society. By involving Transport for All to facilitate focus groups during the planning and development, the City of London can understand disabled people's perspectives through their lived experience; ensuring that the city is designed to achieve maximum possible access.

Our vast membership database enables pan-disability research to be undertaken, ensuring that the following eight categories can contribute to the development of accessible transport:

1. Blind or partially sighted
2. Deaf or hard of hearing
3. Dexterity impairment
4. Learning disability
5. Long term health condition / chronic illness
6. Mental health conditions
7. Mobility impairment
8. Neurodivergent

Method

This project has been designed to maximise the impact of the lived experience to improve the accessibility of the cycleway from Aldgate to Blackfriars.

Focus Groups with Disabled People

We consulted with 10 people with lived experience of disability, who reviewed the cycleway from a variety of perspectives, taking a pan-disability approach, to understand the intersectional and diverse impacts. Looking through the plans and illustrations, they discussed current and potential barriers in relation to the proposed cycleway between Aldgate and Blackfriars, with their lived experience at the centre of the conversations.

Focus Group with Stakeholders

Transport for All liaised with key contacts at external stakeholder organisations, to facilitate a focus group and receive additional feedback on the consultation for the cycleway from Aldgate to Blackfriars, ensuring that different perspectives are considered.

Lived Experience: Focus Group Feedback

The focus groups were conducted to enable perspectives from lived experience to be taken into account and considered. With 1 in 4 people in the UK being disabled, it's essential that accessibility is integrated throughout plans, such as the proposed cycleway from Aldgate to Blackfriars. These were conducted both online and in person, at Guildhall in London.

Participants explored various aspects of cycling infrastructure, including safety concerns, physical barriers, and design preferences for cycleways and pedestrian paths. The participants shared ideas for specific improvements needed for London's cycling infrastructure, such as better signage, clearer lane markings, and more accessible features, while also addressing challenges related to electric bikes (e-bikes) and shared spaces.

Lived Experience: Key Themes

Navigation and Wayfinding

- Frequent concern about inconsistent design across different areas.

- Neurodivergent participants, especially autistic users, find sudden changes in layout distressing and disorienting.
- Strong colour contrast, clear signage, and floor markings were recommended to improve navigation.
- Road and street names need to be implemented at an accessible height.
- Legible London totems are underused due to lack of audio accessibility.

Physical Design and Infrastructure

- Widespread support for segregated cycleways to separate cyclists from pedestrians and cars.
- Preference varies between bollards, curbs, and concrete separators, but agreement on the need for physical separation to reduce risk and improve clarity.
- Shared spaces were consistently described as unsafe and exclusionary, especially for disabled, blind, or neurodivergent users.
- Strong emphasis on mobility aid users, long-term health conditions, and disabled cyclists needing better infrastructure support.
- Support for adapted cycles and trikes that require wider lanes and level, protected routes.
- Described as particularly unsafe and confusing, especially for those with vision impairment or cognitive disabilities.

Safety and Risk Mitigation

- Speed and silent operation of e-bikes and scooters were major safety risks, especially for blind/visually impaired individuals.
- Poorly designed junctions and bus stop bypasses increase risk, particularly in shared areas.
- Suggested mitigations included: audible crossings, tactile paving, speed limits, and visual cues for safe crossing.
- Participants want features like countdown timers, better lighting, and safe refuge zones at crossings.
- Requests for:
    - Tactile paving
    - Audible signals
    - Dropped kerbs
    - Consistent layouts
    - Pedestrian priority enforcement

Public Education and Behaviour

- Multiple references to the lack of public understanding around how to navigate shared spaces safely.
- Participants support education campaigns, especially around bus stop bypasses, cycleway rules, and use of mobility devices in cycle lanes.
- Better signage about who can use cycle lanes (e.g., powered wheelchairs, mobility scooters) was recommended.
- Complaints about cyclists treating cycleways as “racetracks” and not being considerate of pedestrians.
- Participants suggested bike regulation, speed enforcement, and clear user markings.

Environment and Accessibility Barriers

- Issues with cycle parking, kerbside access, dropped kerbs, and blocked pavements highlighted as recurring barriers.
- Calls for uncluttered pavements, non-slip surfaces, and matte finishes to support safety in varied weather and lighting.
- Inadequate lighting, poor maintenance of tactile paving, and improperly placed greenery were flagged as hazards.
- Concerns about bike parking, especially e-bike rentals, cluttering pavements and obstructing access.
- Participants wanted greener, more pleasant environments, but without compromising clear routes and accessibility.
- Planters, trees, and soft landscaping are welcome if they don’t reduce usable pedestrian space.

Lived Experience: Recommendations

Overall, the participants frequently call for:

- Consistency across all infrastructure
- Physical separation between different modes of transport
- Clear and accessible signage
- Awareness on shared use etiquette for the public
- Enforcement of accessibility design standards
- Improved safety features at crossings and junctions

Inclusive and Accessible Infrastructure

Make cycleways usable and accessible for everyone:

- Segregated cycleways and space allocation
- Accessibility for disabled users (e.g. adapted bikes, kerbside access)
- Dropped kerbs, tactile paving, and non-slip, glare-free surfaces
- Consistency in design (important for neurodivergent users)
- Adequate space for wider or adapted mobility aids

Navigation, Wayfinding and Design Consistency

Ensure people can confidently and independently navigate the area, using their chosen mode of transport:

- Clear, consistent wayfinding and signage
- Strong colour contrast and tactile markings
- Countdown timers and audible crossings (including maintenance)
- Improved lighting and readable, accessible maps (e.g. Legible London totems with audio)
- Consistent layout and markings across the network

Safety and Separation of Modes

Reduce conflict and improve safety between pedestrians, cyclists, and vehicles:

- Physical separation (bollards and raised islands / kerbs)
- Managing cyclist speed (especially e-bikes and scooters)
- Avoiding shared paths where possible
- Prioritising pedestrian safety at crossings and junctions
- Creating buffer zones between cycle lanes and motor traffic

Behaviour, Awareness and Education

Promote respectful, informed use of these areas through public engagement and regulation:

- Public education campaigns (e.g. cyclist behaviour, shared space etiquettes)
- Awareness of rights for mobility scooters and adapted cycles
- Improved cyclist awareness of vulnerable users
- Clarification of permitted uses in cycleways
- Maintain and encourage cycle parking

Environment, Comfort and Maintenance

Create welcoming, functional spaces that are clean, safe, and pleasant to use:

- Uncluttered, well-maintained pavements

- Accessible, well-contrasted bike parking
- Avoid obstructions (rental bikes, bins, signage)
- Strategic use of greenery without causing barriers
- Ongoing maintenance of tactile features and colour contrasts

Stakeholders: Focus Group Feedback

This section outlines key recommendations arising from stakeholder engagement on the proposed City of London cycleway project, specifically focused on Queen Victoria Street, Aldgate, Cheapside, and surrounding areas. These recommendations aim to improve infrastructure design, enhance safety and inclusivity, address area-specific challenges, and support the long-term vision of a safer, more accessible and multimodal transport network.

Stakeholders: Key Themes

Cycleway Design and Safety

- Strong emphasis on segregation of cycleways from traffic to improve safety, particularly for disabled cyclists and pedestrians.
- Preference for single-direction cycleways for clarity, though two-way designs are considered necessary in space-constrained areas.
- Concerns over intersection safety, including the importance of yellow box junctions to prevent traffic blockage.

Inclusive Infrastructure

- Broad support for bus stop bypasses, which are seen as essential to avoid cyclists mixing with heavy traffic.
- Infrastructure improvements are linked to increased cycling uptake, especially among women, children, and disabled people.
- Discussion of adapted bikes and cargo bikes, highlighting the need for inclusive design and designated parking for rental bikes.

Behaviour, Enforcement and Education

- Concerns raised about electric motorbikes using cycleways.
- Support for campaigns promoting responsible road use and enforcement to reduce conflict between road users.

- Mention of a delivery rider conduct charter from Manchester as a model for London.

Wayfinding and Accessibility

- Support for direct pedestrian crossings and contrasting colours / signage to improve navigation.
- Stakeholders suggest coloured lanes could help deter illegal parking by motor vehicles.

Area-Specific Issues

- Congestion in Cheapside, Queen Victoria Street, and Aldgate, linked to traffic, deliveries, tourists, and tuk-tuks.
- Concerns about 'junctions under multiple jurisdictions', which complicate accessibility challenges.
- Specific challenges in Aldgate, including:
    - Removal of cycle lanes on Landfall Street.
    - Reopening of Bank junction to black cabs.
    - Narrow roads and construction disruption.
    - Poorly designed turns and mixing with large vehicles.

Urban Environment and Shared Use

- Calls for more greenery and dedicated running lanes.
- Need to balance infrastructure for cyclists, pedestrians, and runners, while accommodating underground utilities and maintaining accessibility.

Stakeholders: Recommendations

Cycleway Design and Safety

- Prioritise physical separation between cyclists, pedestrians, and motor traffic to improve safety.
- Implement single-direction cycleways on each side of the road where feasible for improved navigability and predictability.
- Install yellow box junctions at key crossover points to prevent traffic from blocking cycleways (despite current TfL reluctance).
- Use raised surfaces and directional shifts to slow cyclists in shared spaces and improve safety.
- Address safety at route endpoints and jurisdictional boundaries, particularly where accessibility is reduced.

Inclusive and Functional Infrastructure

- Extend high-quality, inclusive infrastructure along the full route, benefiting a wide range of users including schoolchildren, women, disabled people, and tourists.
- Support and expand bus stop bypasses, which reduce cyclist exposure to motor traffic and improve safety and comfort for all.
- Ensure infrastructure accommodates adapted and cargo bikes, including designated cargo/rental bike parking to reduce pavement obstruction.
- Balance the needs of all users, including pedestrians and runners, especially where pavement width allows multi-use (minimum 4.4m noted).
- Coordinate infrastructure rollout with local business needs to avoid disruption during implementation.

Enforcement and Behaviour Management

- Strengthen enforcement against misuse of cycleways, particularly by electric motorbikes and improperly parked rental bikes.
- Collaborate with bike-share companies to manage parking and ensure safe pedestrian access (e.g. clear fire exits, avoid pavement blockages).
- Promote respectful road user behaviour via public education campaigns.
- Explore codes of conduct for delivery riders, similar to Manchester's charter, to address issues like congestion and safety.

Wayfinding and Accessibility

- Use coloured surfacing and strong contrast to improve wayfinding, visibility, and help deter illegal parking.
- Simplify crossings with direct routes (avoiding two-phase crossings where possible) for improved pedestrian and cyclist flow.
- Improve signage and visual aids to clarify where cycleway layouts change (e.g. two-way to single-lane transitions).
- Incorporate accessible signage and visual cues to better support disabled and neurodivergent users.

Area-Specific Adjustments

- Manage congestion in high-traffic zones (e.g. Cheapside, St. Paul's, Queen Victoria Street), especially where deliveries, coaches, and tuk-tuks are common.
- Consider regulation or licensing for non-traditional vehicles like tuk-tuks, particularly during peak visitor periods.
- Introduce traffic-free phases at junctions like Canon Street to reduce cyclist–vehicle conflict when cycle signals are active.

- Address safety in Aldgate by revising plans to avoid sharp turns and lane removals that force cyclists into conflict with large vehicles.
- Plan construction timelines carefully to minimise disruption to surrounding businesses and maintain safe cycling conditions during works.

Comparisons

Shared Feedback

1. Wayfinding and Visual Design

Participants across both groups identified consistent and accessible wayfinding as a priority. This includes the use of high colour contrast, uniform signage, and visual cues to help all users, particularly those with visual impairments or cognitive processing differences, to navigate safely. Both groups stressed that sudden layout changes or poorly marked transitions within the cycling infrastructure can be disorienting or dangerous.

2. Shared Space and Safety Concerns

There was a strong consensus that shared 'pedestrian–cyclist' areas are problematic. Both sets of contributors described these spaces as unsafe, particularly for disabled users who may need more space, time, or clearer boundaries to move safely. Due to this, all participants strongly agreed with the need to install physical barriers to segregate the cycleway from the pathway. The speed of cyclists, lack of awareness of disabled people crossing, and general unpredictability in these areas were also common concerns.

3. Support for Bus Stop Bypasses

Both the lived experience participants and stakeholders supported the continued use of bus stop bypasses. These were seen as an effective way to keep cyclists out of direct conflict with buses and heavy traffic while also maintaining a smoother flow of movement for all users. There was agreement that these features encourage broader participation in cycling, particularly among people who might otherwise be deterred by safety concerns. The only difference being the accessibility of safety for disabled pedestrians, when crossing over (this is discussed later).

4. Importance of Public Awareness Campaigns

Each group acknowledged that infrastructure alone cannot ensure safety or accessibility; public behaviour and understanding also play critical roles. Both groups supported the idea of awareness campaigns to educate cyclists, pedestrians, and other road users about respectful and lawful conduct, especially in shared spaces and areas of transition. There was also support for clarifying who is permitted to use cycleways, such as mobility scooters or adapted cycles.

Differences in Feedback

1. Cycleway Configuration: Single vs. Two-Way Lanes

Stakeholders, particularly the London Cycling Campaign (LCC), express a preference for single-direction cycleways on each side of the road. They argue this improves navigability, predictability, and clarity for cyclists. However, they acknowledge that two-way cycleways may be necessary in space-constrained areas.

In contrast, the Lived Experience section doesn't focus as much on this distinction but raises concerns about layout changes (e.g. switching between one-way and two-way formats) creating confusion, especially for neurodivergent users. Participants called for consistency above all, rather than favouring one configuration over another. This suggests that while both groups are concerned with layout, stakeholders are more focused on efficiency and space constraints, whereas disabled users are concerned with predictability and clarity.

2. Physical Separation Methods

Both groups support segregation between modes of transport, but they differ on how this should be achieved. Stakeholders support a variety of separation methods, including raised surfaces, bus stop bypasses, and barriers. Their emphasis is often on functionality and traffic flow.

The Lived Experience participants show a clear preference for low-level physical separators such as curbs or raised islands, which are seen as more visible and less intimidating. Some participants expressed anxiety around bollards, viewing them as obstructive or visually confusing, especially for those using mobility aids or with visual impairments. In contrast, others saw bollards as helpful if properly spaced.

3. Design Feature Priorities

Lived experience participants emphasised features like tactile paving, audible crossings, dropped kerbs, non-slip surfaces, and the avoidance of clutter on

pavements. They shared preferences for low-level separation methods such as curbs or raised islands, rather than bollards, which some found anxiety-inducing. Stakeholders, on the other hand, prioritised broader design issues like traffic signal timing, the inclusion of yellow box junctions, and cycleway continuity across borough boundaries.

4. Environmental Considerations

Both groups discussed the role of greenery and environmental features, but with different priorities. The lived experience groups supported the addition of planters and trees, provided they did not obstruct pathways. Their focus remained on how these features affected wellbeing and comfort. Stakeholders suggested a broader design of urban space, including dedicated running lanes and integration of utility access, reflecting a more holistic urban planning approach.

5. Geographic and Implementation Focus

The lived experience discussions evaluated the full route from Aldgate to Blackfriars, highlighting challenges that could affect anyone navigating that corridor. In contrast, stakeholders focused more heavily on location-specific concerns such as congestion at Canon Street, safety around St. Paul's Cathedral, and construction-related disruption in Aldgate. They also addressed the complexity of managing areas under multiple jurisdictions, which was not a theme in the lived experience feedback.

6. Nature of Disruption

When it came to the impact of proposed changes, the lived experience section focused on how poorly designed infrastructure could undermine independence, increase travel times, or create safety risks for disabled individuals. Stakeholders were more concerned with how the rollout of infrastructure might disrupt business operations, deliveries, or general traffic flow, especially during construction phases.

Joint Recommendations

From this, several clear priorities emerge. Both groups advocate for segregated cycleways with physical separation from pedestrians and traffic to reduce risk and confusion. They support the use of strong colour contrast, tactile wayfinding features, and consistent signage across the route. Both groups call for improved safety features at junctions and crossings, including dropped kerbs, countdown timers, and audible signals.

There is also mutual support for enforcing responsible behaviour among road users, particularly regarding e-bike use and obstructive cycle parking. Importantly, both lived

experience participants and stakeholders agree that truly inclusive design must consider not just infrastructure, but also public education, maintenance, and long-term policy coordination. These aligned goals provide a robust foundation for moving forward with the cycleway in a way that works for all.

Summary

This report, commissioned for the City of London and delivered by Transport for All, reviews the proposed cycleway plans between Aldgate and Blackfriars through extensive consultation with disabled people and external stakeholders. It draws on lived experiences from individuals with a range of impairments as well as organisational insights. The objective was to assess the accessibility, usability, and safety of the proposed cycleways and provide actionable recommendations.

Disabled participants contributed feedback based on real-world experiences of navigating London, offering critical insights into barriers posed by shared spaces, inconsistent design, unclear wayfinding and the fast, silent movement of e-bikes. Stakeholders, including the London Cycling Campaign and City River, focused on policy alignment, traffic safety, urban planning, and implementation challenges. Despite differing areas of focus, both groups expressed a shared vision for an inclusive, safe, and accessible transport network.

The consultations underscored that cycleway design must actively account for the diverse needs of disabled people. While stakeholders offered perspectives on traffic management and cycling, the lived experience feedback brought attention to the day-to-day barriers, leading to disabled people to experience exclusion.

Key Takeaways

- **Consistency is critical.** Neurodivergent and visually impaired users especially emphasized the need for consistent design layouts, wayfinding aids, and tactile and visual cues to reduce disorientation.
- **Segregation of transport modes is essential.** Both groups strongly advocated for physical separation between cyclists, pedestrians, and motor traffic to minimise risk. Preferences differed, with lived experience participants favouring curbs and low-level separators, and stakeholders more open to various methods, including bollards.
- **Shared spaces are a major accessibility risk.** All participants agreed that pedestrian–cyclist shared zones are unsafe, particularly for disabled individuals.

There was strong agreement with the plans to avoid shared paths, by segregating cycleways, and to prioritise pedestrian safety at crossing points.

- **E-bikes and scooters pose unique dangers.** Their speed and silence create significant hazards for blind and visually impaired people. Participants called for speed regulation, audible cues, and clearer lane usage rules.
- **Crossings are often inaccessible.** Many crossings lack tactile paving, audible signals, dropped kerbs, or sufficient crossing time. These features are essential for equitable access and must be standardised.
- **Cycle parking creates access barriers.** Improperly parked rental bikes often block pavements, kerbs, and crossings, disproportionately affecting disabled people. Stakeholders and participants supported better parking management and coordination with rental providers.
- **Public behaviour matters.** Education campaigns were strongly supported to improve awareness around shared use etiquette, safe cycling speeds, and the rights of disabled road users.
- **Urban greening is welcomed (with caution).** Both groups supported the inclusion of trees and planters to improve environmental aesthetics and mental wellbeing but emphasised that these must not obstruct paths or create hazards.
- **Stakeholder concerns differ in focus.** Stakeholders focused on implementation logistics, jurisdictional challenges, business impacts, and modal integration. Disabled participants focused on usability, independence, psychological safety, and practical barriers.

Prioritised Recommendations

These recommendations are based on the feedback received during this consultation process. For our specific recommendations, based on the proposed plans, please see the Accessibility Design Review.

1. **Implement fully segregated cycleways** that clearly separate pedestrians, cyclists, and motor vehicles using physical infrastructure such as raised curbs or protective islands.
2. **Standardise wayfinding and visual design** through high-contrast surfacing, consistent lane configurations, readable signage, and tactile markers, especially at transitions and junctions.
3. **Improve crossing accessibility** by adding tactile paving, audible signals, dropped kerbs, countdown timers, and refuge zones across the entire route.
4. **Regulate e-bike and scooter use**, introducing speed limits, clearer lane usage rules, and public education around the safety needs of disabled users.

5. **Ensure the safety and accessibility of bus stop bypasses**, ensuring they are well-marked and designed with disabled pedestrian safety in mind when crossing over them.
6. **Manage cycle parking** by collaborating with bike-share providers to designate parking areas and prevent obstruction of pavements and access points.
7. **Launch public education campaign** that promote awareness around shared space etiquette, cyclist behaviour, and inclusive use of public transport infrastructure.
8. **Coordinate construction plans** with businesses and community groups to minimise disruption during implementation and avoid reducing accessibility during works.
9. **Incorporate inclusive design principles** across the full route, including adequate space for adapted bikes, accessible map signage (e.g. audio-supported Legible London totems), and clutter-free environments.
10. **Incorporate greenery**, in the form of trees and plants, to create a more welcoming environment for all users to explore; ensure these don't clutter or obstruct pathways.

This report highlights the necessity of including disabled people's voices at every stage of planning. By including lived experience, the City of London has an opportunity to set a national standard for inclusive, equitable active transport infrastructure.

Focus Group: Content

This section contains the specific comments from the participants, as well as diversity and inclusion monitoring for equity. Please note that throughout this part of the report, individual participants will be anonymised to reduce any bias. For example, participant one will be referred to as P1, and participant two will be referred to as P2, etc.

Lived Experience

During the focus groups, each participant introduced themselves and said how they typically navigate around London, along with their disability, impairment-type and barriers. The City of London then presented the proposed plans, which include segregated cycle lanes and bus stop bypasses. It's important to highlight that the online focus group raised the need for better visual representations and street view mock-ups to help people understand the changes, particularly for those who are neurodivergent. This was taken on board for the in-person focus group, as illustrations and CGI images were shared with participants and helped facilitate further discussion.

Diversity and Inclusion of Participants

Age Distribution:

- 18–34: 3 participants
- 35–49: 3 participants
- 50–65: 4 participants

Ethnicity:
Diverse backgrounds including:

- Asian (incl. Mixed): 4 participants
- Black (incl. Mixed): 3 participants
- BAME (not specified): 1 participant
- White British: 2 participants

Gender:

- Female: 4 participants
- Male: 6 participants

Sexual Orientation:

- Bisexual: 1
- Heterosexual: 7
- Prefer not to say: 2

Disability type (including carer responsibilities - multiple selections possible):

- Blind or partially sighted: 2 participants
- Long-term health condition or chronic illness: 5 participants
- Mental health condition(s): 7 participants
- Mobility-related impairments: 4 participants
- Neurodivergent: 5 participants
- Parent/carer for a disabled person: 2 participants

Mobility Aids Used (multiple selections possible):

- Long cane: 1 participant
- Mobility scooter: 1 participant
- Orthotics: 2 participants
- Walking stick or crutches: 3 participants
- Wheelchair: 1 participant
- No mobility aid use: 4 participants

Pregnancy or Recent Birth:

- No: 8 participants
- Prefer not to say: 2 participants

General thoughts and awareness

In terms of general thoughts around cycleways in London, participants had mixed views on their impact and accessibility, with some stating the benefits and advantages around having a cycleway to encourage lower carbon emissions when travelling around London, as well as assisting with the flow of traffic. P10 expressed strong support for them as both a cyclist and pedestrian, particularly in London's busy traffic. However, there were also comments from other participants, expressing their concerns around the addition of more cycleways throughout the City of London. Many of these were based on traffic concerns, attitudinal barriers (including cyclists being unaware of the safety of those walking and wheeling on the pavements) as well as a lack of awareness around disability. This will be explored further throughout this report.

Across the focus groups, participants reported a wide range of travel methods. Some cycled occasionally, while others used wheelchairs, mobility scooters, or walked. Several relied heavily on public transport, particularly buses, due to the physical and infrastructural barriers they faced in navigating the area.

The discussion covered various challenges and potential solutions, including the need for better infrastructure, increased awareness, and improved legal frameworks to

enhance safety and navigation for all users. These will be detailed and summarised below.

Accessibility and Mobility

This section summarises key discussions from participants regarding the accessibility and mobility of London's cycleway infrastructure. Drawing from lived experiences, participants identified both barriers and opportunities for improving how these spaces serve disabled and neurodivergent users, people with long-term health conditions, and those who use mobility aids.

The overarching themes include consistency in design, inclusive infrastructure, signage, physical space allocation, and the interplay between safety and usability in the area.

Segregated Cycleways and Inclusive Design
Participants across the group agreed that well-designed segregated cycleways can reduce bike riding on pavements, which helps keep pedestrian spaces safer and more accessible, especially for wheelchair users, and blind or partially sighted individuals.

P1 also stressed the value of segregated cycleways and visual aids, highlighting the importance of making public spaces accessible to all, not just cyclists. P2 supported this, noting that cycleways should "not feel like racetracks," but instead prioritise safety and inclusivity through design. Both participants emphasised that thoughtful design influences whether people feel welcome and safe using a space.

The conversation also addressed bus stop bypasses and the need for better public communication and education around how to safely share space (see **Safety Concerns** for more).

Separation Methods: Bollards vs. Curbs
On the topic of separated cycleways, participants generally supported physical separation from pedestrian areas, provided this was implemented carefully. Many expressed a preference for bollard posts, as they are more forgiving if accidentally contacted by a mobility device.

However, P10 voiced a different view. They stated that bollards caused anxiety due to their height and appearance. Instead, they preferred solid, low-level separation features such as raised curbs or islands, which offer both psychological reassurance and clearer boundaries.

Consistency and Wayfinding
P1 shared their experience navigating both central and outer London and highlighted a lack of accessible signage and placemaking to support wayfinding. They emphasised

the need for greater consistency in the design and layout of cycling infrastructure. This was reiterated by P10, who, as an autistic person, stated that consistency is vital for navigating spaces confidently. They noted that sudden changes in layout, such as switching from two-way to one-way cycle lanes, can be confusing and hard to remember, especially for neurodivergent individuals.

All participants agreed that this challenge could be mitigated through accessible visual design features, such as strong colour contrast. For example, colouring the cycleways in a solid, distinctive tone could help clearly differentiate them from adjacent pedestrian and road areas.

Street Clutter and Pavement Design
Participants highlighted the importance of streamlining pavements to reduce street clutter and improve accessibility. This included reducing obstructions like bins, signage, cycle parking (including rental bikes) and excessive greenery, which can impede movement and create hazards, especially for people with visual impairments or mobility aids (see Design Considerations for further detail).

Crossings, Junctions, and Kerbside Access
P3 also raised concerns about poorly designed junctions and shared pedestrian–cyclist areas. In cases where crossings lack tactile paving or dropped kerbs, blind and visually impaired people are at increased risk. Accessibility is limited when infrastructure fails to provide clear and safe ways to cross cycle lanes. They also flagged that disabled drivers or those using taxis often rely on kerbside access. When cycleways occupy former loading zones or accessible parking spaces, this can severely restrict access for those users.

P10 shared that they would like to see more zebra crossings in the proposed plans and stressed the value of countdown timers at traffic lights, describing them as significantly more accessible and beneficial to safety.

Modes of Cycling
Electric bikes were frequently mentioned, with participants raising concerns about the lack of audible cues, which can create a barrier to crossing safely, as well as inadequate cycle parking available. As mentioned above, these bikes are often left in the pathways, create barriers for disabled users trying to navigate the space. It was also noted that some of these bikes are parked too closely in busy areas; creating a lack of space for some disabled people to access them, particularly in peak time when the area is busier.

P3 discussed how inclusive cycling infrastructure broadens access to active transport for people with long-term health conditions or limited mobility. For many disabled users, adapted cycles, handcycles, and mobility scooters offer a safer alternative to

walking or driving, particularly when supported by protected cycle lanes. Tricycles and recumbent bikes, which require more space, also benefit from wide, segregated lanes.

Construction, Bus Stops, and Travel Times
P7 shared their personal cycling experience, noting that while the route was generally straightforward, factors like construction and poorly placed bus stops posed challenges. The conversation touched on how visually impaired and disabled users are often impacted by environmental disruptions, and how proposed changes may increase travel time or reduce safety (see **Safety Concerns** for more).

Importance of Colour Contrast
Finally, multiple participants emphasised the critical importance of strong colour contrast between pedestrian and cycling zones. This was seen as especially helpful for people with visual impairments and was regarded as a simple, effective measure for improving spatial awareness, safety, and wayfinding across shared urban spaces. It was also suggested that this might improve safety concerns with cyclists, ensuring that they don't move onto the paving.

Safety Concerns

Participants raised several challenges and safety concerns related to both cycling and pedestrian navigation in the area. These discussions highlighted the need for improved infrastructure, greater awareness, and stronger legal frameworks to support safety and accessibility.

Cyclist Speed and Lack of Awareness
P4, P8, and P9 highlighted several key issues affecting safety in the area. These included the high speed at which some cyclists travel, a general lack of awareness among cyclists of pedestrians and other vulnerable users, and the absence of clearly designated spaces for different modes of transport such as rental bikes, scooters, and private bicycles. Speed limits for bikes, including e-bikes, were mentioned as a necessary intervention to prevent accidents and maintain safe flow; alongside the need for increased enforcement around the high speeds of some cyclists.

Crossing Safety and Invisibility of Bikes
P3 raised specific concerns about the safety of pedestrian crossings, particularly for blind and visually impaired individuals. They noted that fast, and often silent, bikes (especially electric bikes) can be very difficult to detect and therefore pose a significant hazard. These risks are increased further in areas without tactile paving, audible crossing signals, or dedicated pedestrian crossings.

Additional conflict points were identified where cycle lanes intersect pedestrian routes without sufficient markings or signage, such as at bus stops bypasses. In these areas, users with visual or hearing impairments may have little or no warning before a cyclist approaches, leaving them with minimal time to react. These risks are particularly high at crossings which are not signalised. Both P4 and P9, who are registered blind, strongly agreed with this based on their personal experiences navigating these environments.

The group expressed openness to a variety of potential improvements. These included installing clearer signage across key parts of the route and introducing audible signals at pedestrian crossings to support blind and visually impaired users. They also supported exploring the use of smart technologies to enhance safety and navigation. Examples suggested included motion detection systems, cyclist-specific traffic lights, speed limit enforcement, designated pedestrian crossings, and a public awareness campaign focusing on pedestrian safety in the local area, potentially led by the City of London. It's important to highlight that the need for consistency with traffic lights is needed; ensuring that audible signals are heard when it's safe to cross, including the maintenance of this.

Value of Segregation and Inclusive Design

Participants expressed appreciation for the cycleway segregation measures that have already been introduced in this area. They noted that shared paths can be particularly unsafe for certain groups. Deaf or hard of hearing individuals may not hear bicycles approaching from behind. People with autism or cognitive impairments may find unpredictable interactions in shared spaces disorienting or distressing. Wheelchair users and those using mobility aids often require clear, unobstructed walking routes and can find shared paths difficult to navigate safely.

The group discussed wider safety issues concerning shared use paths, where both pedestrians and cyclists are expected to navigate the same space. P1 and P2 shared personal experiences relating to the high speeds of cyclists in these areas, which can compromise safety and increase the risk of collisions. Both participants emphasised the need for more visible signage and the installation of tactile paving to support safe and accessible navigation.

In response to these issues, they discussed possible solutions, including the use of physical infrastructure such as concrete cycle segregation units to create clear divisions between spaces designated for pedestrians and those for cyclists. P1 mentioned that they feel significantly safer when cars are slowed or traffic is reduced. P2 highlighted the importance of increased awareness among pedestrians as well and concluded that physical separation using concrete units would help prevent accidents by keeping cyclists and motorists apart.

Cycle Lane Configuration and Communication

P10 raised concerns about the overall design and use of cycle lanes. Their comments focused on the importance of physical safety measures, the regulation of cyclist speed, and the need for improved communication and information for all users.

Participants expressed a preference for physical barriers such as raised curbs or concrete separators rather than relying solely on painted lines to mark out cycle lanes. Additionally, they stated a slight preference for one-way cycle lanes positioned on opposite sides of the road, rather than a two-way cycle lane, which can be more difficult to navigate and predict.

P10 also addressed issues relating to the growing mix of users within cycle lanes, including pedestrians, cyclists, and motorised scooters. They suggested that there needs to be greater clarity and awareness regarding how these lanes are intended to be used, whilst P6 strongly stated their right to use the cycleways with their powerchair or motor scooter. Generally, depending on the features of the powerchair or scooter, the Highway Code currently states the following (this is explored further in the Accessibility Design Review):

“Cycle tracks are separated from the road by barriers or distance. Mobility scooters and powered wheelchairs in class 2 and 3 can be driven on cycle tracks.”

P3 identified road junctions, particularly those where cycleways intersect, as one of the most problematic and dangerous areas for disabled people. They explained that when these junctions are not carefully or thoughtfully designed, they become not only confusing but also inaccessible and unsafe for many users.

The group agreed that providing cyclists with better route planning tools would also help improve safety, by reducing unnecessary confusion and ensuring that cyclists remain on appropriate, designated paths.

Accessibility and Traffic Separation

The discussion also addressed important considerations around physical accessibility, highlighting the critical role of dropped kerbs in supporting access for wheelchair users and others with mobility needs.

P10 stressed the need for a minimum distance, ideally at least half a metre, between cycle lanes and moving traffic, to maintain a safe buffer zone. Additionally, they expressed a preference for cycle lanes to be separated from moving vehicles by parked cars, rather than being positioned directly alongside traffic. This configuration was described as creating a more secure and less intimidating environment for cyclists, while still maintaining flow for all road users.

Design Considerations

Regarding specific design features, participants had a range of ideas to improve the accessibility, and usability, of this area for all users. These have been broken down below:

Crossings and Wayfinding

Audio Cues

Participants agreed that consistent audio cues at traffic lights are vital for the safety of blind and partially sighted individuals. These cues should be regularly maintained to ensure that crossings always remain accessible.

Tactile Paving

P4 emphasised that tactile paving is essential in shared spaces, as it offers clear cues to help visually impaired users navigate safely by identifying hazards such as crossings and changes in level. However, they also noted that tactile paving placed around trees or greenery can cause confusion, particularly for long cane users. To be effective, tactile paving must be correctly installed, clearly contrasted and well maintained (there are accessibility guidelines and standards to support with this).

Missing Crossing Features

Participants noted that many crossings currently lack vital features, including:

- Tactile paving
- Audible signals
- Dropped kerbs
- Sufficient crossing time
- Safe refuge areas between wide cycle lanes and motor traffic

Environment Design

Adequate Lighting

Ensuring the area is sufficiently lit was a key concern, especially during early mornings and evenings in winter, when many people are commuting. Participants shared that good lighting improves safety and visibility for all users, particularly at crossings and areas with multiple transport modes.

Cycle Parking Racks

P9 pointed out that cycle parking racks should be clearly visible to people with low vision. Drawing from an example of their local area, they explained that silver finishes can create glare for them, whilst black finishes may become indistinguishable in low-light conditions. They suggested for racks to be matte and a high-contrast colour, to ensure that they stand out and improve visibility and safety.

Well-Maintained Pavements

Participants emphasised the need for non-slip pavements, particularly in wet weather. Surfaces should also have a matte finish to reduce glare and visual discomfort, supporting safe and comfortable movement for all users.

Greenery

As mentioned earlier in this report, participants expressed that having additional greenery in place, such as planters and trees, would create a more welcoming feel and less like a "racetrack". This was well supported, provided there is enough space for pedestrians to use the paving without access barriers (i.e. the greenery doesn't cause any obstructions). The benefits of this would create a welcoming feel into travelling through the area, particularly as more people are starting to walk, wheel and cycle for their mental health and wellbeing.

Maps and Wayfinding

Legible London Totems

P9 and P4, both who are registered as blind, highlighted that Legible London totems are not currently accessible for individuals with visual impairments. An audio option would make these tools more inclusive. In addition, placement of totems should be carefully considered to avoid creating street clutter or barriers on pavements.

P10, on the other hand, praised the usefulness of these maps and recommended that cycleways be included wherever possible.

General Signage and Shared Space Improvements

The group discussed overall design features for cycling infrastructure, particularly in shared spaces and at crossing points. They agreed that features such as raised paving, tactile surfaces, and clear markings are important for ensuring safety, especially for disabled pedestrians and cyclists.

P1 specifically suggested that the shared space near Aldgate could be improved with better contrast and signage to make the cycling route more visible. Participants also stressed the need for smooth, even pavements to prevent tripping hazards. They concluded that strong colour contrast and clear, consistent markings would help make all pathways easier to navigate.

Floor Markings

Participants suggested using colour-contrasted floor markings to support wayfinding and improve clarity in shared spaces. They also mentioned:

- The potential for solar lighting to enhance visibility

- Surface signage to indicate permitted users, such as wheelchair-friendly cycleways, as Abdul pointed out that their mobility scooter is permitted in cycleways if the speed is over 8mph; however, there is little awareness of this in the public

Junction Design and Prioritisation

Complex Junctions

P3 raised concerns about complex junctions with multiple traffic and cycle lanes, which can overwhelm or disorient individuals with cognitive impairments or vision loss. Without tactile paving or consistent signage, these users struggle to identify where it is safe to cross.

Pedestrian Priority and Awareness

Participants observed that pedestrians often lack clear priority, especially when crossing cycle lanes. Cyclists may not always yield, particularly if the design does not visually or legally prioritise pedestrian movement. This further emphasises the need for an awareness campaign to promote safer behaviours among all road users, including cyclists, pedestrians, and motorists, and how to use these spaces.

Cycle Path Features and Separation Methods

Cycleway Improvements

P10 discussed improvements to cycle paths and shared spaces, suggesting the inclusion of dedicated cycleways on nearby bridges. They stressed the importance of consistency across London's cycle infrastructure.

Bus Stop Bypasses and Cyclist Behaviour

Participants also flagged potential issues with crowding at bus stop bypasses and expressed concern about cyclist behaviour when pedestrians are attempting to cross.

Stakeholders

Two representatives from the London Cycling Campaign (LCC) and the Partnership Director for City River met to discuss and give feedback on the proposed plans for a new cycleway in the City of London. Illustrations, CGI images, and proposed plans were presented. Stakeholders agreed that the plans will play a vital role in improving the infrastructure needed for safe travel through the area. The discussion focused primarily on proposed cycleway designs for Queen Victoria Street and surrounding locations.

Accessibility and Mobility

Wayfinding, Accessibility, and Visual Aids

When an illustration of St Botolph Street (looking west) was reviewed, showing a crossing that spans from the pedestrian area through the cycle lane and onto the road, stakeholders noted that direct crossings are preferable to designs requiring two sets of lights.

There was further discussion on wayfinding features, such as colour contrast and signage, particularly where the cycleway transitions from two-way to one-way. Transport for All asked whether coloured cycle lanes could aid navigation and deter motor vehicles from parking in them, which received broad agreement.

Safety Concerns

Overall Safety Considerations
Safety features in the proposed designs, such as raised surfaces and directional changes, were seen as positive steps to slow cyclists in shared spaces to ensure everyone's safety.

There was discussion around the need for yellow box junctions at crossover points to prevent traffic from obstructing cyclists. LCC noted Transport for London's (TfL) reluctance to implement these for non-motorised traffic. Stakeholders also highlighted challenges at the route's endpoints, especially at junctions under different jurisdictions, which may be less accessible for some users.

Enforcement and Public Awareness
Concerns were raised about electric motorbikes using cycleways, and stakeholders agreed on the need for stronger enforcement. They supported a public campaign to encourage respectful behaviour by all road users, aiming to reduce conflicts and improve safety.

Specific Concerns: Aldgate and Canon Street
City River expressed concerns about potential congestion at the Canon Street junction and suggested traffic-free periods when the cycle light turns green. LCC observed that east of Coin Street, traffic levels drop, creating a safer environment for cycling even without dedicated lanes.

Regarding the Aldgate area, LCC raised concerns about the removal of cycle lanes on Landfall Street and the potential rise in traffic following the reopening of Bank junction to black cabs. They criticised the current cycleway plans in the Aldgate corridor as potentially unsafe for new cyclists, particularly due to a proposed sudden left-hand turn and the requirement to briefly cycle alongside large vehicles, including buses and lorries.

Additional concerns about Aldgate Square included narrow road widths, traffic congestion, and ongoing construction works, all of which pose safety risks to cyclists. Stakeholders noted that timelines for implementing infrastructure changes must be carefully coordinated with local businesses to minimise disruption, particularly for customers and deliveries.

Design Considerations

Overall Cycleway Design

Participants raised general safety concerns, particularly regarding how cycleways are segregated. There was a focus on the need to ensure accessibility for disabled pedestrians and cyclists, and on maintaining proper separation from motor traffic. LCC expressed a preference for single cycleways on each side of the road for improved directness and navigability. However, they acknowledged the rationale behind two-way cycleway designs in areas where space is limited.

Infrastructure Features and Inclusive Design

The conversation also addressed the importance of bus stop bypasses and barriers separating cycle lanes from the road. LCC expressed strong support for bus stop bypasses, noting that without them, cyclists are often forced into heavy traffic, discouraging usage among various groups. They emphasised that improved infrastructure, including bus stop bypasses, has boosted the popularity and inclusivity of cycling; especially among women, children and disabled people.

There was a desire for more greenery along routes, and suggestions to incorporate dedicated running lanes. They felt that there was a need to balance infrastructure for cyclists, pedestrians, and runners while addressing utilities and accessibility for all. Due to the pavements being a minimum of 4.4 metres wide, this felt like a possibility.

Inclusive cycling infrastructure, such as support for adapted bikes and cargo bikes for business use, was also discussed. City River noted the challenges of accommodating cargo bikes in tight spaces and the need for designated parking for rental bikes. LCC referenced a recent charter in Manchester for delivery rider conduct, suggesting it could be adapted for London. The group agreed on the importance of working with bike-sharing companies to ensure proper parking and prevent obstruction of pavements and fire exits.

Area-Specific Issues

City River highlighted congestion issues in Cheapside and Queen Victoria Street, especially around St. Paul's Cathedral. They raised concerns about managing interactions between traffic, cyclists, pedestrians, and deliveries, including those from evening food services and tourist coaches. The increasing presence of tuk-tuks in the

City of London, especially on weekends, was also mentioned. Stakeholders briefly discussed the potential for future licensing regulations for these vehicles, and whether this could be a possibility.

Accessibility Design Review

By Transport for All for City of London

June 2025

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Introduction

This report summarises our feedback of the proposed plans for the cycleway between Aldgate and Blackfriars, as part of the consultancy project commissioned by the City of London. The project comprised of three different elements to review and evaluate the accessibility of the proposed plans for the cycleway between Aldgate to Blackfriars. This includes:

1. **Focus Groups with Disabled People**
2. **Focus Groups with External Stakeholders**
3. **Reports**
    a. Focus Groups Consultation Review (see other report)
    b. Accessibility Design Review

Transport for All's work is rooted in the Social Model of Disability, understanding that the design of the environment can create barriers that prevent Disabled people to fully access and participate in society. By involving Transport for All in this project, the City of London can understand disabled people's perspectives through their lived experience; ensuring that the city is designed to achieve maximum possible access.

Overview

This report, the **Accessibility Design Review**, assesses the proposed plans of the cycleway and comment on design considerations, from a pan-disability and accessibility point of view, alongside making recommendations for the City of London.

Focusing on accessibility, safety, and inclusivity, this review follows relevant UK legislation and best-practice guidance, including the Equality Act 2010, Local Transport Note (LTN) 1/20, Inclusive Mobility (Department for Transport), the Highway Code and BS 8300. These frameworks ensure that infrastructure is inclusive and accessible to all, including disabled people and older adults.

Overall, the plans introduce:

- New two-way and protected cycle lanes
- Improved pedestrian crossings
- Changes to pavements and vehicle lanes
- Relocations of parking / loading bays and bus stops
- Traffic calming and safety features like raised tables and cycle gates

Aldgate to Blackfriars Cycleway 01

Queen Victoria Street West

Cycleway Plan 01 covers the area along Queen Victoria Street, near Blackfriars. It includes new two-way cycle tracks, protected lanes, bus stop bypasses with raised tables, relocated disabled parking, new pedestrian crossings and improved junctions.

Areas of Good Practice

- **Protected Cycle Lanes**
  - Segregated cycle infrastructure supports the needs of various cyclists, including those using adapted cycles. This aligns with the modal separation principles set out in LTN 1/20 and accessibility requirements in BS 8300.
- **Bus Stop Bypasses**
  - Raised tables at bypasses slow cycle traffic and facilitate safer pedestrian access to buses. This feature is consistent with Inclusive Mobility (DfT, 2021) guidance on pedestrian-level continuity and LTN 1/20 guidance on bus stop interactions.
- **Tactile Paving**
  - Present at key crossing points, aiding visually impaired users. This follows recommendations from Inclusive Mobility and BS 8300 for tactile indicators at crossings.
- **Relocated Disabled Bays**
  - Ensures continued access for people with mobility impairments. This is in line with the Equality Act 2010 and BS 8300 standards for accessible parking proximity and gradient.
- **Cycle Gates and Junction Improvements**
  - Improve clarity and safety at intersections. These features are encouraged in LTN 1/20 to enhance cyclist priority and reduce conflict.

Areas for Improvement

- **Bus Stop Bypasses**
  - Lack of clear separation between pedestrian waiting zones and cycle paths could pose hazards to visually impaired people. BS 8300 and Inclusive Mobility recommend distinct surfaces and tactile paving.
- **Crossing Detail Omitted**
  - Plans do not specify whether new crossings will include audible signals, sufficient crossing times, or dropped kerbs with appropriate tactile

paving. These are required features under Inclusive Mobility and the Highway Code for pedestrian crossings.

- **Coach Parking Bays**
  - Relocated bays should not obstruct pedestrian sight lines or pathways. This aligns with BS 8300 recommendations to avoid street furniture blocking accessible routes.

Recommendations and Actions

1. Provide tactile paving and signage at bus stop bypasses.
2. Include audible signals, dropped kerbs and tactile paving at crossings.
3. Assess relocated coach parking for obstruction risks.

Aldgate to Blackfriars Cycleway 02

Queen Victoria Street East

Cycleway Plan 02 continues the route toward Mansion House, including protected eastbound and westbound lanes, widened pavements, cycle gates, coach parking adjustments and improvements to pedestrian infrastructure.

Areas of Good Practice

- **Protected Eastbound and Westbound Cycle Lanes**
  - Aligns with LTN 1/20 recommendations for modal separation and accessibility to ensure safe use by a range of cyclists, including disabled cyclists.
- **Widened Pavements**
  - Provide more space for pedestrians, improving accessibility for wheelchair users and those using mobility aids. This meets the minimum footway recommendations in Inclusive Mobility.
- **Cycle Gates**
  - Improve safety and reduce conflict at key junctions. These features are encouraged in LTN 1/20 to support safer cycling infrastructure design.
- **Cycle Lane Crossover Access**
  - Facilitates easier transition for westbound cyclists. This feature supports connectivity and consistency in design as recommended by LTN 1/20.

Areas for Improvement

- **Wayfinding and Seating**

  - The plans do not include accessible signage or rest areas, which are essential for older users and those with fatigue.
  - These are highlighted as critical under Inclusive Mobility and BS 8300 for accessible street environments.
- **Crossing Infrastructure Details**
  - Like Plan 1, lacks clarity regarding tactile paving, audible cues, or signal timing adjustments for accessibility.
  - These elements are necessary under Inclusive Mobility and the Highway Code.
- **Coach Parking Relocation**
  - Like Plan 1, this requires assessment for impacts on pedestrian movement and visual lines.
  - This is consistent with BS 8300 requirements for unobstructed pedestrian environments.

Recommendations and Actions

1. Add accessible wayfinding signage and provide seating at regular intervals.
2. Ensure new crossings meet Inclusive Mobility standards (tactile, audible, timed).
3. Audit coach bay locations for pedestrian impact and visibility.

Aldgate to Blackfriars Cycleway 03

Aldgate Area to Aldgate High Street

Cycleway Plan 03 focuses on the Aldgate area and includes new and retained protected cycle lanes (both eastbound and westbound), cycle gates, raised table crossings, a shared walking and cycling space, and improved access to Aldgate Square's two-way cycle track. Key features include protected lanes using flexible posts, new zebra crossings and multiple raised table crossings designed to slow traffic and enhance safety.

Areas of Good Practice

- **Protected Cycle Lanes**
  - The continued use of protected lanes with flexible posts supports safe travel for all cyclists, including those using adapted or non-standard cycles. This complies with LTN 1/20 and the inclusive design objectives outlined in BS 8300.
- **Raised Table Crossings**

  - These improve safety for all users by slowing motor traffic and providing level surfaces, enhancing comfort and accessibility. This aligns with guidance from Inclusive Mobility and BS 8300.
- **Cycle Access to Aldgate Square**
  - Provides dedicated access to the two-way cycle track, promoting route continuity and user safety. This supports LTN 1/20 guidance on continuous and connected cycle networks.
- **Cycle Gate Retention**
  - Helps manage interactions between cyclists and vehicles at junctions, supporting safer navigation. These design features are recommended by LTN 1/20 for safer crossings and junction transitions.

Areas for Improvement

- **Shared Walking and Cycling Space**
  - Shared surfaces can create conflict, particularly for visually impaired users. Separation or clearer delineation would improve accessibility. This recommendation follows the standards set in BS 8300 and Inclusive Mobility, which discourage shared space without clear tactile and visual separation.
- **Signage and Wayfinding**
  - No mention of directional signage or wayfinding tools, which are crucial for inclusive navigation. This omission highlights the need to align with Inclusive Mobility and BS 8300 standards on accessible information systems.
- **Lighting and Contrast**
  - The plan does not reference lighting enhancements or high-contrast surfacing, both essential for safety, especially in poor visibility conditions. Both BS 8300 and Inclusive Mobility recommend these measures for user confidence and navigation.

Recommendations and Actions

1. Clearly specify shared walking and cycling spaces with tactile indicators and visual contrasts.
2. Introduce accessible signage and wayfinding at all key decision points.
3. Ensure surface materials are high contrast and slip-resistant, particularly at crossings and transitions.
4. Provide consistent lighting to improve safety and visibility along all cycle routes.

Best Practice Considerations

To ensure the proposed plans are accessible and inclusive for all users, the following best practice design considerations should be incorporated. These align with national standards and guidance:

- **Wayfinding and Signage**
  - Incorporate clear, legible and ideally tactile or audio-enabled signage to aid navigation (Inclusive Mobility, BS 8300)
- **Street Names and Directional Markers at Accessible Heights**
  - Ensure these are visible from both seated and standing positions (BS 8300)
- **Consistent Infrastructure Design**
  - Uniform use of tactile paving, signage and materials throughout the route reduces user confusion (Inclusive Mobility)
- **Cycleway Maps and Orientation Aids**
  - Include local cycle network maps at key junctions and entrances (LTN 1/20, BS 8300)
- **Cycleway Separation**
  - Use of kerbs or flexible posts to physically separate cycleways from pedestrian areas (LTN 1/20)
- **Contrasting Surface Materials**
  - Ensure cycleways, footways, and crossings use visually contrasting materials with non-slip properties (BS 8300, Inclusive Mobility)
- **Access Features and Entry Gates**
  - Install gates near crossings that do not obstruct wheelchair or scooter access and are aligned with tactile paving (Inclusive Mobility)
- **Lighting**
  - Provide consistent, shadow-free lighting for all travel paths (BS 8300)
- **Tactile Maps and Audio Information Points**
  - Support those with visual impairments or cognitive disabilities (Inclusive Mobility)
- **Crossing Infrastructure**
  - All crossings should include tactile paving, dropped kerbs, audible signals and clear visual indicators (Inclusive Mobility, Highway Code)
- **Floor Markings**
  - Use floor guides or painted lines for navigation in shared or complex areas (Inclusive Mobility)
- **Cycle Racks and Bollards**

  - Use high-contrast colours and avoid black or silver finishes to improve visibility (BS 8300)
- **Tactile Considerations for Mobility Aids**
  - Ensure continuous, stable surfaces that support the use of walking sticks, canes and mobility scooters (Inclusive Mobility)
- **Pavement Condition**
  - Maintain surfaces to be free of trip hazards and slip-resistant in wet conditions (BS 8300)
- **Cycleway Safety Measures**
  - Design for speed moderation through layout and geometry and consider visibility enhancements such as cat's eyes or surface markings (LTN 1/20)
- **Awareness and Education**
  - Complement cycleway plans with public campaigns to encourage considerate behaviour (LTN 1/20)
- **E-Bike and E-Scooter Visibility**
  - Investigate enhancements such as sound systems or visibility aids for any electric-based vehicles (Highway Code)

Summary

The Aldgate to Blackfriars cycleway proposals demonstrate a clear intention to promote active travel through the introduction of protected cycle lanes, improved junction design and redesigned street spaces. However, to ensure that these designs are not only sustainable but also equitable, it is essential that accessibility and inclusivity are embedded consistently across all stages of planning, design and delivery.

This review has identified both strengths and areas needing improvements, particularly concerning crossing accessibility, wayfinding, surfaces and the clarity of separation between pedestrian and cyclist movements. While the proposals incorporate several good practices aligned with national guidance such as LTN 1/20, Inclusive Mobility and BS 8300, further changes are required to meet the needs of disabled people and ensure inclusive design.

By implementing the prioritised recommendations and best practice considerations outlined in this report, the City of London can ensure that the cycleway is usable, safe and welcoming for all. This will uphold the legal duties under the Equality Act 2010 and serve as an example of accessible environments to support independent mobility, sustainable transport and social inclusion across the city.

Prioritised Recommendations

To align the cycleway infrastructure with inclusive design standards and best practice, the following prioritised recommendations are proposed:

1. **Maintain a minimum 2m unobstructed footway** on all pavements.
    i. Inclusive Mobility, BS 8300
2. **Ensure all pedestrian crossings include:**
    a. Tactile paving
    b. Dropped kerbs
    c. Audible signals
    d. Adequate crossing times for slow-moving pedestrians
    i. Inclusive Mobility, Highway Code, BS 8300
3. **Clearly separate cycle and pedestrian areas** at bus stop bypasses using tactile delineators and surface contrast.
    i. BS 8300, Inclusive Mobility, LTN 1/20
4. **Introduce accessible wayfinding and rest features**, including:
    a. Tactile or audio signage
    b. Regular seating
    c. Tactile maps and / or floor guides
    i. Inclusive Mobility, BS 8300
5. **Audit relocated coach bays** to ensure they do not obstruct pedestrian routes or reduce visibility at crossings.
    i. BS 8300
6. **Ensure cycleways accommodate Class 2 and Class 3 mobility scooters and wheelchairs**, including:
    a. Appropriate surface width and quality
    b. Step-free access
    c. Safe transitions and gradients
    i. Highway Code, Inclusive Mobility
7. **Implement additional best practice accessibility features**:
    a. High-contrast markings and non-slip surfaces
    b. Shadow-free lighting
    c. Consistent design elements across the route
    d. Visibility enhancements (e.g. colour-contrasted cycle racks and bollards)
    i. BS 8300, LTN 1/20, Inclusive Mobility

These recommendations are important to ensure the proposed plans meet the accessibility, safety, and inclusivity standards in the UK and best practice guidance. These will also promote inclusive, sustainable and active transport, upholding equity and safety for all.

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Appendix 4

Equality Impact Assessment Form

Before completing this form, please refer to the Equality Impact Assessment Guidance documents and training materials

- EQIA Intranet Infohub
- EQIA Guidance

The Equality Impact Assessment (EQIA) will identify how any proposed policies, practices, activities, service changes or procedures will impact or affect different groups or communities if implemented. It supports officers in assessing whether the impacts are positive, negative, or unlikely to impact each of the nine protected characteristic groups. The assessment will also demonstrate whether there are ways to proactively advance equity, equality, diversity and inclusion. An EQIA is required before you finalise your proposal, or it may not be legally compliant.

If you have any questions or need feedback on your analysis, please contact the EDI team: CSPT.EDI@cityoflondon.gov.uk

Section 1: To be completed by all

Proposal Title	Aldgate to Blackfriars Cycleway
Details of the lead officer completing the Assessment/ Role responsible for the completion of the EQIA	Lead Officer: Albert Cheung – Street Space Planning Author Completing EQIA: Linda Kulahcigil – NRP
Department Responsible:	Policy & Projects, City Operations, Environment Department
Who has been involved in creating the EQIA: (please summarise/list stakeholders you have engaged with and how)	Lead Members (Streets and Walkways Sub-Committee Members' briefing on bus stop bypasses) London Cycling Campaign (LCC) (provided a briefing paper and attended the Members' briefing on 18 June) Wheels for Wellbeing (WfW) (provided a briefing paper and attended the Members' briefing on 18 June) Living Streets (provided a briefing paper and attended the Members' briefing on 18 June) Royal National Institute of Blind People (RNIB) (provided a briefing paper and attended the Members' briefing on 18 June)

	National Federation of the Blind UK (NFBUK) (provided a briefing paper and attended the Members' briefing on 18 June) Guide Dogs (provided a briefing paper) Transport for All's Focus groups with Disabled People and Stakeholders (May-June 2025)
Date of Initial assessment:	July 2025
Dates of review (as applicable)	Subject to the decision of the Streets and Walkways Sub-committee, a review will take place when the design of the cycleway resumes, following the publication of London and national guidance on bus stop bypasses.

1.PROPOSAL OVERVIEW

What does the proposal aim to achieve? Please outline your proposal below

- ➔ If no potential impacts are identified at this stage, proceed to **Section 3**
- ➔ If you believe there may be potential negative impacts, continue to **Section 2, Steps 2,3,4, and 5** to complete a full EQIA, then move to **Section 3**
- ➔ If you identified any positive impact, please record and monitor at **Section 2, Step 5,** then move to **Section 3**

Please feel free to attach supporting documents/ information

Summary of the proposals

Aldgate to Blackfriars cycleway. The City of London Corporation is developing a new, high-quality east-west cycle route. Connecting Aldgate with Blackfriars, the route would expand London's network of safe routes with links to:

- Cycleway 2 at Whitechapel High Street
- Cycleway 6 at New Bridge Street
- Cycleway 3 on Victoria Embankment
- Cycleway 1 on Queen Street

Running through the heart of the City Cluster, the route includes St Botolph Street, Aldgate Square, Leadenhall Street, Cornhill, Bank Junction and Queen Victoria Street.

The whole route has been assessed and designed to meet modern standards so that no one feels excluded from cycling due to safety concerns and bus stops bypasses are safe and accessible. The aim is to enhance the streetscape, so it is as safe, attractive, and accessible as possible for all users.

To protect people cycling from traffic, the design includes protected cycle lanes on Queen Victoria Street between New Bridge Street and Queen Street in the west and on St Botolph Street in the east. The public consultation ran from 9 December 2024 to 9 February 2025.

As a result of the traffic restrictions at Bank Junction and Bishopsgate, traffic levels are low enough on Leadenhall Street, Cornhill and the eastern section of Queen Victoria Street to not require any cycle lanes.

The following maps show the consultation plans.

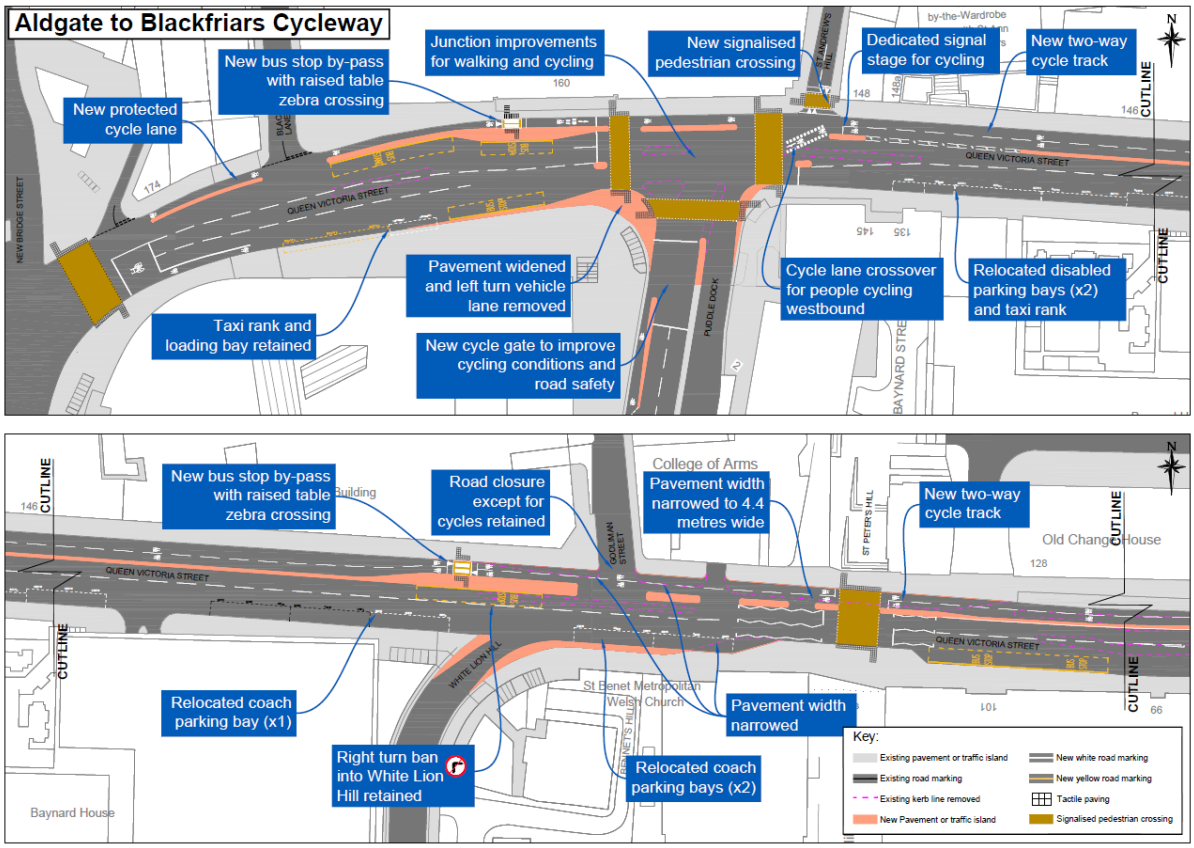

Figure 1 - Aldgate to Blackfriars Consultation Plans

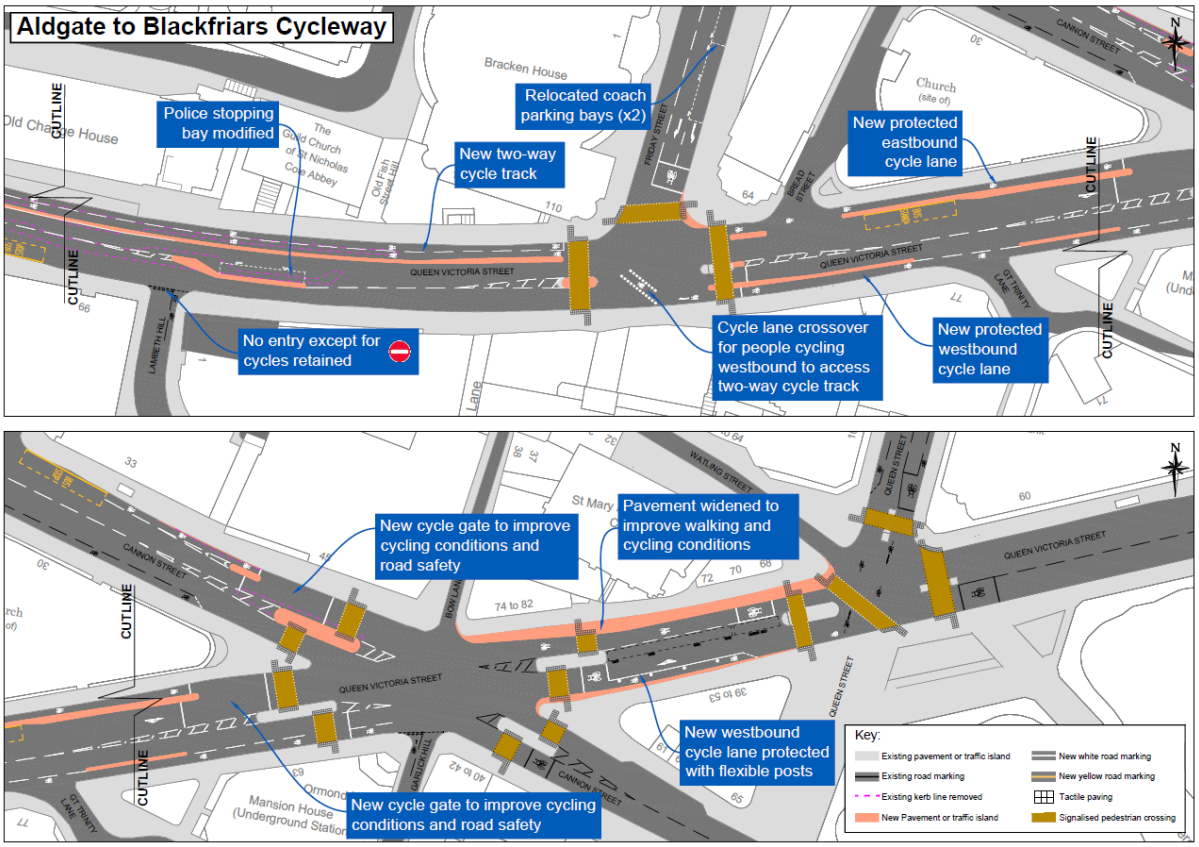

Figure 2 - Aldgate to Blackfriars Consultation Plans

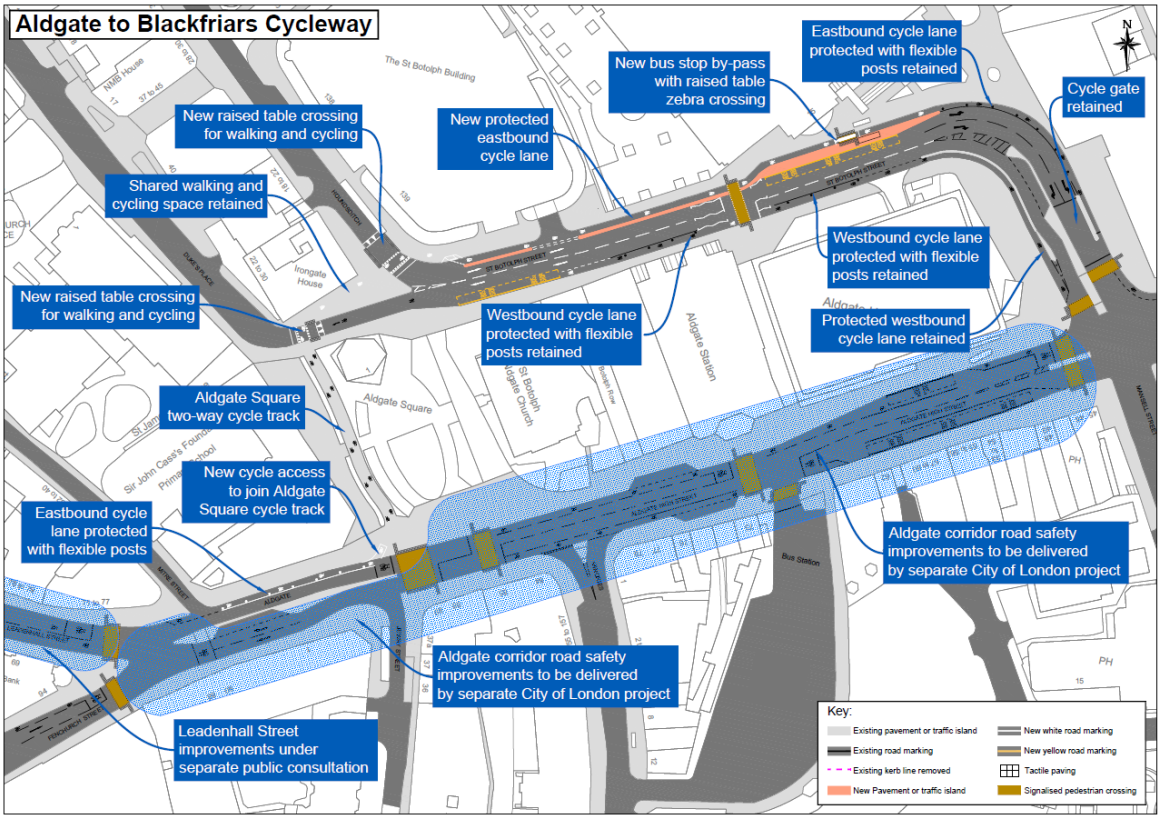

Figure 3 - Aldgate to Blackfriars Consultation Drawings

Further detail of the proposals

The City of London Corporation is working to improve the experience of cycling, walking and wheeling on the City's streets. Working with Transport for London, the proposal is for a high-quality east-west cycle route linking Aldgate to Blackfriars. The aim is to make cycling along the route safe, more attractive and more accessible. The cycleway would connect with five other routes at Aldgate (C2), Queen Street (C1 and CS7) and Blackfriars (C3 and C6), and City destinations such as the City Cluster.

Proposed Improvements along the Cycleway route

Aldgate Area:

- A new eastbound cycle lane on Aldgate, protected by flexible posts.
- Raised side-street crossings on Duke's Place and Houndsditch to support safer walking, wheeling and cycling.
- Upgraded eastbound cycle lane on St Botolph Street using traffic island separators.
- A new eastbound bus stop bypass (with bus stop island) on St Botolph Street with a raised Zebra crossing.

Aldgate to Queen Street:

- No changes proposed on Cornhill, Bank Junction, or the eastern end of Queen Victoria Street due to existing low traffic levels.
- Improvements to Leadenhall Street are being developed separately by the City of London.
- Further changes to Aldgate and Aldgate High Street are under separate consideration.

Queen Victoria Street (Queen Street to New Bridge Street):

- Segregated cycling provided via:
    - Single-lane cycle tracks with flexible posts or traffic islands.
    - A two-way cycle track with island protection.
    - Early or separate traffic signal phases for cycling at junctions.

Bus Stop Bypasses:
Three bus stop bypasses (with bus stop islands) are proposed, designed in line with TfL's accessible design guidance. Each includes:

- A raised Zebra crossing.
- A wide waiting area on both sides of the cycle track.

Locations:

- St Botolph Street – Bus Stop B
- Queen Victoria Street (Millennium Bridge) – Bus Stop SG
- Queen Victoria Street (Blackfriars) – Bus Stop A

Please refer to the EQIA guidance when completing this form

Section 2: To be completed for a full EQIA

2. EVIDENCE AND IMPACT ANALYSIS

Please highlight the potential impact on these groups, actions taken to mitigate impact and advance equality, diversity and inclusion (include data/evidence upon which the analysis is based)

Protected Groups:

- Age
- Disability
- Gender Reassignment
- Marriage & Civil Partnership
- Pregnancy & Maternity
- Race
- Religion & Belief
- Sex
- Sexual Orientation

Additional Groups

- Socio-economic background
- Care leavers
- Carers & Parents
- Veterans

Where relevant note relevant intersectional impacts: where combinations of different group identities may result in unique or compounded impacts.

Transport Strategy Inclusion Principles

City of London have developed five inclusion principles to the development of their Inclusivity and Equity Action Plan and the delivery of the Transport Strategy. These are:

1. Improving our street network and supporting the improvement of London's public transport network to ensure everyone can experience the benefits of our policies and projects, and particularly those currently excluded.
2. Designing and delivering spaces and services which are inclusive by default and work to provide equitable access to all.
3. Encouraging community participation and engagement and ensuring a diversity of voices are heard through the decision-making process.
4. Building trust with local communities through transparency, accountability and demonstrating how engagement has driven change in our processes and plans.
5. Developing shared, local stories of inclusion best practice and lessons learnt, showing how changes to our streets and our polices have improved people's lives; and promoting a culture of inclusivity.

The City of London has developed five Equality Objectives (2024-29)

1. Inclusive and Trustworthy Leadership
2. Inclusive and Diverse Community
3. Accessible and Excellent Services

4. Socio-Economic Diversity
5. Cross-cutting activity: Evidence and Data

Protected groups:

Age

Evidence

Data from the Census 2021 (Figure 4) shows that most residents are aged 25-60 making up 59.8% of the residents in the City of London. Residents aged over 65 comprise 19.5% of residents while residents aged under 15 comprise only 6.9% of resident population.

Compared to London as whole, there is a much lower percentage of people aged under 15 in the City of London. Similarly, residents aged 25-60 seems to represent a higher proportion compared to London and England as whole. However, the proportion of older residents aged over 65 makes up a higher percentage (19.5%) than those in London (16.5%) as a whole.

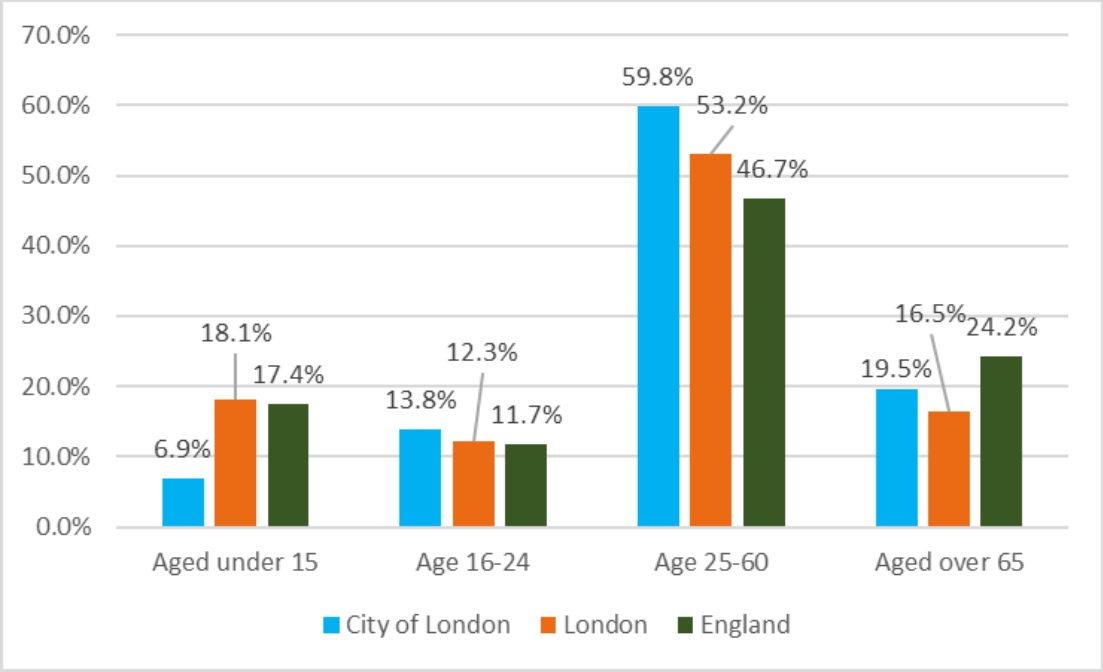

Figure 4 - Age distribution within the City of London compared to London and England as a whole (source: Census 2021)

The City of London has 8,600 residents, but there are 614,500 workers[1]. The Annual population survey conducted by the Office for National Statistics surveyed those in

[1] City of London website 2025: Our impact and key facts - City of London

employment in the City of London. The age profile of those respondents can be seen in the graph below. The majority of workers fall into the age range 25-44.

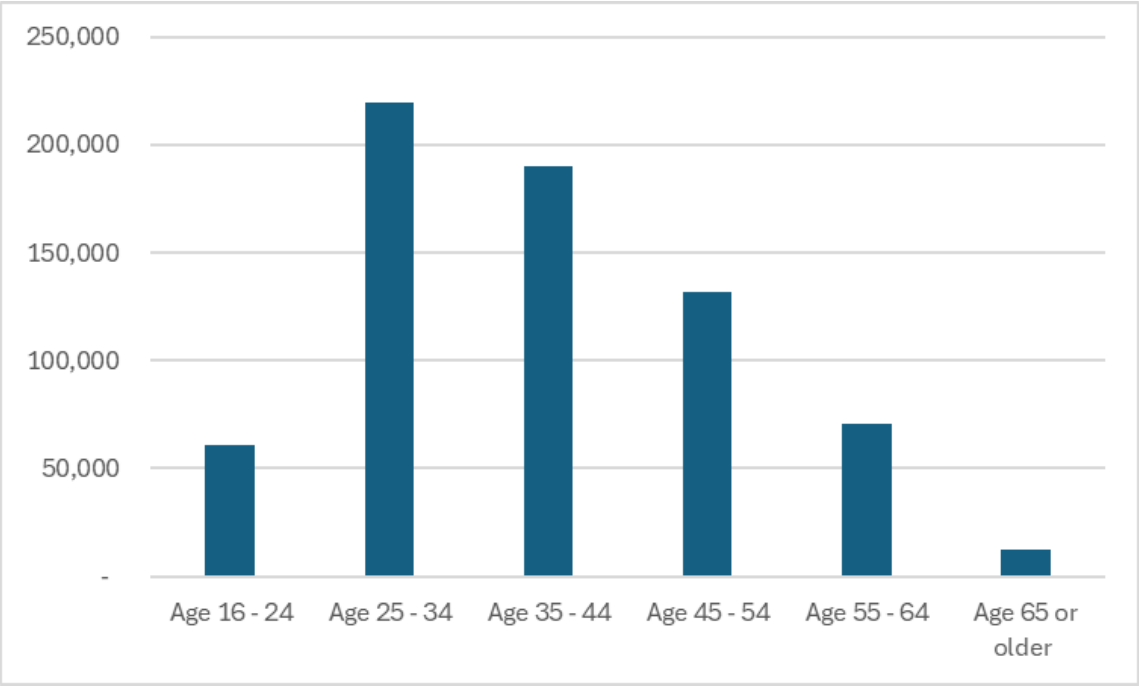

Figure 5 – Age profile of those in employment in the City of London (Source ONS Annual population survey April 2024 - March 2025)

The proportion of Killed or Seriously Injured (KSIs) and Slightly Injured casualties per age category is shown in Figure 6 and 7.

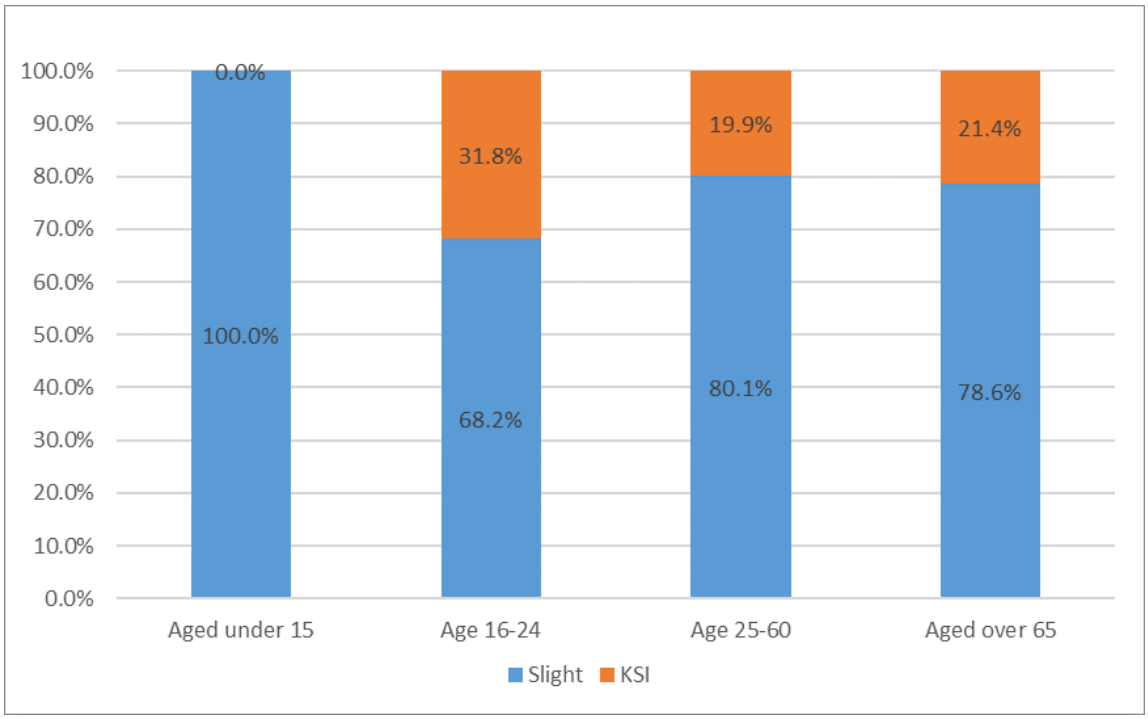

Figure 6 - Casualties by age band split by injury severity in City of London in 2023 (source: Road safety data - Transport for London)

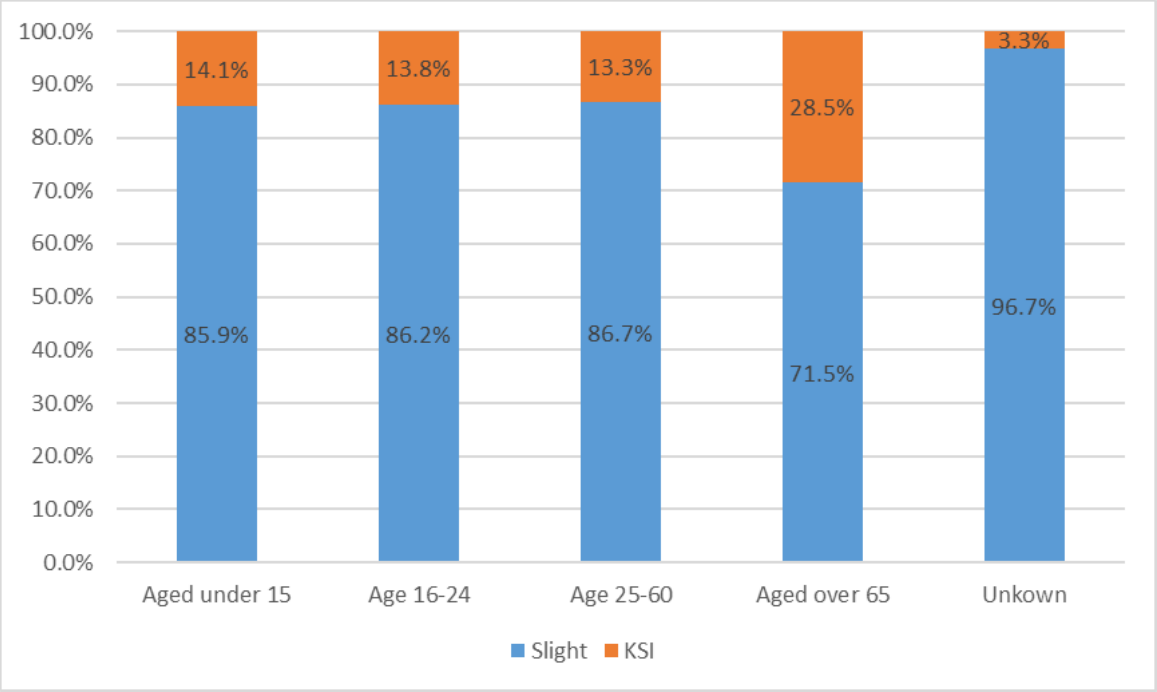

Figure 7 - Casualties by age band split by injury severity in London in 2023 (source: Road safety data - Transport for London)

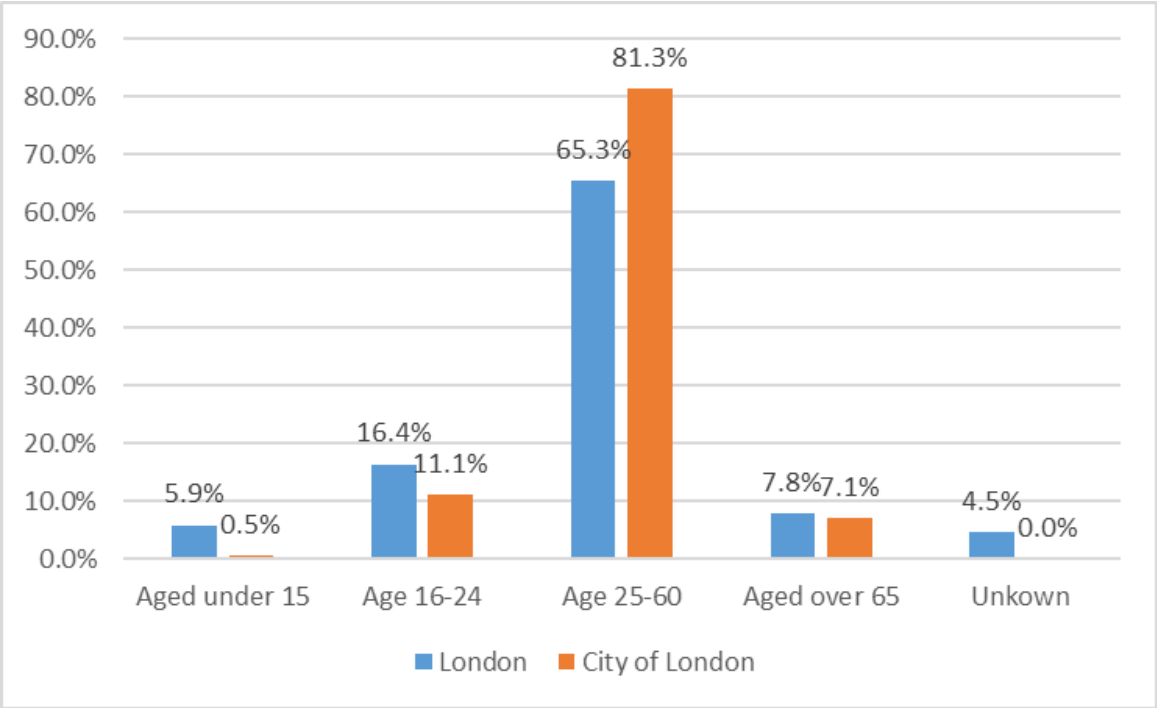

Figure 8 - Total casualties by age band in City of London compared to London as a whole 2023 (source: Road safety data - Transport for London)

Across the UK in 2023, 5% of fatalities and 10% of casualties were aged 16 years and under, 23% of fatalities and 29% of casualties were aged 17 to 29 years old and 22% of fatalities and 8% of casualties were aged 70 years old and over.[2]

Compared to London, the City of London has no fatal collisions, however the ratio of KSI for people aged 16-24 more than double at 31.8% versus 13.8% (Figure 6 compared to Figure 7).

Figure 8 shows that the total casualties for residents aged 25-60 is 81.3% in City of London compared to 65.3% for London. Similarly, casualties for residents aged under 15 is 0.5% for City of London compared to 5.9% for London. This reflects the low proportion of residents aged under 15 in the area.

Fear of road danger can be a barrier to more people walking and cycling, particularly among younger people[3]. In addition, older people may also be more likely to perceive road danger as a barrier due to reduced physical capabilities and slower reaction times. Building active travel into every day routines helps to reduce risk factors for developing chronic, long term health conditions as well as alleviating loneliness[4].

High traffic volumes can have a wide range of effects including restricting the independence of, in particular, children and young people and those with a disability. High levels of traffic can hinder active travel with 'heavy traffic' and 'pollution' often cited as two of the biggest barriers to people not walking more.[5] This can lead to an increase in social isolation for members of vulnerable groups who may fear going out.

Consultation

The age of consultation respondents ranged from 13 to 75+, with a wide spread of ages represented. A total of 350 responses were received for the question asking, 'what is your age?'

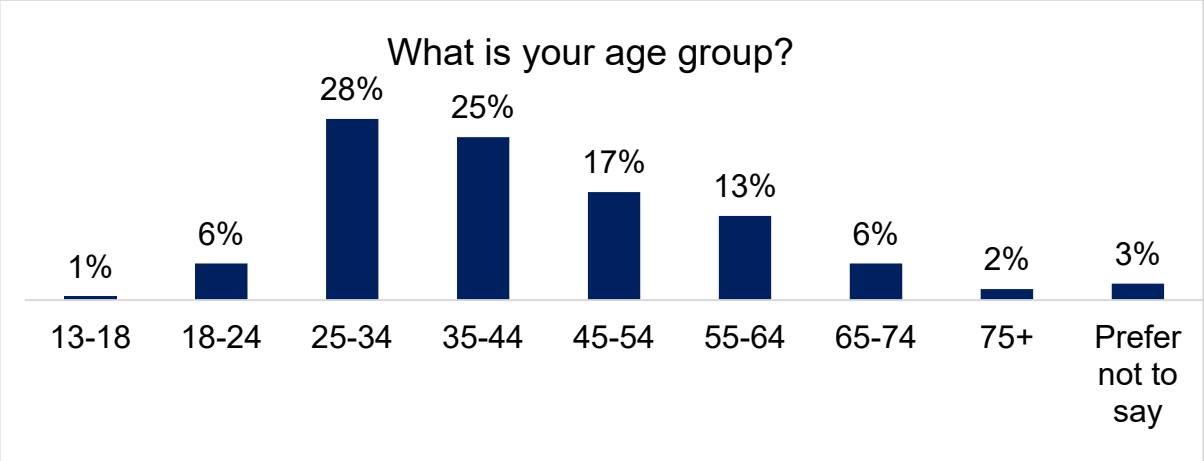

Figure 9 - Consultation Age Group Data

[2] www.gov.uk Reported road casualties Great Britain, annual report: 2023
[3] Safety concerns are barrier to more walking and cycling: Brake
[4] What is so off-putting about walking and cycling? | Centre for Ageing Better
[5] Nice.org.uk synthesis-of-evidence-pdf-430225309

The majority of those responding were aged between 25 and 54 (70%).

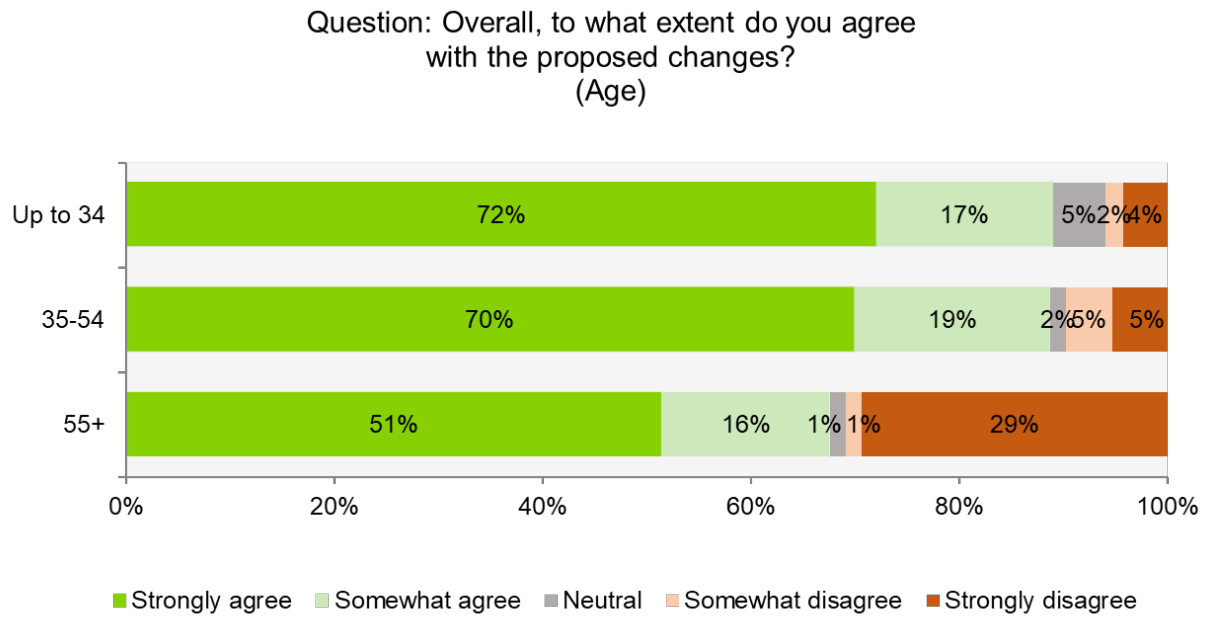

Figure 10 – Consultation results: How agreement with the proposed changes varied by age of the respondent

A majority of all age groups agreed with the proposed changes, however the proportion of those who strongly disagreed with the proposals (orange in Figure 10) is notably higher among the 55+ age group.

Potential impact (positive)

The proposals aim to provide a positive impact on all age groups by creating safer cycling facilities to enable more people to choose to cycle.

Older people are likely to benefit positively from the health benefits of active travel, as low activity levels affect their risk to a wide range of diseases, long term health and well-being. Creating safer road conditions by reducing motor vehicle traffic will create an environment where they can be more confident to walk and cycle.

The introduction of fully segregated cycle lanes provides a protected corridor for people cycling, reducing motor vehicle-cycle conflict and minimises walking and cycling interaction.

Raised carriageway crossings such as the one across St Andrew's Hill has the potential to assist in reducing traffic speed and improve accessibility through level access, which may particularly benefit those who are travelling with children (perhaps on scooters or in pushchairs/ prams) as well as older people who are more likely to have reduced mobility.

Footway widening such as is being proposed at the Queen Victoria Street junction with Puddle Dock improves access for all but is particularly likely to benefit users with mobility aids and pushchairs as well as those walking in groups.

Potential impact (negative)

The bus stop bypasses (with bus stop islands) have the potential to bring both positive and negative impacts on different groups. For those cycling, bus stop bypasses provide a safer environment by removing conflict with buses. However, for those who are pedestrians accessing the bus stop island there is the potential for conflict with people cycling. In some cases, older people and younger children may not be able to detect a cycle approaching at speed. Mitigation measures could be considered to reduce this risk.

Mitigation

Consistent surfacing material and colour contrasts should be considered to make the segregated cycle areas clear to all, particularly older people, children, those travelling with children, disabled people cycling and those who are blind or visually impaired.

Bus stop bypasses – see sections 3 and 4 for suggestions on mitigation by Transport for All through their Accessibility Review and suggestions that arose from the Members' briefing on 18 June.

Consultation of the scheme has been undertaken and is referred to throughout this document; views have been recorded and can be fed into the design process.

Disability

Evidence

According to data from the Census 2021, City of London has 82% of residents stating that they have no limitations on their activities. This is the same as the average for the whole of London. 7% stated that they were disabled under the Equality Act and that their day-to-day activities were limited a little, an additional 3% were disabled under the Equality Act and their day-to-day activities were limited a lot. This is lower than that for London (6%) and for England (7%).

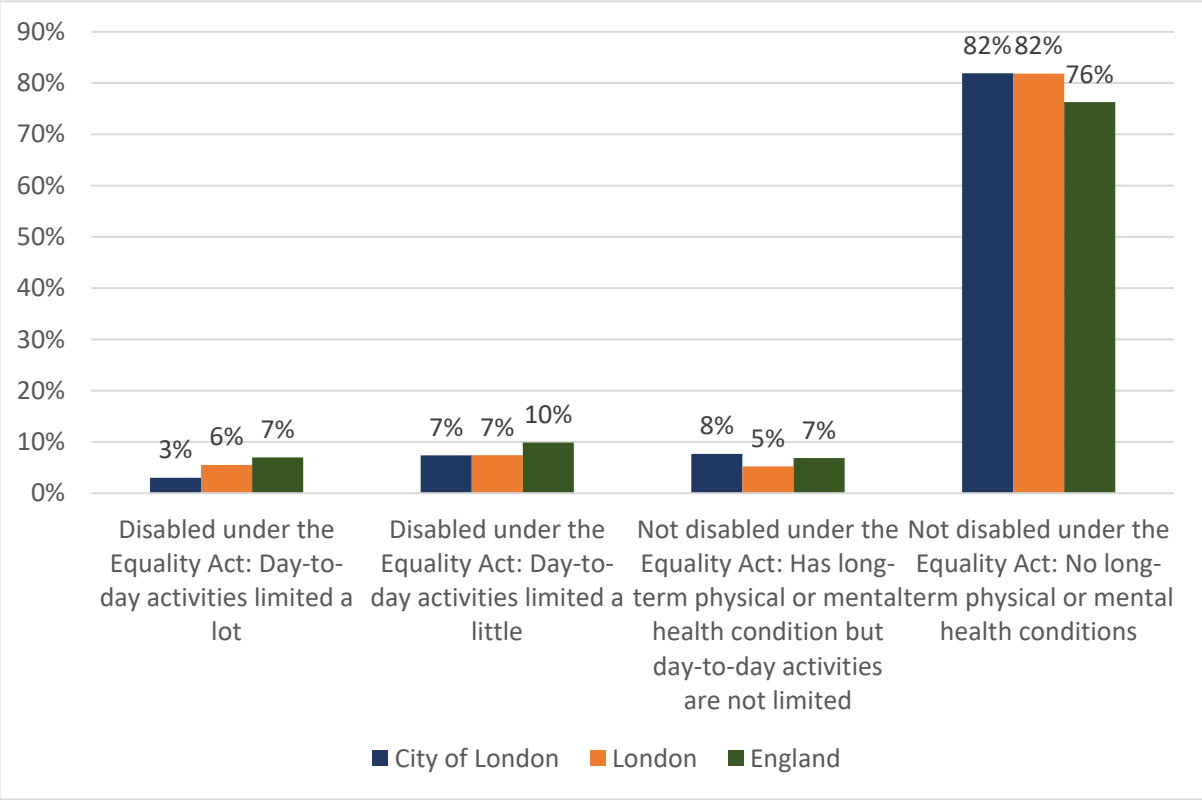

Figure 11 - Proportion of those who are disabled under the Equality Act, City of London Compared to London and England (Source: Census 2021)

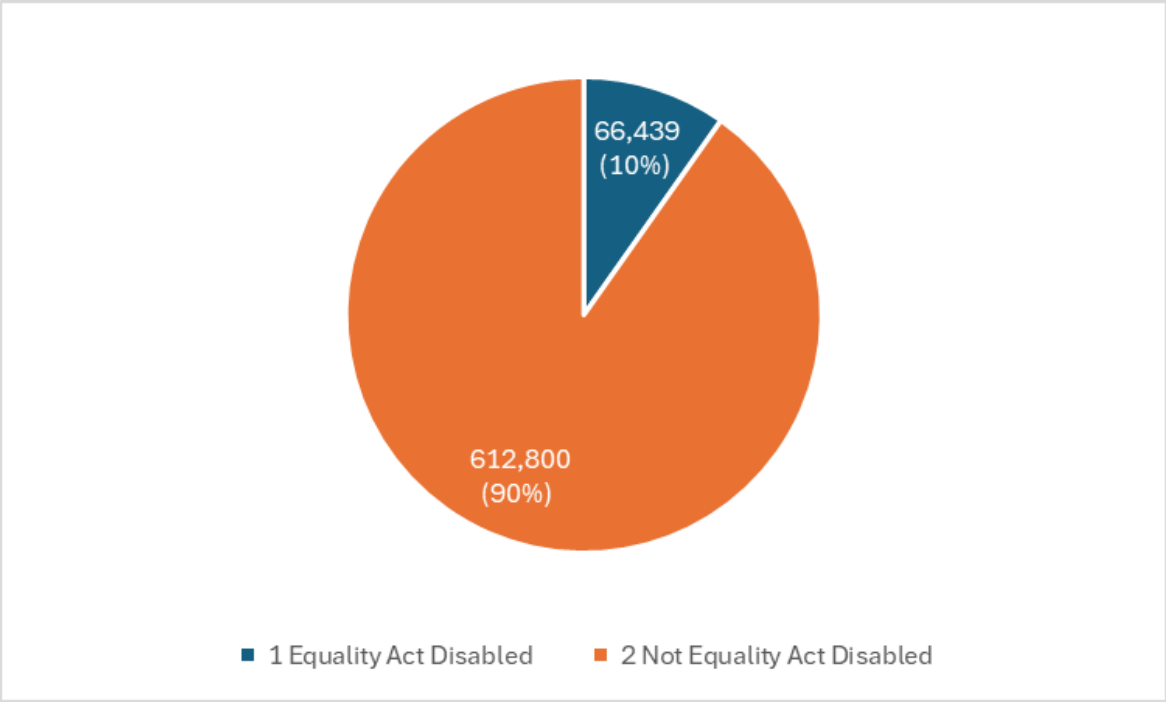

Figure 12 Proportion of workers in the City of London who state that they are disabled under the Equality Act (Source: ONS Annual population survey April 2024 – March 2025)

Figure 12 shows that 10% of those surveyed by the ONS in the annual population survey April 2024-March 2025 stated that they were disabled.

From 'Travel in London: Understanding our diverse communities 2019, A summary of existing research' (TfL, 2019), the most commonly used types of transport by disabled Londoners are walking (81% of disabled Londoners walk at least once a week), the bus (58%) and car as the passenger (42%). The main barriers that disabled Londoners experience in using public transport more often are the same as those expressed by non-disabled Londoners: namely overcrowding and concerns about the antisocial behaviour of other customers. Disabled customers also report accessibility-related issues, cost and comfort as barriers to travel.

Disabled Londoners travel less frequently than non-disabled Londoners (1.9 journeys per weekday compared with 2.5 for non-disabled Londoners). The main transport types used by disabled Londoners are broadly the same as those used by non-disabled Londoners, i.e. walking, bus, and car both as a driver and a passenger, with the exception of private hire vehicles and black cabs, which disabled Londoners are slightly more likely to use than non-disabled Londoners.

Consultation

11% of consultation respondents indicated a limitation of their day-to-day activities due to a physical or mental health condition or disability.

289 people who engaged with the consultation answered this question.

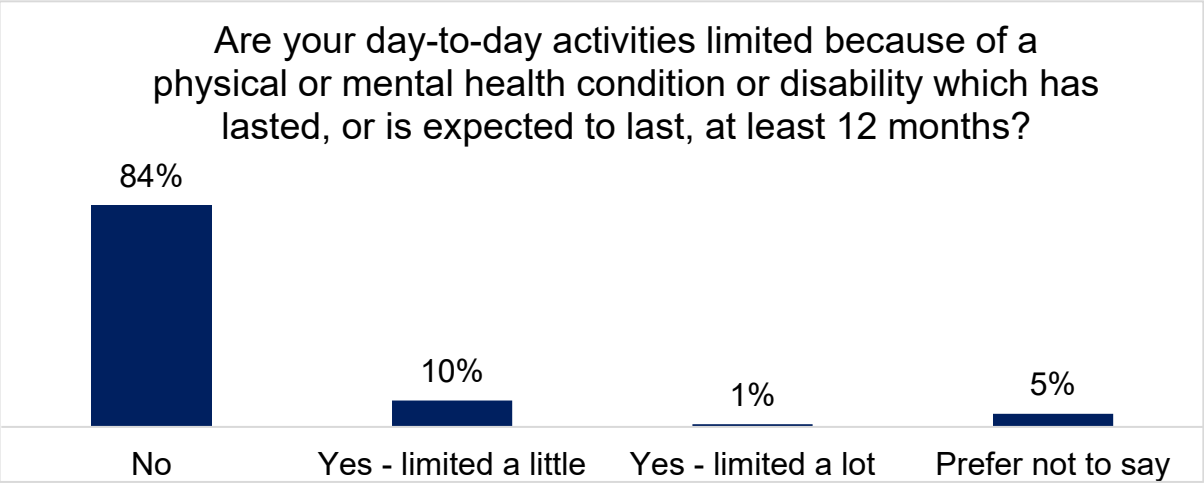

Figure 13 - Consultation Response – Disability

Potential impact (positive)

The proposals aim to provide a positive impact on disabled people by upgrading existing cycle facilities to make them safer and more legible to those who use adapted cycles or a cycle as a mobility aid. Currently, mobility scooters are permitted to use cycle tracks as well as the pavement, but are not allowed to use cycle lanes demarcated with a line.

Creating safer road conditions by separating motor vehicle traffic will create an environment where those with a disability can be more confident to walk, wheel and cycle.

The introduction of fully segregated cycle lanes provides a protected corridor for people cycling, reducing vehicle–cyclist conflict and minimising pedestrian–cyclist interaction.

Raised carriageway crossings such as the ones across St Andrew's Hill and at Duke's Place have the potential to assist in reducing traffic speed and improve accessibility through level access which may particularly benefit those who are mobility impaired, especially wheelchair users. Raised tables also reduce the possibility of ponding that can occur with dropped kerbs – this can assist in preventing wheelchair users getting wet hands.

Footway widening such as is being proposed at the Queen Victoria Street junction with Puddle Dock improves access for all but is particularly likely to benefit users with mobility aids and pushchairs as well as those walking in groups.

Wheels for Wellbeing have stated that cycle provision enables some disabled people to make journeys that are currently excluded from all modes; there are some people who cannot use the bus but can use safe cycle infrastructure. Cycling is more affordable as a mode of transport when compared to using a taxi or private hire vehicle.

Potential impact (negative)

The bus stop bypasses (with bus stop islands) have the potential to bring both positive and negative impacts on different groups. For those cycling, bus stop bypasses provide a safer environment away from buses. However, for those who are walking or wheeling accessing the bus stop there is the potential for conflict with people cycling.

There are concerns about "floating bus stops' or "bus stop bypasses" that can potentially pose significant challenges for blind and partially sighted people. A common issue and fear is that people cycling do not always give way to those wishing to cross the cycle lane. This can lead to some disabled people not wanting to use these facilities, which may mean not travelling at all and being excluded from use of the streets and bus services. This concern has been raised specifically in relation to this scheme proposal by the RNIB and the NFBUK and research by UCL and Guide Dogs supports this. They found that floating island bus stops are difficult for people with sight loss to identify and navigate. The bypass edge must be detectable by someone who is visually impaired and it must be ensured that there is no excessive 'crossfall' on the bus stop island as this may be a problem for those using a ramp to access or leave a bus.

Transport for London undertook a safety review of bus stop bypasses and published its report in 2024. The review showed that safety at bus stop bypasses was generally good, but that there were some design and behaviour gaps. TfL analysed pedestrian

casualties involving people cycling at 164 bus stop bypasses. It found that during the three years 2020, 2021 and 2022, a total of five pedestrian casualties involving people cycling and one involving an e-scooter occurred within the extent of the bus stop bypasses, based on the collision descriptions. This is extremely low compared to 11,400 pedestrians injured in collisions with motor vehicles over the same time period. However, these figures do not record near misses that can contribute to anxiety. The safety review also found that 60% of people cycling failed to yield to pedestrians at Zebra crossings at the sites surveyed. This behaviour and perceived behaviour by some people cycling add to the anxiety of pedestrians and in particular those with a disability such as a mobility or visual impairment at these locations.

It should be noted that onboard announcements on buses are available, warning passengers about the floating stop and for passengers to be cautious when alighting.

Mitigation measures could be considered to reduce this risk.

Bus stop boarding/ alighting zones may become congested and could affect those who have a neurodiverse condition.

The introduction of protected segregated cycle lanes does also reduce the availability of kerbside access for those wishing to drop off or pick up using a vehicle. This may be of particular impact to those who have a disability.

The relocation of blue badge parking bays and the taxi rank from the north to the south side of Queen Victoria Street may potentially initially negatively impact those while they learn of and get used to the new locations.

Mitigation

Consistent surfacing material and colour contrasts should be considered to make the segregated cycle areas clear to all, particularly older people, children, those travelling with children, disabled people cycling and those who are blind or visually impaired.

Bus stop bypasses – see sections 3 and 4 for suggestions on mitigation by Transport for All through their Accessibility Review and suggestions which arose from the Members' briefing on 18 June.

Ensure that new Blue Badge parking bays have a dropped kerb to enable wheelchair users safe access to the footway.

Surfacing of the footway could be considered, something that is absorbent and smooth for wheeled users of the area. Positioning of street furniture needs consideration to through-routes and desire lines kept clear of obstructions.

Consultation of the scheme has been undertaken and is referred to throughout this document; views have been recorded and can be fed into the design process.

Gender Reassignment

Evidence

Table 1: Gender Identity (Source: Census 2021)

Gender Identity	City of London	London	England
Gender identity the same as sex registered at birth	92.07%	91.21%	93.47%
Gender identity different from sex registered at birth but no specific identity given	0.11%	0.46%	0.25%
Trans woman	0.15%	0.16%	0.10%
Trans man	0.06%	0.16%	0.10%
All other gender identities	0.16%	0.12%	0.10%
Not answered	7.45%	7.88%	5.98%

Responses to the Census 2021 Gender Identity questions are generally in line with that of London as a whole.

Transgender hate crime is any criminal offense perceived to be motivated by hostility based on a person's transgender identity. Levels of reported Transgender hate crime in the City of London are low.

Table 2 - Transgender Hate Crime Statistics (Source Government Hate Crime Statistics (Gov.uk))

	City of London			London		
	2021/22	2022/23	2023/24	2021/22	2022/23	2023/24
Transgender hate crime	2	0	6	437	412	526

People who are going through or have gone through gender reassignment can often find safety and security issues a concern on streets and when using public transport.

A survey undertaken by the government[6] on the experiences of transgender people found that fears around safety in the street and when using public transport were particularly common amongst this group. More specifically:

- Nearly half of respondents (47%) said they were most worried about being a victim of a violent crime or harassment.
- Around three-quarters of respondents (76%) had never brought a complaint to the police, and nearly half of respondents (47%) cited the police's lack of understanding/sensitivity as being the greatest challenge in lodging a complaint.

[6] https://www.gov.uk/government/publications/headline-findings-from-our-transgender-online-survey

Consultation

No data was collected on this group during the public consultation.

Potential impact

It is not expected that there will be an impact on this protected group.

Marriage & Civil Partnership

Evidence

Table 3 - Marriage and Civil Partnership Data (Source: Census Data 2021)

	City of London	London	England
Never married and never registered a civil partnership	57.4%	46.2%	37.9%
Married: Opposite sex	27.7%	39.3%	44.2%
Married: Same sex	1.3%	0.4%	0.3%
In a registered civil partnership: Opposite sex	0.2%	0.1%	0.07%
In a registered civil partnership: Same sex	1.2%	0.2%	0.1%
Separated, but still married	2.1%	2.3%	2.2%
Separated, but still in a registered civil partnership	0.07%	0.03%	0.02%
Divorced	6.7%	7.2%	9.0%
Formerly in a civil partnership now legally dissolved	0.27%	0.04%	0.02%
Widowed	3.0%	4.2%	6.1%
Surviving partner from civil partnership	0.01%	0.01%	0.01%

There is significantly higher proportion of the City of London's residents who have never married and never registered a civil partnership (57.4%) compared to London (46.2%) and England (37.93%) respectively as whole. The proportion of Married: Opposite sex is lower 27.71% compared to London (39.2%) and England (44.20%) respectively as a whole.

Consultation

No data was collected on this group during the public consultation.

Potential impact

It is not expected that there will be an impact on this protected group.

Pregnancy & Maternity

Evidence

Table 4 – Crude Birth Rate and General Fertility Rate for City of London compared to London and England Source: ONS, 2023

Area of usual residence Name	Number of live births	Crude Birth Rate (CBR)	General Fertility Rate (GFR)
City of London	57	4.2	14.4
London	104,252	11.7	48.8
England	563,561	9.8	49.9

According to births and fertility rates data, the GFR, which is the number of live births per 1,000 women aged 15-44, of the City of London is 14.4 and for London is 48.8.

Research shows that exposure to poor air quality during pregnancy has an impact on both the health of the pregnant women and on foetal development. Air pollution exposure during foetal development and early childhood can have long-term impacts on health in childhood and beyond. Air pollution exposure may also increase risks for maternal health, and has been linked to increased risk of pre-eclampsia, a serious cardiovascular condition of pregnancy[7].

Consultation

90% of consultation respondents were not pregnant, nor had given birth in the last 12 months. 252 people answered this question although it should be noted that of those who answered the 'what is your gender question' – only 76 were female. This suggests that men have also answered this question on pregnancy.

[7] https://www.rcog.org.uk/news/uk-government-must-stop-ignoring-impact-of-air-pollution-in-pregnancy-and-set-air-quality-targets-which-protect-the-health-of-future-generations/

Figure 14 - Consultation Responses to the question, 'Have you had a baby in the last 12 months or are you currently pregnant?'

Potential impact (positive)

The proposed scheme interventions which include footway widening (e.g. on Queen Victoria Street between Cannon Stret and Queen Street), the implementation of new pedestrian crossings (e.g. on Queen Victoria Street at Puddle Dock and St Andrew's Hill) and raised tables at junctions will enable women who are pregnant or moving around with children and/ or with prams/ pushchairs, to walk through the area more safely and confidently.

If the proposed scheme reduces traffic, this is likely to lead to improved air quality; this is likely to have a positive impact on pregnant women who are more susceptible to the detrimental effects of poor air quality.

Race

Evidence

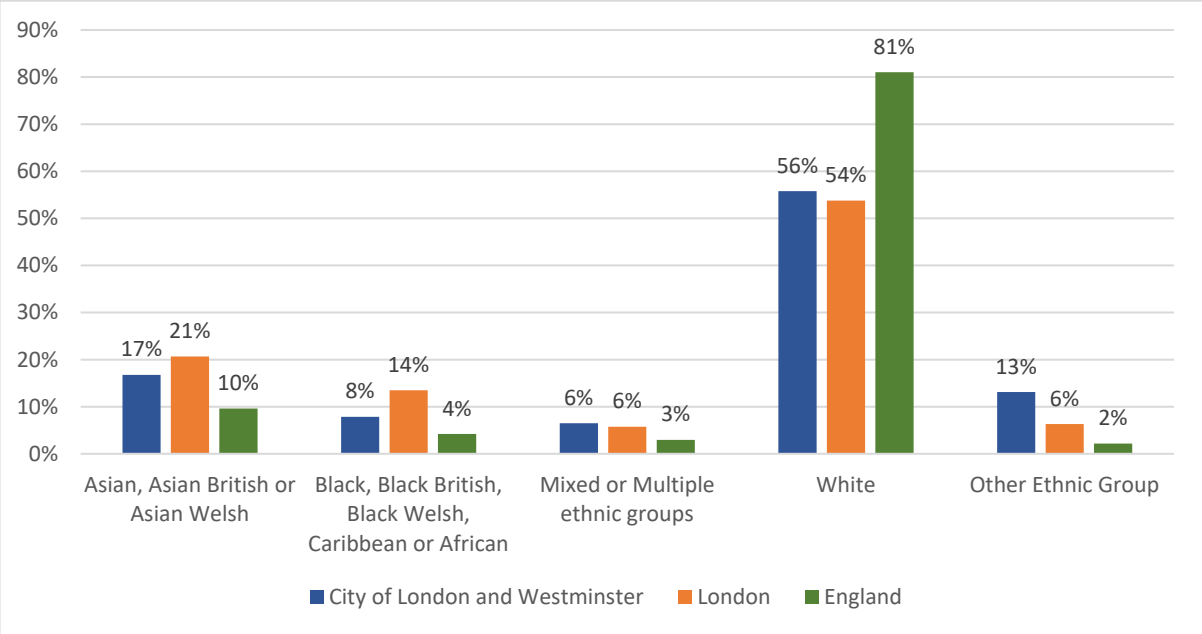

Figure 15 - City of London by ethnicity compared to London and England, Source: Census 2021

According to data from the Census 2021, the ethnicity for the majority of the resident population for the City of London and Westminster is White (56%) which is slightly above the average for London as a whole (54%). The second most common ethnic group is Asian, Asian British or Asian Welsh (17%).

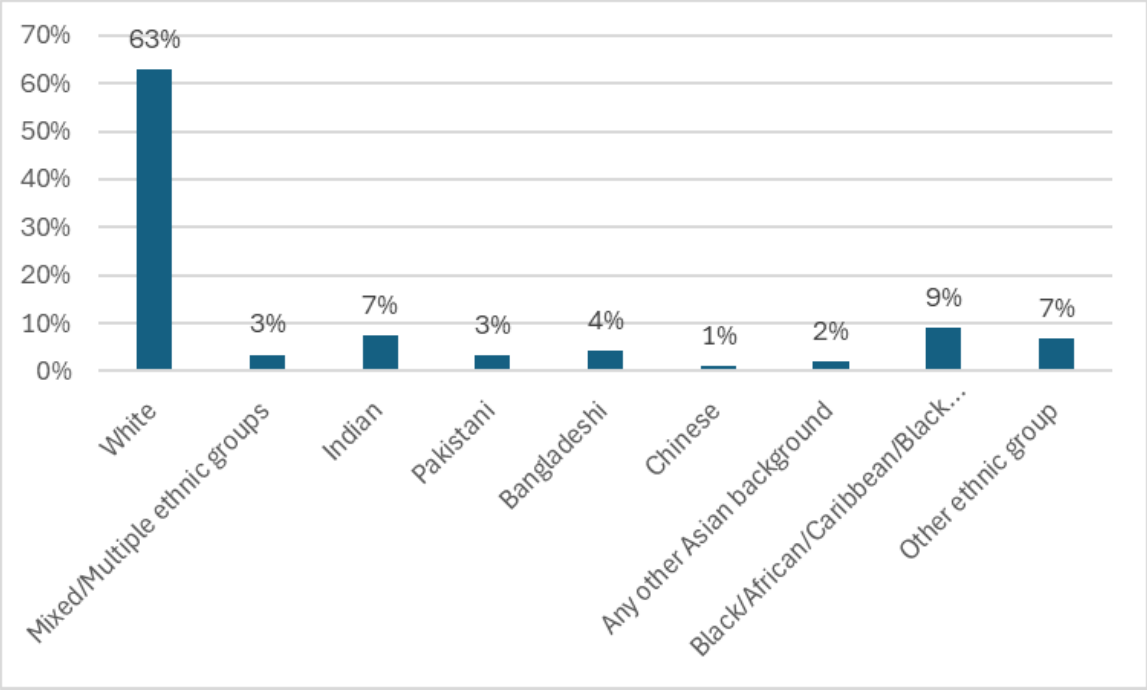

Figure 16 – Proportion of workers in the City of London by ethnicity (Source: ONS Annual population survey April 2024 – March 2025)

According to the annual population survey of those working in the City of London, the majority state that they are White (63%). This is a higher proportion than those who reside there. The next most common ethnicities are stated as Black (9%), Indian (7%) and other (7%).

Consultation

Almost 80% of consultation respondents described their ethnicity as White, with 10% of another, different ethnicity – most frequently mixed or multiple ethnic groups.

266 people responded to this question regarding their ethnicity as part of the consultation.

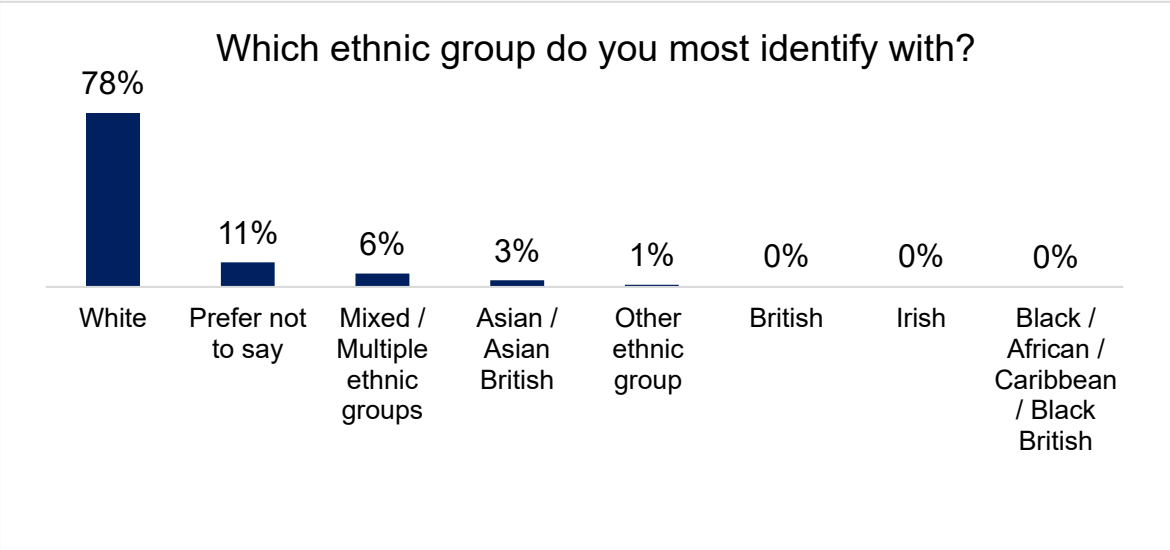

Figure 17 - Ethnicity Consultation Data, answers to the question 'Which ethnic group do you most identify with?'

Potential impact

TfL research shows that Black, Asian and Minority ethnic Londoners are less likely (4%) than other groups (8%) to cycle[8]. Analysis by TfL in 2010 found that Black Londoners made up only 8% of frequent and 10% of infrequent people cycling, but 13% of potential people cycling[9]. Improvements to provision for walking and cycling through this Aldgate to Blackfriars Cycle scheme proposal could therefore potentially benefit these groups more and enable more people from this protected group to cycle.

Religion & Belief

Evidence

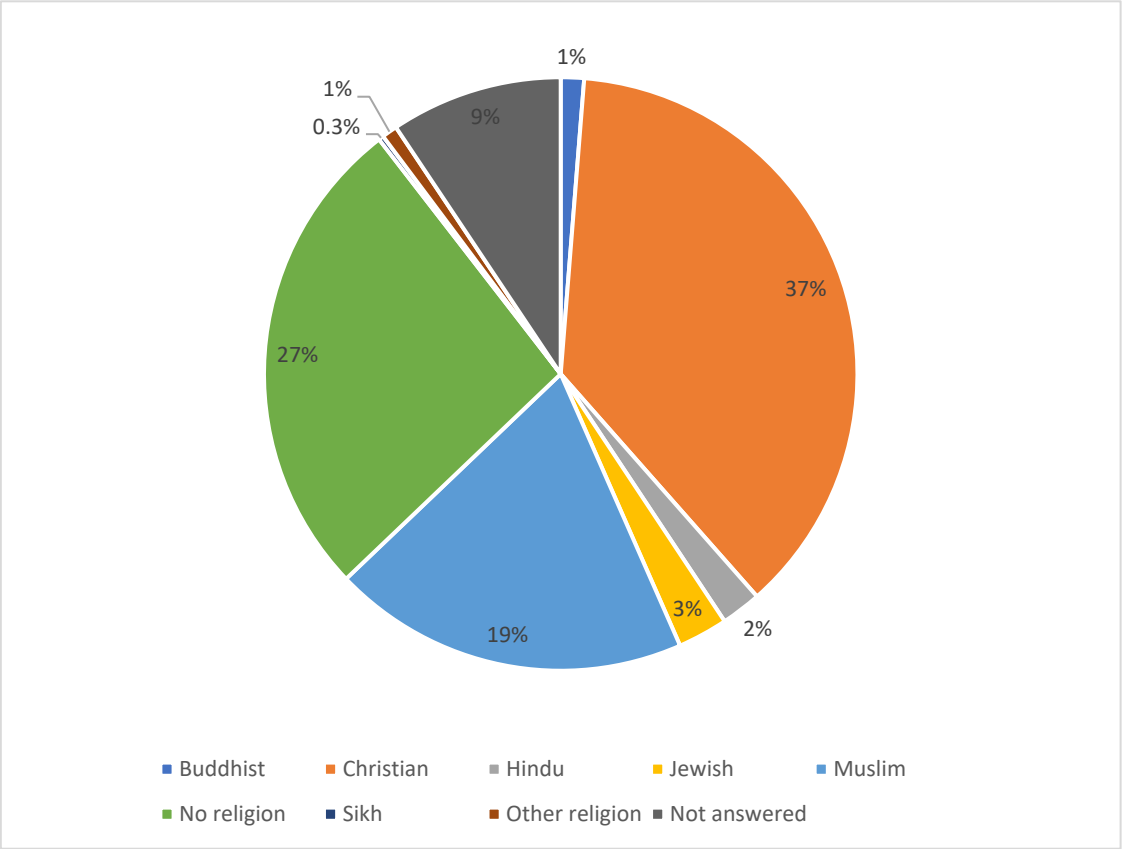

Figure 18 - Religion or belief in the City of London and Westminster (Source: Census 2021)

Individual data for City of London is not available in ONS 2021 hence City of London and Westminster data is used. 37% of the residents identify as Christian; this is slightly lower than London as a whole, 41%. 27% of residents do not follow or state a religion. 19% of the residents identify as Muslim, slightly higher than the figure of 15% for London. Other faiths recorded include Buddhist (1%), Hindu (2%), Jewish (3%), and Sikh (0.3%).

[8] https://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf
[9] https://content.tfl.gov.uk/analysis-of-cycling-potential.pdf

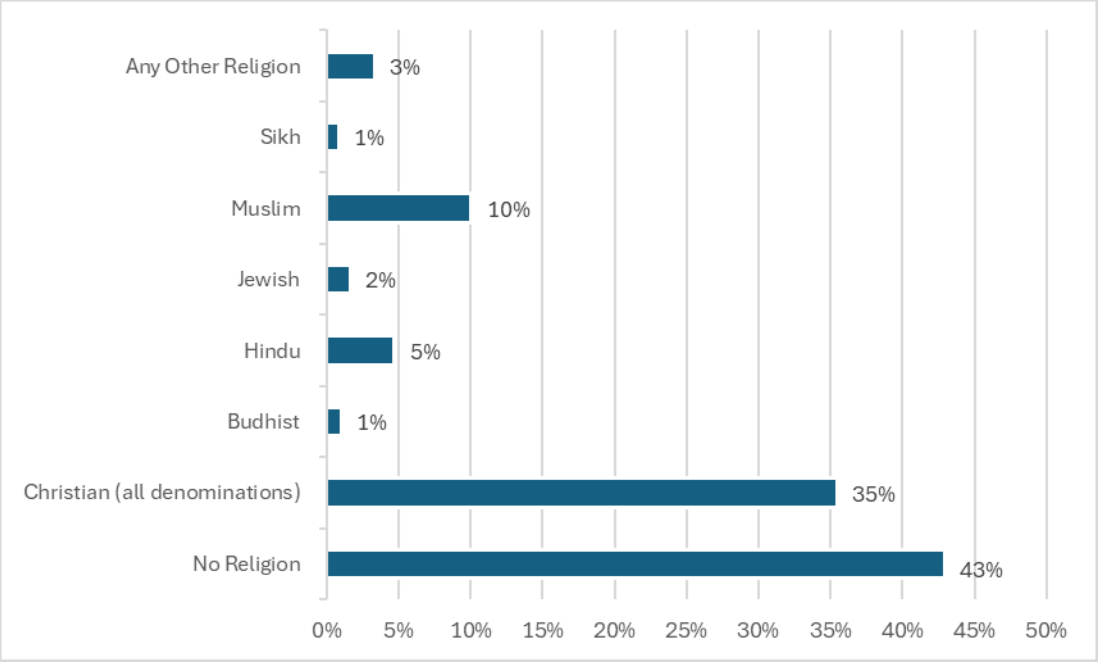

Figure 19 - Religion or belief in the City of London (ONS Annual population survey – workers April 2024 – March 2025

Data from the annual population survey for those employed in the City of London (in the graph above) shows that the majority of those who responded (678,086 responses) stated that they did not have a religion (43%), this is a bigger proportion than those who reside in the City of London and state that they do not have a religion (27%). The second most popular answer was Christian – 35%, this is slightly lower than the 37% recorded in the Census 2021 by those who live in the City of London.

Table 5 - Religious hate crime in City of London compared to London as a whole. Source: Government Hate Crime Statistics (Gov.uk)

	City of London			London		
	2021/22	**2022/23**	**2023/24**	**2021/22**	**2022/23**	**2023/24**
Total Religion	19	15	30	2,330	2,004	3,796

The rate of religious hate crime increased in the City of London by 100% between 2022/23 and 2023/24 significantly more compared to London as whole, 89.42% between 2022/2023 and 2023/24.

Consultation

There was no data collected on this group during the consultation.

Potential impact

There is currently no evidence to suggest that this proposal would have an impact on this group.

Sex

Evidence

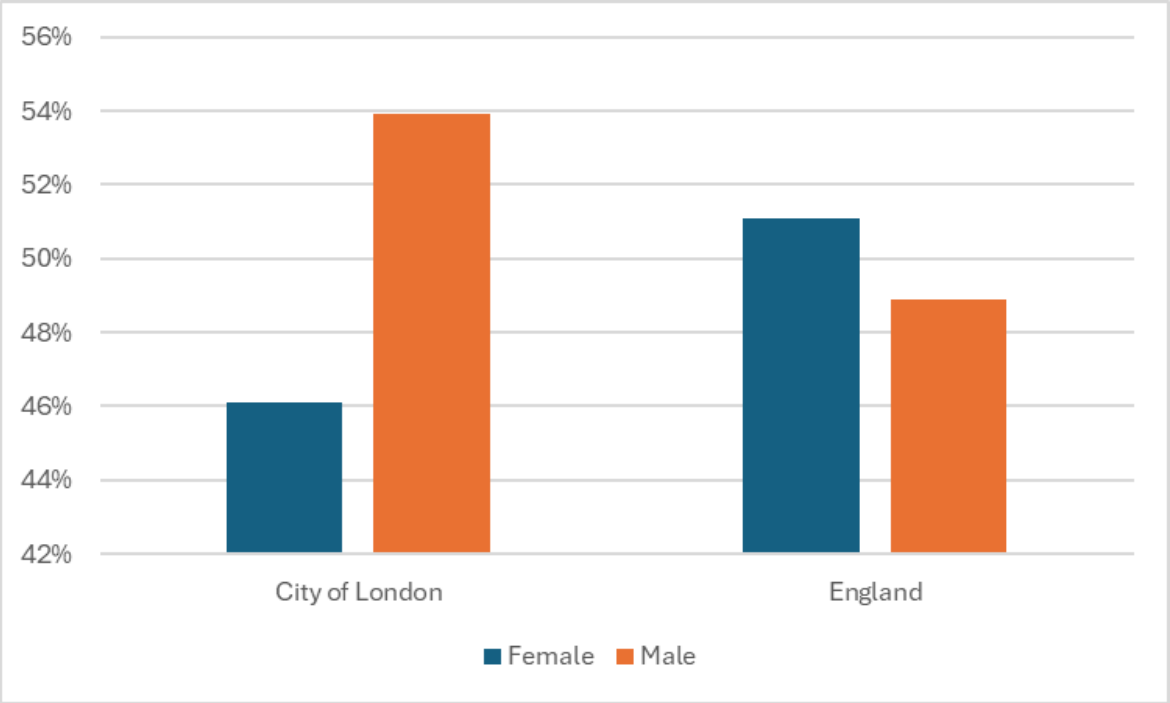

Figure 20 – Sex composition for the City of London compared to England (Source: Census 2021)

Data from the 2021 Census shows that there is a higher percentage of men (53.9%) in the City of London than women (46.1%), this contrasts with the country as a whole where there are more women (51.1%) than men (48.9%). This is based on the City of London's 11,600 resident population.

Significantly more people work in the City of London than live there. The ONS, annual population survey: April 2024 - March 2025 surveyed over 684,000 people employed in the City of London and found that 63% were men and 37% were women. Women are underrepresented as both residents and workers in the City of London.

The 'Travel in London: Understanding our diverse communities 2019' report by TfL shows that:

- Whilst daytime bus use among women (57%) is higher than that of men (43%), women are less likely to use night buses than men (64% of customers are men, 36% are women).

- Women are more likely than men to be travelling with buggies, shopping and/or children. For this reason, the car is often seen as a convenient mode of transport, presenting less of a barrier to completing journeys when laden. However, the cost and stress associated with driving encourages many to use public transport, particularly the bus which is perceived to be more child-friendly than other modes such as the Underground.

- Women are less likely than men to walk a child to school at least once a week (29% compared with 35% of men) and less likely than men to walk to pubs, restaurants, cinemas and other social places (52% compared with 62% of men).

- Conversely, women are more likely than men to walk to complete small errands such as getting a newspaper or posting a letter (81% compared with 76% of men).

There are several potential barriers that can prevent Londoners from using public transport more often. The most commonly cited barrier for both men and women is overcrowding on transport services. However, women are more likely to cite barriers that relate to crime and personal safety than men. Higher proportions of women say the following act as barriers to greater public transport use:

- Concern about anti-social behaviour.
- Fear of crime on the bus/train and getting to the bus/train.
- Fear of terrorist attacks.
- Risk of accidents.

A recent report, 'Safety in public space: Women, girls and gender diverse people, Good growth by design' published by the GLA in 2022 acknowledges that 'concerns around personal safety are a pervasive everyday experience of women, girls and gender diverse people in our city'. The same report outlines that gender-based violence and harassment is common in public spaces, with 71% of women in the UK having experienced some form of sexual harassment in a public space, this rises to 86% among women aged 18-24.

According to TfL's Travel in London Report 2023, private vehicles are the most used mode of transport to move daily in London, followed by public transport and walking. Women are more likely to make a trip by walking each day than men, at a rate of 0.89 trips per day compared to 0.79. Men are more likely to have cycled at least once in the last year, with 28% of men compared to 17% of women.

Consultation

A majority of consultation respondents (71%) described themselves as male. 22% described themselves as female, 5% preferred not to say and 2% preferred to self-describe.

346 people answered this question as part of the scheme's consultation.

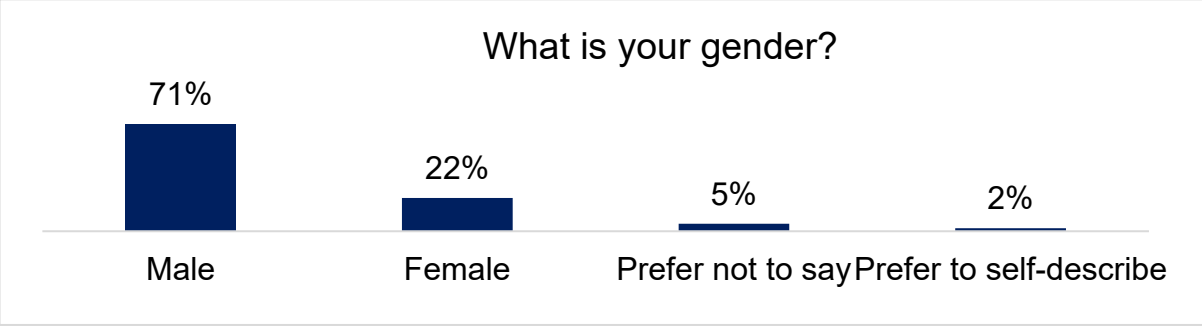

Figure 21 - Gender Consultation Data, answers to the question, 'what is your gender?'

Potential impact (positive)

The evidence suggests that the majority of those using this area are male, however the provision of cycle infrastructure is likely to particularly benefit women as studies have shown that women cyclists prefer cycle lanes separated from traffic, 'off road paths, compared to roads with no facilities'[10].

Sexual Orientation

Evidence

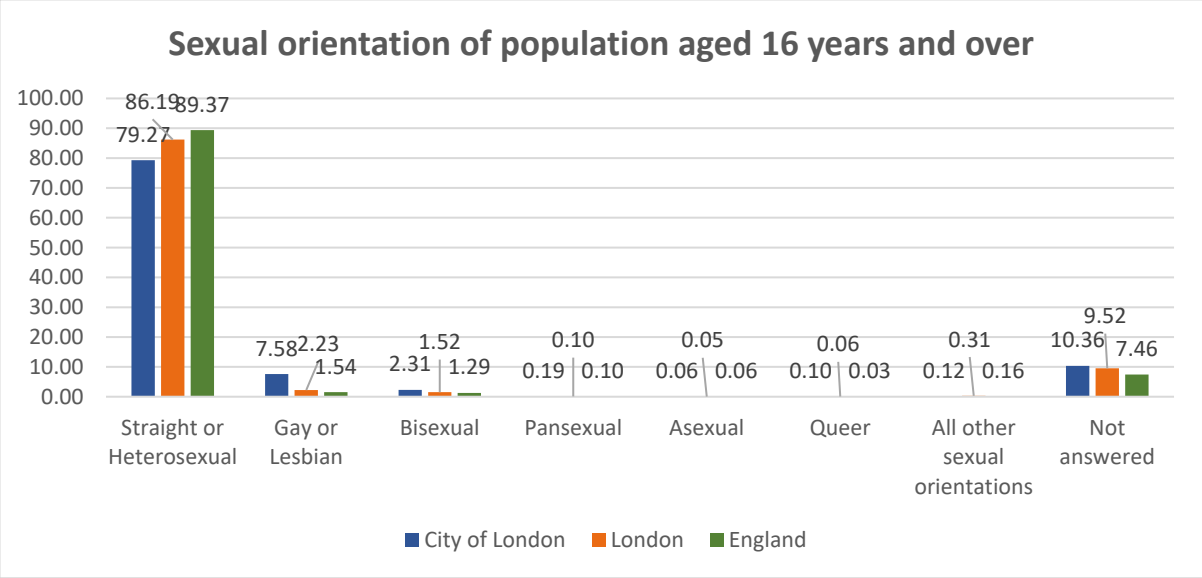

Figure 22 – Sexual orientation data for the City of London compared to London and England (Source: Census 2021)

[10] Nice.org.uk synthesis-of-evidence-pdf-430225309

Consultation

Just over 60% of consultation respondents identified as heterosexual/straight. 16% preferred not to say. 15% were gay or lesbian; 6% were bisexual and 1% preferred to self-describe. 275 people answered this question.

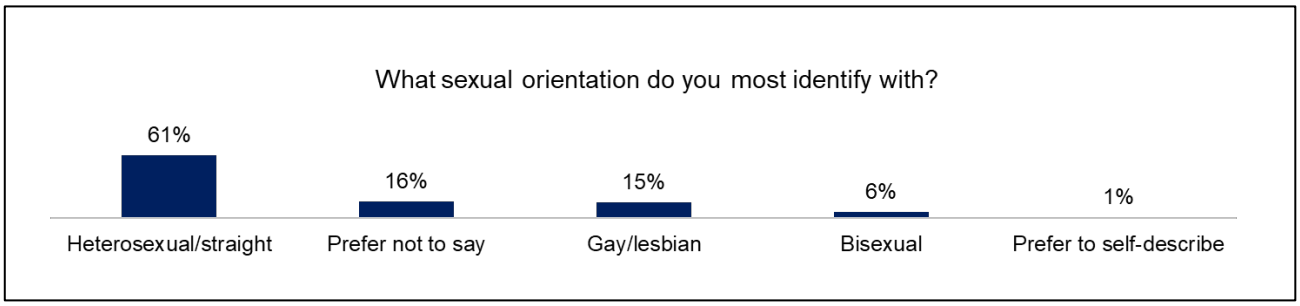

Figure 23 - Sexual Orientation Consultation Data, answers to the question, 'What sexual orientation do you most identify with?'

Potential impact

There is not currently thought to be an impact on this particular group.

Additional Groups:

Care leavers

Evidence

There is no evidence currently available for this group.

Consultation

No data was collected on this group during the consultation.

Socio-economic background

Evidence

The City of London has a high proportion of households who are not deprived in any dimension (59.8%), higher than that for England as a whole.

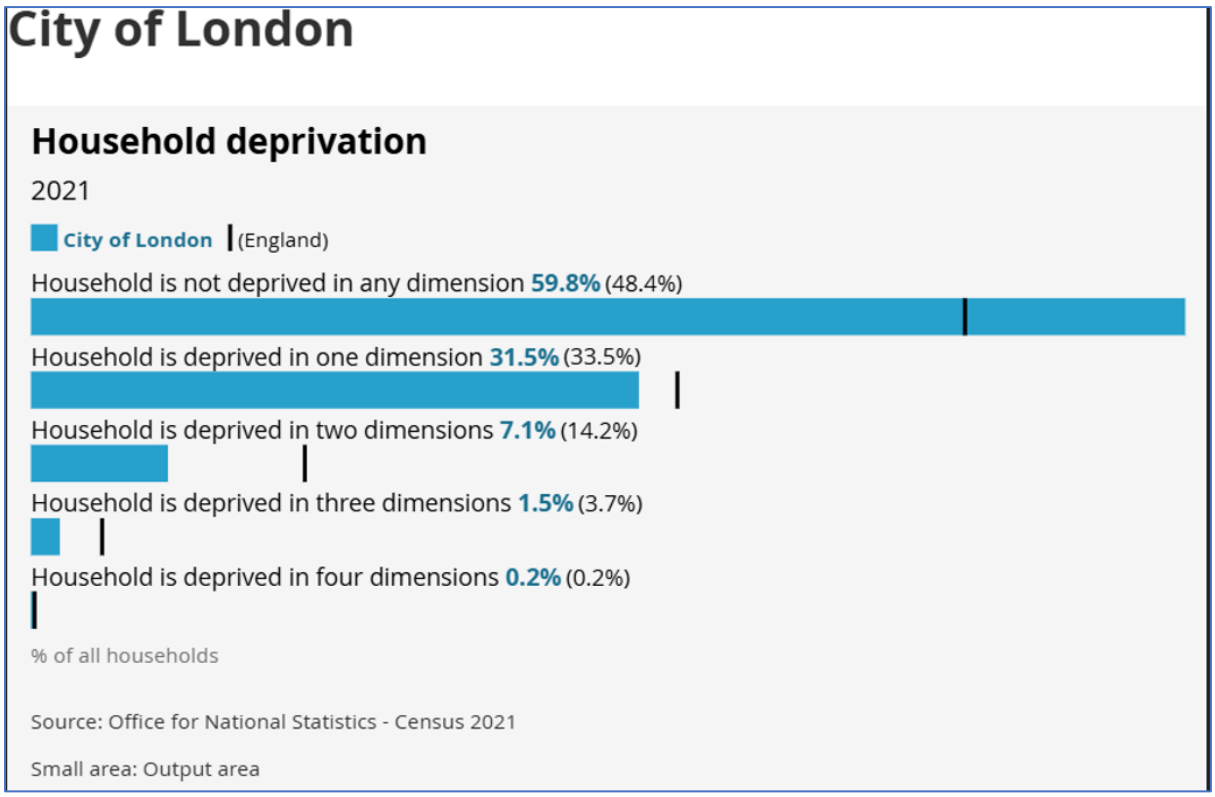

Figure 24 - Household Deprivation (Census 2021)

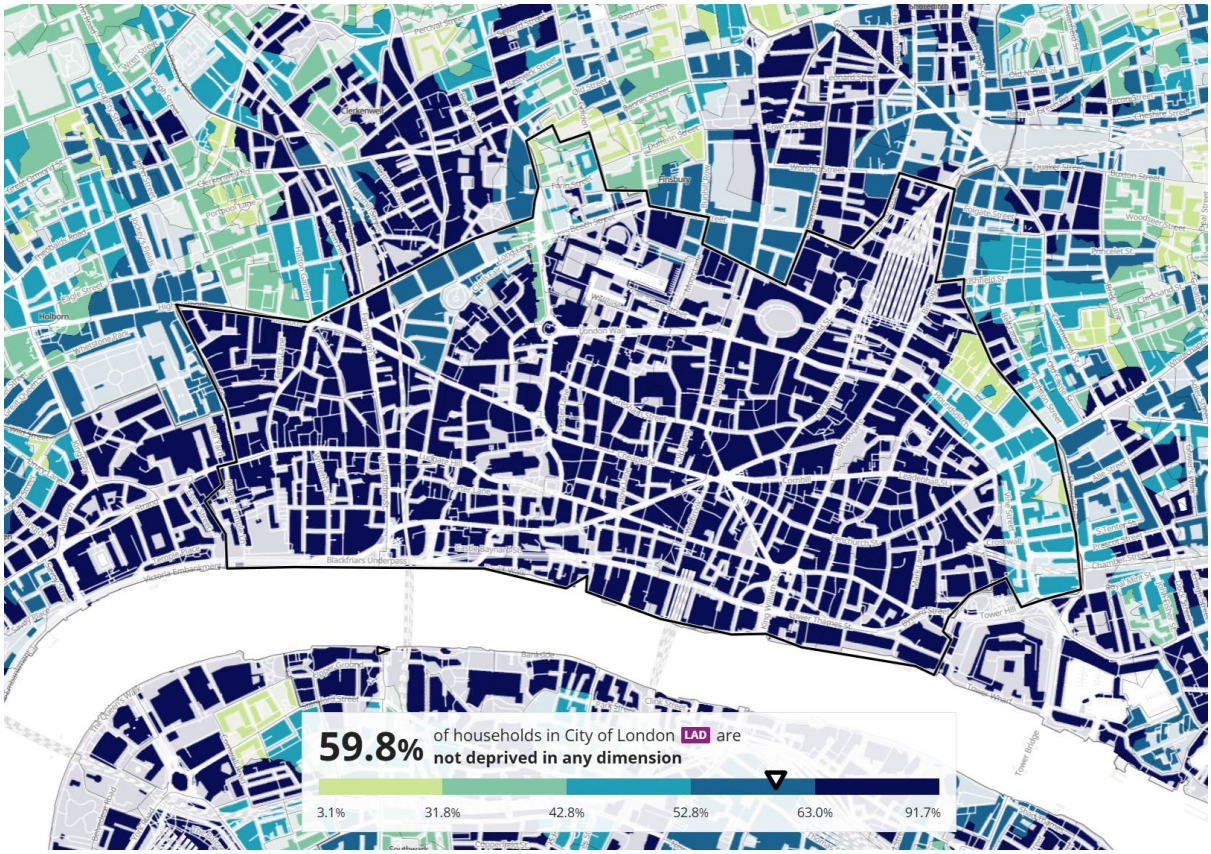

Figure 25 - % Households not deprived in any dimension (Source: Census 2021)

Consultation

Some consultation respondents chose not to specify their household's annual income.

Among those who did, 35% were in the £100,000+ bracket. 235 people answered this question.

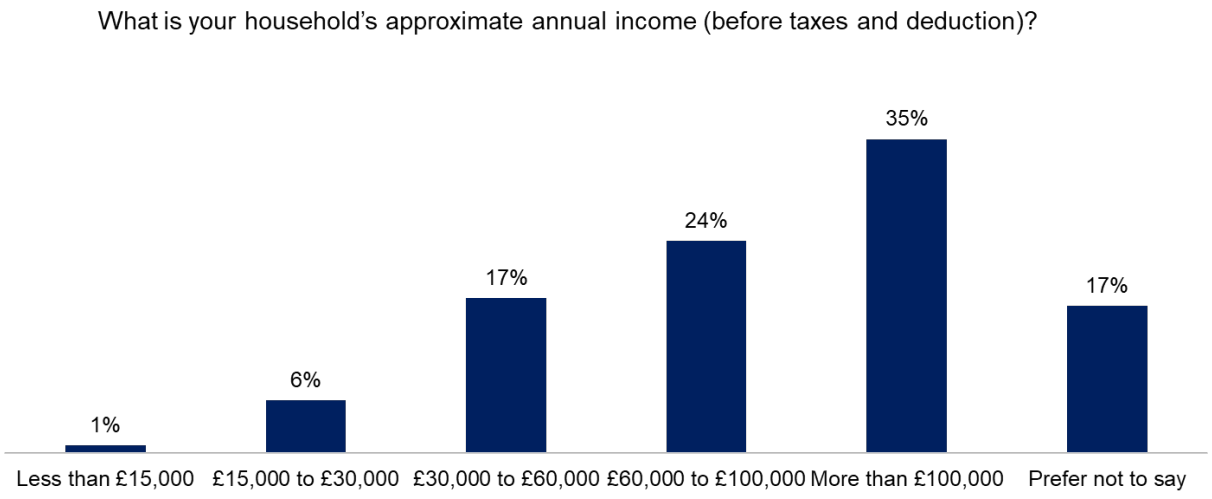

Figure 26 - Household Income Consultation Data, answers to the question, 'What is your household's approximate annual income?'

Potential impact

There is not thought to be an impact on this group, although enabling cycling through safer infrastructure will likely help those to travel using this more affordable mode.

Carers & Parents

Evidence

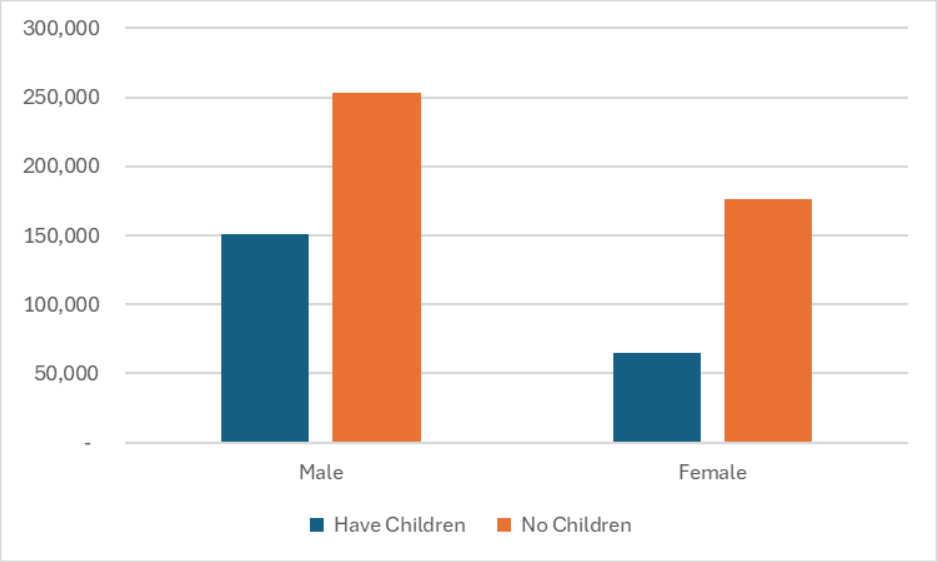

Figure 27: Parents (Source: ONS Labour Force Survey, filtered for those in employment in the City of London, July – September 2024)

Figure 27 shows the proportion of workers surveyed in the City of London who are parents. This is higher for male workers than female workers.

Veterans

There is no evidence currently available for this group.

3. STAKEHOLDER ENGAGEMENT

Outline any consultation/engagement activity and additional information gathered not outlined above (if relevant)

Include information on stakeholders involved, and methods used for engagement / consultation.

Describe any further work required on proposals as a consequence of engagement/consultation (if relevant)

Public consultation

A nine-week consultation on the proposals was undertaken from December 2024 to February 2025, utilising the Commonplace consultation platform, together with a series of public drop-ins. The consultation, which was open to anyone with a connection to, or interest in the area, collected more than 1,200 feedback responses from over 560 individuals.

A consultation report was compiled by Commonplace. Below is a summary of the key findings:

This feedback highlighted agreement with the proposals that was both strong and broad. Almost 80% of respondents agreed with the proposals, with almost two-thirds voicing strong agreement. Majority agreement was evident across those using different travel modes and with differing relationships with the City of London.

Agreement was particularly high among younger respondents (aged up to 54) and those identifying as public transport users and pedestrians. Note also that over 70% of those identifying as car users and taxi users agreed with the proposals. Those working and travelling through the area, were also notably supportive of the proposals.

Similarly high levels of support were evident in relation to the proposals for Queen Victoria Street west (83% supporting), Queen Victoria Street east (88%) and Aldgate (81%).

Common themes, threading across each of the proposals, focused on perceptions of the benefits of a safer environment in which cycling and walking was both encouraged and enabled via a strengthened cycle infrastructure and improved walking and wheeling experience. Respondents often detailed difficulties experienced, particularly when cycling, while currently travelling through these areas. In this context, their agreement and support was frequently offered on the basis of both envisaged personal gain and perceived area improvement. A number of practical suggestions for enhancement of the proposals were made with some

respondents suggesting extended or alternative measures alongside their overall support. In contrast, criticism of the proposals was far less evident.

Queen Victoria Street looking east

Figure 28 - Queen Victoria Street (Source: Images used in the consultation)

Queen Victoria Street looking east

Figure 29 - Queen Victoria Street (Source: Images used in the consultation)

Area Connection

The consultation attracted respondents with a wide range of area connections. More than half of respondents worked in the area (54%) or travelled through the City of London on their way to other places (51%). More than one area connection could be specified by respondents. 381 people responded to this question. Only 13% stated that they lived in the City of London.

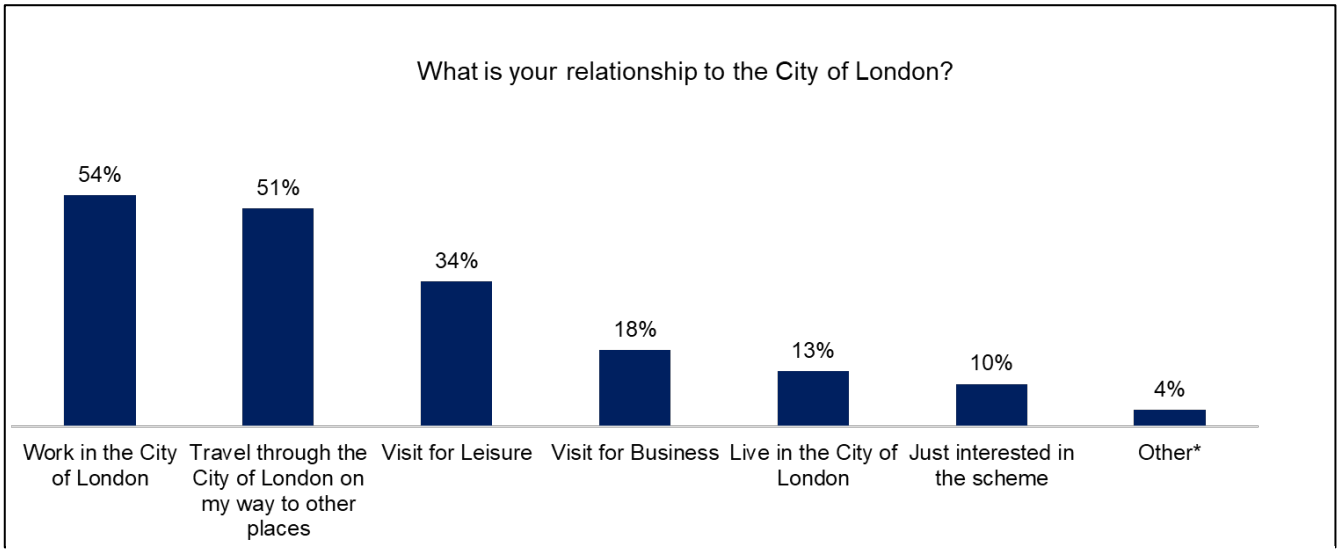

Figure 30 - Relationship to Area, Consultation Data

Additional engagement

Focus Groups Consultation Review by Transport for All (May-June 2025)

The City of London worked with Transport for All to gather the views of Disabled People and external stakeholders through focus groups. Below is a summary of the method used and the highlights from their findings. Please see TfA's reports for full details and recommendations from this piece of engagement.

Focus Groups with Disabled People

Transport for All consulted with 10 people (both online and in person) with lived experience of disability, who reviewed the cycleway from a variety of perspectives, taking a pan-disability approach, to understand the intersectional and diverse impacts. Looking through the plans and illustrations, they discussed current and potential barriers in relation to the proposed cycleway between Aldgate and Blackfriars, with their lived experience at the centre of the conversations.

Focus Groups with External Stakeholders

Transport for All liaised with key contacts at the City River Partnership and the London Cycling Campaign area representative, to facilitate a focus group and receive additional feedback on the consultation for the cycleway from Aldgate to Blackfriars, ensuring that different perspectives are considered.

Shared feedback across all focus groups:

1. Wayfinding and Visual Design

Participants across both groups identified consistent and accessible wayfinding as a priority. This includes the use of high colour contrast, uniform signage, and visual cues to help all users, particularly those with visual impairments or cognitive processing differences, to navigate safely. Both groups stressed that sudden layout changes or poorly marked transitions within the cycling infrastructure can be disorienting or dangerous.

2. Shared Space and Safety Concerns

There was a strong consensus that shared 'pedestrian–cyclist' areas are problematic. Both sets of contributors described these spaces as unsafe, particularly for disabled users who may need more space, time, or clearer boundaries to move safely. Due to this, all participants strongly agreed with the need to install physical barriers to segregate the cycleway from the pathway. The speed of people cycling, lack of awareness of disabled people crossing, and general unpredictability in these areas were also common concerns.

3. Support for Bus Stop Bypasses

Both the lived experience participants and stakeholders supported the continued use of bus stop bypasses. These were seen as an effective way to keep people cycling out of direct conflict with buses and heavy traffic while also maintaining a smoother flow of movement for all users. There was agreement that these features encourage broader participation in cycling, particularly among people who might otherwise be deterred by safety concerns. The only difference being the accessibility of safety for disabled pedestrians when crossing over the cycle track to/from the bus stop island.

4. Importance of Public Awareness Campaigns

Each group acknowledged that infrastructure alone cannot ensure safety or accessibility; public behaviour and understanding also play critical roles. Both groups supported the idea of awareness campaigns to educate people cycling, pedestrians, and other road users about respectful and lawful conduct, especially in shared spaces and areas of transition. There was also support for clarifying who is permitted to use cycleways, such as mobility scooters or adapted cycles.

Joint Recommendations

Both groups advocate for segregated cycleways with physical separation from pedestrians and traffic to reduce risk and confusion. They support the use of strong colour contrast, tactile wayfinding features, and consistent signage across the route. Both groups call for improved safety features at junctions and crossings, including dropped kerbs, countdown timers, and audible signals.

There is also mutual support for enforcing responsible behaviour among road users, particularly regarding e-bike use and obstructive cycle parking. Importantly, both lived experience participants and stakeholders agree that truly inclusive design must consider not just infrastructure, but also public education, maintenance, and long-

term policy coordination. These aligned goals provide a robust foundation for moving forward with the cycleway in a way that works for all.

Transport for All's Accessibility Design Review

Please see TfA's full report to read the details of their Accessibility Design Review. Here are the prioritised recommendations from that review:

To align the cycleway infrastructure with inclusive design standards and best practice, the following prioritised recommendations are proposed:

1. **Maintain a minimum 2m unobstructed footway** on all pavements.
    i. Inclusive Mobility, BS 8300.
2. **Ensure all pedestrian crossings include:**
    a. Tactile paving.
    b. Dropped kerbs.
    c. Audible signals.
    d. Adequate crossing times for slow-moving pedestrians.
        i. Inclusive Mobility, Highway Code, BS 8300.
3. **Clearly separate cycle and pedestrian areas** at bus stop bypasses using tactile delineators and surface contrast.
    i. BS 8300, Inclusive Mobility, LTN 1/20.
4. **Introduce accessible wayfinding and rest features**, including:
    a. Tactile or audio signage.
    b. Regular seating.
    c. Tactile maps and / or floor guides.
        i. Inclusive Mobility, BS 8300.
5. **Audit relocated coach bays** to ensure they do not obstruct pedestrian routes or reduce visibility at crossings.
    i. BS 8300.
6. **Ensure cycleways accommodate Class 2 and Class 3 mobility scooters and wheelchairs**, including:
    a. Appropriate surface width and quality.
    b. Step-free access.
    c. Safe transitions and gradients.
        i. Highway Code, Inclusive Mobility.

7. **Implement additional best practice accessibility features**:
    a. High-contrast markings and non-slip surfaces.
    b. Shadow-free lighting.
    c. Consistent design elements across the route.
    d. Visibility enhancements (e.g. colour-contrasted cycle racks and bollards).
        i. BS 8300, LTN 1/20, Inclusive Mobility.

These recommendations are important to ensure the proposed plans meet the accessibility, safety, and inclusivity standards in the UK and best practice guidance. These will also promote inclusive, sustainable and active transport, upholding equity and safety for all.

Transport for All's work is rooted in the Social Model of Disability, understanding that the design of the environment can create barriers that prevent Disabled people to fully access and participate in society.

Members' Briefing 18 June 2025

On the 18 June a Members' briefing and site visit took place to specifically to discuss the issue of the bus stop bypasses contained within the design of this scheme proposal. Those groups who attended and contributed this meeting were:

- London Cycling Campaign (LCC)
- Living Streets
- NFBUK
- RNIB
- Wheels for Wellbeing
- Guide Dogs (not in attendance but sent a briefing paper in advance)

Below is a summary of key points made by those in attendance:

LCC – Simon Munk, Head of campaigns and community development made the following points

- The City's Transport Strategy is very progressive and the LCC are very supportive of it. It shows that the City care about road danger and mobility.
- The LCC want inclusive mobility and want people to be able to get around safely. They support concerns being dealt with carefully and with sensitivity and evidence based. LCC want to ensure that the designs are made as safe as they can be.
- They want the Committee to consider other street elements and how they all fit together. LCC stated that the roads here are really complicated. This discussion risks missing the bigger picture of inclusive mobility.
- LCC referenced the evidence relating to bus stop bypasses and how safe they are. The LCC supported Bank junction – even though this is not a perfect scheme. It has increased safety and reduced road danger. LCC wants the designs to improve where they can and wants the scheme to continue.

- Alternatives to bypasses are not great. They do not want delay. LCC stated that the key focus should be safety and how conditions can be improved inclusively. Cycle tracks are a necessity, especially at bus stops to reduce conflict between people cycling and buses.
- Evidence was cited that the introduction of facilities increases the diversity of people cycling including race, religion, women, children and disabled users. The LCC stated that they want to find common ground and to tackle the issue of road danger and unnecessary car use.

Living Streets – Sam Wakeling made the following points.

- They want better conditions especially for people walking and people walking with mobility aids and those wheeling.
- Living Streets carried out a government funded study on bypasses over the last 3 years. They spoke to lots of designers in the UK as well as internationally. They carried out detailed observations of a number of sites (10) to see how they currently work. It was clear from this that for those who are visually impaired there was a difficulty in crossing the cycle track to get to the bus stop island (and vice versa) and that will always be the case. They did not find any alternative design where there are heavy flows of traffic and being able to protect people cycling.
- Living Streets acknowledge that bus stop bypasses have issues but they are necessary for cycle safety. They would recommend that full traffic lights are used sparingly.
- Living Streets saw bus stop bypasses in the context of the level of accessibility on the streets, which was often poor. Living Streets think it is important to continually improve the design and recommend to have signalised crossings on the busiest ones only. Their study found no cycling on the pavements at these bus stop bypass sites as there was adequate provision.
- Living Streets' advice to Committee Members is that this is necessary and should focus on leading the process of designing the mitigations.

NFBUK – Sarah Grayton made the following points.

- Blind people have limited mobility options, but they can catch the bus independently and need a lot of training to do this, either with a cane or a guide dog. This is why bus travel is so important to this group. They can't hear people cycling over the traffic.
- NFBUK noted that there has been an explosion of micromobility, e.g. Lime bikes. This morning, they witnessed a person jumping back as an e-scooter went towards them.
- NFBUK stated that Blind people are being ignored and they see this as discrimination. They stated that there is evidence of problems of this design feature in Denmark.
- They want LTN1/20 to be rewritten as it is not working. NFBUK say that designs like this are taking away the ability to travel independently for some blind people. NFBUK also warned against two-way cycle lanes and referred to

Professor Nick Tyler's research. They stated that there is a risk that schemes will not be fit for purpose.

- They want the cycleway scheme to be paused and more engagement with disability groups. They want people cycling to slow down. They quoted the UN convention on the rights for disabled people as well as the Equality Act. They want a halt on the delivery of bus stop bypasses. A lot of their members used to cycle. They feel like they have been ignored for 10 years.
- NFBUK state that visually impaired people can get disoriented on a large bus stop island. NFBUK do not want cycle routes on busy bus routes, they want alternative routes.

RNIB – Mike Wordingham made the following points.

- Last month RNIB produced their All Aboard publication. Bus stop bypasses create several challenges for those who are visually impaired – they have to locate the cycle track, ascertain if the crossing is clear and then safely cross the track.
- Bus stop bypasses have severe effects on those who want to travel by bus. RNIB have carried out a survey and 87% of those who encountered this design feature say that it was harder to reach the bus stop. Some make fewer journeys or altered journeys. 14% no longer go out because of this. RNIB state that the stress can be severe and long lasting.
- They urge the delivery of bus stop bypasses to be paused until there is full consultation and a design solution that works for everyone. Sam Fothergill – Lawyer for RNIB spoke with regards to the EqIA and quoted that the public sector equality duty needs to have due regard to promote equality and not to discriminate, disadvantage needs to be anticipated and eliminated.

Wheels for Wellbeing (WfW) – Kate Ball made the following points.

- WfW are a pan impairment charity based in London. WfW stated that there are lots of barriers to accessing buses and they are essential for some people. However, some people have to use cycles and class 3 mobility aids and cannot use the bus. WfW stated that there are substantive rights under the Equality Act in both categories. A balance needs to be struck and there is a need for routes that work for everyone.
- Cycle provision enables some disabled people to make journeys that are currently excluded from all modes. The national situation is very different from the City of London. Many bus stop bypasses nationally don't meet current guidance. People need the means to detect cycle lanes, they need improved sightlines and better surfaces in all weathers.
- WfW would support wider area treatments and reduction in street clutter, as well as education campaigns for safer cycling. There is a need to make sure delivery riders are safe and don't use unsafe devices (APG report). A moratorium on bus stop bypasses will prevent people cycling from being safe. WfW don't want to prevent this. They want bus stop by passes to be delivered with mitigation. Crossings are needed at busy locations and detectors are

needed for those who are visually impaired as well as for neurodivergent people.

- WfW state that current cycling conditions are dangerous as there is no provision for inclusive cycling – it is not safe to share space with an HGV. WfW referred to their hierarchy of design options and stated that bus stop bypasses should be used for inclusive cycling.

4. DECISION MAKING (MITIGATIONS AND CHANGE)

After completing steps 1-3, please outline your informed decision.

Possible outcomes could be that:

a. **No changes are required; there is no negative impact or discrimination**
b. **Available actions have been taken to remove or minimise potential negative impacts**
c. **Adjustments to the proposal to remove or minimise potential negative impacts – monitoring and regular review will take place to manage this with a view to taking further mitigation actions**
d. **Where a negative impact is identified that is not unlawful discrimination, or where discrimination can be objectively justified- justify and continue with the proposal: there may be other factors (such as other proposal aims or financial constraints) that make it reasonable to adopt the proposal, despite the negative impact – potential impacts will be monitored and kept under regular review. Please seek advice from the EDI team and the Legal team before making the decision.**

e. **You decide not to take the proposal forward.**

Following the consultation and further engagement that took place with representative groups and Committee Members it is considered that refinements to the bus stop bypass design could be made.

These could include further investigation into how the designs can be improved. At the Bus Stop Bypass Members Briefing on 18th June 2025 the following were suggested as design mitigations for the bus stop bypasses in this proposal:

- Noise indicators to alert those who are blind or visually impaired of an approaching person cycling (although this will be difficult if in close proximity to other crossings with audible noises).
- Belisha beacons on the zebra crossings over the cycle track behind the bus stops.
- Cameras to detect presence of people cycling and to alert those who are visually impaired and wishing to cross.
- Investigate signalised crossings for people cycling instead of zebra crossings.
- Investigate design solutions to assist visually impaired people to find the crossing point.
- Investigate the crossing design to encourage considerate cycling.

Reference was made to the trials in Greater Manchester as well as orientation training for those who are visually impaired.

5.MONITORING AND REVIEW

How will you monitor and review the impact (positive or negative) of the proposal once it has been put into effect, if so, how? What are the timescales for reviewing the EQIA once proposals are implemented?

This may take the form of an action plan.

Monitoring and Review Plan

- Road Safety Audit – Stage 3 (0-3 months post completion)
  To ensure the delivered infrastructure is as safe as practically possible for all users.

  Any issues identified are considered and actioned appropriately

- Stakeholder engagement feedback (at 6 months post completion)
  Receive stakeholders' comments on the scheme now in operation
  Carefully consider comments and actioned appropriately

- Monitoring study (at 6 months post completion)
  Collect data to provide an evidence based approach to the scheme review
  Draw out scheme conclusions

- Review EQIA (6-12 months post completion)
  Include new data and engagement feedback into EQIA
  Update the EQIA where required

- Committee Outcome Report (6-12 months post completion)
  Assess scheme delivery & outcomes
  Key conclusions
  Assessment of risks & issues
  Benefits realised
  Improvement reflections

Please refer to the EQIA guidance when completing this form

Section 3: To be completed by ALL

6.RECORDING YOUR DECISION AND SIGN-OFF

1. Submit to your line manager for review and sign-off
2. Submit to Director or Chief Officer (as relevant) for sign-off
3. Where possible, share the final document with the corporate EEDI team

Outcome

Proceed with the delivery of the cycleway scheme, as the identified negative impacts are not considered unlawful discrimination and can be objectively justified. However, refinements to the proposal will be investigated where possible to remove or minimise potential negative impacts. Post-delivery monitoring will continue, and where appropriate and feasible, further mitigation measures will be considered.

Sign off

1. Lead Officer of the EQIA
2. Author completing EQIA

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Appendix 5

Members' Briefing Papers

London Cycling Campaign
Living Streets
Royal National Institute of Blind People
Wheels for Wellbeing
Guide Dogs

London Cycling Campaign briefing on "bus stop bypasses" for City of London

June 2025

What is a floating bus stop? And why are they needed?

Floating bus stops such as Bus Stop Bypasses (BSBs) are what happens broadly where a cycle track goes past a bus stop. Without some form of floating bus stop, cyclists are expected to rejoin the road through the bus area. There are no alternative designs that cities have found yet for cycle tracks that pass bus stops that aren't some form of floating stop – so the main alternative done in some areas is to just end the track, forcing cyclists to rejoin the carriage through the bus 'cage' where the bus stops.

Just like with poor junction designs, we know the end result of doing that is road danger for those who currently cycle *and* a hostile barrier to cycling for those who would cycle if a continuous cycle track was available. Research including 'The Near Miss Project' shows women, children, the elderly and Disabled people are impacted more by gaps in provision. Absence of floating bus stops also means two-way cycle tracks along bus routes cease to be deliverable.

Active Travel England (ATE) has produced guidance on bus stops (TfL also, as below). It says: "Cyclists should be protected from buses, with interactions between pedestrians and cyclists being low-level. Well-designed bus stop bypasses help to reduce conflicts between cyclists, buses and moving traffic… Bus stop bypasses… [have] the potential to introduce conflicts between pedestrians and cyclists…. To minimise potential conflicts, the layout of a bus stop bypass must [consider] design details." In other words, there is good guidance already on how to design floating bus stops to minimise risks to any pedestrians, conflict etc. and conflict levels are low.

Could the City reduce motor traffic enough to avoid cycle tracks on bus routes?

No. The main alternative for the City to avoid the necessity for cycle tracks and therefore bus stop provision would *theoretically* be to reduce private motor traffic to such an extent the City could deliver a coherent cycle network entirely on streets with very low motor traffic volumes. Most guidance (such as DfT's LTN 1/20 Fig 4.1, p33) suggests above 2-3,000 PCUs* daily on a street, most people will not cycle when mixing with motor traffic. *(* PCUs or 'Passenger Car Units' are a measure of motor traffic volumes taking into account sizes of vehicle. A cycle is generally 0.2 PCUs, a car 1, a bus or coach 2, an HGV lorry 2.3.)*

Every main road in the City far exceeds such PCU levels. A no cycle tracks approach in the City would therefore require removal of the vast majority of motor traffic on most roads and still likely wouldn't enable children, the elderly etc. to cycle comfortably there – as we know these groups will only cycle on roads with coherent cycle tracks or on roads with far lower levels of traffic still: hundreds not thousands of PCUs daily. This would mean traffic reductions far in excess of current strategy and seems unlikely to be (politically or logistically) deliverable.

Assuming the City is not realistically about to become a giant Low Traffic Neighbourhood (LTN) with little in the way of buses, construction lorries or taxis then for the City's stated transport targets cycle tracks will be needed on some 'main' roads, including ones with bus stops – both to increase cycling rates and to increase safety, but also to increase cycling diversity.

TfL's Bus Stop Bypass Safety Review 2024

TfL and others internationally have studied floating bus stops. TfL analysis suggests the risk of a pedestrian being injured at a BSB is "very low" particularly when "compared to… the wider [road] network." TfL's evidence also shows "slightly more disabled or older boarders at bus stops with bypasses, compared to bus stops without bypasses… and bus boarding patterns for older and disabled people found… a bus stop bypass did not subsequently affect overall numbers using that same bus stop." In other words, Disabled or elderly people are not changing travel patterns to avoid BSBs. This is echoed by other data, for instance from Brighton where use of routes by Visually Impaired people with "bus stop boarders", a type of floating bus stop, has risen.

TfL also mention the 2020 University of Westminster study that found “protected cycle infrastructure reduces risk of injury by 40-65 per cent for people cycling”. Floating bus stops are necessary for cycling safety and diversity, are uncontroversial across most of Europe and are not dangerous or causing significant barriers to mobility, based on TfL and other evidence.

Can’t we just wait until better designs emerge?

Again, no. Significantly delaying rollout of BSBs means risks for the City achieving its transport strategy targets and delivering appropriate levels of mode shift to cycling etc. And there is no clear, rapid path to improvements that hasn’t been considered or isn’t being rolled out already (via TfL’s design guidance, for instance).

LCC is very much in favour of improving design guidance as these designs progress. But delays cost lives and will impact your delivery of your transport strategy. And TfL has already produced extensive design guidance that highlighted that most ‘issues’ with current floating stops are on those not yet brought up to the latest standards.

Good design guidance for floating bus stops must at heart be evidence-led and also flexible enough to continue rollout – without so heavily adding to cost or reducing feasibility of delivery – so the City can realistically hit its targets and fulfil its strategy.

Vision Zero and the ‘safe systems’ approach

Central to the City transport strategy, as well as TfL transport strategy is a ‘Vision Zero’ approach to safe streets. This utilises a ‘safe systems’ approach to tackling the biggest issues as a priority. *All* street designs and associated design decisions in the City – from junctions, to speed limits and speed results, pedestrian guardrailing, bollards, kerbs, side roads, narrow pavements, paving slabs etc. - need carefully prioritising by the size of risk and size of barrier to mobility they pose, particularly for those who already face the largest barriers to safe and comfortable movement.

If the City of London wants to keep momentum in improving safety outcomes, rising cycling rates and safety for pedestrians too, cycle tracks are a priority and must provide constant protection from other traffic. We also need to ensure the best possible design guidance is developed that takes into account everyone’s needs to ensure streets are more inclusive, as new street layouts rollout and the City changes. Design inevitably does mean some level of compromise, conflict even between road users, but the evidence says floating bus stops broadly work and are needed.

Inclusive Design at bus stops and continuous footways

Living Streets is the UK charity for everyday walking. We ran a major research study, looking at bus stops where there is also a cycle track, over three years (ending 2024).

We wanted to understand whether bus stop bypasses/floating bus stops were necessary, were effective, and whether they make streets more or less inclusive.

One of our ten 'detailed study sites' was on New Bridge Street, Blackfriars (City of London).

Our conclusions point to a complex and nuanced situation.

We are clear that further work is needed to ensure all those concerned are involved in evaluating whether our conclusions are correct, and in testing and/or refining the proposed design enhancements. A starting point is a series of pilots, and disabled people should be at the heart of this work.

What follows is an informal and greatly simplified summary to accompany an in-person briefing. This document's content should not be reproduced separately.

More formal information can be found at:
www.livingstreets.org.uk/inclusivedesign.

Purpose

- There has been confusion over the purpose of bus stop bypasses
- The purpose of bus stop bypasses is not primarily about separating cyclists from buses, nor the convenience of cycling, but because continuing a cycle track at a bus stop provides overall protection from traffic.

Evidence of exclusion/disadvantage

- There is inconsistency in current design approaches.
- Existing British bus stop bypasses do not reliably allow a blind or partially sighted pedestrian to stop cyclists.
- The level of cycling, along with the complexity of the environment, dictate the overall level of impact.
- The level of discomfort or difficulty most people experience in using these bus stops, when well designed, is very low.

Current attempts to mitigate issues

- Zebra crossings don't work reliably, but for complex reasons that are rarely understood/discussed
- Some of the features that have been used to try to slow cyclists may be having effects that are the opposite of those desired

Avoiding the use of bus stop bypasses

- Entirely ruling out the use of bus stop bypasses is not a viable option.
- It is preferable to avoid the need for bus stop bypasses in as many locations as is practical.

Minimum design quality

- Any design enhancements will only be effective if the basic design follows some key principles, which we outline.
- In absolutely all cases there must be sufficient space for accessible design, including sufficient footway width and a bus stop island/platform which can be easily negotiated using a wheelchair or other mobility aid.
- Many existing bus stop bypass designs do not meet the standard and principles we outline.

Three characters of site

The problems that bus stop bypasses create, and the enhancements needed, vary greatly according to the environment. We identified three broad site characters

- very quiet-simple,
- moderately busy-complex, and
- very busy-complex.

Possible design enhancements

For the most busy-complex sites traffic lights are needed to create safe crossing opportunities. These should **not** be used at the other sites.

For moderately-busy moderately-complex sites we propose the testing of three new approaches to provide pedestrians who need it with extra support to cross.

These enhancements should be designed on the basis that they will only be used rarely and by very few pedestrians, using a push-button system. They are:

- A detection system producing a sound/tactile signal as cyclists approach
- An AI based system, informing pedestrians about cyclists
- A highly-visible flashing lighting system, activated by pedestrians who want cyclists to know they are crossing.

It may be valuable to combine these approaches.

Cycle Tracks at Bus Stops

June 2025

RNIB

See differently

About Sight Loss in the UK (table has 1 row, 4 columns)

Every day 250 people start to lose their sight	More than two million people have sight loss	320,000 registered blind or partially sighted	Age-related macular degeneration is the leading cause of blindness in adults.

Summary

- Currently, there are no designs of cycle lanes at bus stops that enable blind and partially sighted people to safely cross the cycle lane to access buses. Whilst this remains the case, we should halt the building of bus stops with cycle lanes.
- Bus stops should be designed such that all passengers can continue their journey without crossing a live cycle lane.

Opportunity to make bus travel more inclusive

RNIB supports the Government's ambition to promote walking and cycling, but this must be underpinned by inclusive infrastructure. Getting the design right from the outset is essential. Retrofitting for accessibility is more expensive and leaves blind and partially sighted people excluded until changes are made.

Bus travel is a lifeline for people with sight loss

Blind and partially sighted people, who are excluded from driving, rely heavily on public transport, especially buses, as their main way of getting around. 83 per cent of respondents to a recent RNIB survey said it was "very important" for them to have the option to travel by bus and 95 per cent use buses at least monthly. If buses aren't accessible, it can leave them further isolated with few or no alternatives.

Accessible bus travel is even more vital because street design is often so poor—cluttered pavements, inaccessible crossings, and pavement parking mean that walking can be difficult or impossible. Many blind and

partially sighted people report using buses for even short trips just to avoid dangerous or inaccessible routes.

Cycle lanes at bus stops aren't safe for blind and partially sighted people

Floating bus stops pose significant challenges for blind and partially sighted passengers. They must first locate the often hard-to-detect cycle track, judge whether it's safe to cross, and then navigate to the bus shelter on the island. These difficulties come on top of the many barriers they already face when accessing public transport.

A recent RNIB study into bus travel found that, of the approximately 400 survey respondents who have encountered this kind of bus stop:

- 87 per cent report that bus stop bypasses make it harder for them to reach the bus stop.
- 59 per cent are prevented from using buses at bus stop bypasses.
- 55 per cent have changed their routes to avoid bus stop bypasses.
- 49 per cent make fewer journeys to avoid bus stop bypasses.
- 14 per cent no longer go out because of a bus stop bypass.

Blind and partially sighted survey respondents told us:

"I have been knocked down when crossing over the cycle path to get on a bus."

"Floating bus stops are a complete nightmare, and I will use a different stop if at all possible. They simply are not safe for me to navigate, and I put myself and my guide dog at risk when I am forced to use them. The design is not consistent; it is potluck whether I will find the crossing or not (or if it has one!). There is no mechanism for me to stop cyclists or e-scooters so that I can cross in safety. In a busy and chaotic place such as London this is a recipe for disaster."

Research by Guide Dogs has found higher physiological stress levels in blind and partially sighted people at bus stops with cycle lanes. Physical effects of increased stress can be severe and long-lasting with repeated exposure.

Despite their well-known risks, these bus stop designs are being rolled out in growing numbers by local authorities across the UK. With no standardised approach, they continue to put blind and partially sighted people in harm's way.

About RNIB

The Royal National Institute of Blind People (RNIB) is one of the UK's leading sight loss charities and the largest community of blind and partially sighted people. Every day 250 people begin to lose their sight. We want society, communities and individuals to see differently about sight loss.

Wheels for Wellbeing

Bus Stop Bypasses

– Wheels for Wellbeing briefing for City of London event 18th June 2025

1 Principles for accessible journey-making

Key principle: Everyone should have safe, accessible transport options that they can use to make the local journeys they want and need to make.

(i) The Equality Act (2010) requires service providers to make anticipatory reasonable adjustments for Disabled people "to approximate the access enjoyed by disabled people to that enjoyed by the rest of the public."

(ii) Some Disabled people need to use walking/wheeling and buses/public transport to make essential journeys, and cannot make these journeys other ways.

(iii) Some Disabled people need to use cycling, mobility scooters and other above-walking-speed mobility options (amplified mobility) to make essential journeys, and cannot make these journeys other ways.

(iv) Some Disabled people need to use private motor vehicles (including taxis and private hire vehicles) to make journeys, and cannot make these journeys other ways.

(v) Presently, poor accessibility of all travel modes in the UK unfairly disadvantages many Disabled people. Poor safety and accessibility of infrastructure and vehicles, poor access to mobility aids (including cycles) and vehicles, and disabling societal attitudes are all factors worsening Disabled people's access to journey-making.

(vi) Both measures taken and not taken to improve accessibility for some groups of Disabled people using some travel modes can worsen access for others. For example, a decision not to install modal filters on one entrance to a street because some Disabled people using motor vehicles may be excluded from making trips by longer driving routes, will exclude some Disabled people walking/wheeling, cycling and using amplified mobility due to the risk of being injured or killed in collisions with motor vehicles. Collaborative working with pan-impairment Disabled experts is needed to negotiate best practice solutions to access frictions.

(vii) Reducing private motor vehicle use by non-disabled people is necessary to achieve mobility justice within an equitably accessible and safe transport system. This applies whether the vehicles are combustion engine driven, electric, owner-driven, private hire, human-controlled or autonomous: All contribute to excessive hazard to Disabled people, inaccessibility of public spaces and environmental harm including climate damage, which disproportionately affects Disabled people.

(viii) Systems including legislation, funding, guidance, enforcement and infrastructure must facilitate and prioritise journey-making using travel modes that cause the least harm and most benefit to individuals, wider society and the environment, **that are also accessible for the person or people making the journey.**

We consider that dangerous and illegal e-cycle and e-motorcycle use by gig economy riders needs to be urgently but separately addressed by measures to make the companies commissioning the services of these riders responsible for their riders' devices and behaviour.

Wheels for Wellbeing – Charity no.1120905 / Company no. 06288610 ref CoLBus06/2025
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2 Bus, cycle and pedestrian infrastructure for best practice pan-impairment, pan-modal accessibility

Improved funding for and levels of access/orientation training and support for Disabled people using all modes is needed, especially where changes are made to infrastructure. This applies to all schemes, whether or not the infrastructure includes bus routes or protected cycle tracks.

2.1 Hierarchy of design option accessibility for all Disabled people on bus routes

Bus stop bypasses are presently an essential part of inclusive active travel networks that enable pan-impairment Disabled people to make journeys. Formal, informal or de facto bans on bus stop bypasses prevent the development of safe, accessible active travel networks, resulting in ongoing exclusion of Disabled people including from bus use and additional deaths/injuries in collisions.

(i) **On-carriageway cycling/amplified mobility:** Motor vehicle movements must be minimised to maximise accessibility for walking/wheeling, cycling and amplified mobility use. On bus routes, max <2000 PCU/day **and** <200 PCU/peak hour **and** vehicle speeds <20mph can enable relatively inclusive carriageway use to usually avoid the need for bus stop bypasses.

(ii) **Separate routes:** Where motor vehicle volumes and speeds cannot be sufficiently reduced, protected cycle routes are required. In some locations, it is possible to provide socially safe, prioritised and direct routes for cycling on parallel roads or paths to bus routes. Walking-speed cycling on footways must be permitted for Disabled cyclists to reach destinations.

(iii) **Bus stops on opposite side of road from cycle tracks:** On streets with bus stops on one side only, two-way cycle tracks can be placed on the opposite side of the road from the bus stops, avoiding the need for bypasses. Controlled pedestrian crossings will need to cross the cycle tracks and carriageway. Controlled cycle/mobility crossings will be needed.

(iv) **(Bus moves over cycle track to stop at pavement kerb:** At low bus frequency and low cycle track use locations, this could be investigated as a way to avoid installing bus stop bypasses. Will cause unacceptable risk to cycle track users and bus passengers at higher-use locations. Unlikely to be safe or accessible in any City of London locations.)

(v) **Bus stop bypass:** Where other solutions are not possible, we believe best practice bus stop bypasses are the most accessible available option for pan-impairment, pan-modal Disabled users. Bypasses are always less accessible for bus users than moving directly from bus to pavement, due to the extra crossings needed. May reduce injury risk for bus passengers.

We do not consider bus stop boarders to be accessible **unless** there is an effective way to stop all cycle track movement while buses are present. This is due to lack of inter-visibility between users.

2.2 Maximising accessibility for all users where bus stop bypasses are needed

(i) **For non-bus-using walking/wheeling**, continuous footway meeting TfL Pedestrian Comfort Guidance will be the most accessible option.

(ii) **For bus-using walking/wheeling**, consistent bypass and island design with accessible swept paths such that Disabled bus users can move safely onto and around the island at busy times, on-bus announcements that the stop has a bypass, designated tactile crossings on desire lines with raised tables to emphasise pedestrian priority, measures to ensure Blind/VI and other Disabled pedestrians can identify that crossings lead to a bypass and use them safely, clear colour contrast between footway and cycle track, audio and visual bus arrival information, bus shelters with seating and for busy bypasses, crossing controls.

(iii) **For cycle/amplified mobility users**, safe distance from side street crossings, clear sight lines, no objects near cycle track edges, forgiving kerbs, full accessible surface widths, clear colour contrast and minimised clutter will improve accessibility and help ensure cycle track users are aware of pedestrians. Measures such as high kerbs, speed bumps and “chicane” turns make spaces inaccessible to many Disabled users, are unlikely to slow fast cyclists, and will require attention to navigate, potentially increasing risk of collisions.

Guide Dogs

Designing for Inclusion

Briefing for City of London elected members

Following concerns raised to us by vision impaired people and our expert trainers, we commissioned University College London (UCL) to research the accessibility of four different types of infrastructure design in the built environment. These forms of cycle infrastructure are currently implemented across many UK local authority areas.

Summary:

- There is a need for safe, segregated cycle paths to protect cyclists.
- However, our research found four designs currently in use that incorporate cycle paths can cause fear and anxiety for disabled people, especially people with sight loss, which make them unsafe.
- This is particularly the case when disabled people need to cross a cycle path to get on or off a bus or to cross a road.
- Guide Dogs is calling on the Department for Transport to research how these designs and Local Transport Note 1/20 and other relevant guidance might be revised to take account of the technical findings of this research, with the involvement of disabled people and other infrastructure users.

Impact of incorporating cycle paths at bus stops

The report focused on two types of bus stop:

1. **Floating Island Bus Stops**. Also called Bus Stop By-passes, or just Floating Bus Stops. These are where a cycle path diverts from the kerbside to behind the bus stop, so buses can stop kerbside next to the bus stop. People wishing to catch a bus need to cross the cycle path to reach the bus stop on an island.
   Example image: Lambeth Palace Road, London
2. **Shared Bus Stop Boarders.** This is where a cycle path is raised to the level of the pavement and continues next to the kerb. This means the bus stop is next to the cycle path. People wishing to use the bus must step on to the cycle path in order to board or alight from the bus.
   Example image: Hoe Street, Walthamstow. London

Our research found that Floating Island Bus Stops are difficult for people with sight loss to identify and navigate.

Guide Dogs

Experiments conducted by UCL found detecting a cyclist approaching a bus stop can be a real challenge, especially for blind people and people with vision impairments. The speed at which cyclists travel also increases the fear of a collision. Another concern with this design is the size of the island (platform) the bus stop is situated on, surrounded by a cycle lane and road. Some people need more space, including wheelchair users and people travelling with a companion or assistance dog.

We found Shared Bus Stop Boarders cause even more concern than Floating Island Bus Stops for disabled people, due to the challenge of boarding and leaving a bus directly onto a cycle path. This creates a clear conflict between three users of the same space: pedestrians, cyclists and bus users. This is in addition to the challenge of detecting an oncoming cyclist. Shared Bus Stop Boarders were found to be unsafe by all research participants.

Both bus stop designs were found to be unsafe by blind and vision impaired participants. This leads to a general sense of fear about using them, which causes some disabled people to avoid using bus services altogether.

Impact of incorporating cycle paths to footpaths

We also researched the impact of two different types of footpaths:

3. **Segregated Cycle-footways.** These are where a footpath and a cycle path are next to each other and separated by a delineator of some sort, such as a continuous raised physical delineator. In some instances, a painted white line is used.
   Example image: Lea Bridge, London
4. **Continuous Footways.** This is where the road is raised to the level of the footpath to allow level crossing across a junction. This type of design is not exclusively used on routes that include cycle paths.
   Example image: Lea Bridge, London

We found painted line delineators in Segregated Cycle-footways are difficult for people with sight loss to identify. Instead, continuous raised delineators were much easier to detect. Participants in the research found it difficult to know when they were moving from a standard pedestrian-only footpath onto a Segregated Cycle-footway, and which side they needed to be on

Our research also found Continuous Footways are dangerous for blind people and people with a vision impairment, as it is difficult to detect when they are

crossing onto a road, especially where tactile paving is not present. This means people with sight loss may not know when they are putting themselves in the way of oncoming cyclists and vehicles.

Guide Dogs recommendations

Based on UCL's findings, Guide Dogs developed fifteen recommendations
to improve these designs for disabled people. These include:

- Investigate how to make Floating Island Bus Stops safer for disabled people, focusing on the size of the island platform and ways to reduce the speed of oncoming cyclists.
  Until further research is carried out, **there should be a pause in the further implementation of Floating Island Bus Stops.**
- Investigate if there are any means by which Shared Bus Stop Boarders can be made safe in practice**. Until there is evidence on whether they can be developed safely, the installation of Shared Bus Stop Boarders should be halted.**
- Segregated Cycle-footways should have a tactile paving delineator at all times rather than a painted white line, and tactile paving should be installed at the start and end, as well as at regular intervals along the route.
- Ensure tactile paving and other signalling are installed and consistent at all Continuous Footways.

By adopting these recommendations, local authorities can work towards delivering active travel networks that are truly inclusive and accessible to all members of the community.

How City of London Authority can help

- Please write to the Secretary of State for Transport to ask that the department commission research to investigate how Local Traffic Notice 1/20 and other relevant guidance might be revised to take account of the technical findings of the research undertaken by UCL for Guide Dogs

- Guide Dogs welcomes the review of the public realm guidance measures City of London Authority is taking on cycle way design

- To conduct an audit of existing street layouts and infrastructure to identify areas for improvement

- To seek reassurances from Transport for London (TfL) that audible announcements are in place to inform passengers where a Floating Island Bus Stop or Shared Bus Stop Boarding is on a particular route

- Make a commitment that any proposals to introduce Floating Island Bus
  Stops or Shared Bus Stop Boarders are halted Until the outcome of the Bus Services (No 2) Bill. Specifically, clause 22 'Safety and accessibility of stopping places', which enables the Secretary of State for Transport to create guidance on the accessibility of bus stops, specifically to meet the needs of disabled people. The Secretary of State for Transport and Lord Hendy have recently announced that they will be asking local authorities to pause any further plans to introduce this type of bus stop design

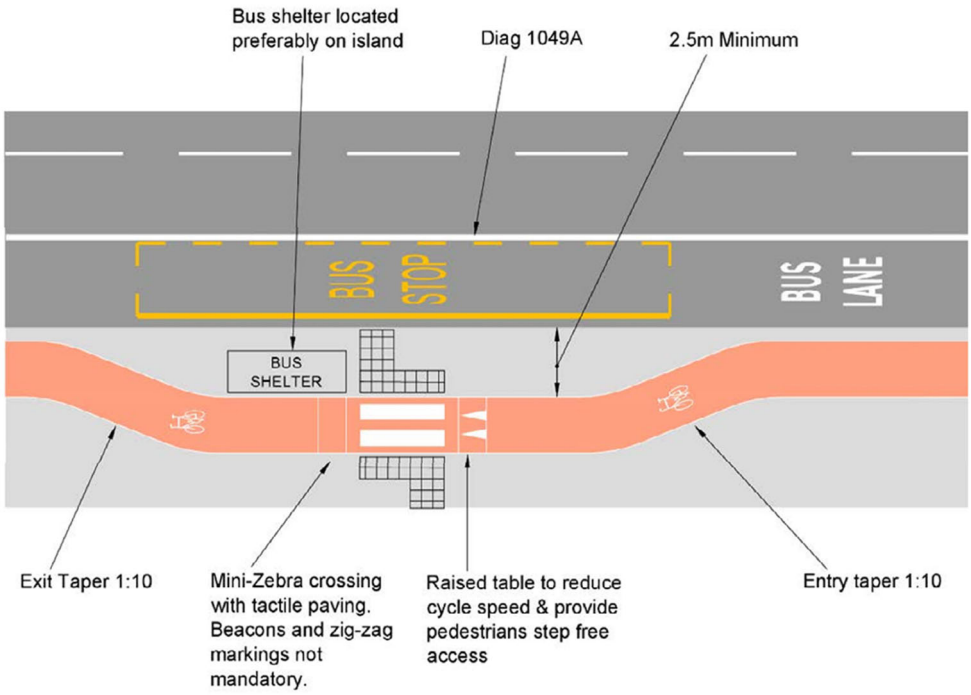
To access the full report, summary and all 15 Guide Dogs' recommendations, please visit Guide Dogs website: https://www.guidedogs.org.uk/how-you-can-help/campaigning/our-current-campaigns/streets-ahead/

Bus Stop Bypasses Supplementary Information

1.1 Bus stop bypasses is a current UK and London-wide design guidance that enables a continuous and protected cycle route to be provided. They have been successfully used for over 10 years. A standard layout of a bus stop bypass is shown below in Figure A2.1. However, given the accessibility implications, its application should be considered on a case by cases to ensure the right balance that reflects the specific location can be taken into account.

Figure A2.1 – Bus Stop Bypass Layout

Bus Stop Bypass Layout – DfT Cycle Infrastructure Design LTN 1/20



1.2 Active Travel England (ATE) guidance on bus stops states: *"Cyclists should be protected from buses, with interactions between pedestrians and cyclists being low-level. Well-designed bus stop bypasses help to reduce conflicts between cyclists, buses and moving traffic."*

Bus stop bypasses… [have] "the potential to introduce conflicts between pedestrians and cyclists… To minimise potential conflicts, the layout of a bus stop bypass must [consider] design details."

In other words, bus stop bypasses are essential for people cycling to maintain continuous protection from motorised vehicles. Well-designed bus stop bypasses help minimise the risk of conflicts, which is low when effectively designed.

1.3 Bus stop bypasses provide benefits to people cycling, walking, wheeling and bus operations. A summary of the benefits of bus stop bypasses are listed in Table A2.1 below.

Table A2.1 Benefits of bus stop bypasses

	Key benefits
Cycling	• Continues protected cycle lanes through bus stop area • Eliminates conflict with motorised vehicles • Inclusive and attractive cycle facility for all
Buses	• Minimise conflict with people cycling • Minimise delay at bus stop areas • Makes access and egress at bus stops easier for bus drivers
Walking / Wheeling	• Bus stops are more conspicuous • Defined dwelling area for bus passengers • Improves pavement accessibility
General	• Supports delivery of the Transport Strategy • Supports delivery of Vision Zero • Supports Climate Action Strategy

1.4 The main benefit of bus stop bypasses is that the protected cycle lane is continued through the bus stop area without any breaks so that people cycling are removed from conflict with motorised vehicles. This supports the provision of a safe, attractive, and inclusive cycle route so that any person wishing to cycle does not feel excluded due to safety concerns.

1.5 Bus stop bypasses provide benefits from a bus operation aspect too, as they minimise the interaction between people cycling and buses and therefore removes the collision risk at bus stops making it safer, bus dwell times may be reduced as there would be no delay to buses waiting for people cycling to clear when buses are accessing and egressing the bus stop area.

1.6 The arrangement of a bus stop bypass with the bus stop located on an island makes the bus stop more distinguishable and therefore easier to find for bus passengers. The island also defines the area for bus passengers waiting for the bus and this keeps the pavement clear of people dwelling which improves accessibility for people walking and wheeling on the pavement.

1.7 The installation of bus stop bypasses supports the delivery of the Transport Strategy by facilitating the development of a safe, attractive, and inclusive cycle route. These features are key to encouraging a broader and more diverse range of people to take up cycling, including women, children and disabled people who may not cycle without protected infrastructure. By physically separating people cycling from motorised traffic, protected cycle lanes enhance safety and contribute to achieving Vision Zero. Furthermore, encouraging a modal shift from motor vehicles to cycling directly supports the City's Climate Action Strategy and its ambition to achieve net zero for the Square Mile.

1.8 While there are benefits to providing a bus stop bypass, there are also some concerns or disbenefits. A summary of the disbenefits of bus stop bypasses are listed in Table A2.2 below.

Table A2.2 Disbenefits of bus stop bypasses

	Disbenefits
Walking / Wheeling	• People need to cross the cycle track to board or alight from the bus stop • Bus stop layout may be confusing to some people • Can be difficult to judge the speed of people cycling • People with disabilities such as visual impairments may have difficulty crossing the cycle track • Guide dogs may have difficulty and may need training • Older, children and people with disabilities may have difficulty using the bus stop • People cycling do not always give-way to people crossing on the zebra crossing which can lead to conflict or near misses
Cycling	• May need to slow down or stop to allow people walking to cross the cycle track • Can be difficult to predict the behaviour of people walking • braking sharply may cause a person cycling behind to collide into the person in front.
Buses	• May need to provide signage or announcements • May need to provide education to bus passengers • May need to provide training to bus drivers
General	• There is inconsistent design of bus stop bypasses therefore some users are unsure how to behave.

1.9 The main disbenefits of bus stop bypasses are that people need to cross the cycle track to board or alight at the bus stop. This can be a particular issue for people with visual impairments who may find it difficult to detect where to cross the cycle track and to cross safely. Elderly people, children, people with disabilities and guide dogs may have similar difficulties as they find the layout confusing. Specific training for guide dogs may also be needed to navigate the bus stop. The behavior of people cycling can make it difficult for people walking or wheeling, as people cycling do not always stop to give-way at zebra crossings and it can also be difficult to judge the speed of people cycling.

1.10 The difficulties for people cycling at bus stop bypasses are that it can be hard to predict the behavior of people walking on the pavement as people can be distracted looking at their phone or chatting. People cycling often need to slow down or stop to give way to people crossing the cycle track, which can disrupt the flow of cycling. Additionally, there is a risk that if a person cycling brakes sharply, another person cycling too closely may collide with them from behind.

1.11 To mitigate the risks of bus stop bypasses extra signage or announcements may be needed on buses or bus stops to warn or educate users of bus stop bypasses. Also, bus drivers may require training to better understand how these bus stops affect different users and support mitigating the risks.

1.12 In 2024 TfL undertook a bus stop bypass review and concluded that there is an extremely low risk of a person walking or wheeling being injured by someone cycling at a bus stop bypass in London. TfL assessed casualties that occurred within 50 metres of a bus stop bypass between 2020 and 2022 inclusive and found there were

five pedestrian casualties involving people cycling and one involving an e-scooter rider on bus stop bypasses over a three-year period. This represents 0.8 per cent of a total of 623 pedestrian casualties involving collisions with cyclists during the three-year period, and 0.05 per cent of all 12,069 pedestrian road casualties during this time. None of the casualties identified as part of this analysis occurred in the City where the number of people cycling and using the bus is one of the highest in London during peak times.

1.13 Following the 2024 review, TfL continues to promote, sponsor, and implement bus stop bypasses, even as both TfL and the DfT work to update their bus stop bypass guidance.

1.14 Table A2.3 provides a summary of the seven existing bus stops in the City.

Table A2.3 Existing bus stop bypasses in the City

Location	Cycle Route	Facility Type
Farringdon St (Fleet St Stop)	C6	Bi-directional (northbound side)
Blackfriars Bridge (Blackfriars Station South)	C6	Bi-directional (northbound side)
Upper Thame St (Cannon St Station – coach stop)	C3	Bi-directional (eastbound side)
New Bridge Street (Blackfriars Station North Entrance)	C6	Bi-directional (northbound side)
Victoria Embankment (Temple Av – coach stop)	C3	Bi-directional (eastbound side)
Farringdon St (Snow Hill)	C6	With-Flow (northbound side)
Farringdon St (Snow Hill)	C6	With-Flow (southbound side)

1.15 All these bus stop bypasses meet current design guidance except for the New Bridge Street – Blackfriars Station North Entrance. This bus stop is missing a zebra crossing to assist people crossing the cycle track. However, TfL has confirmed they are working to resolve this issue.

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Project Coversheet

[1] Ownership & Status

UPI:
Core Project Name: City Cycleways Programme
Programme Affiliation: Cycling Network Programme
Project Manager: Albert Cheung – Street Space Planning, Environment Department

Definition of need:

- Cycling is an important mode of transport with huge health and social benefits. Despite this, only a third of all vehicles in the City are pedal cycles.

- A City survey also found that only 4% of people currently consider the experience of cycling in the City pleasant and most feel that it is not safe. Data also shows that the number of people cycling involved in collisions are disproportionately high

- Providing a dense network of cycle friendly streets will mean that anyone who wishes to cycle is not prevented from doing so because of safety concerns.

- The transport strategy has set out a range of cycling proposals including the delivery of a cycle network to enable more people to cycle.

Key measures of success:

- People are safe and feel safe
- People have equal opportunities to enrich their lives and reach their full potential.
- We have clean air, land and water and a thriving and sustainable natural environment
- Our spaces are secure, resilient and well maintained.

Expected timeframe for the project delivery:

- 2022 – 2023 (originally set out G2)
- March 2028 (G3/4)

Key Milestones:

- Concept design approval.
- Public consultation.
- Detailed traffic modelling and detailed highway design.

Are we on track for completing the project against the expected timeframe for project delivery?
No, project delay has been as a result of issues related to the pandemic which has affected external TfL funding for the project.

Has this project generated public or media impact and response which the City of London has needed to manage or is managing?
No

[2] Finance and Costed Risk

Headline Financial, Scope and Design Changes:

'Project Briefing' G1-2 report (as approved by Streets & Walkways Sub-committee, July 2019):

City Cycleways Programme (Q11 Upgrade, Monument to Sun Street Cycleway and Aldgate to Blackfriars Cycleway)

- Total Estimated Cost (excluding risk): £3.5M - £4.5M
- Costed Risk Against the Project: None at this stage
- Estimated Programme Dates: see below

Q11 Upgrade

- Preliminary design, stakeholder engagement, traffic modelling and detailed design – Nov 2019
- G3/4/5 Dec 2019
- Delivery timeframe Feb - Apr 2020

Monument to Sun Street

- Preliminary design, modelling, consultation – Dec 2019
- G3/4 – Jan 2020
- Detailed design & modelling – April 2020
- Gateway 5 – May 2020
- Delivery timeframe 2021 – 2022

Aldgate to Blackfriars Cycleway

- Preliminary design, modelling – Feb 2020
- Consultation – May 2020
- G3/4 – Summer 2020
- Detailed design & modelling – Winter 2020
- Gateway 5 – Early 2021
- Delivery timeframe 2022 – 2023

Scope/Design Change and Impact:

'Options Appraisal and Design' G3/4 report (Submitted, for approval October 2024):

Aldgate to Blackfriars Cycleway

- Total Estimated Cost (excluding risk):
- Resources to reach next Gateway (excluding risk):
- Spend to date:
- Costed Risk Against the Project:
- Estimated Programme Dates:

Scope/Design Change and Impact:

'Authority to start Work' G345 report (as approved by Streets & Walkways Sub-committee, October 2019):

- Q11 Upgrade
- Total Estimated Cost (excluding risk): £680K
- Resources to reach next Gateway (excluding risk
- Spend to date: £680K
- Costed Risk Against the Project: None
- Estimated Programme Dates: Delivery – March 2020

Scope/Design Change and Impact:

Total anticipated on-going commitment post-delivery [£]: None.

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Committee(s): Planning & Transportation Committee	**Date:** 21/10/2025
Subject: Naming of new Highway Maintainable at Public Expense: Greyfriars Square	**Public report:** For Decision
This Proposal: • **Provides statutory duties**	Street Naming and Numbering
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of:	Katie Stewart, Executive Director of Environment
Report author:	Richard Tranter, Local Land and Property Gazetteer Custodian,

Summary

This report advises Members that an application has been made by the City of London Corporation, acting as the local highway authority, to name the publicly accessible square to the west of 81 Newgate Street created as part of the St Paul's Gyratory Transformation Project as 'Greyfriars Square'. The new square encompasses the southern part of King Edward Street and land adjacent Christchurch Greyfriars Churchyard and Garden. It recommends that the name Greyfriars Square should be approved.

Recommendation(s)

Members are recommended to:

- APPROVE the name Greyfriars Square and require that a statutory order be issued.

Main Report

Background

1. The City Corporation is responsible for the authorisation of all building names, street numbers and street names within the City in accordance with the London Building Acts (Amendment) Act 1939. The normal procedure is for most applications to be dealt with by officers under delegated authority, but it

is usual for new street names and other high profile or contentious cases to be reported for decision by Planning & Transportation Committee.

2. The City of London Corporation are working to transform the St Paul's gyratory. The final design option for the gyratory was approved by the Streets and Walkways Sub Committee on 23 May 2023, with the developed design for the Greyfriars Square new public space approved 14 May 2024.

3. Largely unchanged since the 1970s, the new design will reorganise the traffic-dominated streets to create a new public space, introduce safer walking and cycling routes, whilst retaining access for buses and motor-vehicles. The works started onsite on 28 April 2025 and will take place over two years.

4. Closing the southern section of King Edward Street to traffic enables the creation of a new 3,000-square-metre public space. Further details of the project can be found at: https://www.cityoflondon.gov.uk/services/streets/traffic-schemes-and-proposals/st-pauls-gyratory-transformation-project

The Site

5. The site is located to the west of 81 Newgate Street created as part of the St Paul's Gyratory Transformation Project. The new square encompasses the southern part of King Edward Street and land adjacent to Christchurch Greyfriars Churchyard and Garden. Appendix 1 shows the site plan, detailing the new area of highway maintainable at public expense to become part of the new square (ref. GREYSQ0001). The remainder of King Edward Street will continue as currently named. The new name will apply only to the new space being constructed as outlined in Appendix 1.

6. Addresses at the site of 81 Newgate Street were approved under delegated authority on 7 February 2023. It is proposed as part of this street naming proposal that the addresses 1 King Edward Street (office) and Units 1 and 2, 1 King Edward Street (retail) on the west side of the development facing the proposed square, be renamed as 1 Greyfriars Square and Units 1 and 2, 1 Greyfriars Square.

7. A highway maintainable at public expense is defined as "A way over which the public have a right to pass and repass in perpetuity. The highway is maintainable by the highway authority".

The naming as Greyfriars Square

8. An application has been submitted by the City of London Corporation for the naming of Greyfriars Square.

9. A public consultation was held by the City of London Corporation from 18 August to 2 October 2023 and stakeholders were given a shortlist of four proposed names for the new space and asked to select their preferred name. Greyfriars Square was the preferred name by a significant margin.

10. The new square lies adjacent to the current Christchurch Greyfriars Church Garden on the site of the former Franciscan Friary of Greyfriars Monastery that was established in 1225. It was the second largest church in medieval London, destroyed by the Great Fire of London in 1666. A new church designed by Sir Christopher Wren was completed by 1705. In 1940, incendiary bombs devastated Christchurch Greyfriars, destroying the roof and much of its interior. The remaining shell became a Listed Building. The proposed name Greyfriars Square thus will help reinforce the local area's historic identity.

11. Greyfriars Square has been endorsed by members of the Streets & Walkways sub-committee on 30 January 2024. Further details can be found in the committee paper "St Paul's Gyratory Transformation Project – Phase 1". In this paper the members of the Streets & Walkways sub-committee were asked to "note that Greyfriars Square was the most popular name for the new space in the public consultation and that officers will progress the statutory process for re-naming a street pursuance to existing delegations".

12. The City Corporation's Street Naming and Numbering Guidelines state that "A strong justification for renaming a street would need to be provided because of the potential inconvenience to existing occupiers whose numbers and street address would need to be changed. Renaming an existing street will therefore require strong support from owners and occupiers on that street."

13. The St Paul's Gyratory Transformation Project provides a strong justification for the renaming as it provides a new transformative public space. The square will provide a mix of hard and soft landscaping befitting a major public square, distinct from adjacent streets and the remainder of King Edward Street. The only property affected is the aforementioned 81 Newgate Street.

Consultation

14. Following the public consultation on the proposed names, a full street naming and numbering consultation was undertaken from 4 April to 20 April 2025 on the preferred name. Statutory consultees were consulted, and a public notice was posted on-site inviting comments.

15. Statutory consultees and Royal Mail have raised no objections to the proposed name. Ward Members for the wards of Cheap and Farringdon Within have been consulted without further comment of the proposed name. Both the developer of 81 Newgate Street (Pella) and the agent representing the new tenant (HSBC) have confirmed that they have no objection to the proposed re-naming.

Next steps

16. Following committee approval, a statutory Street Naming and Numbering Order will be created to bring the proposed name into legal effect. This will

take place upon completion of works, and the opening of the square for public access. It accordance with the Street Naming and Numbering Advice Note, the Order will be sent to the applicants for their records and communicated to organisations such as Royal Mail, Land Registry and the emergency services. New signage associated with the renaming will also be clearly displayed in accordance with the principles of the Guide.

Corporate & Strategic implications

17. None

Financial implications

18. None

Resource implications

19. None

Legal implications

20. A Statutory Street Naming and Numbering Order will be created in accordance with the London Building Acts (Amendment) Act 1939 and the City Corporation's Street Naming and Numbering Advice Note (2019).

Risk implications

21. None.

Equalities implications

22. None

Climate implications

23. None.

Security implications

24. None.

Conclusion

25. The proposed Greyfriars Square meets the street naming and numbering guidance set out by the City Corporation. The proposal has received strong support within the public consultation and no issues were raised by statutory consultees.

Appendices

- Appendix 1: Drawing Reference

Contact:

Richard Tranter, Local Land and Property Gazetteer Custodian, Environment Department

E: snn@cityoflondon.gov.uk

Appendix 1: Drawing Reference GREYSQ0001

City of London Corporation Committee Report

Committee(s): Streets & Walkways Sub Committee Planning & Transportation Committee	**Dated:** 16 September 2025 21 October 2025
Subject: Advertising board update	**Public report:** For Decision
This proposal: • delivers Corporate Plan 2024-29 outcomes	• Vibrant Thriving Destination • 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: Executive Director Environment	
Report author: Andrea Larice, City Operations	

Summary

Advertising boards or A-boards pose safety and accessibility issues, particularly for people with impaired vision or mobility. In March 2020 the Planning & Transportation Committee approved a City-wide ban of A-boards to ensure clear and accessible pavements. However, the implementation of enforcement was delayed during the COVID-19 pandemic and to allow time for footfall to recover post-pandemic.

As footfall in the City of London increases and the working population rises, maintaining clear pavements is crucial for creating an inclusive environment that allows people to navigate our streets independently and safely. This Sub Committee received an update in July 2024 on the phased approach to implementation of the A-board ban, engaging with businesses and working towards enforcement by City Corporation Street Enforcement Officers in 2025.

Officers have conducted a City-wide study to identify the distribution, location, and purpose of A-boards. This identified A-boards or similar obstructions at 830 out of

1,994 surveyed sites, representing 42% of the total locations, with the majority (93%) serving exclusively as advertising tools with no wayfinding element. 75% of A-boards were positioned on public highway. This widespread use of A-boards on public highways poses challenges for maintaining clear, safe and accessible pavements.

Based on the findings of the study, an internal review was conducted to:

- understand how teams would react to the request to remove A-boards
- determine the feasibility of a licence-based system for the businesses using A-boards for wayfinding to support businesses without visible frontages.

Based on the above this report seeks approval to continue with current policy and begin engagement prior to enforcement (Option 1, recommended) or amend the A-board policy to allow A-boards for wayfinding purposes by exception and proceed to public consultation (Option 2). Further consideration could also be given to other exemptions under licence based on location or other factors. This can be considered as an option if Members agree to amend the current policy to allow exemptions.

Recommendation(s)

Members of the Streets & Walkways Sub Committee are asked to:

- Comment on the options and make recommendations to the Planning & Transportation Committee.

Members of the Planning and Transportation Committee are asked to:

- Note the comments of the Streets & Walkways sub-committee
- Agree to proceed with one of the following:

  Option 1: Continue with current policy and begin engagement prior to enforcement (Recommended).

  Option 2: Amend the A-board policy to allow A-boards for wayfinding purposes by exception (via a Way-board licence or other licencing criteria) and proceed to public consultation.

Main Report

Background

1. A-boards are usually used by businesses to advertise and promote their services. They are typically a simple stand-alone board on a heavy 'A' shape frame, which businesses place across the pavement, to attract attention. Their size and type differ across a broad range of business activities.
2. A-boards narrow the pavement and can cause an obstruction. Many campaigning organisations have been advocating for a complete ban of A-boards stating that it is essential for older, blind and partially sighted people, wheelchair and mobility aids users to have a clear route along the pavement.

3. The Royal National Institute of Blind People (2014) note: “The proliferation of A-boards can make it difficult for those with sight difficulties to negotiate the path. This can result in them walking into A-boards and injuring themselves or inadvertently walking into the road whilst attempting to avoid these obstructions. Falling over or bumping into an A-board can be painful and can adversely affect blind and partially sighted people’s confidence and mobility. The overuse of A-boards can restrict their freedom and opportunity to participate in their local community.”
4. Transport for all (2014) note: “Street clutter is not just a problem for visually impaired people, but a problem for wheelchair users, scooter users, buggy users, and older people too. Transport for All welcome this ‘zero-tolerance’ approach to businesses which repeatedly flout rules on keeping the pavement clear. Not everyone can step down into the road to bypass an A-board or other obstacle”
5. In May 2019 the first edition of the Transport Strategy was adopted. This included a proposal to keep pavement free of obstructions, including not permitting A-boards on the public highway.
6. In March 2020, the Planning & Transportation committee approved a City-wide ban of A-boards. However, the implementation was delayed during the COVID 19 Pandemic and to allow time for footfall to recover post-pandemic (Appendix 1).
7. Although we have not yet commenced enforcement of the policy, we are currently encouraging businesses that contact us not to place A-boards on the Public Highway. Instead, businesses are offered the opportunity to increase their business visibility through the City of London Corporation’s visitor-facing marketing channels. Businesses can be listed on thecityofldn.com, which currently features over 280 listings, and they may also submit events and offers. This provides an opportunity for potential coverage on the City of London Corporation’s website, newsletters, and social media platforms.
8. In October 2021, the Streets & Walkways Sub Committee approved our commitment to Transport for All’s Equal Pavements Pledge to: “Operate a zero-tolerance approach to street clutter. Issue warnings to businesses that obstruct pavements with A-boards and follow up with fines.” (Transport for All , 2021)
9. Transport for London (TfL) enforce a ban on A-boards on the TfL Road Network (also known as Red Routes) including within the City. In our neighbour boroughs there are several approaches, including:
    - Westminster, zero tolerance of A-boards with fixed penalty notices issued.
    - Hackney, no A-boards are allowed on the public highway, fines issued for obstruction.
    - Camden has restrictions on A- boards, however due to issues with compliance in some areas they have set up a working group and trial to best manage the complexities.
    - Islington has implemented policies to restrict the use of A-boards on pavements. A permit is available for some locations, with a fee.
10. With effect from 2 April 2024, the National Pavement Licence Guidance has been updated to state that: “Advertising boards are not included in the definition of furniture within the pavement licensing regime. As well as needing consent under

the Highways Act 1980, advertising boards also require express advertising consent under the Town and Country Planning Regulations 2007." Prior to April, A-boards were not expressly prohibited, and some licences may have included A-boards within the pavement licence area. These licences expired in September 2024 and no business in the City of London has an A-board under their licence.

11. Hybrid policy approaches have been explored to balance business needs and pedestrian safety. However, the City's narrow pavements and high foot traffic make these approaches inequitable. A policy that supports allowing A-boards on streets with wider pavements (such as Cheapside) could disadvantage businesses located in the narrower streets and lanes (such as Bow Lane) and does not create a level playing field for businesses to operate and compete. A paper brought to the Planning & Transportation Committee in 2014 highlighted complaints from traders and informed the subsequent reports to members.

12. Pressure on the City's pavements is increasing, with footfall level now between 70-80% of 2019 levels and increasing year on year. Over the period of the City Plan, GLA projections suggest that 104,000, or 14.2% more people will be working in the City of London by 2041 (City Corporation, 2023). Accessible pavements that help people navigate their surroundings independently and safely will be key to accommodating future growth.

Current Position

13. Proposal 16: Keep pavements free of obstructions of the second edition of the Transport Strategy includes not permitting A-boards on the public highway.

14. This Sub Committee received an update in July 2024 outlining a phased implementation of the A-board ban. These updates detailed the City Corporation's approach to engaging with businesses, raising awareness of the policy objectives, and encouraging the adoption of alternative methods that maintain clear and accessible pavements on the public highway. The phased approach was designed to support businesses transition ahead of formal enforcement, which was scheduled for 2025.

15. To guide our engagement strategy, officers conducted a baseline assessment to understand the distribution and use of A-boards. The findings indicated that A-boards were widely used across the City. Based on this study officers conducted a case study to gather information from internal teams using A-boards and assess stakeholder reception to the request to remove A-boards from our streets. A summary of the results appears below; and details of the A-board Baseline Study can be found in Appendix 2.

16. Our research highlighted the prevalence of A-boards in the City, and the challenges involved in balancing business needs with the goal of maintaining accessible, clutter-free pavements. It also highlighted that a small number of businesses use A-boards for wayfinding purposes, and as a result we have explored an alternative option for members to consider, detailed in Option 2.

17. Note that proceeding with either of the options outlined below will mean that there will be locations where we do not allow A-boards but do allow tables and chairs. There are sperate licensing powers for tables and chairs, applications for which are considered on their own merits.

A-Board Baseline Study

18. To evaluate the distribution and use of A-boards throughout the City, data was collected via the Field Maps App. This process utilised a custom Geographical Information System (GIS) base layer of business locations developed by the City Corporation GIS team.

19. A-boards or similar obstructions were identified at 830 out of 1,994 surveyed sites, representing 42% of the total locations.

20. A-boards are primarily used for advertising, with 772 boards (93%) serving this purpose. A small percentage (0.7%) are used for wayfinding; these were usually businesses in alleyways. About 5.7% serve both advertising and wayfinding roles, and 0.6% fall under other uses, such as buckets full of flowers, or postcard stands for sale outside or delivery trollies without branding (Table 1).

21. Chain café/sandwich bars (such as Pret a Manger, Itsu, café Nero) had A-boards at all of their locations, a total of 52 A-boards (amounting to 7% of A-boards counted). Some also had delivery trolleys with advertising outside.

Table 1: Distribution of A-boards by purpose

Category	Number of Boards	Percentage
Advertising	772	93%
Wayfinding	6	0.7%
Both advertising and wayfinding	47	5.7%
Other	5	0.6%

22. A-boards placement was photographed. Often A-boards were positioned in ways that reduced the available space on pavements and in some cases caused obstruction. In contrast, businesses that placed A-boards inside their premises maintained unobstructed pavements and were noted as examples of good practice; these instances were not included in the count of on-street A-boards.

23. The data on the type of land usage reveals that a significant majority of A-boards are on the public highway (Table 2). There were a number of boards on private land we cannot enforce on these areas or any land which is within curtilage of a building. We can only enforce on pavement legally defined as within 'Highway'. We do intend to encourage an approach on private land which is in line with our accessibility principles.

24. There was a widespread use of A-boards across all wards, including streets such as Bishopsgate, Farringdon Street, and New Bridge Street, which are subject to TfL enforcement. TfL are enforcing their streets, with a total ban on A-boards, however there are incidences of businesses flouting the rules, which are reflected in the numbers.

Table 2: Distribution of A-boards by land type

Type of Land	Number	Percentage
Public highway	621	75%
Private land	153	18%
Uncertain	56	7%

Internal Review

25. The engagement with various teams displaying A-boards in the City highlighted diverse perspectives on their usage. Teams involved included the Air Quality Team, Street Environment Officers and the Guildhall Art Gallery. These teams served as case studies in understanding the practicality and impact of A-boards removals.
26. While all acknowledged the necessity of their A-boards for conveying key messages, communicating campaigns, and providing wayfinding information, they also recognised the importance of accessibility.
27. Teams raised concerns about having to remove their A-boards, however, all teams expressed a willingness to explore innovative solutions for effective communication without causing obstructions. One team trialled the use plastic sleeves on City Corporation bollards to convey information, which are less obstructive than A-boards.
28. Alongside these efforts, teams requested we provide information regarding available alternatives to A-boards, clarification on public land usage policies, and guidance on utilising them for temporary events. Recognising these needs, the City Corporation will schedule further workshops designed to foster the sharing of best practices and the identification of practical, compliant solutions. These sessions aim to ensure that all teams are empowered to communicate effectively while leading by example in accessibility and innovation.
29. It is worth noting that one team, despite having removed their A-boards, observed that other teams continued their usage, leading them to request permission to use A-boards again. This observation highlights the need for consistent enforcement to ensure all teams comply uniformly, preventing any group from feeling disadvantaged or pressured to revert to old practices.

Proposals

Option 1: Continue with current policy and begin engagement prior to enforcement (Recommended).

30. Option 1 aims to address obstructions through strict enforcement of A-board regulations, ensuring clear and accessible pavements.
31. This approach prioritises public safety and compliance with legal obligations, potentially reducing accidents and liability risks. Additionally, it aligns with the Equality Act and the Public Sector Equality Duty (PSED), reinforcing the City Corporation's commitment to creating inclusive and accessible public spaces.
32. Under both option 1 and 2 engagement and enforcement would be carried out in four stages:
    - Advisory letter – This will notify businesses of enforcement start. This will be supported by further information on the reasons why we are asking businesses to remove A-boards, alternative methods that they can adopt with examples of best practice, and the contact of internal teams to explore signage or online marketing options.

- A warning letter - This will be issued, accompanied by policy guidance, after an A-board has been recorded following the advisory letter, warning of the next stage of penalty.
- Notice letter - Notice will be served to a premises if they do not comply following the Warning letter
- Enforcement letter - Served with a Fixed Penalty Notice and prosecution if necessary, depending upon which legislation is used

33. Each letter will refer to the previous, and to the next stage, so that the continuum of the enforcement process is clear. The above enforcement process adds an additional layer to s17 of the Local Authority and Transport Act 2003 (the Notice Letter of paragraph above, bullet point 4). The procedure in the LATA 2003 provides for a three-stage process. Following this revised process, with its four stages, will give businesses time to adapt to the changes and improve compliance. Further detail on the time between notices will be worked up after committee decision. It is important to develop the process with due regard to the risk of legal challenge.

34. Non-enforcement of the policy could undermine the local authority's commitment to the Equality Act and its Public Sector Equality Duty. Furthermore, the risks caused by the continued obstruction puts the City Corporation at risk of litigation for non-compliance with duties under Section 130 of the Highways Act 1980.

35. Businesses that rely on A-boards for visibility and customer engagement are likely to express frustration and concern. These businesses may perceive the removal as a threat to footfall and economic viability, particularly those without prominent frontages or located in alleyways. Conversely, businesses that are already compliant or located on the Transport for London Road Network (TLRN) - where A-boards are already banned - may welcome enforcement. They might see it as a move toward fairness and improved accessibility.

36. Adopting this course of action is expected to promote consistent compliance, minimise the risk of legal misinterpretation, reduce potential barriers, and uphold the City Corporation's commitment to inclusivity and equality.

Option 2: Amend the A-board policy to allow A-boards for wayfinding purposes by exception (via a Way-board licence) and proceed to public consultation.

37. Under this option there would still be a City-wide A-board ban (enforced using the same four stage process outlined above) but businesses would be able to apply for a Way-board licence by exception and subject to meeting set eligibility criteria. Eligibility criteria and guidance is under development and the current draft can be found in Appendix 3.

38. Less than one percent of signage was identified as being used exclusively for wayfinding (0.7%) and 5.7% were identified as utilised for both advertising and wayfinding purposes. A licensing system could allow a limited number of businesses to use A-boards to make their business more visible.

39. Although this approach could support a select number of businesses it would require a change in policy and a consultation.

40. As of 2 April 2024, the Department for Levelling Up, Housing and Communities clarified that A-boards are not considered “furniture” under the Pavement Licensing regime. The proposed eligibility criteria and licensing guidance for Wayfinding A-Boards will be drafted to align with the following legal frameworks:
    - The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 under Class 3A
    - The Highways Act 1980 – As long as the Wayfinding would not cause an obstruction s130 or a nuisance s149
41. Licences would incur a fee and would require a formal application procedure. Applicants would be required to demonstrate that the need for a Way-board and meet stringent accessibility criteria, as outlined in draft guidance. Each application will be reviewed, and licences will be granted to successful applicants.
42. Enforcement will focus on verifying whether a valid licence is present for any Way-board displayed. The proposed licensing scheme is intended strictly for exceptional circumstances only, and all businesses must adhere to the established guidelines. Any other board in place would go through enforcement process potentially with a fine as outlined in option 1.
43. Option 2 will require additional administrative resource in the form of a dedicated staff member responsible for licensing, compliance, appeals, and general administration. The initial set-up will be the most time and resource intensive, and needs should reduce as the rules and processes are understood. Accessibility of the City’s streets for disabled people could be affected by any ‘allowed’ A-boards under this option. Blocking of pavements and sight lines and introducing barriers disadvantages some disabled people. The implications are explained further in the next section of this report.
44. Further consideration could also be given to other exemptions under licence based on location or other factors. This can be considered as an option if Members agree to amend the current policy to allow exemptions.

Strategic implications

45. An A-board ban supports the delivery of Corporate Plan Outcome: Vibrant thriving destination and supporting a Diverse and Engaged Community by improving the user experience for people walking and wheeling and striving to ensure people can travel independently, safely and without restriction.
46. The City of London Transport Strategy sets out our approach to improving accessibility in the Square Mile (Outcome 3: The Square Mile is accessible to all). The removal of A-boards is included in Proposal 16: Keep pavements free of obstructions. This proposal supports the Public Sector Equality Duty (PSED) by ensuring that public spaces are accessible and non-discriminatory, fostering inclusivity and equality, and our commitment to Transport for All’s Equal Pavements Pledge.
47. A change in policy to Option 2 could support a small number of businesses who face location-based visibility challenges, offering them an option to have a Way-board through a licensing scheme. Although the City of London is host to around 20,000 small and medium-sized enterprises (SMEs), only 5% are retail or food and beverage. While this may enhance visibility for select businesses, it must be

considered within the City Corporation's broader commitments under the Equality Act.

Financial implications

48. Option 1 will be businesses as usual and will be met within existing resources; however, there will be an impact on the total number of tasks SEOs are required to undertake. The initial phase of introducing the system will require some extra administrative tasks. Once in place there will be a layer of additional administration, but this will be covered by existing resources. There will be no additional financial implications.

49. The implementation of Option 2 will introduce additional administrative requirements for both businesses and the City Corporation. Establishing a licensing system will necessitate dedicated staffing to oversee compliance checks, appeals processes, and ongoing licence administration.

50. Initial estimates for the ongoing costs, which are mostly staff costs, are between £18,000 and £31,000 for the first year, with higher costs anticipated during the initial phase as the system is established. These costs are expected to reduce over time as procedures become more streamlined, and demand stabilises.

51. A fee for licences will be charged, and it is estimated that full recovery of costs for managing a licence system could be met. Should there be a shortfall in the cost recovery, the staff costs can be met from the Policy and Projects existing local risk revenue budget.

52. For Option 1 and 2, the initial costs of implementing the enforcement system together with 'one-off' costs for Option 2 (for the EQIA, engagement, and consultation) will be met from existing Strategic Transport budget allocations.

53. There is also a risk of some additional legal costs, associated with appeals.

Resource implications

54. The enforcement and inspection of licences would have an impact on SEO time, as it would be an additional task to current workload and may impact on other tasks, requiring reprioritisation of workloads. There will be a need to have a fixed penalty and enforcement system under both options. Some further work to finalise an agreed enforcement process and protocol for issuing FPNs would be required.

55. Option 2 cannot be delivered with existing staff resources. Recruitment, training, and effective resource management will be required. As noted above charges for licenses would need to be set at a level that aims for full cost recovery. There is a vacant post that could be allocated for this task. In the longer term the task is not anticipated to be full time and that officer could pick up other tasks to support the Transport Strategy team.

Legal implications

56. Highway authorities have duties to protect the use of the highway for all, including some extra provision for disabled people. All of these are listed here. Under legal advice we are proposing to use Highways Act 1980 (Section 137), and our duties under the Equality Act.

57. Under UK legislation, businesses must obtain permission from the highway authority before placing A-boards on public footways or carriageways.

The **Highways Act 1980 (Section 137)** prohibits any obstruction of the highway without lawful authority, which includes the unauthorised placement of advertising boards. Local authorities may issue specific conditions for A-board use, such as maintaining clear pedestrian access and ensuring boards are stable and removed outside trading hours. Therefore, no A-boards are on street with permission at present.

58. Under the **Town and Country Planning (Control of Advertisements) Regulations 2007**, A-boards are classified as advertisements and may require express consent from the local planning authority. Even where deemed consent applies, authorities retain the right to restrict or revoke permission based on public safety or amenity concerns. Failure to comply with these requirements may result in enforcement action or removal of the boards.

59. There is a reasonable risk that not removing A-boards would breach the Highways Act 1980 (Section 130): The City Corporation has a duty to assert and protect the rights of the public to use and enjoy the highway. A-boards that obstruct pavements may breach this duty, particularly if they impede access for disabled people or create hazards.

60. There is a reasonable risk that not removing A-boards would breach the Equality Act 2010 (Section 20(4)): Public bodies must make reasonable adjustments to avoid placing disabled people at a substantial disadvantage. Allowing A-boards to obstruct pavements could be seen as a failure to meet this duty, especially if it affects wheelchair users or people with visual impairments. Inconsistent enforcement or failure to act could expose the City Corporation to legal action from individuals or advocacy groups, particularly under the Equality Act or Highways Act.

61. The **Provision of Services Regulations 2009** requires that fees charged by a competent authority for authorisation schemes under an authorisation scheme must be reasonable and proportionate to the cost of the procedures and formalities under the scheme and must not exceed the cost of those procedures and formalities. Such fees should also be justified and transparent.

Risk implications

62. There is a reputational risk to the City Corporation if our streets are not considered to be accessible to all. There is also a reputational risk if we are considered to be implementing a policy that may have negative implications for smaller, independent businesses.

63. Removing A-boards from the City Streets has the potential to reduce injury caused by obstruction, especially to people who are blind or visually impaired (RNIB, 2021). A-boards left unchecked may cause trips, falls, or collisions - particularly for people with visual impairments or mobility issues. This could result in personal injury claims against the City Corporation.

64. Drafting of an exceptional circumstances eligibility criteria for Option 2 introduces an additional layer of complexity and risk; criteria can be open to interpretation that result in disputes, or misunderstanding that can lead to perceptions of favouritism, or claims of unfair treatment, further exposing the City Corporation to both legal and reputational challenges. The introduction of exceptions and a licensing scheme could create ambiguity around the rules, leading to inconsistent

application and enforcement. These outcomes risk undermining public trust, creating legal challenges, and hindering effective service delivery.

65. Proceeding with Option 2 would necessitate a change in policy and consultation, which may be received negatively, particularly by disability advocacy groups, given our previous commitments and pledges to maintaining uncluttered and accessible pavements. It would be a departure from the previously established policy of a complete A-board ban.

66. There is also a risk of businesses misinterpreting consultation on a limited change to the policy as re-opening the A-board debate, undermining efforts to implement the wider ban.

67. Allowing exceptions through a licensing system for A-boards might invite legal scrutiny under both the Highways Act 1980 and the Equality Act 2010. There is a risk that the City Corporation could face legal challenges or claims of non-compliance, especially if exceptions result in physical obstructions that could disproportionately disadvantage disabled people, wheelchair users, or those with visual impairments.

68. There is a risk of legal challenge at the point of enforcement, for either option 1 or 2 if not undertaken with due care and process. The City Solicitor has advised on approach, and we will ensure the risk is minimised.

69. Further delay in implementing enforcement may erode confidence in the City Corporation's ability to uphold its policies and commitments, particularly considering the prior decision to implement a City-wide ban on A-boards.

Equalities implications

70. The Equality Act 2010 S20 (4) provides support to remove A-boards. The Act requires that where a physical feature puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to avoid the disadvantage. The Act states that:

    (2) The duty comprises the following three requirements:

    - (3) The first requirement is a requirement, where a provision, criterion or practice of A's(where ‘A’ means the responsible party) puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to avoid the disadvantage.
    - (4) The second requirement is a requirement, where a physical feature puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to avoid the disadvantage.
    - (5) The third requirement is a requirement, where a disabled person would, but for the provision of an auxiliary aid, be put at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to provide the auxiliary aid.

71. Option 1 provides the greatest equality benefits, significantly enhancing accessibility and safety, especially for disabled people, young and elderly and other vulnerable groups. Any movement towards exceptions or delays in enforcement risks undermining legal compliance, public trust, and the City's stated goals for an inclusive environment.

72. Fallen or poorly placed A-boards may impede access and obstruct street-level sightlines, particularly for people using wheelchairs or children who navigate the environment from a lower eye level. It could hinder their ability to anticipate hazards, locate crossings, or respond quickly in emergency situations. The Department for Transport's *Inclusive Mobility* guidance reinforces this by stating that clear, unobstructed sightlines are essential for safe navigation (Department for Transport, 2022 and Transport for All, 2025). Therefore, it is important to consider the risks that displaced, or poorly positioned A-boards pose to accessibility and to the overall safety and security of public spaces

73. Option 2 offers a strict eligibility criteria and accessibility guidance, which should mitigate negative impacts, balancing of the needs of businesses and the rights of disabled people. Ongoing consultation and practical support for affected businesses are recommended to achieve an equitable and lawful outcome.

74. The EQIA can be found in Appendix 4.

Climate implications

75. None identified at present

Security implications

76. No specific security implications have been identified

Conclusion

77. Moving to engagement and enforcement of the current A-board policy will significantly enhance the accessibility and safety of public spaces for people walking and wheeling, particularly for disabled people, older people and people with small children, or using prams or mobility aids. Maintaining clear, unobstructed pathways is essential to achieving the Transport Strategy's vision of "a Square Mile that is inclusive and accessible to all". Whilst there will still be some businesses who attempt to flout the rules, enforcement of the system would certainly lead to an improvement in reducing the number of A-boards on our streets.

78. It is important to recognise the needs of businesses that use on-street advertising to attract customers. Many businesses, particularly independent retailers, face significant challenges in a competitive marketplace, and for some, the visibility provided by A-boards can be a tool for engagement and growth. Any policy or enforcement strategy should therefore consider practical support for these businesses - such as guidance on alternative advertising options, clear signage policies, and transition periods - to help them adapt while ensuring public spaces remain accessible and safe for all.

79. If the recommended option (Option 1) is agreed, we will move forward to enforce our current policy with a phased approach. We will finalise our communication material and communicate our intentions and the rationale behind these changes to all affected businesses and our stakeholders. Engagement materials will

provide context and transparency regarding the necessity of creating safer, more accessible public spaces. Promotion of the changes and engagement would be recommended to commence in January 2026 with enforcement commencing before March 2026.

80. If Option 2 is agreed, officers will complete the eligibility criteria and define the circumstances in which a licence may be issued. The process will include drafting detailed terms and conditions for all approved licences. The policy and eligibility criteria wording will be finalised with input from the legal team and prepared for publication on the City Corporation website for public consultation. Engagement will take place with the Business Improvement Districts (BIDs), representative disability groups, and other relevant stakeholders. At the conclusion of the consultation period, members will receive a report detailing the outcomes and next steps. The lead in time for the detail would suggest consultation can commence in January 2026, although some earlier engagement with representative groups could take place sooner.

81. Further consideration could also be given to other exemptions under licence based on location or other factors. This can be considered as an option if Members agree to amend the current policy to allow exemptions.

Appendices

Appendix 1: 2020.03.31 Planning and Transportation Committee Agenda Item 2 Advertising A-Board Policy
Appendix 2: 2025.02 A-Board Baseline Report
Appendix 3: 2025.09 Proposed Draft Way-Board Licensing Policy
Appendix 4: 2025.09.16 Streets & Walkways EQIA A-Board Policy Amendment

Background Papers

City Corporation (June 2014). Advertising ("A") Boards in the City of London. Planning and Transportation Committee Report: https://democracy.cityoflondon.gov.uk/documents/s35291/Advertising%20A%20Boards%20in%20the%20City%20of%20London.pdf

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Committee(s)	Dated:
Planning and Transportation Committee – For decision Port Health and Environmental Services – For information	31 March 2020 19 May 2020
Subject: Advertising 'A' Boards Policy	**Public**
Report of: Director of the Built Environment	**For Decision**
Report author: Thomas Parker – Department of the Built Environment	

Summary

The City of London Transport Strategy commits to keeping streets clear of obstructions including by not permitting A-Boards to improve accessibility and inclusivity for all users of City streets. This report takes forward detailed implementation.

The report outlines our background strategic and policy position for taking forward Proposal 17 in respect of A-Boards. The report reviews our existing approach to managing A boards and other potential opportunities, including a review of Transport for London's Operation Clearway.

These approaches are considered unsuitable for improving accessibility City streets as they do not provide a solid or clear enforcement base or mandate. Non-permittance of A-Boards provides a clear and consistent approach to supporting the ambitions of both the Corporate Plan and Transport Strategy.

The report concludes that A-Boards should not be permitted on any public highway in the City. Due to the COVID-19 pandemic, education and enforcement of this policy will not take place until business' trade has returned to normal, likely a few months after reopening. This date is to be delegated to the Chair and Deputy Chairman of the Committee with the Director of the Built Environment.

Recommendation(s)

Members are asked to:

- Agree to option C that A-Boards should not be permitted on public highway in the City.
- Agree to delegate the decision to begin implementing the education and enforcement plan to the Director of the Built Environment in discussion with the Chair and Deputy Chairman of the Planning and Transportation Committee.

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Main Report

Introduction

1. The City of London's 25-year Transport Strategy aims to ensure that the Square Mile is a healthy, attractive and easy place to live, work learn and visit.

2. It is imperative that this vision for City streets is achieved inclusively, ensuring that everybody can travel easily, comfortably and confidently to and around the Square Mile.

3. Proposal 17 commits the City Corporation to keep pavements and streets free of obstructions. This addresses various highway obstructions, from managing outdoor drinking to avoid blocking footways, considered provision of outdoor seating and effective management of dockless cycles. It also includes not permitting A-Boards on the public highway. This report considers the strategy for taking forward the A Board element of Proposal 17. Other elements are also being actively considered and addressed.

4. The Transport Strategy was widely consulted on prior to adoption through an extensive programme of stakeholder engagement. Proposal 17 received 1960 responses with an average support level of 4/5, indicating strong support. Only 26 comments opposed not permitting A boards.

5. Many groups representing people with mobility impairments have called for A-Boards to be banned, including the Royal National Institute of Blind People (RNIB) and Transport for All, who have stated that;

   "A-Boards pose significant issues for both wheelchair users, those with mobility impairments and visually impaired people. They physically block the walkways, forcing disabled people either into the road or funnelled into the path of others. We need clear, accessible walkways that don't force conflict with overcrowding."

Duty as a highway authority

6. The City is the Local Highway Authority for most City streets and as such also has an obligation to ensure compliance with the Highways Act 1980. The relevant sections of this Act are:

   a) Section 137 - if a person, without lawful authority or excuse, in any way wilfully obstructs the free passage along a highway it is an offence and liable to a fine on Level 3 of the Standard Scale (currently up to £1,000.00).

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b) Section 148(c) - if, without lawful authority or excuse a person deposits anything whatsoever on a highway to the interruption of any user of the highway he is guilty of an offence and liable to a fine (again, Level 3 on the Standard Scale).

c) Section 149 – if anything is so deposited on a highway as to constitute a nuisance, the highway authority for the highway may by notice require the person who deposited it there to remove it forthwith. In the event of non-compliance, a court order may be obtained authorising the removal and disposal of the offending item. In the event that the highway authority considers the item to constitute a danger to users of the highway it can remove the item forthwith and, ultimately, seek a court order for its disposal.

d) Section 149 (3) of the Act allows a Local Authority to recover its 'expenses' incurred in removal, but not for storage. A charge of £40 for removal of item if owners come forward to claim it may be levied. This charge is to be treated as a measure of deterrence rather than securing an income from this service.

e) Section 130 – the highway authority has a duty to assert and protect the rights of the public to use and enjoyment of the highway.

2014 policy

7. In July 2014, a paper was bought forward to the Planning and Transportation Committee to formalise the City Corporation's position on A-Boards. Before this policy position was adopted, the City Corporation did not have a rigid position on A-Boards and took a neutral view, taking each case on its merits.

8. The recommendation agreed by members was that A-Boards on footpaths less than 2m wide will normally be regarded as giving rise to a highway obstruction and removal should be secured, with persistent offenders risking prosecution. On footpaths over 2m wide, an assessment would be made on a case by case basis as to whether A-Boards caused an obstruction.

9. Since this policy was adopted in 2014 the City has continued to grow, with over a half a million people working in the City and over 90% of journeys involving walking. New high-density developments have become occupied, with more being built.

10. In the context of both this and the Transport Strategy's objective of ensuring the Square Mile is accessible to all, it is considered that the 2014 policy should be reviewed to take account of changed circumstances and increased pedestrian footfall.

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Alternative approaches

Transport for London (TfL) – Operation Clearway

11. Since 2016, TfL have had a programme to deal with unauthorised obstructions on the public highway called Operation Clearway. This programme uses engagement, education and enforcement tactics to reduce unauthorised obstructions on the public highway.

12. Operation Clearway uses Revenue Protection Inspectors and Roads and Transport Enforcement Officers. They are dispatched to priority areas on the Transport for London Road Network (TLRN) to engage with businesses to improve compliance with the Highway legislation as well as gathering evidence for enforcement activity, whether that be formal warning, Fixed Penalty Notices (FPNs) or prosecution, where this is required.

13. While not a zero-tolerance policy across all TfL streets, this robust and proactive method more formally resources and targets highway obstructions beyond the existing policy provision of the City Corporation. The approach has achieved over 80% compliance with businesses engaged in the campaign.

14. Operation Clearway fits within the remit of the existing policy but with dedicated, targeted and well-resourced enforcement.

Hybrid Approach

15. Another approach to managing A-Boards could be a hybrid system which slightly modifies the 2014 Policy and considers the nature and use of the street in considering the acceptability of A-Boards.

16. On footways less than 3m wide, A-Boards would be regarded as an obstruction and not permitted.

17. On footways greater than 3m wide, whether A Boards were considered acceptable would depend on the volume of people using the footways.

18. This option is not recommended. Pedestrian comfort levels are an indexed score used to assess footway crowding. The Transport Strategy commits to achieving a B+ pedestrian comfort level across the whole of the Square Mile. It is considered that to permit A-Boards on highways more than 3m wide would compromise the achievement of a B+ comfort level. Many wider footways are on busier routes which routinely have very high footfall. Items placed on the footway would be likely to restrict free flow of pedestrians, increase the incidence of conflicts between pedestrians and risk diversion of pedestrians into the carriageway where the risk of conflict with vehicles (including bicycles) would arise.

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London Borough of Hackney

19. The London Borough of Hackney have gone further and in March 2013 resolved that no A-Boards would be allowed on public highway in Hackney (although they would be allowed on private land subject to planning requirements on advertising).

20. This position is supported by an information and enforcement programme. This consists of educating businesses who use A-Boards on the issues they can cause, before progressing to formally writing to the business before resorting to fixed penalty notices and confiscation.

21. We have engaged with Hackney to review the effectiveness of their policy. While unable to provide exact figures, their enforcement director has informed us that almost all businesses remove their A-Boards after discussions with enforcement officers and formal enforcement is rarely required.

New policy options

22. There are three potential options for our A-Board policy

    a) Do nothing: Retain the 2014 Policy without amendment

    b) Amend the 2014 Policy: The amendments would adopt the Hybrid Approach set out at paragraphs 15 - 17

    c) Resolve not to permit A boards on the public highway in the City

Evaluation

23. The Transport Strategy acknowledges the importance of facilitating movement of people by ensuring walking is convenient, safe and inclusive. It also recognises the need for the City's fixed amount of street space to accommodate past (and future) growth. At the same time, businesses sometimes wish to use A Boards, especially if competing premises have A Boards or if the premises are in less conspicuous locations. These competing interests must be weighed in considering the appropriate option.

24. Regard must also be had to the Equalities Impacts outlined below. It is considered that given the particularly intensive use of the City's highways, A Boards are likely to impede free access over footways for pedestrians, with potential adverse impacts as outlined in paragraph 18 above.

25. Options (a) and (b) are not recommended, and Option (c) is proposed. It is considered that any adverse impacts for businesses will be mitigated by providing

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a consistent approach so that no one businesses can secure a competitive advantage through the use of A-Boards, and by communicating with businesses about alternatives to A-Boards.

26. The ban will include City Corporation A-Boards but not extend to road signs or other statutory signage related to highways use.

Legal implications

27. The courts have held that some encroachments are so minor as to fall outside the ambit of criminal sanction (the "de minimis" rule). However, this rule is limited to encroachments that are "fractional" or "trifling"[1]. Due to the large volumes of people who use the City's footways at peak times, it is unlikely that an obstruction could be considered as de minimis.

28. All other legal implications are in the body of the report.

Next steps

29. Should members approve the recommendation, officers will agree an education and publicity programme with impacted teams ahead of implementing the new policy. Where A-Boards remain in place after the education and publicity campaign, officers will visit non-compliant premises and request removal. If non-compliance persists, business owners will be written to, after which, where removal powers are available, remaining A-Boards will be removed.

30. This education and enforcement programme will be managed by the Cleansing team and developed with the input of City Transportation.

31. A monitoring strategy will also be put in place to report on the number of A boards removed by occupiers or by enforcement. This is likely to include annual reporting to Members.

Strategic Implications

32. Approval of Option C supports the delivery of Corporate Plan High Level Action 9d – Improve the experience of arriving in and moving through our spaces.

33. The adverse impacts of A-Boards on pedestrian flows, pedestrian comfort and safety particularly affect blind or partially sighted people, including long cane users, and people who may require wider footway widths such as people using wheelchairs or buggies. This supports the deliverables of the Transport Strategy.

[1] Eg Torbay Borough Council v Cross QBD 1995

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Conclusion

34. Officers recommend Option C - not permitting A-Boards on the public highway in the City - with the aim of reducing obstructions on the highway and to help provide an attractive, safe and inclusive walking environment.

35. Additionally, officers recommend that, due to the COVID-19 pandemic, Members agree to delegate the decision to begin implementing the education and enforcement plan to the Director of the Built Environment in discussion with the Chair and Deputy Chairman of the Planning and Transportation Committee.

36. The education and enforcement programme will not begin until trade at City businesses have not only reopened but trading has returned to normal. This likely to be a few months after reopening.

Background Papers

Advertising ('A') Boards in the City of London – July 2014

City of London Transport Strategy – May 2019

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APPENDIX

City of London Corporation A-board Baseline

February 2025

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Summary

1. A survey was conducted to assess the distribution and purpose of A-boards throughout the City of London. Data collection took place using a Field Maps App from 5 December to 20 January 2025, excluding the holiday period from 21 December to 7 January 2025.
2. Officers found A-boards or Stand obstructions at 830 locations, accounting for 42% of all locations visited.
3. All Wards in the City had A-boards, with Cordwainer displaying the highest percentage of organisations with A-boards at 57%, followed by Aldersgate at 50%, and Billingsgate at 49%.
4. A-boards are predominantly utilised for advertising purposes, accounting for 93% of their usage. Less than one percent of signage is designated exclusively for wayfinding (0.7%), 5.7% serve both for advertising and wayfinding purposes, and 0.6% are utilised for other functions.
5. Most A-boards are placed on public highways, with a smaller proportion on private land.
6. The data shows that the number and location of A-boards has an impact on public spaces and streets and necessitates management to improve accessibility and safety for all individuals in the City of London
7. Given the increase in foot traffic and our policies on accessibility and inclusion, maintaining clear and accessible pavements is a high priority. The baseline study is instrumental in informing future engagement with businesses and to plan for enforcement of the City-wide ban on A-boards.
8. Please note some of the actions or comments written in here have been taken forward to the committee report and have been developed further since this baseline report was written (February 2025).

Introduction

9. In March 2020, the Planning & Transportation Committee approved a City-wide ban to ensure clear and accessible pavements. However, the implementation was delayed due to the COVID-19 pandemic and to allow time for foot traffic to recover post-pandemic.
10. Prohibiting the placement of A-boards on any streets enhances the user experience for people walking, including those with sight and mobility impairments, as well as individuals wheeling prams and using mobility aids.
11. With foot traffic increasing and the working population expected to rise, maintaining clear and accessible pavements is crucial for creating inclusive environments that enable people to navigate their surroundings independently and safely.
12. Project updates and proposed delivery were included in discussions with members at the Streets & Walkways Sub Committee in July 2024. Following a meeting with the Chairmen of Streets and Walkways and Planning and Transportation in November 2024, it was agreed to undertake a baseline study ahead of starting engagement with businesses. A baseline would help identify the number of A-board distribution across the City and their purpose.

Methodology

13. To assess the distribution and purpose of A-boards across the City, data collection was conducted using a Field Maps App. Using a specifically designed Geographical Information System (GIS) base layer of 1835 commercial business' locations created by the City Corporation GIS team.
14. The Field Maps App allowed officers to add new businesses to the base layer.
15. For this project we identified an A-board as a simple stand-alone board with a heavy base or two boards creating an 'A' shape, placed on the pavement to attract attention (Figure 1). While a stand or similar, was any object that could cause obstruction outside of a premises that was being used to advertise. These included menu stands, flags, delivery carts and cargo bikes with branding etc (Figure 2).
16. Data Collection was undertaken during working hours (8 – 6pm), from the 5 December to the 20 January 2025. No data was collected from over the Christmas period between 21 December - 7 January 2025. Officers recorded:
    - which organisations/locations had an A-board or stand or both to advertise and promote their business.
    - the number of each A-board or Stand,
    - their use (wayfinding, advertising, or both) and location (private land, public highway or unsure).
17. Officers visited a total of 2012 locations and recorded if that premises or location had an A-board or stand on the Field Map app (Figure 3).
18. After data collection, the data was downloaded and cleansed to fix inconsistencies and improve its quality and reliability.
    - Ten locations were removed from the base layer because they either did not physically exist or the business had closed, resulting in 1,025 original data points remaining.
    - Additionally, 177 new locations were added to the GIS Field Map; however, eight were removed due to incomplete data, leaving 169 new locations.

Figure 1: Different types of A-boards recorded as part of this project

Figure 2: Different types of stands or similar obstructions recorded

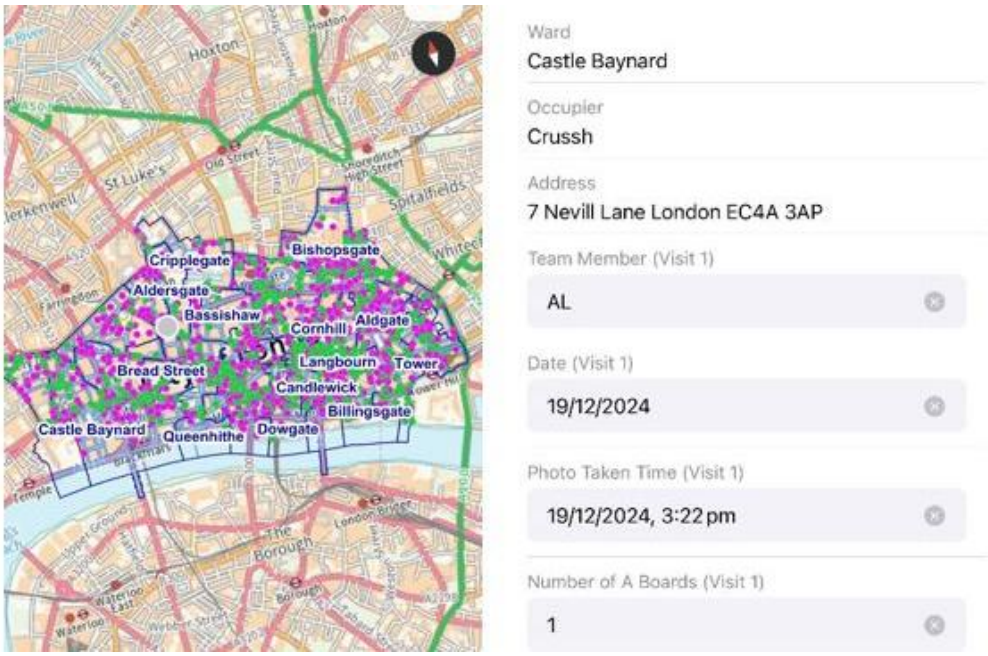

Figure 3: Screen shot of the GIS App data collection page. Green dots indicate locations with obstruction and pink dots are locations without. This is indicative of the app; a full map is shown later in the report.

Results

19. A-boards or stand obstructions were found at 830 of the 1994 locations (42%).
20. Of the 169 new points added majority were new businesses or churches displaying A boards or stands. However, several were not specific to the business location in that area, for example: A Hop on Hop off sign at a bus stop advertising a bus tour, City of London Police sign at Ludgate Hill, City Corporation signs discouraging anti-idling or anti littering signs were found across the City etc. (Figure 4).

Figure 4: Examples of A boards that were not specific to a specific business location

21. A-board dominated with 805 locations recorded as displaying at least one A-boards, 79 had at least one stand or similar, and 54 had both (Figure 5).

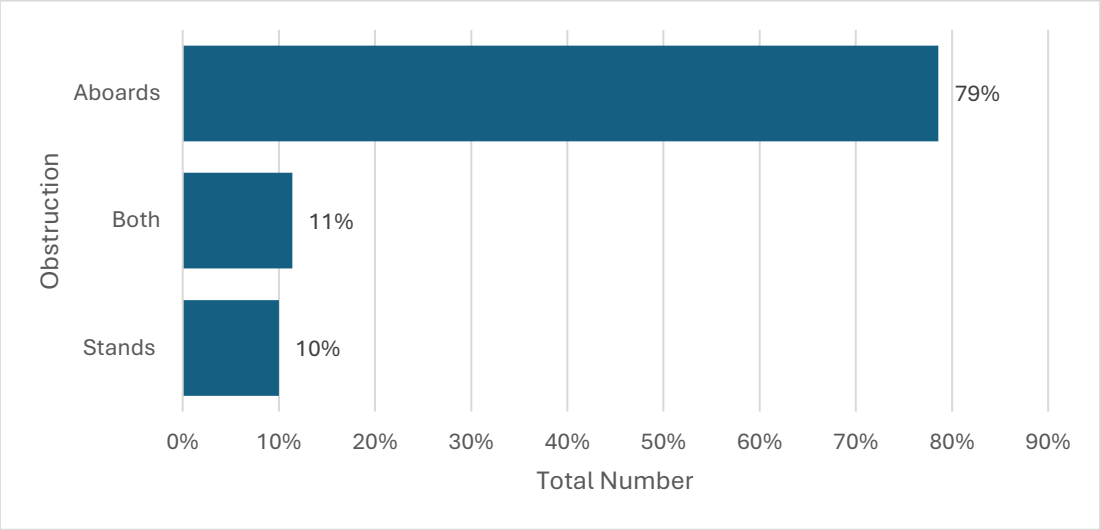

Figure 5: Percentage distribution of total numbers of A-board, Stands or both

22. Out of 805 locations with A-boards, there were a total of 973 boards, with an average of 1.2 per location. Specifically,
    - 666 locations had 1 A-board,
    - 116 had 2 A-boards,
    - 18 had 3 A-boards,
    - 4 had 4 A-boards,
    - 1 location displayed 5 A-boards.

23. Of the 79 locations there were a total of 124 stands or similar. The average was slightly higher than with A-boards at 1.6. Specifically:
    - 58 had 1 stand,
    - 12 had 2 stands,
    - 5 had 3 stands,
    - 1 had 4 stands,
    - 1 had 6 stands,
    - 1 had 7 stands,
    - 1 had 10 stands.
24. A-boards are primarily used for advertising, with 772 boards (93%) serving this purpose. A small percentage (0.7%) are used for wayfinding; these were usually businesses in alleyways. About 5.7% serve both advertising and wayfinding roles, and 0.6% fall under other uses, such as buckets full of flowers, or postcard stands for sale outside or delivery trollies without branding (Table 2). Several locations had a number of items outside taking up considerable space.

Table 1: Distribution of A-boards by purpose

Category	Number of Boards	Percentage
Advertising	772	93%
Wayfinding	6	0.7%
Both advertising and wayfinding	47	5.7%
Other	5	0.6%

25. Officers observed that some businesses were displaying A-boards within their premises, rather than placing them outside, thus keeping the pavements accessible. These businesses were not recorded as having A-boards. Instead, officers photographed these establishments as examples of best practices (Figure 6).

Figure 6: Examples of best practice seen at locations across the City

26. The data on the type of land usage reveals that a significant majority of A-boards are on the public highway (Table 2).

Table 2: Distribution of A-boards by land type

Type of Land	Number	Percentage
Public highway	621	75%
Private land	153	18%
Uncertain	56	7%

27. In terms of distribution A-boards and stand obstructions were spread out across the City of London, present in every Ward (Figure 7).
28. The Ward with the highest number of A-boards is Bishopsgate, with a total of 119 A-boards (Figure 8 and Appendix 1).
29. Dowgate and Bishopsgate have a high number of organisations using A-boards. In these Wards, both the total number of A-boards and the percentage of businesses with A-boards are higher compared to others.
30. Cordwainer has the highest percentage of organisations within each ward that have A-boards 57%, followed by Aldersgate with 50%, and Billingsgate with 49%. Wards like Portsoken, Bridge, and Queenhithe show both low total A-board counts and low percentages of businesses with A-boards (Figure 8).
31. The organisations that had the greatest number of A-boards or stands were:
    - Pret A Manger had A-boards at each of their 29 locations, with 7 locations having a delivery trolley outside the premises.
    - The City of London Corporation had at least 13 locations displaying A-boards.
    - Starbucks had A-boards at all 9 of their locations.
    - Itsu and Café Nero had A-boards at 7 locations.
32. Transport for London has an A-board ban on all the roads it manages across the Transport for London Road Network (also known as red routes), which include several streets in the City such as Bishopsgate, Farringdon Street and New Bridge Street. Enforcement is undertaken on a regular basis, however, there were still A-boards displayed along the TLRN (Figure 7).
33. At City Corporation locations we have already started working on alternative ways to promote messages with those teams (Destination City, Visitor Centre, Air Quality, City Gardens and Recycling), so that we may demonstrate best practice at our own locations.

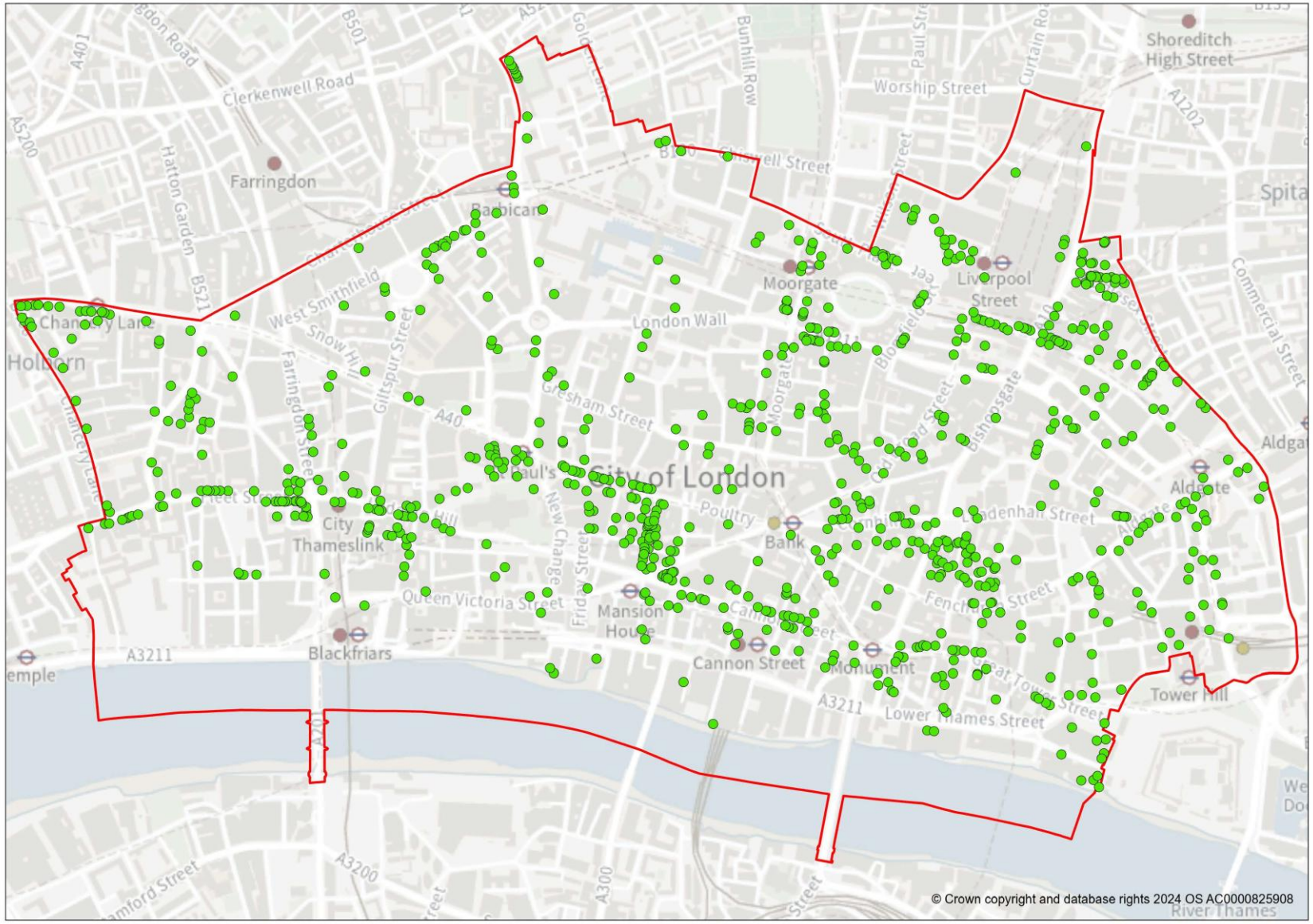

Figure 7: Distribution of A-board and stand locations across the City of London (please note this map was created using all the entered location points, prior to data cleaning so there may be slight discrepancies)

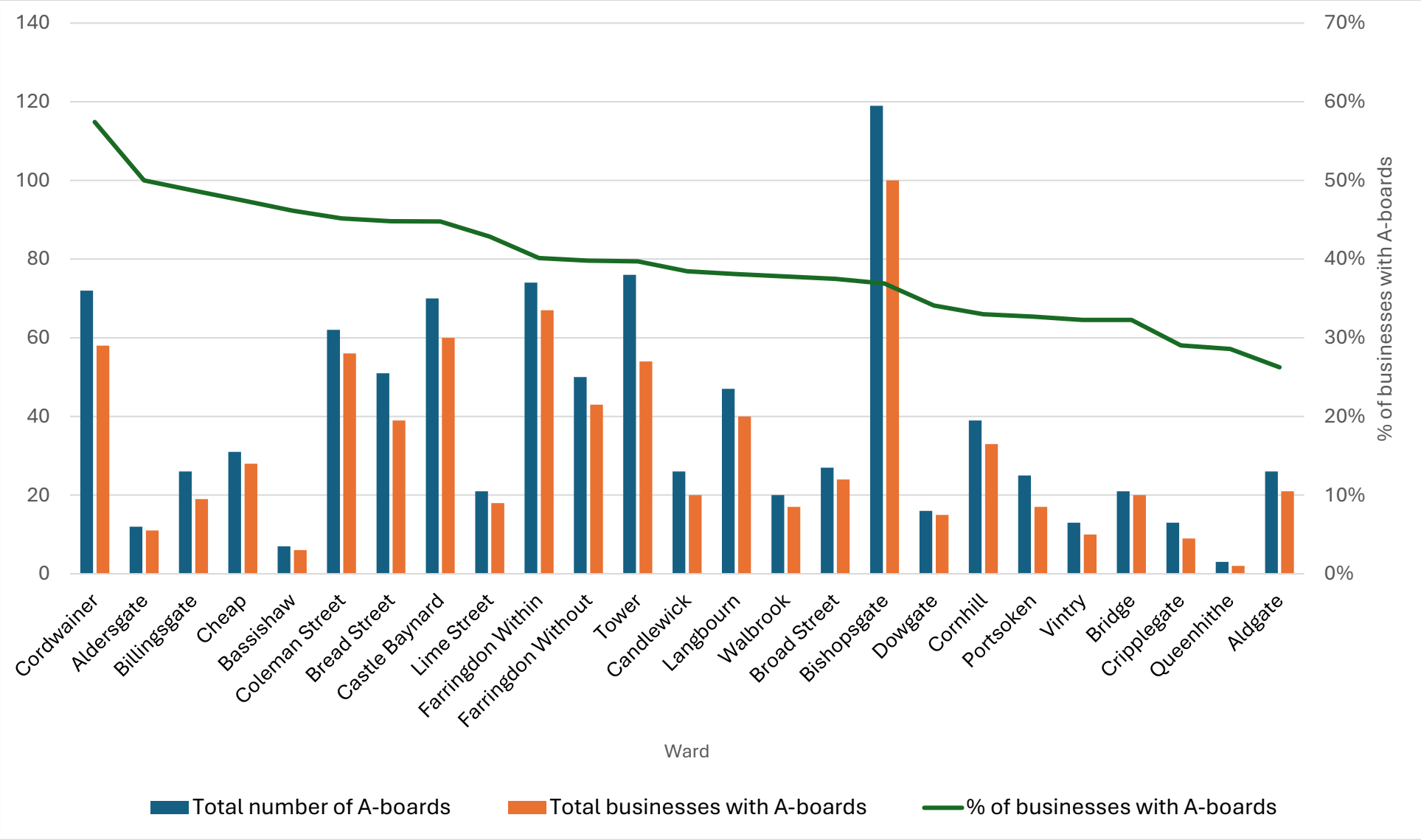

Figure 8: Total number and '% of businesses with A-boards by Ward

Limitations

34. The report has a few limitations that should be considered:
    - Officers did not document all businesses location visited that were permanently closed, under construction, or unoccupied.
    - Some observation data where A-boards were recorded was incomplete and had to be excluded from the dataset. This further supports the point that the actual number of businesses with A-boards or other stands may be higher than recorded.
    - Furthermore, due to time constraints, businesses that were closed at the time of recording were not revisited. For example, some cafés close at 3 pm, and the visit occurred at 4 pm.
35. These limitations suggest that the figures presented in the report might be an underestimation of the actual number of A-boards and stands in the City.

Discussion

36. The data analysis reveals a significant usage of A-boards or similar stands in the City of London, with obstructions identified at 830 locations, representing 42% of all surveyed sites. Due to limitations in data collection this figure may be an underestimation.
37. The widespread use of A-boards on public highways poses challenges for maintaining clear and accessible pavements. A-boards causing obstructions can reduce available pavement space, often making it insufficient for people walking, compelling them to step into the carriageway, posing a safety risk. People using push chairs, mobility aids, or wheelchairs could encounter blockages and may need to turn back, posing another safety risk and overexertion for some. For those who are visually impaired, A-boards can present a trip hazard. Additionally, for neurodivergent individuals or those sensitive to visual clutter, areas with numerous A-boards could increase stress and discomfort. A 2014 report to the Planning and Transportation Committee highlighted the challenge around allowing A-boards on wider streets, while banning them on narrower lanes where they don't cause obstruction, it raised concerns of unfair advantage to some businesses. To address this, officers conducted a review that supported the removal of A-boards from all City streets. These were all the reasons that led to the implementation of a City-wide ban on A-boards to ensure clear and accessible pavement.
38. While A-boards are primarily used for advertising, with 93% serving this purpose, they also play a crucial role in wayfinding for a small percentage of businesses (0.7%) located in less visible areas such as alleyways. Effective wayfinding helps customers locate them, which is important in a competitive urban environment. A permit-based system or a grant to support businesses that can make a case that their A-boards is explicitly for wayfinding could be explored.
39. Several businesses are already using best practice and displaying A-boards inside their premises. Encouraging businesses to adopt alternative advertising methods, such as window displays and digital signage, can help maintain clear

pavements while still allowing businesses to attract customers. However, A-boards are viewed as cost effective ways to advertise that require little maintenance. Digital signage has a much higher upfront cost, but could offers benefits like animated content, remote updates, and better visibility. If used long-term and updated frequently, digital signage can be cost-effective over time compared to repeatedly printing new posters for A-boards (Play Digital Signage, ScreenCloud, Signagelive, DISPL & Mvix, 2025).

40. Transport for London has an A-board ban on all the streets it manages across London already, which include some in the City such as Bishopsgate, Farringdon Street and New Bridge Street. Enforcement is undertaken and businesses receive a fixed penalty notice.
41. The challenge posed by the number of A boards being used for advertising in the City of London necessitates a balanced approach that considers both business needs, public safety and equitable access. It is imperative to carefully evaluate the needs of businesses to advertise their services on the Public Highway in line with the City Corporation's commitment to the Equalities Act 2010.

City of London Corporation sites - case study

42. The City Corporation had A-boards at 13 different locations across the city, situated on both public highways and private land. The teams responsible for these boards, including the City of London Air Quality Team, Recycling Team, and the Visitor Centre, were contacted. They were informed about the City-wide ban on A-boards approved in March 2020, which was delayed due to the COVID-19 pandemic, and were requested to remove their A-boards. The Streets and Walkways 2024 report was shared with them, and it was explained that removing our A-boards would improve accessibility and underscore the importance of leading by example.
43. Alternative options to A-boards were explored such as using digital screens placed inside their premises, visible through windows, to attract customers. Creating attractive window displays to draw the attention of passersby without the need for external boards. Using digital advertising and social media platforms offered by OneCity, and the possibility to explore further options with our planning team.
44. The response highlighted:
    - Concerns were expressed regarding the impact that removing A-boards would have on the promoting exhibitions, guided tours, events, and campaigns. There were worries about the reduced visibility of landmarks without wayfinding A-boards.
    - Questions were raised about the possibility of exemptions or case-by-case decisions in areas with no accessibility concerns, such as those with wide pavements or where the signs are temporary (campaign).
    - While alternative options for visibility and promotion were discussed, it was noted that limited budgets restrict teams from enhancing their promotional efforts. It was suggested that funding from the City Corporation could be

allocated to support the implementation of other visibility and promotional materials.

45. The varied responses from the case study on City Corporation's teams underscore the need for caution in engaging with businesses. The issue is that most businesses will note that they rely on A-boards for visibility and promotion, and their removal will impact foot traffic and sales, especially for those in less visible locations. Additionally, there are concerns about the financial burden on businesses to adopt alternative advertising methods. Engaging with businesses on a non-consultative decision, could lead businesses to suggest that the City Corporation do not listen to business needs and reopen the debate, and not implementing the ban could undermine the City's commitment to equitable access and public safety.

Next steps

46. The presence of A-Boards on streets, many of which are used solely for advertisements, highlights the need to enforce our policy. Considering the challenges and the importance of a balanced approach, to address the interests of businesses, public safety, and equitable access, we recommend the next steps:

Explore Permit-Based System

47. Collaborate with internal teams in Licensing, Enforcement, and Legal teams to explore the implications of a permit-based system for wayfinding. This need arises from the challenges faced by a small percentage (0.7%) of businesses that use A-boards exclusively for wayfinding.

Explore alternatives and develop case studies with internal teams

48. We could engage further with internal teams (Destination City, Visitor Centre, Air Quality, City Gardens and Recycling) currently using A-boards to review alternative solutions and work through options to identify any serious concerns and understand costs, allowing for adjustments to be made before wider recommendation.

Approach to enforcement

49. Conducting face to face engagement with approximately 830 businesses over the next year would be time and resource intensive. Face to face engagement could lead to a better understanding of the ban and its necessity, potentially giving better compliance. However, there is a risk that businesses could mis-interpret engagement as consultation, re-open the debate and lead discontent when the ban is implemented. It is unlikely that engagement of all businesses will yield much more information, but would further delay implementation of the ban, which could have significant equality implications for our streets and reputation and impact on public using our streets.
50. We recommend that we progress through to an approach for enforcing current A-board policy for all, potentially with very limited exemptions as suggested above. This would include a general notification period to all businesses to allow businesses to engage with us on specific challenges and draw out any issues we haven't identified. City Solicitors will ensure all processes are carried out appropriately within powers permitted as Highway Authority.

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Appendices

Ward summary (STATIC)	Total A-boards	Total businesses	Total businesses with A-boards	% of businesses
Cordwainer	72	101	58	57%
Aldersgate	12	22	11	50%
Billingsgate	26	39	19	49%
Cheap	31	59	28	47%
Bassishaw	7	13	6	46%
Coleman Street	62	124	56	45%
Bread Street	51	87	39	45%
Castle Baynard	70	134	60	45%
Lime Street	21	42	18	43%
Farringdon Within	74	167	67	40%
Farringdon Without	50	108	43	40%
Tower	76	136	54	40%
Candlewick	26	52	20	38%
Langbourn	47	105	40	38%
Walbrook	20	45	17	38%
Broad Street	27	64	24	38%
Bishopsgate	119	271	100	37%
Dowgate	16	44	15	34%
Cornhill	39	100	33	33%
Portsoken	25	52	17	33%
Vintry	13	31	10	32%
Bridge	21	62	20	32%
Cripplegate	13	31	9	29%
Queenhithe	3	7	2	29%
Aldgate	26	80	21	26%

DRAFT: Way Finding Way-board Licensing Eligibility Criteria and Guidance September 2025 (Under Development)

Purpose

Advertising Boards (A-boards) are not permitted within the City of London. A-boards can be an obstruction and hazard if not placed correctly, especially for disabled people.

Under UK legislation, businesses must obtain permission from the highway authority before placing A-boards on public footways or carriageways. **The Highways Act 1980 (Section 137)** prohibits any obstruction of the highway without lawful authority, which includes the unauthorised placement of advertising boards. Local authorities may issue specific conditions for A-board use, such as maintaining clear pedestrian access and ensuring boards are stable and removed outside trading hours.

The **Provision of Services Regulations 2009** requires that fees charged by a competent authority for authorisation schemes under an authorisation scheme must be reasonable and proportionate to the cost of the procedures and formalities under the scheme and must not exceed the cost of those procedures and formalities. Such fees should also be justified and transparent.

The introduction of a licensing system for wayfinding A-boards ("Way-boards") would allow businesses with demonstrated need to apply for a licence, thereby supporting their visibility provided they do not reduce accessibility or compromise the safety of public highways, walkways, or public spaces in the City.

General Principles

The Way-board Licensing Guidance will be applied to all businesses applying for a licence to place an A-board on the public highway, walkways, or public spaces within the City.

- All Way-boards must be licensed.
- Way-board licences will be granted based on strict criteria and will not be automatically granted. Businesses are required to apply for a licence and provide a detailed justification for the necessity of a Way-board.
- Accessibility and safety will be prioritised over wayfinding.
- Way-board placement should not impede access for people walking and wheeling and should maintain a safe and accessible streets and public realm.

To further clarify the distinctions between Way-Boards and Advertising Boards Table 1 highlights the key differences in purpose and public benefit.

Table 1: Wayfinding vs. Advertising Boards: Key Differences

Aspect	Wayfinding Board (Way-board)	Advertising Board (A-board)
Purpose	To help people navigate to a business or service (e.g., directions or map)	To promote a business, product, or service.
Public Benefit	Improves navigation and orientation	Primarily benefits the business
Placement	Strategically placed for navigation purposes	Outside business premises

Way-board Application Guidance

The following Eligibility Criteria outlines the necessary licensing conditions for businesses wishing to apply for a Way-board license.

For the purposes of this policy, an “alleyway” or “passage” is defined as a narrow pedestrian route that is not considered a main street. Such routes usually run between or behind buildings and may be covered or uncovered. They allow access to buildings that do not front onto a main street.

A “courtyard” refers to an open, often shared space located on the public highway, situated behind or between buildings. It is typically not visible from a main street and is usually accessed via an alleyway or passage. Courtyards may be enclosed or partially enclosed and are generally accessible to the public, unless otherwise restricted

1. Eligible Businesses

To apply for a Way-board licence, you must be a business:

- located within the City of London and is situated away from primary streets and main thoroughfares, such as within alleyways and passages or courtyards.
- that does not have direct frontage onto the main street and has no other means of displaying street-level signage.
- that can demonstrate that its visibility and customer footfall are, in part, reliant on passing trade. This must be supported by evidence such as photographs or diagrams showing limited visibility from the main street, thereby reinforcing the need for directional signage.

Examples of eligible businesses may include:

- A business located in a courtyard behind a main shopping street.
- A business accessed via a narrow alleyway with no direct street-facing windows or signage.

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- A business situated in a mews or passageway with limited visibility from the main thoroughfare.

2. Way-board Eligibility Criteria

2.1 Size and number

The following guidelines must be adhered to in relation to number and size:

- Each business is permitted to display one Way-board; however, businesses located down alleyways or courtyards with more than one distinct entrance may be permitted additional Way-boards provided they justify this and meet the other eligibility criteria
- In cases where multiple businesses plan to apply for a Way-board at a single location, they should consider (or the City Corporation will determine) the possibility of consolidating multiple business listings on a single board to reduce clutter and enhance clarity.
- Each Way-board should be no more than 850 mm high and 550 mm wide, including the supporting structure. The depth of the Way-board usually ranges between 500 to 600 mm to ensure stability. The base's width must provide enough stability to prevent the way-board from easily tipping over.
- Way-boards must be detectable by white canes (e.g. solid base). The base must be made of solid, non-flexible materials such as metal or heavy-duty plastic and the base should be at least 150 mm high to ensure detection by white canes.

2.2 Design and information

To ensure that Way-boards serve their primary function of wayfinding, a thoughtful approach must be taken in relation to design and information:

- Way-boards must contain only way-finding information to assist individuals in navigating to the business.
- Businesses may incorporate brand elements, such as the business name, logos, and colour schemes, into way-finding information in a manner that complements rather than detracts from the primary function of the Way-board.
- Businesses must use universally understood symbols and arrows to guide individuals to the business location.
- Way-boards should have high-contrast signage to ensure that wayfinding information is clear and visible, using high-contrast colours to make text easily readable for everyone, including those with visual impairments and avoiding flashing lights or confusing designs for neurodiverse individuals.

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2.3 Proposed location and accessibility

The proposed location of the way-board must be indicated on the application form and should preferably be situated near a building line. This approach minimises the risk of obstructing people walking and wheeling pathways and reduces potential hazards.

The following guidelines must be adhered to in relation to number and size:

- There must be a minimum residual width of 2 metres of unobstructed footpath for the passage of people walking and wheeling.
- Way-boards should be placed against (physically touching) a building or business where possible
- Way-boards must be placed on straight sight lines and not on any curved angles along the building line and not in the sight line of any crossing points.
- Way-boards must not obstruct access, and should not be placed within 2m of:
    - Tactile paving.
    - Dropped kerbs
    - Bus stops or crossings
    - Street furniture
- Way-boards must not be of a rotating or swinging banner/flag type.
- Way-boards placed on the highway must not be fixed or attached to any street furniture, lamp poles, signposts etc. and must not have other 'things' attached e.g. balloons and streamers.
- Way-boards must be taken in or removed from the footpath when the business is closed.
- Way-boards which have fallen over must be immediately removed or made secure to ensure the above criteria are met.

2.4 Potential Impacts and equality considerations

An Equality Impact Assessment will be undertaken by the business as part of the application process, and City Corporation officers review these. Applicants will be asked to consider how placement and use of Wayboards might affect people with protected characteristics. For example: obstructions to walking and wheeling pathways, proximity to tactile paving or dropped kerbs, visual clutter, etc.

This process ensures businesses assess Way-board placement to avoid creating obstacles for disabled people, parents with prams etc. and will insure these are mitigated to public spaces remain accessible, inclusive, and safe for everyone. An example of what could look like is shown in Table 2.

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Table 2: Example response to the Way-board Placement Equality Impact Assessment consideration

Equality consideration	Potential Impact	Mitigation Measures	Applicant	City Corporation
Obstruction to walking and wheeling	Risk of narrowing footway, affecting wheelchair users and parents with prams	Way-board will be placed flush against the building line, leaving at least 2m of clear footway	*The total footway width at the proposed location is 3.2m. The Way-board will be positioned directly against the building line, ensuring a 2m unobstructed path remains.*	*This was confirmed using a tape measure at a site visit*
Proximity to tactile paving or dropped kerbs	Could interfere with navigation for visually impaired individuals	Board will not obstruct tactile paving or dropped kerbs. A 1m buffer will be maintained.	*There is no tactile paving or dropped kerb nearby so a buffer will be maintained to ensure accessibility and safety for all pavement users.*	*A site inspection confirmed that the nearest tactile paving is 3m away and the closest dropped kerb is across the street.*

3. Way-board license fees and appeals process

A Way-board License will cost £xxx.

- Application fee of £xx (non-refundable, paid upfront)
- License fee of £xxx (paid after approval, before the licence is issued)
- This licence is valid for 2 years
- License Fee's will be reviewed every four years

Applications that do not satisfy the Way-board eligibility criteria will not be granted a license. Business owners who receive this decision retain the right to appeal.

Step 1: The business owner must submit a written notice of appeal within 14 days of receiving the notice that their application has been declined. The notice of appeal must include the grounds for the appeal and any supporting evidence.

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Step 2: Upon receipt of the notice of appeal, an independent panel will review the case, and all evidence submitted within 30 working days. This will be the decision of the Director of City Operations. All decisions made by the panel will be documented and made available to the public to ensure transparency in the decision-making process.

Step 3: The panel will issue a written decision within 14 days of the hearing. The decision will include the findings of fact, conclusions and the reasons for the decision. The panel may affirm, modify, or reverse the decision to give a Way-board license. The decision of the panel is final and binding. No further appeals will be entertained.

4. License enforcement and public feedback

Way-boards will be enforced through regular inspections by street enforcement officers to check for valid licenses.

- Non-compliance may lead to Fixed Penalty Notices (FPN) or license revocation.
- Appeals will follow FPN guidelines.

Appendix 1 outlines the proposed Terms and Conditions.

A key aspect of this initiative is creating clear ways for the public to contact the City Corporation about Way-boards via email, telephone and potential street reporting applications. This ensures anyone can report Way-boards that obstruct or affect navigation in the City.

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Appendix 1: Draft Terms and Conditions for proposed Way-Board Licensing

City of London Corporation Proposed Way-board Licensing Guidance Section 149 Highways Act (1980)

Your business appears to have placed an item (including Advertising boards or Way-board) on the public highway outside your premises. Advertising boards or A-boards are not authorised in the City of London. Way-boards are permitted for eligible businesses who hold a way-board licence only.

Enforcement action will be taken where any of the following criteria are not met when holding a Way-board Licence:

- There must be a minimum residual width of 2 metres of unobstructed footpath for the passage of pedestrians.
- No more than one item (Way-board) per business.
- Items must be no more than 850mm in height, 550mm in width, and 600mm in base or footprint.
- Items must be high-contrast so they are easily visible and should not be mirrored or reflective.
- Item must be detectable by white canes (e.g. solid base). The base must be made of solid, non-flexible materials such as metal or heavy-duty plastic and the base should be at least 150 mm high to ensure detection by white canes.
- Items should be placed against (physically touching) a building line and must not obstruct access, they should not be placed within 2m of:
    - Tactile paving.
    - Dropped kerbs
    - Bus stops or crossings
    - Street furniture
- Items must be placed on straight sight lines and not on any curved angles along the building line and not in the sight line of any crossing points.
- Items must not be of a rotating or swinging banner/flag type.
- Items placed on the highway must not be fixed or attached to any street furniture, lamp poles, sign posts etc. and must not have other 'things' attached e.g. balloons and streamers.
- All items, including Way-boards must be taken in or removed from the footpath when the business is closed.
- Way-boards which have fallen over must be immediately removed or made secure to ensure the above criteria are met.

Items (Way-boards) that are deemed to be a danger, which are placed on the highway whether because the above criteria are not met or for any other reason will

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be removed without notice by the City of London Corporation's Street Environment Officers.

Any business placing items on the public highway does so at their own risk and may be liable, in the event of injury, loss or damage being caused to a highway user.

Advertising is subject to advertising control and the local planning authority may enforce against and remove unauthorised Way-boards which do not have advertising consent. The local planning authority's policy is to resist excessive or obtrusive advertising.

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Equality Impact Assessment – A-board Policy update and Way-board eligibility

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Proposal Title	A-Board Policy update – To allow Wayboards
Details of the lead officer completing the Assessment	Andrea Larice, Strategic Transport
Department Responsible:	Environment, City Operations, Strategic Transport
Who has been involved in creating the EQIA: (please summarise/list stakeholders you have engaged with and how)	City Corporation Highways Team City Corporation Parking Team City Corporation Transport Strategy Team
Date of Initial assessment:	This EQIA evaluates and reviews the proposed modifications to the Red Badge holder policy, aiming to gain a comprehensive understanding of their potential impacts. Version 1 of this EQIA was issued in July and subsequently updated in September 2025.
Date of next review	Should members proceed with this option an evaluation of this EQIA should be conducted in accordance with the public consultation, implementation of the Policy, and after the successful implementation of the Policy.

1.PROPOSAL OVERVIEW

The City of London Corporation's Transport Strategy 2024 Second edition sets out our approach to improving accessibility in the Square Mile (Outcome 3: The Square Mile is accessible to all). The removal of A-boards is included in Proposal 16: Keep pavements free of obstructions. This proposal supports the Public Sector Equality Duty (PSED) by ensuring that public spaces are accessible and non-discriminatory, fostering inclusivity and equality, and our commitment to Transport for All's Equal Pavements Pledge.

In March 2020, the Planning & Transportation committee approved a City-wide ban of A-boards. However, the implementation was delayed during the COVID- 19 Pandemic and to allow time for footfall to recover post-pandemic (Appendix 1). As footfall in the City of London increases and the working population rises, maintaining clear pavements is crucial for creating an inclusive environment that allows people to navigate our streets independently and safely.

In December 2024 officers conducted a City-wide study to identify the distribution, location, and purpose of A-boards. This identified A-boards or similar obstructions at 830 out of 1,994 surveyed sites, representing 42% of the total locations, with the majority (93%) serving exclusively as advertising tools with no wayfinding element. 75% of A-boards were positioned on public highway. This widespread use of A-boards on public highways poses challenges for maintaining clear, safe and accessible pavements. Based on the findings of the study, an internal review was conducted to understand how teams would react to the request to remove A-board and determine the feasibility of a licence-based system for the businesses using A-boards for wayfinding without visible frontages (Appendix 2).

This EQIA examines the potential impacts of a policy change regarding A-boards for wayfinding.

The proposed update includes keeping the current ban on advertising A-boards throughout the City of London, while exploring the possibility of introducing a licensing system for Wayfinding A-boards ("Way-boards") under certain conditions.

The purpose of this approach is to consider both public highway accessibility and safety, as well as business requirements for directional signage. The EQIA evaluates how these changes may affect individuals with protected characteristics.

Purpose of the Policy Change

The City Corporation plans to revise its A-board policy to:

- Continue the City-wide ban on advertising A-boards.
- Establish a licensing system for Way-boards in select cases where wayfinding is considered essential and accessibility can be preserved.

Legal framework

Highway authorities have duties to protect the use of the highway for all, including some extra provision for disabled people. All of these are listed here. Under legal advice we are proposing to use Highways Act 1980 (Section 137), and our duties under the Equality Act.

- Under UK legislation, businesses must obtain permission from the highway authority before placing A-boards on public footways or carriageways. The **Highways Act 1980 (Section 137)** prohibits any obstruction of the highway without lawful authority, which includes the unauthorised placement of advertising boards. Local authorities may issue specific conditions for A-board use, such as maintaining clear pedestrian access and ensuring boards are stable and removed outside trading hours. Therefore, no A-boards are on street with permission at present.
- Under the **Town and Country Planning (Control of Advertisements) Regulations 2007**, A-boards are classified as advertisements and may require express consent from the local planning authority. Even where deemed consent applies, authorities retain the right to restrict or revoke permission based on public safety or amenity concerns. Failure to comply with these requirements may result in enforcement action or removal of the boards.
- There is a reasonable risk that not removing A-boards would breach the Highways Act 1980 (Section 130): The City Corporation has a duty to assert and protect the rights of the public to use and enjoy the highway. A-boards that obstruct pavements may breach this duty, particularly if they impede access for disabled people or create hazards.
- There is a reasonable risk that not removing A-boards would breach the Equality Act 2010 (Section 20(4)): Public bodies must make reasonable adjustments to avoid placing disabled people at a substantial disadvantage. Allowing A-boards to obstruct pavements could be seen as a failure to meet this duty, especially if it affects wheelchair users or people with visual impairments. Inconsistent enforcement or failure to act could expose the City Corporation to legal action from individuals or advocacy groups, particularly under the Equality Act or Highways Act.

Potential impacts of introducing a Wayboard Licencing system.

The placement of A-boards on footways, even in limited numbers may adversely affect individuals with disabilities by obstructing pathways, creating potential tripping hazards, and complicating navigation—particularly for those who are blind or partially sighted. Such boards may also impede tactile paving and diminish the clarity and equality of pedestrian routes.

While increased visibility of local services may offer some benefits to older adults, there remains an elevated risk of trips and falls associated with reduced mobility or declining vision. Regarding pregnancy and maternity, although no direct impacts are identified, narrowed walkways can still present challenges for individuals using prams or mobility aids.

Disabled people, particularly those who are blind or partially sighted, wheelchair users, and individuals with mobility impairments, are most susceptible to the adverse effects of A-boards situated on public highways. Inappropriately placed signage can act as physical barriers, reduce navigable space, and introduce additional tripping hazards. Older adults, children, and those who are pregnant or accompanied by prams may also be disproportionately affected by congested or restricted footways.

Furthermore, the presence of A-boards on pavements can considerably decrease available walking space, occasionally compelling pedestrians to step into the carriageway to bypass obstacles. This situation not only poses safety risks but also compromises independent movement for all pedestrians, including those without disabilities. Inconvenience, increased stress, and greater risk may result from navigating cluttered walkways. Consequently, maintaining clear and accessible pavements is paramount to ensuring safety, dignity, and equal access for all members of the community, irrespective of their protected characteristics.

Although the presence of A-boards may have negative impacts —particularly for individuals with disabilities, older adults, parents with prams, and others with mobility challenges—these impacts can be effectively mitigated by implementing a strict licensing policy combined with robust enforcement measures. By establishing clear and stringent criteria, such as maintaining a minimum 2metre unobstructed footway, requiring high-contrast, cane-detectable signage, and ensuring that A-boards are positioned only where accessibility will not be compromised, the risks can be substantially mitigated.

Regular monitoring and responsive enforcement will ensure compliance, while ongoing public engagement and accessible reporting channels will allow issues to be identified and addressed promptly. Although no direct negative impacts have been identified for other protected groups, including those defined by race, religion, gender, or sexual orientation, continued assessment will help guard against potential indirect discrimination. With such safeguards in place, the adverse effects associated with A-boards can be effectively managed, balancing the needs of businesses with the imperative for accessible, safe, and inclusive public spaces for as many people as possible. Therefore, keeping pavements clear and accessible is vital to ensuring safety, dignity, and equal access for everyone, regardless of their protected characteristics. While A-boards may negatively impact disabled people, older adults, parents with prams, and others with mobility challenges, these risks can be effectively managed through a robust licensing policy and strong enforcement.

In summary, the introduction of a City-wide ban, coupled with a rigorous licensing framework for essential Way-boards, aims to reduce physical obstacles. Continued monitoring and active public participation are crucial to implementing and maintaining a policy that is both equitable and effective, thereby supporting the core values of equality and inclusion within the City's public spaces.

2. EVIDENCE AND IMPACT ANALYSIS

Introduction

A-boards, or Advertising boards, are typically used by businesses to advertise and promote their services. Constructed as simple standalone boards mounted on heavy ‘A’-shaped frames, they are placed across pavements to attract attention. Their size and style can vary widely, reflecting the diversity of business activities across the City.

A-boards often narrow the pavement and can create significant obstructions for pedestrians. Many campaigning organisations have called for a complete ban on A-

boards, emphasising that clear, unobstructed routes are critical for elderly people, blind and partially sighted individuals, and those using wheelchairs or mobility aids.

Concerns about A-boards have been raised by the Royal National Institute of Blind People (RNIB) representing people who are blind or partially sighted. They note that a proliferation of A-boards can make it difficult to navigate pavements safely, often forcing individuals to manoeuvre around obstacles or risk stepping into the road. Encounters with A-boards can lead to injury or undermine the confidence and mobility of people with vision impairments, restricting their independence and ability to participate fully in community life.

Transport for All (2014) also highlighted that *"Street clutter is not just a problem for visually impaired people, but a problem for wheelchair users, scooter users, buggy users, and older people too. Transport for All welcome this 'zero-tolerance' approach to businesses which repeatedly flout rules on keeping the pavement clear. Not everyone can step down into the road to bypass an A-board or other obstacle."*

While hybrid policy approaches—allowing A-boards on wider streets, for example—have been considered to balance business demands with pedestrian safety, the City's narrow footways and high pedestrian volumes have made such policies inequitable. Permitting A-boards on some wider streets, like Cheapside, could disadvantage traders on narrower lanes such as Bow Lane, undermining fair competition. This issue was raised in a 2014 Planning & Transportation Committee paper, which also referenced complaints from traders and informed subsequent policy discussions.

Reflecting these concerns, in March 2020, the Planning & Transportation Committee approved a City-wide ban of A-boards. However, enforcement implementation was postponed due to the COVID-19 pandemic and the need to allow footfall in the City to recover in the post-pandemic period. City pavements and footways are seeing rising use, with current foot traffic at 70% of 2019 levels. The Greater London Authority forecasts a 14.2% increase in City of London workers by 2041. The historic layout of many City streets contributes to the challenge, with several areas featuring particularly narrow pavements. Negotiating these footways can be especially difficult for wheelchair or mobility scooter users and parents with buggies. When A-boards are present, the lack of sufficient pavement space may force pedestrians to step into the carriageway to pass by. Maintaining accessible pavements is crucial to ensure safe and independent movement for all.

Data considerations and limitations

Pregnancy and Maternity

ONS Conception Statistics for England and Wales, 2020, present conception data for the City of London and the London Borough of Hackney together to ensure confidentiality.

In 2020, there were 5,659 conceptions recorded in Hackney and the City of London. This corresponds to a conception rate of 74.6 per 1,000 women aged 15 to 44 years, marginally higher than the Inner London average (66.1) but below the overall London average (76.2).

It is important to note that this data may not fully represent the majority of pregnant women in the City who may be impacted by the proposed change, as many commuters and visitors are regularly present in the area rather than being permanent residents.

Age

The Office for National Statistics (ONS) 2021 population statistics for the City states a total population of 8,580 for the borough. The age breakdowns for the City and London are detailed in Table 1 below:

Table 1: Age Breakdown for City and London (Source: ONS Census Data 2021)

Age	City of London (%)	Greater London (%)
Total: All residents	100.0	100.0
Aged 4 years and under	2.5	6.0
Aged 5 to 9 years	1.9	6.0
Aged 10 to 15 years	2.4	7.2
Aged 16 to 19 years	2.1	4.4
Aged 20 to 24 years	11.2	6.7
Aged 25 to 34 years	25.8	18.1
Aged 35 to 49 years	21.2	22.7
Aged 50 to 64 years	18.8	16.9
Aged 65 to 74 years	8.3	6.5
Aged 75 to 84 years	4.4	3.8
Aged 85 years and over	1.4	1.6

The data highlights notable differences in the age distribution between the City of London and Greater London. Specifically, the City has a markedly smaller proportion of residents under the age of 15, at just 6.8%, compared with 19.2% in Greater London. In contrast, the City records a slightly greater percentage of individuals aged 25 to 34 years, as well as those aged 65 and over, relative to the broader Greater London area (ONS, 2021 and City of London Corporation, 2023b)

Table 2: Workforce Age Structure, City and Greater London 2011 (Source: City of London Workforce CENSUS 2011- Analysis by Age and Occupation)

Age	City of London Actual	City of London %	Greater London Actual	Greater London %
16 - 19	2,521	1	81,959	2
20 - 24	26,806	8	387,569	9
25 - 29	67,481	19	685,431	15
30 - 34	70,450	20	697,643	16
35 - 39	56,574	16	591,814	13
40 - 44	45,902	13	548,352	12
45 - 49	35,964	10	507,549	11
50 - 54	24,541	7	405,451	9
55 - 59	14,941	4	295,937	7

60 - 64	8,293	2	196,176	4
65 - 69	2,370	1	73,115	2
70 - 74	863	0	29,485	1
Total	356,706	100	4,500,481	100

Table 2 shows that the age profile of the City of London's workforce differs notably from that of Greater London. Employees aged 25 to 34 make up 39% of the City's workforce, compared to 31% in Greater London. Similarly, those in the 35 to 49 age brackets represent 39% of workers in the City, whereas they account for only 36% across Greater London. In contrast, individuals aged 50 and over constitute a smaller proportion of the City workforce (14%) than in Greater London (23%), indicating a lower presence of older professionals. Census 2021 data further highlight a younger workforce in the City, with 61% of workers aged between 22 and 39, compared to 40% for England and Wales as a whole.

Research by Transport for London (2019) has found that walking is the most frequently used mode of transport by older Londoners aged 65 and over, with 87% walking at least once a week, and 65% travelling by bus at least once a week. 51% of weekday journeys made by Londoners aged 65 and over are for shopping/personal business, while 30% are for leisure purposes. Walking is the most used mode of transport by younger Londoners, with 97% aged 24 and under walking at least once a week.

It is also important to acknowledge the intersectionality between age and disability. For example, Age UK fact and figures (2025) shows that 52% of those aged 65 and over are disabled compared with only 9% under 64.

Disability

The City of London is a unique area with a small residential population but a significant daily influx of workers, students and visitors, making it difficult to fully represent the number of disabled individuals who regularly work, study and visit the City.

The 2021 Census (Office of National Statistics, 2023) found that London 15.7%, or 1.2 million people are disabled. It also identified that City of London had one of the lowest proportions of disabled residents (11.8%) compared to other local authorities in London:

- 3.9% had a disability that limited their day-to-day activities a lot
- 7.9% had a disability that limited their day-to-day activities a little

Specific data on the number of disabled individuals working in the City of London is not readily available with exception to some limited information the City Corporation hold on City workers holding Red Badges.

- As of 1 November 2024, there were 167 Red Badges issued, with 72 held by City residents and 95 by permanent City workers.
- According to the latest data, approximately 678,000 people work in the City of London (City Corporation, 2023). It is estimated that 0.01% of City workers hold a Red Badge.
- There may also be disabled drivers with designated parking spaces at their City workplace who do not hold a Red Badge.

Specific data on the number of disabled individuals currently studying in the City of London is not readily available. However, the City of London is home to several higher education institutions and schools. Including:

- Gresham College, which offers free public lectures within the City of London.
- Guildhall School of Music and Drama, which is renowned for its performing arts programs.
- BPP University, which specializes in law, business, finance, and health.
- Coventry University campus on Middlesex St
- London Metropolitan University, Aldgate Campus, which offers a wide range of undergraduate and postgraduate courses.

The Department for Work and Pensions (2023) identified that there has been strong growth in the number and rate of disabled people in employment, and a narrowing of the gap between the rate of disabled and non-disabled people in employment (the disability employment gap). However, the disability employment gap is wider for:

- disabled men
- older (aged 50 to 64) disabled people
- disabled people with no qualifications
- disabled people of White ethnicity

2024/2025 City Corporation Study on A-Board distribution and use

To assess the distribution and purpose of A-boards across the City, data collection was conducted using a Field Maps App. Using a specifically designed Geographical Information System base layer of business's locations created by the City Corporation GIS team.

For this study, an A-board was identified as a simple stand-alone board with a heavy base or two boards creating an 'A' shape, placed on the pavement to attract attention (*Figure 1*). While a stand or similar, was any object that could cause obstruction outside

of a premises that was being used to advertise for example: menu stands, flags, delivery carts with branding etc.

Data Collection was undertaken during working hours (8 – 6pm), from the 5 December to the 20 January 2025. No data was collected from over the Christmas period between 21 December - 7 January 2025. Officers recorded:

- which organisations/locations had an A-board, or stand, or both, to advertise and promote their business.
- the number of each A-board or stand,
- their primary use (wayfinding, advertising, or both) and location (private land, public highway or unsure).

A summary of the A-board Baseline Study is provided below; see Appendix 2 for the full study.

Figure 1: Distinct types of A-boards recorded as part of this project

A-boards or stand obstructions were found at 830 of the 1,994 locations (42%).

A-boards dominated the street environment with 805 locations recorded as displaying at least one A-boards, 79 displaying at least one stand or similar, and 54 displaying both (*Figure 2*).

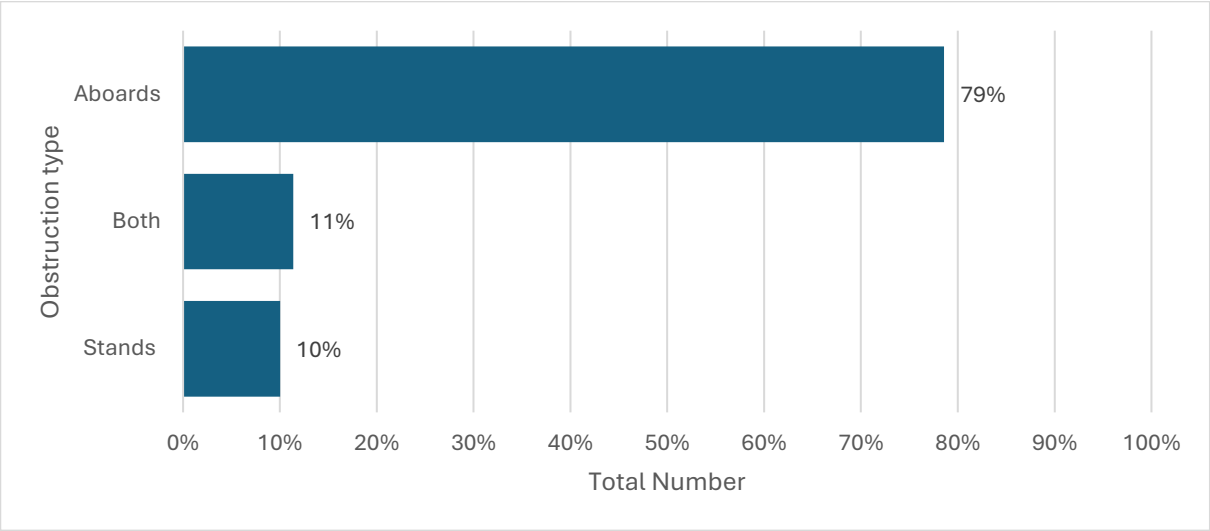


Figure 2: Percentage distribution of total numbers of A-board, Stands or both

Out of 805 locations with A-boards, there were a total of 973 boards, with an average of 1.2 per location. Specifically,

- 666 locations had 1 A-board,
- 116 had 2 A-boards,
- 18 had 3 A-boards,
- 4 had 4 A-boards,
- 1 location displayed 5 A-boards.

Of the 79 locations there were a total of 124 stands or similar.

A-boards are primarily used for advertising, with 772 boards (93%) serving this purpose. A small percentage (0.7%) are used for wayfinding; these were usually businesses in alleyways. About 5.7% serve both advertising and wayfinding roles, and 0.6% fall under other uses, such as buckets full of flowers, or postcard stands for sale outside or delivery trollies without branding.

Table 3: Distribution of A-boards by purpose

Category	Number of Boards	Percentage
Advertising	772	93%
Wayfinding	6	0.7%
Both advertising and wayfinding	47	5.7%
Other	5	0.6%

A-boards placement was photographed, and often A-boards were positioned in ways that cause safety concerns or reduced the available space on footways, which could lead to obstructions and people walking stepping onto the street.

Officers observed that some businesses were displaying A-boards or stands within their premises, rather than placing them outside, thus keeping the pavements accessible. These businesses were not recorded as having A-boards. Instead, officers photographed these as examples of best practices (Figure 3).

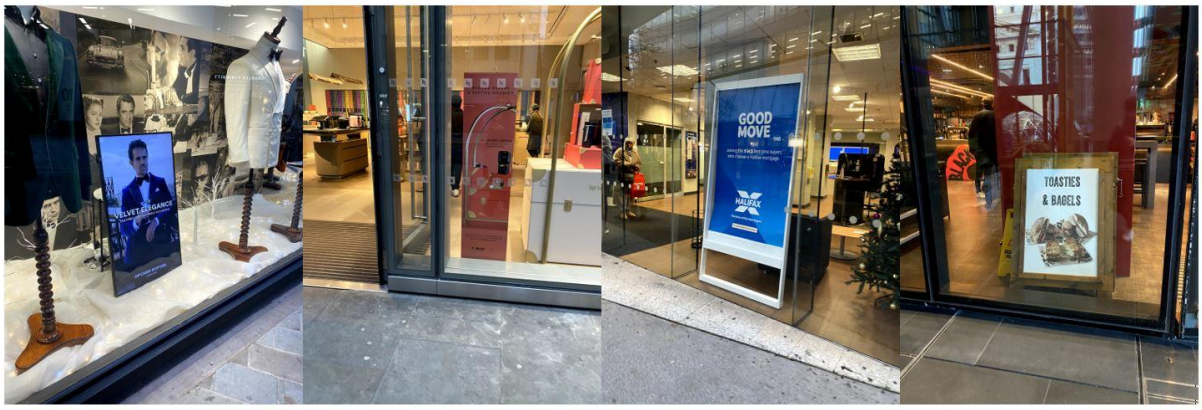


Figure 3: Examples of best practice seen at locations across the City

The data on the type of land usage reveals that a significant majority of A-boards are on the public highway (*Table 4*).

Table 4: Distribution of A-boards by land type

Type of Land	Number	Percentage
Public highway	621	75%
Private land	153	18%
Uncertain	56	7%

In terms of distribution A-boards and stand obstructions were spread out across the City of London, present in every Ward (*Figure 4* and Figure 5).

A-Boards were also recorded along streets such as Bishopsgate, Farringdon Street, and New Bridge Street, which are part of the TfL Road Network (TLRN) and are subject to regular enforcement.

These findings highlight both the widespread presence and diverse distribution of A-boards and stand obstructions throughout the City of London, underscoring the importance of consistent monitoring and effective policy enforcement across all wards.

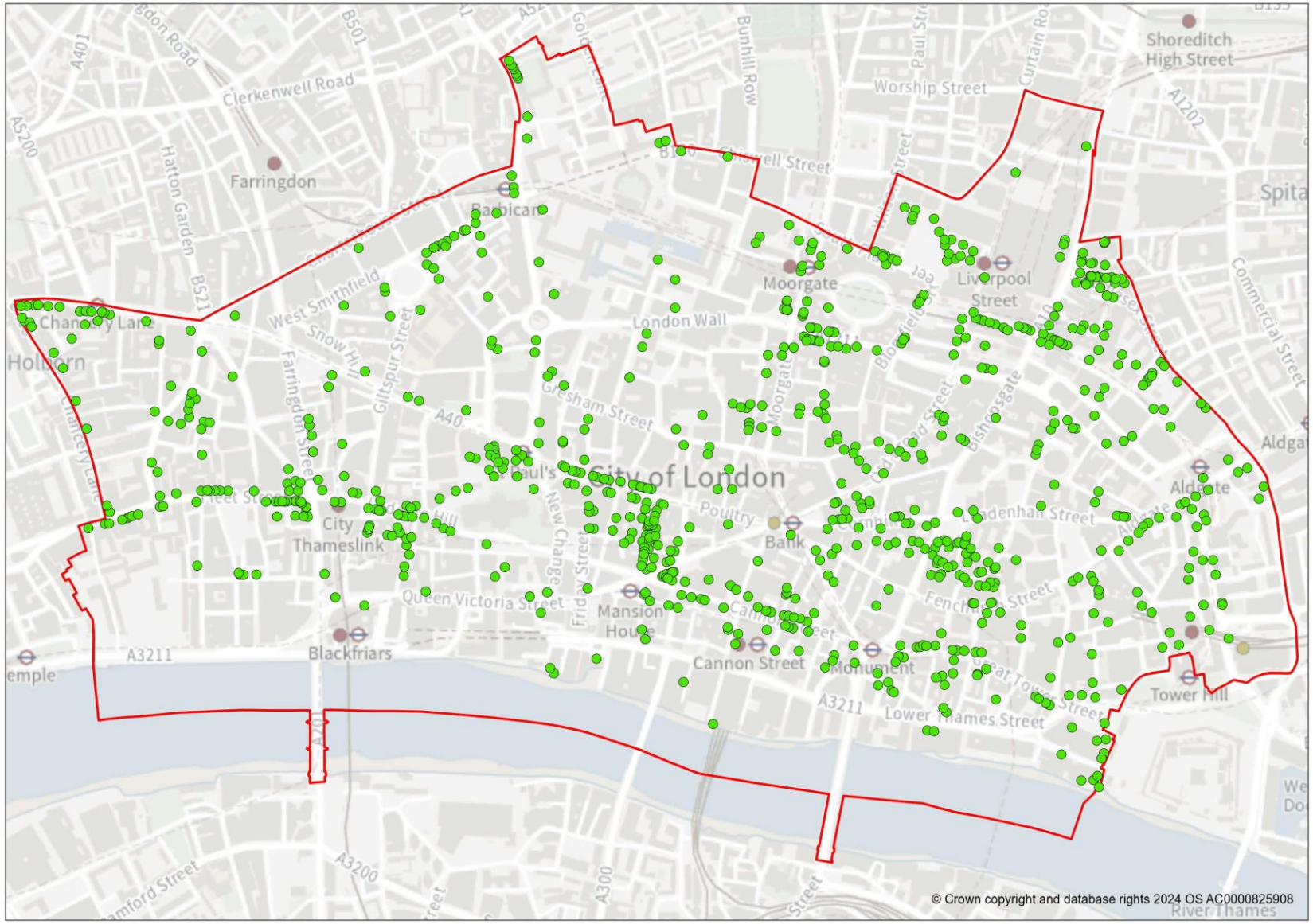


Figure 4: Distribution of A-board and stand locations across the City of London (please note this map was created using all the entered location points, prior to data cleaning so there may be slight discrepancies

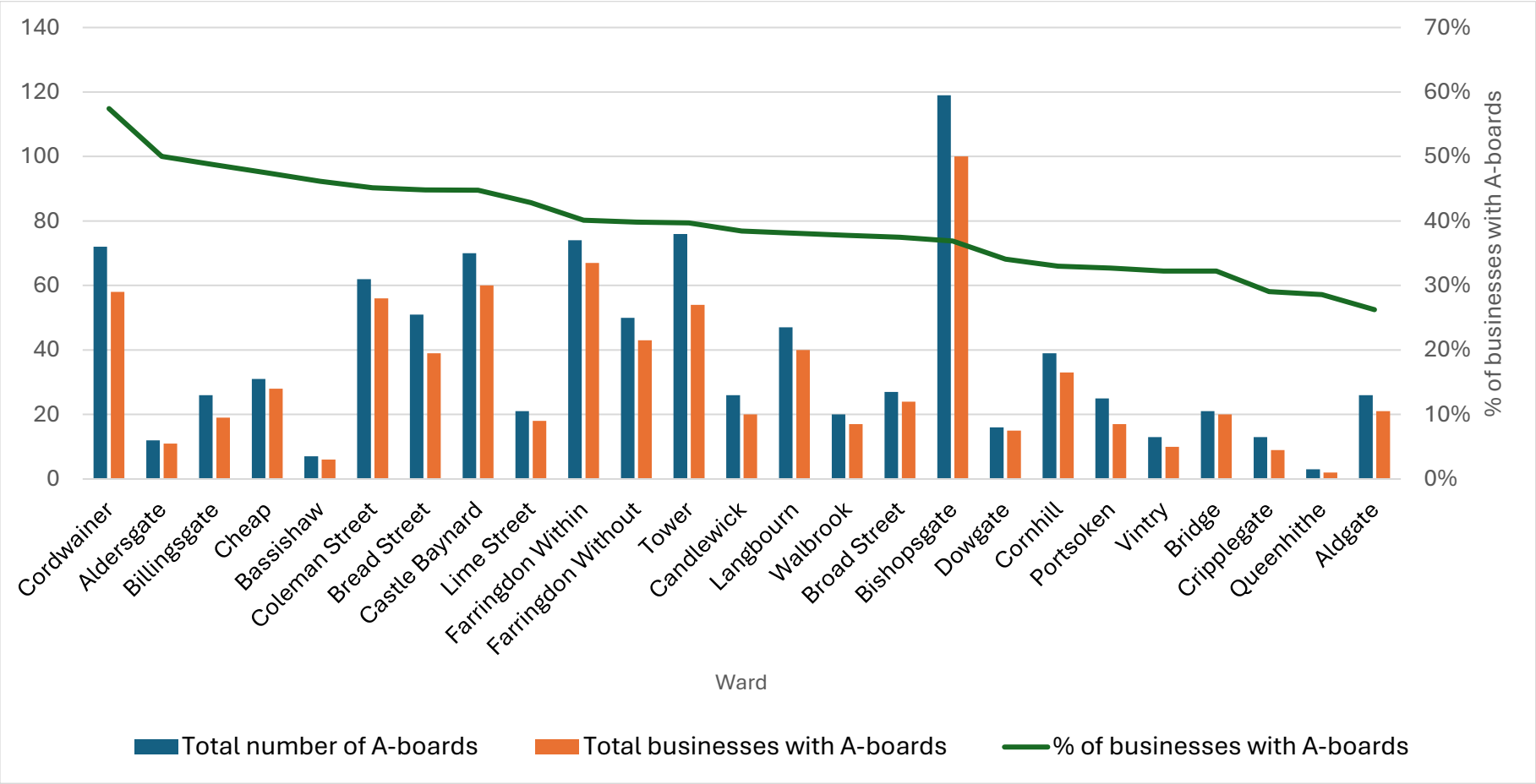


Figure 5: Total number of A-boards by Ward

Proposed changes

Amend the A-board policy to allow A-boards for wayfinding purposes by exception (via a Way-board licence)

Under this option there would still be a City-wide A-board ban but business would be able to apply for a Way-board licence by exception subject to meeting set eligibility criteria.

As less than one percent of signage was identified as exclusively for wayfinding (0.7%) and 5.7% were identified as utilised for both advertising and wayfinding purposes, a licensing system could allow businesses with genuine needs for A-boards to maintain visibility.

To further clarify the distinctions between Way-Boards and Advertising Boards the table below highlights the key differences in purpose and public benefit.

Aspect	Wayfinding Board (Way-board)	Advertising Board (A-board)
Purpose	To help people navigate to a business or service (e.g., directions or map)	To promote a business, product, or service.
Public Benefit	Improves navigation and orientation	Primarily benefits the business
Placement	Strategically placed for navigation purposes	Outside business premises

There will be a strict Eligibility Criteria that outlines the necessary licensing conditions for businesses wishing to apply for a Way-board license. A draft Licencing and Eligibility Criteria and Guidance can be found in Appendix 1.

Licences would incur a fee and would require a formal application procedure. Applicants will need to demonstrate that their Way-board is for wayfinding purposes and meets stringent accessibility criteria, as outlined in forthcoming guidance.

Applications and guidance material/documentation will be prepared in accordance with the social model of Disability (Disability Rights UK, 2025). This will ensure that businesses recognise and address the barriers created by society, rather than focusing solely on individuals' impairments. This approach aligns with regulatory expectations around equality, inclusion, and accessibility, helping businesses understand and demonstrate their commitment to fair treatment and compliance. Furthermore, integrating the social model improves business understanding by encouraging inclusive policies and practices, fostering a more diverse workforce, and enhancing customer experience for everyone.

Each application will be reviewed, and licences will be granted to successful applicants.

Enforcement will focus on verifying whether a valid licence is present for any Way-board displayed.

The proposed licensing scheme is intended strictly for exceptional circumstances only, and all businesses must adhere to the established guidelines.

Positive

- Small and medium-sized businesses would benefit from increased visibility and the ability to use their A-boards. This supports equity in business competition. For many small and medium enterprises (SMEs), street-level advertising such as A-boards could be a tool for attracting foot traffic and communicating daily specials, services, or promotions. In areas with high pedestrian flows, like the City of London, A-boards can help these businesses remain visible amidst larger competitors who might have more extensive branding resources. Allowing continued use of A-boards for wayfinding — subject to regulation—could help level the playing field, ensuring that independent businesses have opportunities comparable to larger chains.
- Enhanced wayfinding signage, such as clearly marked A-boards, can be particularly beneficial for older residents and visitors, as these signs make it easier to locate amenities and services in busy urban environments (Age UK, 2018).

Negative

- Older people, particularly among people over 65, are more vulnerable to slips, trips, and falls (Public Health England, 2019). As such, A-boards can be a risk and need regulations and careful placement—possibly including guidelines from the Royal National Institute of Blind People (RNIB, 2021) are crucial to balance the needs of accessibility and businesses visibility, ensuring public spaces remain safe for all users.
- Beyond the risks of slips, trips, and falls, A-boards can contribute to additional public realm challenges. Street clutter can obstruct the free flow of pedestrians, particularly impacting those using wheelchairs, mobility scooters, or pushing prams.
- Narrow pavements can become congested, making it difficult for people with visual impairments or limited mobility to navigate safely. There is also a risk that, without consistent enforcement, some businesses may place boards in unsuitable locations or allow them to encroach upon pedestrian routes, exacerbating accessibility concerns and causing people to step into the street, putting them at risk of collisions.
- Maintenance of A-boards can be inconsistent and poorly-maintained or weather-damaged boards could become hazards, increase the likelihood of incidents or creating unsightly streetscapes. This is of particular concern for way-boards, which will by their nature likely be out of the line of sight of the businesses responsible for them. If they fall, become damaged or otherwise create a hazard, this may not be immediately visible to the business responsible.

Outcome

A comprehensive assessment of the advantages and disadvantages indicates that implementing a regulated licensing system for Way-boards represents a pragmatic solution. Establishing explicit criteria and ensuring robust enforcement can facilitate greater visibility and fair competition for small and medium-sized businesses, without unduly impacting individuals who walk, wheel or use mobility aids.

Transport for All (2015) notes: *"Street clutter is not just a problem for visually impaired people, but a problem for wheelchair users, scooter users, buggy users, and older people too. Transport for All welcomes this 'zero-tolerance' approach to businesses which repeatedly flout rules on keeping the pavement clear. Not everyone can step down into the road to bypass an A-board or other obstacle."*

Upholding stringent eligibility requirements and guidance—through careful placement and high maintenance standards—serves to reduce associated safety risks. In conclusion, the adoption of a licensing scheme with transparent fees and criteria provides a structured framework that supports business growth and urban vitality while prioritising accessibility and safety for all members of the community.

Proposed licencing structure and fee for "Wayboards"

It is proposed that applications for Way-board licences be assessed strictly in accordance with established eligibility criteria and have a licencing fee.

Should an application fail to meet these criteria, approval will not be granted. However, it is recommended that applicants retain the right to appeal any decision where their application has been refused, ensuring transparency and fairness throughout the process.

The **Provision of Services Regulations 2009** requires that fees charged by a competent authority for authorisation schemes under an authorisation scheme must be reasonable and proportionate to the cost of the procedures and formalities under the scheme and must not exceed the cost of those procedures and formalities. Such fees should also be justified and transparent.

It is anticipated that our proposed fee structure will be modelled on Barnet Council's approach. For reference, Barnet's 2025 model sets the total cost at £245, consisting of a non-refundable £72 application fee (payable upfront) and a further £173 licence fee, which is paid upon approval prior to the licence being issued. The licence remains valid for one year (London Borough of Barnet, 2025).

Proposed Way-board Licence

- Total Cost: £240
- Application Fee: £70 (non-refundable, paid upfront)
- Licence Fee: £170 (paid after approval, before licence is issued)
- Licence validity: 2 years
- Licence Fees subject to review every four years

Positive

- In setting low costs, the structure is designed to cover administrative expenses while remaining accessible for businesses, particularly SMEs. By

keeping costs manageable and clear, the scheme promotes equal opportunity, making participation in the Way-board licensing system fair and inclusive for all applicants regardless of background.

- Accessibility considerations—such as providing information in alternative formats or offering additional support during the application process—further strengthen compliance with the Equality Act and help create an environment where all eligible businesses can participate on equal footing.

Negatives

- A potential downside is that low fees may unintentionally lead to an increase in street clutter or obstructions if not managed carefully.

Outcome

On balance, the current proposed fee structure creates a positive framework that encourages participation while responsibly managing administrative costs. However, careful oversight is necessary to prevent unintended negative consequences. By maintaining transparency in costs, ensuring ongoing accessibility support, and periodically reviewing the fee levels, the scheme can continue to promote fairness and inclusivity. With these safeguards in place, the licensing system will be well-positioned to meet the needs of diverse business applicants and uphold equal opportunity.

Exceptional Circumstances policy

Current procedures did not have any specific mention of exceptional circumstances. Having a procedure will ensure that these are dealt with fairness and consistency, and the City Corporation can offer necessary support to vulnerable individuals facing significant challenges either though a Red Badge or by way of short-term parking exemption. For example, to include people undergoing life-changing medical treatments in the City of London

Positives

- This change would align with the requirements of the Equality Act 2010, to making reasonable adjustments for individuals with protected characteristics and will provides a framework to support individuals who might be disproportionately affected by exceptional circumstances, that standard rules might not cover. It will define a criterion and how businesses can qualify to ensure these applications will be reviewed with fairness and compassion and we can offer necessary support to vulnerable individuals facing significant challenges
- It ensures that all individuals are treated fairly and consistently. This helps prevent discrimination and ensures that everyone has equal opportunities, regardless of their circumstances.
- By addressing exceptional circumstances, the City Corporation demonstrate empathy. Flexibility can enhance our reputation and build trust with our stakeholders

Negative impacts

- There is a risk that some individuals might exploit these policies, claiming exceptional circumstances without genuine need. This could negatively affect parking for disabled people.
- Managing and accessing exceptional circumstances could increase the administrative workload for the Contact Centre, however, this would likely not impact any of the protected characteristics at this time.

Outcome

By including provisions for exceptional circumstances, we ensure that our policies are inclusive and that all individuals are treated fairly and consistently. This flexibility can lead to greater public trust and aligns with the Corporate Plan's focus on creating a supportive and adaptable environment. However, it is essential to establish a strong verification process to prevent misuse and ensure that the support reaches those who genuinely need it.

This will include ensuring individuals with long term illnesses and severe mobility issues are considered. For example, if someone has a condition that severely limits their ability to walk that is expected to last for a significant period and can justify that a red badge will give them independence, in cases such as these they might be eligible.

Licence validity and renewals

Generally, licences are valid for 1 year (pavement licences). We are proposing renewal period to two years (applicants will need to provide evidence to support their renewals). The change aims to empower small businesses by providing them with a longer period of validity for their Wayboard Licence, thereby reducing the stress and effort associated with frequent renewals.

Positives:

- Longer validity periods renewals period can reduce administrative and financial barriers for SME’s

Negative

- There is a risk that some individuals might exploit these policies, this could exacerbate the negative impacts of A-boards.

Outcome

On balance a two-year validity is expected to have a positive effect for SMEs by reducing administrative and financial hurdles, thus supporting local businesses. However, to address concerns regarding potential misuse—such as increased street clutter or obstruction—a robust eligibility criteria is required.

The adoption of strict eligibility criteria, evidence requirements, and targeted guidance will help mitigate negative impacts, particularly for disabled people, older adults, and families with prams. Through these measures, the policy aims to strike an equitable balance between supporting economic activity and safeguarding accessibility and inclusivity in public spaces.

3. STAKEHOLDER ENGAGEMENT

To date, engagement has primarily been office-based, involving internal discussions with licensing, highways, and enforcement officers, as well as external engagement with officers from other London boroughs. In addition, previous engagement and feedback gathered during earlier committee meetings and detailed within background papers relating to A-boards have also been considered as part of this process. This ensures that the current approach is informed by a broad spectrum of insights and lessons learned from prior consultations and deliberations on similar matters.

Businesses and disability groups have not been directly consulted about the proposed change. If members support this option at the October Planning and Transportation Committee, further consultation with these stakeholders will follow, and the EQIA will be updated after broader engagement.

4. DECISION MAKING (MITIGATIONS AND CHANGE)

It is recommended that the following actions are taken to avoid or mitigate any negative impact and to better advance equality and foster good relations.

Strict eligibility criteria and guidance

The introduction of strict eligibility criteria for Way-board licensing is a key mechanism for mitigating potential negative impacts on accessibility and safety. By limiting eligibility to businesses located in alleyways, courtyards, or other locations without direct street frontage or alternative signage options, the policy ensures that only those with a demonstrable need can apply.

This targeted approach prevents widespread proliferation of Way-boards, thereby reducing the risk of street clutter and obstructions that could disadvantage disabled people, older adults, and parents with prams.

The requirement for applicants to provide evidence—such as photographs showing limited visibility—further supports objective decision-making and reinforces the City Corporation’s commitment to maintaining inclusive and navigable public spaces.

Engagement

Engaging with stakeholders is crucial as it ensures that the voices and experiences of those directly affected are heard and considered in the policy development process. It is important to involve people with of a range of protected characteristics and lived experience in this proposed change to introduce Way-boards.

To further support inclusivity and responsiveness, establishing a dedicated feedback line for reporting obstructions or concerns relating to accessibility is essential. This direct channel would allow users, particularly those with lived experience of disability, to promptly highlight any barriers encountered in public spaces or with the new Way-board system. Enforcement officers will monitor compliance and respond to public reports.

Such a mechanism not only ensures ongoing dialogue but also enables timely action to address issues as they arise, thereby reinforcing the City Corporation's commitment to accessible environment for all.

EQIAs will be required from applicants as part of the licensing process

As part of the Way-board licensing application process, all applicants will be required to complete an Equality Impact Assessment (EQIA). This ensures that businesses proactively assess how their proposed Way-board placement may affect people with protected characteristics, including disabled individuals, older adults, and parents with prams.

Applicants must identify potential risks, for example, obstructions to walking and wheeling paths or proximity to tactile paving and propose mitigation measures, such as maintaining a minimum 2m clear footway and using high-contrast, cane-detectable way board signage.

These EQIAs will be reviewed by City Corporation officers to verify accuracy and feasibility, helping to ensure that licensed Way-boards do not compromise accessibility or safety. This process will support our Public Sector Equality Duty, while reinforcing the City Corporation's commitment to inclusive public spaces.

5. MONITORING AND REVIEW

Monitoring will help ensure the impacts identified have been successfully mitigated and will aim to maximise the potential positive impacts identified for businesses, especially SMEs.

It is recommended that lines of communication are maintained on the website so that different user groups can provide feedback where appropriate.

6. RECORDING YOUR DECISION AND SIGN-OFF

The proposed changes to implement a Way-board licencing system are anticipated to positively impact businesses in alleyways and passages, who don't have visibility and business from passersby. These are usually small or medium sized businesses in the City.

The introduction of a licensing system for wayfinding A-boards ("Way-boards") would allow businesses with demonstrated need to apply for a license, thereby supporting their visibility, provided they do not reduce accessibility or compromise the safety of public highways, walkways, or public spaces in the City.

Several potential negative impacts have been identified in relation to A-boards causing obstruction and their potential impact on disabled people, elderly people and people who are currently pregnant or have small children. Although these can be mitigated via the licensing system. However, fallen or poorly placed A-boards may impede access and obstruct street-level sightlines, affecting not only people using wheelchairs or children who navigate the environment from a lower eye level, but everyone who uses public spaces. Such obstructions can hinder the ability of all members of the public to anticipate hazards, locate crossings, or respond quickly in

emergency situations. The Department for Transport's Inclusive Mobility guidance reinforces this by stating that clear, unobstructed sightlines are essential for safe navigation for all (Department for Transport, 2021). Therefore, it is important to consider the risks that displaced, or poorly positioned A-boards pose not only to accessibility for groups but to the overall safety and security of public spaces for everyone. As way-boards are likely to be out of the line of sight of the businesses responsible for them, it may be difficult for a business with a way-board license to monitor whether the way-board is causing an obstruction or creating a hazard.

There are also several risks to consider

Risk	Impact	Mitigation
Reputational	It could be seen as a departure from the previously established policy of a complete A-board ban—a policy which has been strongly supported by accessibility and disability advocacy groups and was implemented to champion the principles of the Equality Act.	Clear communication that Way-boards are for exceptional cases only
Legal	Appeals or challenges if licensing guidance is not very specific or policies are perceived as inconsistent.	Transparent criteria and independent appeals process

Officers recommend that this EQIA be updated again following consultation and monitoring.

This EQIA will be updated if this option is chosen and officer move forward with consultation.

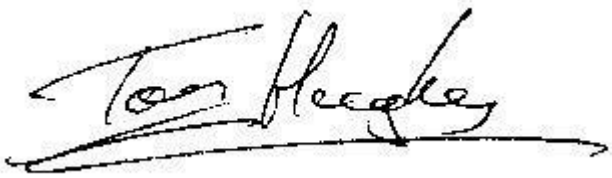
Please refer to the EQIA guidance when completing this form

Sign off

1. Officer completing the EQIA

Name	Andrea Larice
Job Title	Behaviour Change and Campaigns Officer
Date	29.09.2025
Signature	*Andrea Larice*

2. Senior Manager or Chief Officer

Name	Ian Hughes
Job Title	Director of City Operations
Date	29/09/2025
Signature	

Appendices

Appendix 1	**City of London Corporation A-board Baseline** February 2025 (Separate Attachment)
Appendix 2	**DRAFT: Way Finding Way-board Licensing Eligibility Criteria and Guidance (Under Development)** September 2025 (Attachment below)

Background Papers

City Corporation (June 2014). Advertising ("A") Boards in the City of London. Planning and Transportation Committee Report: https://democracy.cityoflondon.gov.uk/documents/s35291/Advertising%20A%20Boards%20in%20the%20City%20of%20London.pdf

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- Royal National Institute of Blind People (RNIB) (2025). *Creating accessible information and communication resources for health and social care*. Available at : https://www.rnib.org.uk/living-with-sight-loss/independent-living/accessible-nhs-and-social-care-information/creating-accessible-information-and-communication-resources-for-health-and-social-care/

Appendix 1 City of London Corporation A-board Baseline February 2025 (Separate Attachment)

Appendix 2: DRAFT: Way Finding Way-board Licensing Eligibility Criteria and Guidance (Under Development) September 2025

Purpose

Advertising Boards (A-boards) are not permitted within the City of London. A-boards can be an obstruction and hazard if not placed correctly, especially for disabled people.

Under UK legislation, businesses must obtain permission from the highway authority before placing A-boards on public footways or carriageways. The **Highways Act 1980 (Section 137)** prohibits any obstruction of the highway without lawful authority, which includes the unauthorised placement of advertising boards. Local authorities may issue specific conditions for A-board use, such as maintaining clear pedestrian access and ensuring boards are stable and removed outside trading hours.

The **Provision of Services Regulations 2009** requires that fees charged by a competent authority for authorisation schemes under an authorisation scheme must be reasonable and proportionate to the cost of the procedures and formalities under the scheme and must not exceed the cost of those procedures and formalities. Such fees should also be justified and transparent.

The introduction of a licensing system for wayfinding A-boards ("Way-boards") would allow businesses with demonstrated need to apply for a licence, thereby supporting their visibility provided they do not reduce accessibility or compromise the safety of public highways, walkways, or public spaces in the City.

General Principles

The Way-board Licensing Guidance will be applied to all businesses applying for a licence to place an A-board on the public highway, walkways, or public spaces within the City.

- All Way-boards must be licensed.
- Way-board licences will be granted based on strict criteria and will not be automatically granted. Businesses are required to apply for a licence and provide a detailed justification for the necessity of a Way-board.
- Accessibility and safety will be prioritised over wayfinding.
- Way-board placement should not impede access for people walking and wheeling and should maintain a safe and accessible streets and public realm.

To further clarify the distinctions between Way-Boards and Advertising Boards Table 1 highlights the key differences in purpose and public benefit.

Table 1: Wayfinding vs. Advertising Boards: Key Differences

Aspect	Wayfinding Board (Way-board)	Advertising Board (A-board)
Purpose	To help people navigate to a business or service (e.g., directions or map)	To promote a business, product, or service.
Public Benefit	Improves navigation and orientation	Primarily benefits the business
Placement	Strategically placed for navigation purposes	Outside business premises

Way-board Application Guidance

The following Eligibility Criteria outlines the necessary licensing conditions for businesses wishing to apply for a Way-board license.

For the purposes of this policy, an “alleyway” or “passage” is defined as a narrow pedestrian route that is not considered a main street. Such routes usually run between or behind buildings and may be covered or uncovered. They allow access to buildings that do not front onto a main street.

A “courtyard” refers to an open, often shared space located on the public highway, situated behind or between buildings. It is typically not visible from a main street and is usually accessed via an alleyway or passage. Courtyards may be enclosed or partially enclosed and are generally accessible to the public, unless otherwise restricted

1. **Eligible Businesses**

To apply for a Way-board licence, you must be a business:

- located within the City of London and situated away from primary streets and main thoroughfares, such as within alleyways and passages or courtyards.
- that does not have direct frontage onto the main street and has no other means of displaying street-level signage.
- that can demonstrate that its visibility and customer footfall are, in part, reliant on passing trade. This must be supported by evidence such as photographs or diagrams showing limited visibility from the main street, thereby reinforcing the need for directional signage.

Examples of eligible businesses may include:

- A business located in a courtyard behind a main shopping street.
- A business accessed via a narrow alleyway with no direct street-facing windows or signage.
- A business situated in a mews or passageway with limited visibility from the main thoroughfare.

2. Way-board Eligibility Criteria

2.1 Size and number

The following guidelines must be adhered to in relation to number and size:

- Each business is permitted to display one Way-board; however, businesses located down alleyways or courtyards with more than one distinct entrance may be permitted additional Way-boards provided they justify this and meet the other eligibility criteria
- In cases where multiple businesses plan to apply for a Way-board at a single location, they should consider (or the City Corporation will determine) the possibility of consolidating multiple business listings on a single board to reduce clutter and enhance clarity.
- Each Way-board should be no more than 850 mm high and 550 mm wide, including the supporting structure. The depth of the Way-board usually ranges between 500 to 600 mm to ensure stability. The base's width must provide enough stability to prevent the way-board from easily tipping over.
- Way-boards must be detectable by white canes (e.g. solid base). The base must be made of solid, non-flexible materials such as metal or heavy-duty plastic and the base should be at least 150 mm high to ensure detection by white canes.

2.2 Design and information

To ensure that Way-boards serve their primary function of wayfinding, a thoughtful approach must be taken in relation to design and information:

- Way-boards must contain only way-finding information to assist individuals in navigating to the business.
- Businesses may incorporate brand elements, such as the business name, logos, and colour schemes, into wayfinding information in a manner that complements rather than detracts from the primary function of the Way-board.
- Businesses must use universally understood symbols and arrows to guide individuals to the business location.
- Way-boards should have high-contrast signage to ensure that wayfinding information is clear and visible, using high-contrast colours to make text easily readable for everyone, including those with visual impairments and avoiding flashing lights or confusing designs for neurodiverse individuals.

2.3 Proposed location and accessibility

The proposed location of the way-board must be indicated on the application form and should preferably be situated near a building line. This approach minimises the risk of obstructing people walking and wheeling pathways and reduces potential hazards.

The following guidelines must be adhered to in relation to number and size:

- There must be a minimum residual width of 2 metres of unobstructed footpath for the passage of people walking and wheeling.
- Way-boards should be placed against (physically touching) a building or business where possible
- Way-boards must be placed on straight sight lines and not on any curved angles along the building line and not in the sight line of any crossing points.
- Way-boards must not obstruct access, and should not be placed within 2m of:
  - Tactile paving.
  - Dropped kerbs
  - Bus stops or crossings
  - Street furniture
- Way-boards must not be of a rotating or swinging banner/flag type.
- Way-boards placed on the highway must not be fixed or attached to any street furniture, lamp poles, signposts etc. and must not have other items attached e.g. balloons and streamers.
- Way-boards must be taken in or removed from the footpath when the business is closed.
- Way-boards which have fallen over must be immediately removed or made secure to ensure the above criteria are met.

2.4 Potential Impacts and equality considerations

An Equality Impact Assessment will be undertaken by the business as part of the application process, and City Corporation officers review these. Applicants will be asked to consider how placement and use of Wayboards might affect people with protected characteristics. For example: obstructions to walking and wheeling pathways, proximity to tactile paving or dropped kerbs, visual clutter, etc.

This process ensures businesses assess Way-board placement to avoid creating obstacles for disabled people, parents with prams etc. and will insure these are mitigated to public spaces remain accessible, inclusive, and safe for everyone. An example of what could look like is shown in Table 2.

Table 2: Example response to the Way-board Placement Equality Impact Assessment consideration

Equality consideration	Potential Impact	Mitigation Measures	Applicant	City Corporation
Obstruction to walking and wheeling	Risk of narrowing footway, affecting wheelchair users and parents with prams	Way-board will be placed flush against the building line, leaving at least 2m of clear footway	*The total footway width at the proposed location is 3.2m. The Way-board will be positioned directly against the building line, ensuring a 2m unobstructed path remains.*	*This was confirmed using a tape measure at a site visit*
Proximity to tactile paving or dropped kerbs	Could interfere with navigation for visually impaired individuals	Board will not obstruct tactile paving or dropped kerbs. A 1m buffer will be maintained.	*There is no tactile paving or dropped kerb nearby so a buffer will be maintained to ensure accessibility and safety for all pavement users.*	*A site inspection confirmed that the nearest tactile paving is 3m away and the closest dropped kerb is across the street.*

3. **Way-board license fees and appeals process**

A Way-board License will cost £xxx.

- Application fee of £xx (non-refundable, paid upfront)
- License fee of £xxx (paid after approval, before the licence is issued)
- This licence is valid for 2 years
- License Fee's will be reviewed every four years

Applications that do not satisfy the Way-board eligibility criteria will not be granted a license. Business owners who receive this decision retain the right to appeal.

Step 1: The business owner must submit a written notice of appeal within 14 days of receiving the notice that their application has been declined. The notice of appeal must include the grounds for the appeal and any supporting evidence.

Step 2: Upon receipt of the notice of appeal, an independent panel will review the case, and all evidence submitted within 30 working days. This will be the decision of the Director of City Operations. All decisions made by the panel will be documented and made available to the public to ensure transparency in the decision-making process.

Step 3: The panel will issue a written decision within 14 days of the hearing. The decision will include the findings of fact, conclusions and the reasons for the decision. The panel may affirm, modify, or reverse the decision to give a Way-board license. The decision of the panel is final and binding. No further appeals will be entertained.

4. **License enforcement and public feedback**

Way-boards will be enforced through regular inspections by street enforcement officers to check for valid licenses.

- Non-compliance may lead to Fixed Penalty Notices (FPN) or license revocation.
- Appeals will follow FPN guidelines.

Appendix 1 outlines the proposed Terms and Conditions.

A key aspect of this initiative is creating clear ways for the public to contact the City Corporation about Way-boards via email, telephone and potential street reporting applications. This ensures anyone can report Way-boards that obstruct or affect navigation in the City of London.

Appendix 1: Draft Terms and Conditions for proposed Way-Board Licensing

City of London Corporation Proposed Way-board Licensing Guidance Section 149 Highways Act (1980)

Your business appears to have placed an item (including Advertising boards or Way-board) on the public highway outside your premises. Advertising boards or A-boards are not authorised in the City of London. Way-boards are permitted for eligible businesses who hold a way-board licence only.

Enforcement action will be taken where any of the following criteria are not met when holding a Way-board Licence:

- There must be a minimum residual width of 2 metres of unobstructed footpath for the passage of pedestrians.
- No more than one item (Way-board) per business.
- Items must be no more than 850mm in height, 550mm in width, and 600mm in base or footprint.
- Items must be high-contrast so they are easily visible and should not be mirrored or reflective.
- Item must be detectable by white canes (e.g. solid base). The base must be made of solid, non-flexible materials such as metal or heavy-duty plastic and the base should be at least 150 mm high to ensure detection by white canes.
- Items should be placed against (physically touching) a building line and must not obstruct access, they should not be placed within 2m of:

- Tactile paving.
- Dropped kerbs
- Bus stops or crossings
- Street furniture

- Items must be placed on straight sight lines and not on any curved angles along the building line and not in the sight line of any crossing points.
- Items must not be of a rotating or swinging banner/flag type.
- Items placed on the highway must not be fixed or attached to any street furniture, lamp poles, sign posts etc. and must not have other 'things' attached e.g. balloons and streamers.
- All items, including Way-boards must be taken in or removed from the footpath when the business is closed.
- Way-boards which have fallen over must be immediately removed or made secure to ensure the above criteria are met.

Items (Way-boards) that are deemed to be a danger, which are placed on the highway whether because the above criteria are not met or for any other reason will be removed without notice by the City of London Corporation's Street Environment Officers.

Any business placing items on the public highway does so at their own risk and may be liable, in the event of injury, loss or damage being caused to a highway user.

Advertising is subject to advertising control and the local planning authority may enforce against and remove unauthorised Way-boards which do not have advertising consent. The local planning authority's policy is to resist excessive or obtrusive advertising.

Committees: Corporate Projects Board *[for information]* Planning and Transportation Committee *[for decision]* Markets Board [*for information]* Projects and Procurement Sub Committee *[for information]*	**Dates:** 08 October 2025 21 October 2025 06 November 2025 18 November 2025
Subject: Pipe Subways of Holborn Viaduct and Snow Hill over Thameslink **Unique Project Identifier:** 9845	**Gateway 4** Complex **Issue Report**
Report of: Executive Director of Environment Department **Report Author:** Jagdeep Bilkhu	**For Decision**
PUBLIC	

1. Status update	**Project Description:** Refurbishment/maintenance/replacement to extend the life of existing structures and to mitigate the Corporation's risk from third party claims. **RAG Status:** Amber (Amber at last report to Committee) **Risk Status:** Medium (Medium at last report to committee) **Total Estimated Cost of Project (excluding risk):** £2,862,000 **Change in Total Estimated Cost of Project (excluding risk):** Increase of £196,000 since last report to Committee in Oct 2019. **Spend to Date:** £305,000 **Costed Risk Provision Utilised:** Zero **Slippage:** This scheme has been delayed since 2020 giving priority to the City Corporation's major scheme of re-locating the Museum of London (MOL) to its new home in Smithfield Market. The previous focus has been on the refurbishment of structures 33/18, 33/22 and 33/23 around the market and working collaboratively with colleagues on the MOL Tunnels Lids project

	(see plan contained in Appendix 2 showing these structure locations).
2. Requested decisions	**Next Gateway:** Gateway 5 - Authority to Start Work (Light) **Requested Decisions:** 1. That an additional budget of **£196,000** is approved for Gateway 4 to allow for analytical work to be carried out; 2. Note the total estimated cost of the project at **£2,862,000** (excluding risk) up from £2,666,000 reported in September 2019; 3. That a Costed Risk Provision (CRP) of **£135,000** is approved (to be drawn down via delegation to Paul Monaghan, Assistant Director Engineering). 4. That the recommended option in 5.2 is agreed.
3. Budget	3.1 Members are advised that City of London have applied for external funding in the sum of £196,000 to Transport for London via the bidding mechanism of the London Bridges Engineering Group (LoBEG). Limited funding is made available to all London boroughs through this bidding process for highway structures that are maintainable at public expense. Funding for carrying our structural assessments, particularly for structures that are over railway, are bus routes or strategically important highways should feature highly in the bidding process. Unfortunately, despite meeting the aforementioned criteria, LoBEG have confirmed that the City Corporation were unsuccessful on this occasion with our bid for funding. 3.2 A Costed Risk Provision at Gateway 4 of £75,000 was agreed in September 2019. The CPR requested herein of £135,000 is inclusive of the previously agreed CPR which is still considered to be required, therefore an additional CRP of £60,000 is requested.

Item	**Reason**	**Funds/ Source of Funding**	**Cost (£)**
Consultant Fees	Detailed modelling and assessment work.	On-Street Parking Reserve (OSPR)	40,000
Contractor Costs	For surveys and investigations to support detailed	OSPR	96,000

	modelling and assessment.		
Staff Fees		OSPR	10,000
Network Rail Basic Asset Protection Agreement	Agreement with Network Rail for access on to their land to conduct surveys and investigations.	OSPR	50,000
Total			196,000

Costed Risk Provision requested for this Gateway: £135,000 (as detailed in the Risk Register – Appendix 1)

4. Issue description

4.1 All the pipe subways that are the subject of this project have been found to have weak roof elements that fail for accidental wheel loading. Since the inception of the project, other remedial works to keep the pipe subways in a good state of repair have become necessary, including concrete and metal repairs, as well as undertaking waterproofing.

Snow Hill Pipe Subway

4.2 Following the Gateway 4 report dated Oct 2019, the project has progressed by completing a design for the pipe subways traversing over the railway and present under both the footways on Snow Hill, collectively known as structure number 33/P11 (see Appendix 2 for location plan).

4.3 Both these pipe subways comprise a relatively simple structural form, i.e. wrought iron buckle plates forming the roof that supports the footway, which in turn are supported on steel girders that form the walls of each pipe subway. The base of the pipe subways are steel joists encased in concrete. These two pipe subways have seen some, but no major modification to them since they were constructed, circa 1860s.

Holborn Viaduct Pipe Subways

4.4 The pipe subways on Holborn Viaduct do not have a fully completed design, unlike Snow Hill Pipe Subway.

4.5 These pipe subways traverse also the railway and support the footways on Holborn Viaduct and are known independently as structure numbers 33/P12 and 33/P13

	in the north and south footways respectively. They are more complex in their structural form than those on Snow Hill. 4.6 They contain a higher number of utilities, which are supported in a more complicated manner inside the subways, some of which are hung on a steel gantry that is suspended from the roof of the subways. The roof itself has been modified over the years and comprises not one, but several different structural elements that form the deck as well as the side walls of the pipe subways. 4.7 The primary deck elements are 3no.wrought iron girders. The two outer girders are supported upon lattice girders. The base slabs are beams encased in concrete. The portion of these subways over the railway could be described as a miscellany of different elements. There are also further beams that support a skin of masonry on the outer face (on the railway side). It is not clear why this detail was constructed. There are also further beams on both the north and south side that support the footway just adjacent to the 3no. wrought iron girders that form the roof of the subways. All of these elements in some way provide support or share load from the highway, mainly the footway. 4.8 In progressing the design of these two pipe subways, the consultant has identified possible reserve capacity from interconnected elements that may potentially have a load sharing effect. 4.9 It is proposed to use 3-D computer modelling software to structurally analyse the form of the subway in a holistic manner rather than rely on the assessment of individual elements in the way that has been done previously. This has the advantage of understanding how interconnected elements share load between each other based on various loading scenarios. Ultimately, this could result in elements that were previously deemed to fail, actually having more capacity than previous calculated. Consequently, the option for remediation could change to refurbishment or strengthening rather than replacement of specific elements. 4.10 The above would also allow the capture of the existing condition, which could have deteriorated, into the assessment.
5. Options	5.1 Continue to finalise the design for the Holborn Viaduct subways without further modelling and assessment, basing the design on limited information for some elements. This could mean more elements may need strengthening or replacement when exposed during the

	construction stage. This approach could impact the programme and increase risk to the works over the railway by adding more complexity to the construction works. 5.2 Undertake further assessment that would help understand the capacity of elements for which no such information is available. Help reduce the possibility of having to strengthening or replace some elements, and in doing so potentially de-risk the project by needing to manage more complicated works over the railway. This is the recommended option.

Appendices

Appendix 1	Risk Register
Appendix 2	Plan showing location of structures over railway corridor

Contact

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Email Address	jagdeep.bilkhu@cityoflondon.gov.uk
Telephone Number	020 7332 1544

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City of London: Projects Procedure Corporate Risks Register

Project name: *Pipe Subways of Holborn Viaduct and Snow Hill over Thameslink*

Unique project identifier: *9845*

Total estimated cost *£0*

PM's overall risk rating	Medium
Avg risk pre-mitigation	9.9
Avg risk post-mitigation	4.9
Red risks (open)	5
Amber risks (open)	10
Green risks (open)	4

Corporate Risk Matrix score table

	Minor impact	Serious impact	Major impact	Extreme impact
Likely	4	8	16	32
Possible	3	6	12	24
Unlikely	2	4	8	16
Rare	1	2	4	8

Costed risks identified (All)	£10,985,000.00	0%	*Costed risk as % of total estimated cost of project*
Costed risk pre-mitigation (open)	£10,985,000.00	0%	*" "*
Costed risk post-mitigation (open)	£135,000.00	0%	*" "*
Costed Risk Provision requested	£135,000.00	0%	*CRP as % of total estimated cost of project*

	Number of Open Risks	Avg Score	Costed impact	Red	Amber	Green
(1) Service Delivery/ Performance	6	11.0	£950,000.00	1	5	0
(2) Financial	6	10.2	£6,260,000.00	2	3	1
(3) Reputation	0	0.0	£0.00	0	0	0
(4) Legal/ Statutory	0	0.0	£0.00	0	0	0
(5) Safety/ Health	5	7.8	£3,450,000.00	1	1	3
(6) Objectives	2	11.0	£325,000.00	1	1	0

		Extreme	Major	Serious	Minor
Issues (open)	0	**Open Issues**	0	0	0	0
All Issues	0	**All Issues**	0	0	0	0

Cost to resolve all issues (on completion) £0.00

Total CRP used to date £0.00

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City of London: Projects Procedure Corporate Risks Register

Project Name:	Pipe Subways of Holborn Viaduct and Snow Hill over	**PM's overall risk rating:**	Medium	**CRP requested this gateway**	£ 135,000	**Average unmitigated risk**	9.9
Unique project identifier:	9845	**Total estimated cost:**	£ -	**Total CRP used to date**	£ -	**Average mitigated risk score**	4.9

Open Risks	19
Closed Risks	0

General risk classification											Mitigation actions						Ownership & Action				
Risk ID	Gate way	Category	Description of the Risk	Risk Impact Description	Likelihood Classification pre-mitigation	Impact Classification pre-mitigation	Risk score	Costed impact pre-mitigation (£)	Costed Risk Provision requested Y/N	Confidence in the estimation	Mitigating actions	Mitigation cost (£)	Likelihood Classification post-mitigation	Impact Classification post-mitigation	Costed impact post-mitigation (£)	Post-Mitigation risk score	Date raised	Named Departmental Risk Manager/ Coordinator	Risk owner (Named Officer or External Party)	Date Closed OR/ Realised & moved to Issues	Comment(s)
R1	5	(2) Financial	The removal of surfacing, setts and kerbs on the bridges could dislodge loose materils on the structure soffit	Debris could fall onto the railway	Possible	Extreme	24	£2,000,000.00	N	D – Very Uncomfortable	Removal of surfacing, setts and kerbs on the bridges to be undertaken during possession of the railway	£0.00	Possible	Serious	£0.00	6	15/03/19	Paul Monaghan	Principal Contractor		
R2	4	(5) Safety/ Health	Trial pit investigations in the carriageway could dislodge loose material on the structure soffit	Debris could fall onto the railway	Possible	Extreme	24	£2,000,000.00	N	D – Very Uncomfortable	Trial pit investigations to be undertaken during railway possession.	£0.00	Possible	Minor	£0.00	3	15/03/19	Paul Monaghan	Principal Contractor		
R3	4	(2) Financial	Damage to STATS	Investigations and works impact on STATS	Possible	Serious	6	£1,000,000.00	N	C – Uncomfortable	Identify and locate STATS. Provide full detals to all parties.	£0.00	Unlikely	Serious	£0.00	4	15/03/19	Paul Monaghan	Principal Contractor		
R4	5	(2) Financial	Removal of loose and cracked materials to underside of structure	Damage to railway assets	Unlikely	Extreme	16	£2,000,000.00	N	D – Very Uncomfortable	Works to be undertaken during railway possession. OLE, cables and ducts, tracks and equipment to be protected.	£0.00	Rare	Extreme	£0.00	8	15/03/19	Paul Monaghan	Principal Contractor		
R5	5	(5) Safety/ Health	Working at height	Scaffold falling on to railway	Unlikely	Serious	4	£500,000.00	N	C – Uncomfortable	Scaffold to be erected on firm ground by trained and certified staff (PASMA etc)	£0.00	Rare	Serious	£0.00	2	15/03/19	Paul Monaghan	Principal Contractor		
R6	5	(5) Safety/ Health	Working at height	Tools and equipment falling on to railway	Possible	Minor	3	£500,000.00	N	C – Uncomfortable	Suitable edge protection to be provided on scaffold. Tools to be "tied on".	£0.00	Rare	Minor	£0.00	1	15/03/19	Paul Monaghan	Principal Contractor		
R7	5	(5) Safety/ Health	Storage of plant and materials for the works	Interface with railway	Rare	Serious	2	£250,000.00	N	B – Fairly Confident	Plant and materials to be stored securely when not in use in areas designated by Network rail	£0.00	Rare	Minor	£0.00	1	15/03/19	Paul Monaghan	Principal Contractor		
R8	4	(1) Service Delivery/ Performance	Network Rail approval of design details	Delays to programme.	Likely	Serious	8	£100,000.00	N	B – Fairly Confident	Provide & update schedule of issue dates to Network Rail.	£0.00	Likely	Minor	£0.00	4	15/03/19	Paul Monaghan	Principal Contractor		
R9	5	(2) Financial	STATS protection & support during the works	Damage to STATS	Possible	Serious	6	£1,000,000.00	N	C – Uncomfortable	Advance consultation with relevant STATS to agree methodology	£0.00	Unlikely	Minor	£0.00	2	15/03/19	Paul Monaghan	Principal Contractor / Pricipal Designer		
R10	4	(5) Safety/ Health	Lead paint and hazardous materials	Risk to health	Possible	Serious	6	£200,000.00	N	B – Fairly Confident	Undertake surveys in advance of works to help identify materials hazardous to health - tar, lead, chromium etc.	£0.00	Rare	Minor	£0.00	1	15/03/19	Paul Monaghan	City of London		
R11	5	(6) Objectives	Changes in highway and footway vertical alignment	Clashes with access to adjacent properties and "tie ins"	Likely	Major	16	£250,000.00	N	C – Uncomfortable	Use detail surveys to check impacts.	£0.00	Likely	Serious	£0.00	8	15/03/19	Paul Monaghan	City of London		
R12	5	(2) Financial	Repairs extensive	Repairs are more extensive than anticipated	Possible	Serious	6	£250,000.00	N	C – Uncomfortable	Use inspection results to estimaterepairs required and include for provisional items.	£0.00	Possible	Serious	£0.00	6	15/03/19	Paul Monaghan	City of London		
R13	5	(1) Service Delivery/ Performance	Railway possessions	Availability	Likely	Major	16	£200,000.00	N	C – Uncomfortable	Confirm in advance with Network Rail availability of possessions to undertake the works.	£0.00	Possible	Serious	£0.00	6	15/03/19	Paul Monaghan	City of London		
R14	5	(1) Service Delivery/ Performance	Road space	Availability	Possible	Major	12	£100,000.00	N	C – Uncomfortable	Confirm in advance availability with Network Management & traffic management required.	£0.00	Unlikely	Serious	£0.00	4	15/03/19	Paul Monaghan	City of London		
R15	5	(1) Service Delivery/ Performance	Contractor and resources	Experienced contractor and resources not available	Possible	Serious	6	£250,000.00	N	C – Uncomfortable	Advertise / source Contractors in advance	£0.00	Unlikely	Serious	£0.00	4	15/03/19	Paul Monaghan	City of London		
R16	4	(6) Objectives	Changes in design scope or increases in coordination with other projects.	Increases in our suppliers' costs, e.g. consultants fees.	Possible	Serious	6	£75,000.00	Y	B – Fairly Confident	Close scrutiny of all tasks provided by suppliers.	£75,000.00	Likely	Minor	£75,000.00	4	15/07/19	Paul Monaghan	City of London		
R17	4	(1) Service Delivery/ Performance	Diversion of utilities on top of the pipe subways where they should be inside the subway or where they were completely unexpected, specifically plant owned by Colt which is known to be fibre-optic cables.	Significant rise in cost and affect on programme.	Possible	Major	12	£250,000.00	N	B – Fairly Confident	Continue negotiations with all utilities to determine exactly what plant/apparatus is over the pipe subways and who owns it. Determine what diversion work can be undertaken and why this plant is not in the subway.	£250,000.00	Possible	Major	£0.00	12	02/09/19	Paul Monaghan	City of London		If an agreement cannot be reached with utilities companies for them to bear the cost of diverting plant atop the pipe subways, then this broad estimate will be required.
R18	4	(1) Service Delivery/ Performance	The Cost of Aaccess on to Netwrok Rail land is much higher for the investigations an surveys for the additonal assessment as described in the Issue report dated Oct 2025 cost more	All access on to Network Rail land requires a Basic Asset Protection Agreement (BAPA) with Network Rail. At this moment in time, the cost of the BAPA is an estimate based on previous experience working with and on Network Rail land.	Possible	Major	12	£50,000.00	Y	B – Fairly Confident	It is not possible to mitigate this risk cost in advance.	£0.00	Possible	Major	£50,000.00	12	17/10/25	Paul Monaghan	City of London		

R19	4	(2) Financial	Staff costs are actually higher than estimated.	Managing the additional assesment and investigations takes a lot more time resource.	Possible	Minor	3	£10,000.00	Y	B – Fairly Confident		£0.00			£10,000.00						
R20								£0.00				£0.00			£0.00						
R21								£0.00				£0.00			£0.00						
R22								£0.00				£0.00			£0.00						
R23								£0.00				£0.00			£0.00						
R24								£0.00				£0.00			£0.00						
R25								£0.00				£0.00			£0.00						
R26								£0.00				£0.00			£0.00						
R27								£0.00				£0.00			£0.00						
R28								£0.00				£0.00			£0.00						
R29								£0.00				£0.00			£0.00						
R30								£0.00				£0.00			£0.00						
R31								£0.00				£0.00			£0.00						
R32								£0.00				£0.00			£0.00						
R33								£0.00				£0.00			£0.00						
R34								£0.00				£0.00			£0.00						
R35								£0.00				£0.00			£0.00						
R36								£0.00				£0.00			£0.00						
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R94								£0.00				£0.00			£0.00						
R95								£0.00				£0.00			£0.00						
R96								£0.00				£0.00			£0.00						
R97								£0.00				£0.00			£0.00						
R98								£0.00				£0.00			£0.00						
R99								£0.00				£0.00			£0.00						
R100								£0.00				£0.00			£0.00						

City of London: Projects Procedure Corporate Issues Log

Project Name: Pipe Subways of Holborn Viaduct and Snow Hill over

Unique project identifier: 9845

General issue classification							Ownership & Action							
Issue ID	Risk ID (where previously identified)	Category	Description of the Issue	Issue Impact Description	Impact Classification	Control actions	Date raised	Named Departmental Issue Manager/ Coordinator	Issue owner (Named Officer or External Party)	Dependencies	Status	Cost to resolve [£] on completion	Date Closed	Comment(s)
I.01														
I.02														
I.03														
I.04														
I.05														
I.06														
I.07														
I.08														
I.09														
I.10														
I.11														
I.12														
I.13														
I.14														
I.15														
I.16														
I.17														
I.18														
I.19														
I.20														

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City of London: Projects Procedure Corporate Assumptions Log

Project Name: Pipe Subways of Holborn Viaduct and Snow Hill over

Unique project identifier: 9845

A list of any factors that you are assuming to be in place that will contribute to the successful result of your project.

General assumption classification								Ownership & Action						
Assumption ID	Category	Description of the Assumption	Assumption Impact Description	Impact Classification	Control actions	Response type	Confidence in the estimation	Date raised	Assumption owner (Named Officer or External Party)	Assumption owner (Named Officer or External Party)	Action dependencies	Status	Date Closed	Comment(s)
A.1														
A.2														
A.3														
A.4														
A.5														
A.6														
A.7														
A.8														
A.9														
A.10														
A.11														
A.12														
A.13														
A.14														
A.15														

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City of London: Projects Procedure Corporate Dependencies Log

Project Name: Pipe Subways of Holborn Viaduct and Snow Hill over

Unique project identifier: 9845

A list of any event or work that are either dependent on the result of your project, or your project will depend on.

General dependency classification								Ownership & Action						
Dependency ID	Category	Description of the Dependency	Dependency Impact Description	Impact Classification	Control actions	Response type	Confidence in the estimation	Date raised	Dependency owner (Named Officer or External Party)	Dependency owner (Named Officer or External Party)	Action dependencies	Status	Date Closed	Comment(s)
D.1														
D.2														
D.3														
D.4														
D.5														
D.6														
D.7														
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D.9														
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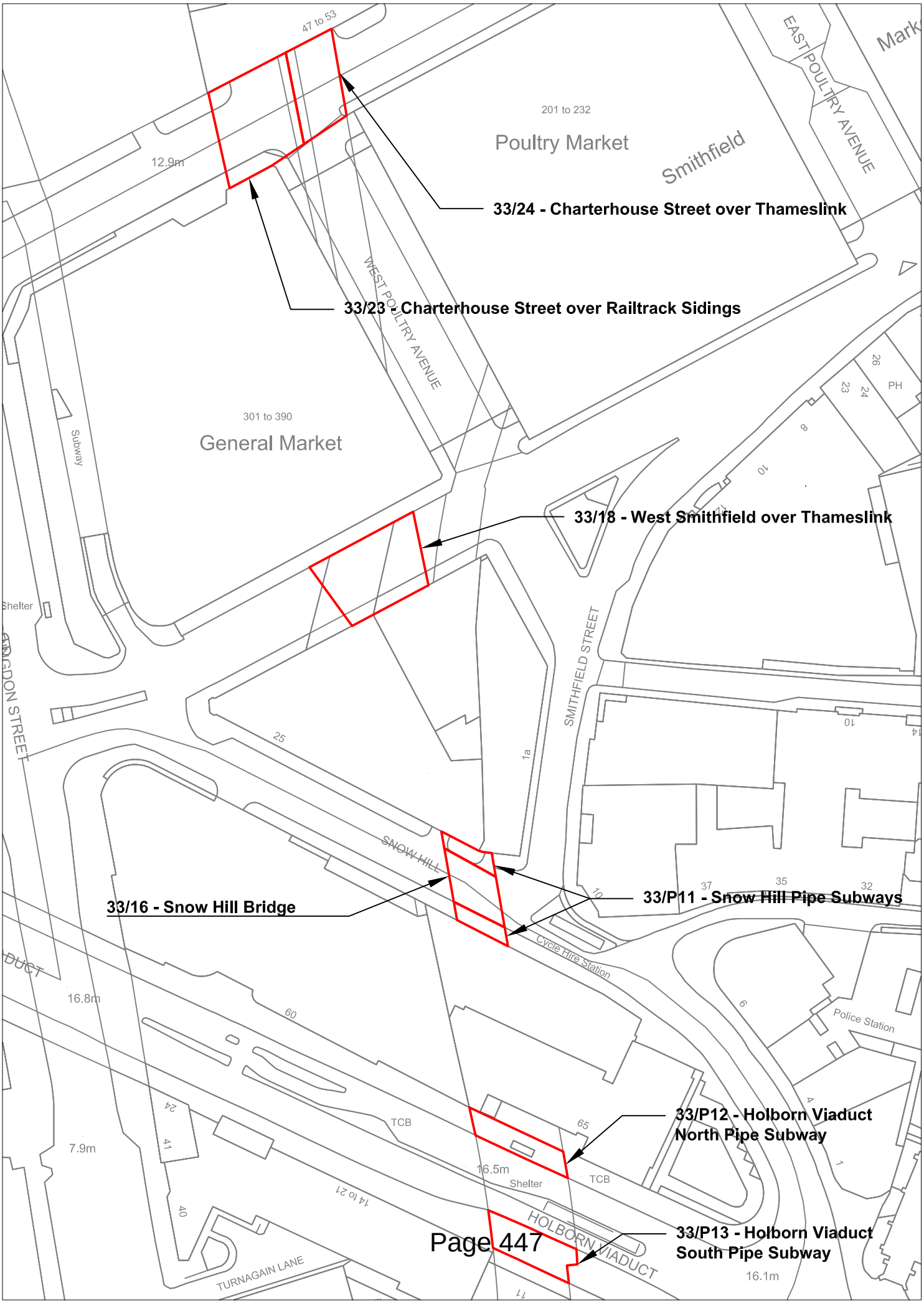
Appendix 2 - Plan showing extent and location of structures



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