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Port Health & Environmental Services Committee

Date: **TUESDAY, 21 JULY 2026**

Time: 11.00 am

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

Members:

Deputy Peter Dunphy MBE
George Abrahams
Alderman Sir Alastair King DL
Alderman & Sheriff Robert Hughes-Penney
Nicholas Bensted-Smith
Deputy Christopher Boden
Leyla Boulton
Deputy Timothy Butcher
Simon Duckworth CBE OBE DL VR
Deputy John Edwards
John Foley
Dawn Frampton
Deputy Marianne Fredericks
Mercy Haggerty
Deputy Caroline Haines
Deputy Jaspreet Hodgson
Sandra Jenner
Helen Ladele
Antony Manchester
Vasiliki Manta
Deputy Deborah Oliver
Fraser Peck
Deputy Henry Pollard
Jason Pritchard
Hugh Selka
Dr Giles Shilson OBE
Alethea Silk
Mandeep Thandi
Stuart Thompson
Deputy Dawn Wright

Enquiries: **Jayne Moore**
jayne.moore@cityoflondon.gov.uk

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Ian Thomas CBE
Town Clerk and Chief Executive

AGENDA

Part 1 - Public Agenda

1. **APOLOGIES**

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

3. **ELECTION OF CHAIRMAN**

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

For Decision

4. **ELECTION OF DEPUTY CHAIRMAN**

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

For Decision

5. **MINUTES**

To agree the public minutes of the meeting of 21 April 2026.

For Decision
(Pages 5 - 10)

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

To consider the report of the Clerk.

For Decision
(Pages 11 - 14)

7. **CITY OF LONDON THAMES FISHERY RESEARCH EXPERIMENT**

To consider the report of the Executive Director, Environment.

For Decision
(Pages 15 - 32)

8. **REVENUE OUTTURN 2025/26**

To receive the report of the Executive Director, Environment.

For Information
(Pages 33 - 40)

9. **AIR QUALITY SUPPLEMENTARY PLANNING DOCUMENT**

To receive the report of the Executive Director, Environment.

For Information
(Pages 41 - 126)

10. **ENVIRONMENT DEPARTMENT BUSINESS PLAN 2025/26: PROGRESS REPORT (END OF YEAR: 1 OCTOBER 2025 - 31 MARCH 2026)**

To receive the report of the Executive Director, Environment

For Information
(Pages 127 - 142)

11. **RISK MANAGEMENT UPDATE**

To receive the report of the Executive Director, Environment

For Information
(Pages 143 - 158)

12. **REPORT OF ACTION TAKEN BETWEEN MEETINGS**

To note the report of the Clerk.

For Information
(Pages 159 - 160)

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

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

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

15. **EXCLUSION OF THE PUBLIC**

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

Part 2 - Non-public Agenda

16. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 21 April 2026

For Decision
(Pages 161 - 162)

17. **PORT HEALTH AND ENVIRONMENTAL SERVICES DEBTORS - PERIOD ENDING 31 MARCH 2026**

To receive the report of the Executive Director, Environment

For Information
(Pages 163 - 172)

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

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

PORT HEALTH & ENVIRONMENTAL SERVICES COMMITTEE

Tuesday, 21 April 2026

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

Present

Members:

Deputy Peter Dunphy MBE (Chairman)	Deputy Jaspreet Hodgson
George Abrahams (Deputy Chairman)	Helen Ladele
Leyla Boulton	Antony Manchester
Simon Duckworth OBE DL	Vasiliki Manta
Deputy John Edwards	Fraser Peck
John Foley	Deputy Henry Pollard
Dawn Frampton	Alethea Silk
Deputy Marianne Fredericks	Stuart Thompson
Mercy Haggerty	Alderman Kawsar Zaman

Officers:

Susie Pritchard	-	Environment
Ruth Calderwood	-	Air Quality Manager
Gavin Stedman	-	Port Health & Public Protection Director
Jenny Pitcairn	-	Chamberlain's Department
Rachel Pye	-	Environment
Jayne Moore	-	Town Clerk’s Department
Kate Alexander-Newton	-	Environment
Matthew Purkiss	-	Environment
Joanne Purkiss	-	Environment
Joe Kingston	-	Environment
Ruth Calderwood	-	Environment

1. **APOLOGIES**

Apologies were received from Caroline Haines, Simon Burrows, Deputy Tim Butcher, Deputy Christopher Boden, and Jason Pritchard.

These Members observed the meeting online: Deputy Timothy Butcher, Jason Pritchard, Alderman Hughes-Penney.

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

There were no declarations.

3. **MINUTES**

Referencing item 7, a Member asked whether any updates on simpler recycling legislation have been communicated to residents, citing an apparent lack of clarity among residents of Barts Square in particular. The meeting heard that the City of London was already compliant with the vast majority of the legislation, though some City properties had previously lacked food waste collection facilities. These facilities are now mandatory, and were already provided to Barts Square. Some communication is planned around card and paper recycling, which remains unchanged.

RESOLVED, That the minutes of the meeting of 03 March 2026 be approved as an accurate record of the proceedings.

4. **COMMERCIAL ENVIRONMENTAL HEALTH SERVICE PLAN 2026-27**

The Committee considered the report of the Executive Director, Environment setting out for approval the Commercial Environmental Health Service Plan 2026-27.

Referencing data gathering matters (section 3.2) on compliance with Food Standards Agency (FSA) reporting requirements, a Member asked for more information on the timescale for full compliance and what issues were being experienced. The meeting heard that a new Management Information System is in place, the Corporation is working closely with the service-provider and with the FSA, and the issues are mainly to do with the software.

RESOLVED, That the Commercial Environmental Health Service Plan 2026-27 be approved.

5. **PORT HEALTH FOOD ENFORCEMENT SERVICE PLAN 2026-27**

The Committee considered the report of the Executive Director, Environment setting out the proposed Port Health Service Food Enforcement Service Plan 2026/27, noting also the update on the Sanitary and Phytosanitary (SPS) agreement between the UK and EU and how that may affect future food and feed border controls.

A Member commented on the significant rise in consignments year-on-year as set out in section 7 of the report. The Committee noted the development of the London Gateway Port, the displacement of road transport to port-related transport, and increased container traffic from non-EU countries since the UK's exit from the European Union.

Referencing the cost recovery basis set out in the report, a Member asked for more information on budget-setting and funding. The meeting heard that fees are set annually based on throughput on a full cost recovery basis in relation to imported food and feed controls, with the aim of cost neutrality across a 3-4 year period. A Member asked if any of the work was covered by the Government's funding settlement and it was confirmed that while most of the work was based full cost recovery, some elements were subject to the funding settlement. This included, but is not limited to, food hygiene inspections, infectious disease control and shellfish sampling.

Referencing section 7, a Member commented on the apparently low sample levels and asked for more information on the criteria for sampling. The meeting heard that intervention criteria are determined in line with risk-based measures set out in Central Government guidance.

RESOLVED, That the Committee approve the Port Health Service Food Enforcement Service Plan 2026/27.

6. **DRAFT AIR QUALITY SPD**

The Committee received the report of the Executive Director, Environment setting out the draft Air Quality Supplementary Planning Document (SPD) prepared for consultation providing detailed guidance on how applicants should manage and minimise air pollution emissions to comply with policies HL2: Air Quality and HL9: Health Impact Assessments in the City Plan 2040.

The Committee noted that the SPD aims to ensure that development is designed to minimise emissions at source wherever possible, and noted also that the draft SPD was published for a four-week public consultation before returning to committee in July 2026.

The Committee noted that the draft Air Quality Supplementary Planning Document (whose consultation period ended on 15 April 2026) was circulated to Committee members on 17 March 2026 for comment, noting also comments from Members that earlier submission of draft documents would have been welcome - noting also the timescale restrictions.

Referencing section 10 of the report, a Member asked for further information on the methodology applied to the Air Quality Damage Cost Update published by the Department for Environment Food & Rural Affairs (DEFRA) in December 2025, particularly in respect of the density of high-pollution projects. The meeting noted that location rather than density is taken into account.

A Member asked where damage costs will be directed. The meeting noted that costs will be spent on projects in the Square Mile that support delivery of the Air Quality Strategy under the broad themes of public health and transport, infrastructure and research.

A Member noted the air pollution issues arising from construction in the City and raised the issue of idling vehicles in the City that are likely to worsen air pollution, asking how vehicle idling is being monitored – particularly from construction companies. The meeting heard that construction companies are instructed to monitor vehicle idling (as set out in section 4.15 of the Corporation's Code of Practice for Deconstruction and Construction Sites) and that focussed enforcement initiatives, working with civil enforcement officers, take place. Members were directed to the online 'Report a Problem' facility and encouraged to forward the link to residents (details were circulated later that day), noting also the rewarding of good performance.

Citing section 2.1.2 of the Air Quality Supplementary Planning Document, a Member asked whether an issue around building controls relating to Battery Storage Solutions has been resolved. The meeting noted that in some circumstances issues still exist.

7. **REPORT OF ACTION TAKEN - HARC FEES**

The Committee reviewed the report of action taken, noting the rationale and strategy around the measures.

Members noted that the Executive Director Environment is expected to report to the Chair and Deputy Chair in the event of any need to extend the measures beyond the six month period.

A Member asked whether any initial figures are available to ascertain the effectiveness of the measures. The Committee noted that a small reduction in throughput has been noted, and that some changes have been observed in carrier and route choices.

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

Expanding on the discussion on vehicle idling set out in item 6, a Member commented that more emphatic articulation of requirements upstream (such as signage) would be welcome rather than relying on the reporting of violations.

At the request of the co-Chair of the Cross River Partnership Simon Duckworth OBE DL, the Chair thanked the City Bridge Foundation for facilitating the Partnership's first full meeting since 2019 at Tower Bridge.

Members noted the timetable for the update to the Corporation's Code of Practice for Construction and Deconstruction Sites as follows:

1. Officer pre-consult - May
2. Pre- Consultation draft for committee approval
3. Port Health & Environmental Services Committee (PHES) 21st July
4. Planning & Transportation Committee (P&T) 22nd June
5. Post Consultation for approval
6. P&T 10 November
7. PHES 3 November

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

10. **EXCLUSION OF THE PUBLIC**

RESOLVED, That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for subsequent 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.

11. **NON-PUBLIC MINUTES**

12. **UK-EU SANITARY AND PHYTOSANITARY (SPS) AGREEMENT - APPENDIX 2**

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

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

The meeting closed at 11.55 am

Chairman

Contact Officer: Jayne Moore
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City of London Corporation Committee Report

Committee(s): Port Health and Environmental Services Committee	**Dated:** 21 July 2026
Subject: Appointments to Sub Committees and Representatives to Outside Bodies	**Public report:** For Decision
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of:	Town Clerk
Report author:	Jayne Moore, Governance & Member Services' Team, Town Clerk's Department

Summary

Members are asked to approve various appointments which the Port Health and Environmental Services Committee makes annually to various other Committees and outside bodies. Further information on these bodies, including the previous appointees for 2025/26, is included at Appendix 1.
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Recommendation(s)

(i) Members are asked to:

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

(ii) Members are also asked to:

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

Appendices

- Appendix 1 – Further information on Committee appointments.

Jayne Moore
Governance & Member Services' Team
Town Clerk's Department

Appendix 1 – Further Information on Committee Appointments

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

a) Local Plans Sub (Planning and Transportation) Committee

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

2025/26 Appointee: Mercy Haggerty

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

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

2025/26 Appointee: Mercy Haggerty

c) Projects and Procurement Sub Committee

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

2025/26 Appointee: Deputy Timothy Butcher

d) Thames Estuary Partnership

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

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

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

2025/26 Appointee: Deputy John Edwards

e) Thames21

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

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

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

2024/25 Appointee: Marianne Fredericks

City of London Corporation Committee Report

Committee(s): Port Health and Environmental Services Committee	**Dated:** 21/07/2026
Subject: City of London Thames Fishery Research Experiment	**Public report:** For Decision
This proposal: • **delivers Corporate Plan 2024-29 outcomes**	• Leading Sustainable Environment • Diverse Engaged Communities
Does this proposal require extra revenue and/or capital spending?	Yes
If so, how much?	£4,800
What is the source of Funding?	City's Estate Grant
Has this Funding Source been agreed with the Chamberlain's Department?	Yes
Report of:	Katie Stewart, Executive Director Environment
Report author:	Gavin Stedman, Environment Department

Summary

This report presents a summary of the 53rd City of London Thames Fishery Research Experiment, which was held on 4 October 2025 and received positive feedback from participants and guests. To develop a more scientific and collaborative approach to the Experiment, the City partnered with the University of Essex and University Centre Sparsholt, who linked the Experiment into their ongoing research programmes. Students collected fish samples to study the impacts of river pollution on fish health and survival. Though few fish were caught, researchers found the work valuable and plan to participate again in 2026. A summary of the students' findings is included in the appendices.

Anglers continued to be instrumental in seeking opportunities to further improve the competition's methodology and promote sustainable angling techniques. They were again proactive in supporting the involvement of young anglers, encouraging their interest in marine conservation. Feedback from the angling community is included within this report.

This report also provides details of the 54th Experiment, to be held on 10 October 2026. Your Committee is asked to approve the annual grant of £4,800 from the City's Estate fund to partially finance the 54th Experiment.

Recommendations

Members are asked to review and approve the grant of £4,800 from the City's Estate to partially fund the 54th City of London Thames Fishery Research Experiment, which will take place on 10 October 2026.

Main Report

Background

1. The City of London Thames Fishery Research Experiment has been held annually since 1973. The Experiment takes the form of an angling competition, the results of which form a survey of the numbers and species of fish present in the river during a four-hour period each year. It is organised by the City, with the support of the angling community and organisations such as the Thames Angling Preservation Society, the Environment Agency and the Port of London Authority (PLA), with whom the results are shared.

2. The Experiment encourages sustainability and conservation. The competition rules comply with advice and guidance issued by the Angling Trust and participants are advised about the proper handling of fish to minimise mortality. All young and undersize fish are returned to the river immediately once they have been recorded.

3. As a long running 'citizen science' project, the Experiment has the unique advantage of linking the river's recreational angling community, and local communities, with sustainability and conservation. It is also an opportunity for younger participants to learn from experienced anglers and be encouraged to develop a long-term interest in fishing and marine conservation.

4. We now hold 53 years' worth of valuable data on the numbers and species of fish present at the time of each Experiment. However, collection of associated environmental data has been limited and somewhat sporadic over the life of the Experiment and, prior to 2025, more detailed and scientific analysis of the results had never been undertaken.

5. Since 2024, we have made improvements to strengthen the scientific nature of the Experiment, introducing a process to collect water temperature and salinity readings. In 2025, we partnered with the University of Essex and University Centre Sparsholt who linked the Experiment to their ongoing research into river pollution and fish health, supporting a shared goal of better understanding the biodiversity and health of the River Thames.

Current Position

6. On Saturday, 4 October 2025, 73 anglers, representing 11 teams, participated in an angling competition over a period of four hours, catching a total of 50 fish

consisting of 5 species. Anglers competed for a range of team and individual prizes, including those sponsored by the PLA; The Fishmongers' Company; and the Worshipful Company of Water Conservators. Details of the competing teams and winners are provided at Appendix A.

7. For comparison, the data from the last 15 years is provided at Appendix B.

8. Researchers and students from the University of Essex and University Centre Sparsholt also attended, collecting samples of fish caught for scientific analysis to inform their ongoing research studies into the impact of river pollution on fish health and growth. The research projects and sampling methodology were fully approved by the Ethics Board of each university.

9. In total, 8 bass specimen and 12 flounder were retained, in accordance with a dispensation granted by the Kent and Essex Inshore Fisheries and Conservation Authority (IFCA). To further promote sustainability, the number of fish taken was minimised by the students from each university sharing the specimen; each taking the parts required for their own study. A summary of each study and results is provided at Appendices C and D.

10. The City's collaboration with the universities proved mutually beneficial, providing valuable data for the researchers and enabling the City to start to compile a more extensive dataset. It was also positively received by the anglers who are keen to contribute to research which will support marine conservation, rather than simply taking part in a competition.

Feedback from stakeholders

11. Participating anglers, guests and researchers provided positive feedback on the 2025 Experiment. Stakeholders acknowledge the Experiment's significance in evaluating the condition of the River Thames and the health of the species that live within it. The event also fosters a sense of community among river stakeholders and serves an educational purpose by involving young people.

12. The lead researcher from each of the partner academic establishments has emphasised the benefits of their participation: it is valuable for their overarching research programmes and for the dissertations of their individual students. Both intend to take part again in 2026.

13. The angling community's representative has commented as follows:

14. With the event being held in early October, sea temperatures were higher than in previous years and the catch was dominated by late summer species visiting this section of the River Thames, partly explaining the low numbers of fish caught. However, another contributing factor was the challenging weather conditions, with very strong north westerly winds affecting the fishing equipment and heavy overnight rain resulting in high levels of fresh water running downriver.

15. Despite these challenges, the anglers persevered and achieved a return of 50 fish of five species (bass, eel, flounder, pouting and sole). A highlight was the increase in European Eels caught, measured and released. Eels have been in decline for the last couple of decades and have protected status. This decline has been reflected in our past results. However, reports from around the UK suggest they are recovering and we were pleased to record 25 specimens with the largest being some 55cm in length.

16. Again, we are pleased to report that there were zero reports of fish mortality, with all but the authorised specimens being safely returned to the river.

17. This year saw the establishment of scientific research on the fish that were landed, with students from Essex University and University Centre Sparsholt collecting sample specimens for study. Our anglers have a great interest in marine conservation and sustainability and were, therefore, very pleased to have the opportunity to contribute to this important research, regarding it as a positive step forward for the Experiment and its future.

18. We continue to increase our support for young anglers from our local schools and wider community. This year, we had a full complement of 12 youth team members. A donation from the Thames Angling Preservation Society enabled the purchase of eight new sets of angling equipment for the young participants. There was also a positive response from the attending teachers, and we will explore ways of linking the Experiment results to science study in the classroom.

19. This important work with young people is starting to reap rewards: we now have two former youth team members participating in adult teams, with the potential of a further ‘promotion’ in the near future. This will help to reduce the increasing angling participant age profile and help establish succession plans for each team.

Financial Summary

20. The total cost of the 2025 event was £15,312.

21. Funding was provided through a grant of £4,800 from City’s Cash (now City’s Estate). Financial contributions were also received from the Fishmongers’ Company (£750); the PLA (£250); and the Thames Angling Preservation Society. In addition, a trophy was again donated by the Worshipful Company of Water Conservators.

22. The remaining cost to the local risk budget was £8,248.

Next steps

23. The 54th City of London Thames Fishery Research Experiment will be held on Saturday 10 October 2026. This year's event will incorporate a more informal meal to further enhance networking opportunities. Other minor adjustments will be made to ensure value for money. However, the primary objective of the Experiment itself will be preserved.

Proposal

24. The March 2016 Policy and Resources Committee agreed the transfer of funding commitments from Finance Grants Sub Committee to the relevant Committees for ongoing administration. Members are asked to review and approve the annual grant from City's Estate fund to deliver the Experiment. The amount of the proposed grant for the Fishing Experiment in 2026/27 is £4,800.

Corporate and strategic implications

Strategic implications - The City of London Thames Fishery Research Project supports the aims and outcomes of the City's Corporate Plan 2024-2029, particularly 'Diverse Engaged Communities' and 'Leading Sustainable Environment'.

Financial implications - The Experiment is partly funded by a grant from City's Estate and from financial contributions made by partner organisations. The balance is paid from the local risk budget. Financial implications are balanced against the non-financial benefits of the Experiment. Some changes are being introduced in 2026 to ensure better value for money.

Climate implications - The City of London Thames Fishery Research Experiment encourages sustainability and conservation. It is one of the oldest 'citizen science' projects and encourages young people to become involved in conservation of the river Thames.

Conclusion

The 53rd City of London Thames Fishery Research Experiment was a successful event which was well supported and valued by all who took part. Continued improvements to the angling methodology resulted in reduced fish mortality rates. In addition, partnership with two academic establishments strengthened the scientific nature of the Experiment, enhancing data collection and enabling research and analysis which will contribute to a broader understanding of the biodiversity and health of the River Thames.

The project aims to facilitate comprehensive collaboration with stakeholders, government agencies, and educational establishments, alongside the recreational angling community. This collaborative approach may bolster and guide the progress of future scientific research.

Appendices

- Appendix A: Summary of competition results and winners 2025
- Appendix B: Fishing Experiment statistics 2011-2025
- Appendix C: University of Essex Research Report
- Appendix D: University Centre Sparsholt Research Report

Contact

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Appendix A

53rd Thames Fishery Research Experiment
4 October 2025
Summary of results

Total catch: 50 fish consisting of 5 species: **9 bass; 25 eel; 12 flounder; 3 pouting; 1 sole.**

THE LADY HOWARD TROPHY was awarded to the team of adult anglers with the highest number of points.

In 3rd place with 120 points and a catch of 8 fish, was the Kent Angling Team.

In 2nd place with 195 points and a catch of 13 fish, was the Essex County Angling Team.

In **1st place** with 240 points and a catch of 16 fish, consisting of 4 bass; 6 eel; 2 flounder; 3 pouting and 1 common sole was the **Charles Stanley Angling Team**.

THE PLA SCHOOLS TROPHY is awarded to the team of school-age anglers with the highest number of points.

In joint 2nd place with 0 points were the Gravesend Grammar School and the Independent Youth Team.

In **1st place** also with 15 points and 1 bass, was **City of London School for Girls**.

BEST INDIVIDUAL CATCH BY AN ADULT
The adult angler with the highest individual score was a member of the **Charles Stanley Angling Team** who caught 3 bass, 2 eel, 1 flounder and 1 pouting, resulting in a total of 105 points.

BEST INDIVIDUAL CATCH BY A SCHOOL PUPIL
The school-age angler with the highest individual score was a member of the **City of London School for Girls** who caught 1 bass, resulting in a total of 15 points.

THE BIODIVERSITY AWARD is supported by the Worshipful Company of Water Conservators for the catch which most demonstrates the continuing healthiness and improvement of the River Thames. The judges chose this year's winning catch (1 flounder; 3 bass; 1 pouting and 2 eel) to be that of a member of the **Charles Stanley Angling Team**.

THE FISHMONGERS' CUP is awarded to the angler judged to have caught the largest or best single fish. The best single fish was judged to have been a 55cm eel caught by a member of the **Kent Angling Team**.

THE REG BUTCHER CUP was awarded to the young angler judged to have caught the largest or best single fish. The best single fish was judged to have been a 26cm bass caught by a member of the **City of London School for Girls**.

THE CLUBB SAND AND GRAVEL TROPHY this new trophy was awarded to the angler who caught the single fish of the most unusual species. The fish judged to be the most unusual species was a common sole, caught by a member of the **Charles Stanley Angling Team**.

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City of London Thames Fishery Research Experiment
Results 2011-2025

Appendix B

Event	Number	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	
	Year	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	
	Date	8 Oct	27 Oct	19 Oct	20 Sep	10 Oct	15 Oct	21 Oct	22 Sep	12 Oct	17 Oct	18 Sep	8 Oct	14 Oct	28 Sep	4 Oct	
Environmental Conditions	Weather	No record	No record	No record	No record	Dry, mild, sunny periods	Dry, mild, sunny periods	Strong winds, sunny periods, some heavy showers	Light winds, some heavy rain	Mild, overcast, light winds, some light rain	Dry, mild, overcast, light winds * NB	Dry, very warm, sunny, light winds * NB	Dry, warm, sunny, light winds	Dry, mild, sunny, light winds	Dry, warm, sunny, light winds	Dry, mild, bright, high winds	Total
	Salinity (2024 onwards)														30%	35%	
	Mean Sea Temp										15 degrees		13.5 degrees	18 degrees	18 degrees	16 degrees	
	Total Competitors	76	76	76	76	76	76	74	72	71	24*	39*	73	75	75	73	969
	Winning Team	Essex	Public Services	Essex	Kent	Kent	Essex	Essex	Essex & Kent (tie)	Essex	Kent	Charles Stanley	Essex	Essex	Essex	Charles Stanley	
	Number of fish	117	116	23	23	125	35	27	15	75	142	19	209	43	122	50	
	Number of species	3	No record	5	5	6	5	3	4	4	5	4	6	5	5	5	
Species	Bass			2			6	14	20	6	4	8	6	32	102	9	209
	Bib																0
	Cod (Poor)																0
	Cod or Codling		1			8											9
	Crab									5							5
	Dab		3			2		1					1		1		8
	Dogfish	1											4	1			6
	Eel	1		3	8	2	17	1	7	8		14	10	10	6	25	112
	Flounder	8	24	21	63	14	20	9	5	35	8	21	10	8	11	12	269
	Garfish																0
	Gunard, Tub																0
	Gunard, Red																0
	Mackrel																0
	Mullet, Grey																0
	Mullet, Red																0
	Pipefish																0
	Pouting	1	2		23	17	5			128	14	13	5	103	2	3	316
	Plaice	1			1						1		1	1			5
	Rockling				1												1
	Sandeel	2															2
	Scad																0
	Sea Scorpion																0
	Smelt				3												3
	Sole	9		1	3	4	1	2	1	6			2			1	30
	Trout																0
	Whiting	629	520	72	19	537	86	68	28	187	534	34	840	12			3,566
Total	Fish recorded	652	550	99	121	584	135	95	61	375	561	90	879	167	122	50	4,541
	Species recorded	8	5	5	8	7	6	6	5	7	5	5	9	7	5	5	

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University of Essex Report from the 2025 Thames Fishing Experiment

By Anna M. Sturrock, Joe Dawson, Colleen Malfatti
12th May 2026

Introduction

Estuaries are hotspots for pollution given their link to freshwater and proximity to cities and industrial hubs. The Thames is a critical estuary for the UK, running directly through the capital city of London, whose 2020 population size was around 10 million people (Vane et al., 2022). Historically the main pollution sources in the Thames were heavy metals, PCBs and hydrocarbons (Vane et al., 2020, 2022). Today, there has been a large increase in antibiotics and pharmaceuticals, associated with large inputs from sewage. There has been considerable interest in the volumes of treated and untreated sewage entering the UK's waterways, including the Thames. In general, the human health impacts (e.g. from bacteria such as *E. coli*) have received the most attention, but there are also impacts on biota as a result of contaminants associated with urban runoff and sewage.

Stable isotopes can provide markers of pollution exposure and diet, and elevated nitrogen isotope ratios ($\delta^{15}N$) in lower trophic levels (i.e. prey to fishes such as sea bass) can be associated with sewage runoff (Loomer et al., 2015). Nitrogen isotopes in consumer tissues also tend to increase with trophic position, but we expect newly settled bass to be all eating at approximately the same trophic position, providing a potentially valuable marker of sewage exposure. Ordinarily, stable isotope studies will use soft tissues such as muscle, but these get reworked as the fish grows and ages. In contrast, eye lenses are metabolically inert and grow in sequential layers of crystallin protein (known as laminae), providing a permanent chronological record of that fish's diet history (Fig. 1A) (Quaeck-Davies et al., 2018).

European sea bass (*Dicentrarchus labrax*) is a species of high economic importance throughout its range. Bass experienced population declines in the late 2000s resulting in a number of protective measures. Sea bass typically spawn offshore, with post-spawned larvae undertaking a pelagic phase of around 2-3 months, where they drift to inshore nursery habitat such as estuaries and salt marshes (Pickett & Pawson, 1994). Juveniles occupy these nursery grounds until they reach maturity at 4-5 years old, when they recruit into the adult spawning population (Pickett & Pawson, 1994). Recent studies suggest that young sea bass show high levels of fidelity to their original settlement sites (Ryan et al., 2024), and are thereby subjected to variation in habitat quality which can strongly affect growth and condition of young fish. Maximising juvenile survival can lead to disproportionate gains in adult stock; therefore, creating optimal nursery habitats for bass should be a priority.

Previous work (Sturrock et al. unpublished) from newly settled '0-group' bass caught in the Thames and Medway in 2022-24 showed elevated $\delta^{15}N$ values in their outermost (i.e. most recently formed) eye lens laminae. The values were particularly elevated in fish sampled at upstream sites exposed to higher sewage inputs (e.g. https://experience.arcgis.com/experience/c9b8f3ba094c429aa30e0e2b6eaf43ac). We thus interpreted these data as potentially reflecting sewage effluent propagating through the food web. In preparation for this current study, we explored historical trends in bass abundance and sizes from the Thames Fishery Experiment to assess whether we would expect to catch sufficient numbers in 2025, and whether the bass being caught would likely be of the correct size range to allow us to cohort match them to the 0-group fish we sampled in 2022-24. Encouragingly, most bass caught in the

Thames Fishery Experiment in recent years were likely to have been 1-3 years old (Fig. 2) and this species has represented an increasingly large fraction of the catch (>100 fish in 2024; Fig. 3).

Our central question is whether bass exposed to high sewage levels during early life are at a survival disadvantage. To test this, we aimed to analyze eye lens isotopes from 1-3 year old bass caught in the 2025 Thames Fishery Experiment that would be cohort matched to our 0-group bass from 2022-24 (Fig. 2). We would then compare eye lens $\delta^{15}N$ values in the same innermost (equivalent to when they had recently settled in the estuary) growth layers from the different age classes of fish. If sewage effluent (and associated loadings of contaminants such as pharmaceuticals) have an adverse effect on juvenile bass survival, we would expect to see a lower fraction of fish in older age classes exhibiting high lens $\delta^{15}N$ values.

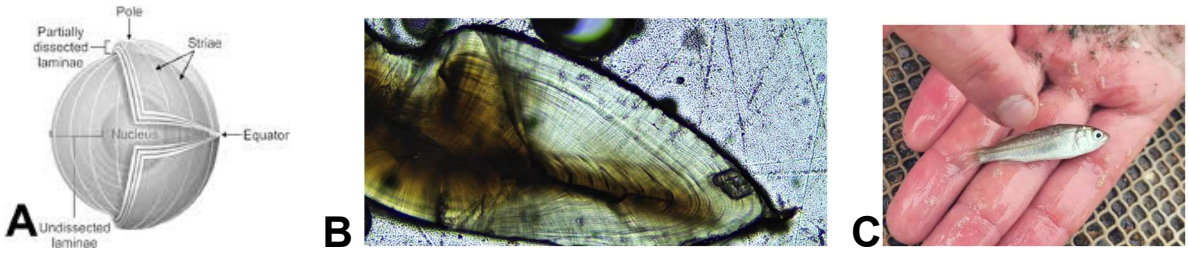

Fig. 1A Teleost eye lens showing the laminae (growth layers) and nucleus. B shows a sectioned juvenile sea bass otolith showing the daily rings used to estimate birth date and growth rate. C shows a group-0 bass caught from the Medway in September 2022.

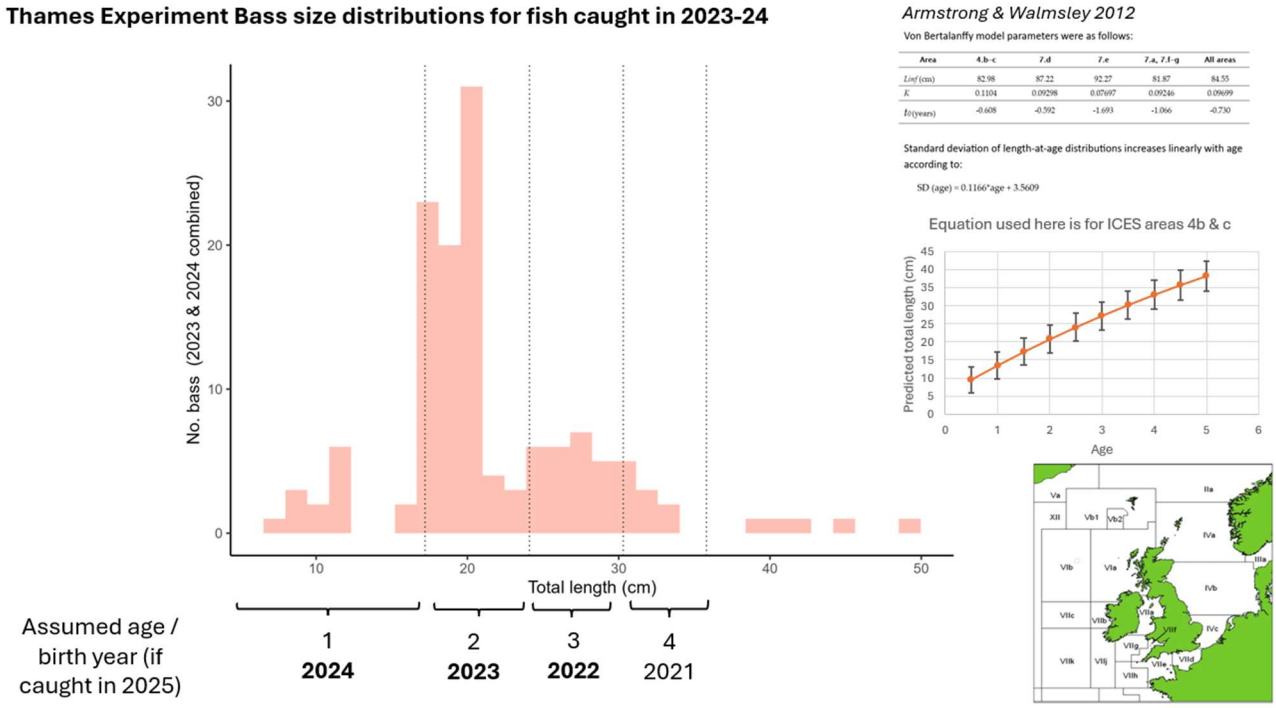

Fig. 2 Size distribution of the bass caught in the Thames Fishery Experiment in 2023-24 showing the approximate size cut offs for each age class, with the birth years in bold (2022-24) equivalent to the juvenile bass sampling previously carried out that highlighted the elevated eye lens $\delta^{15}N$ values.

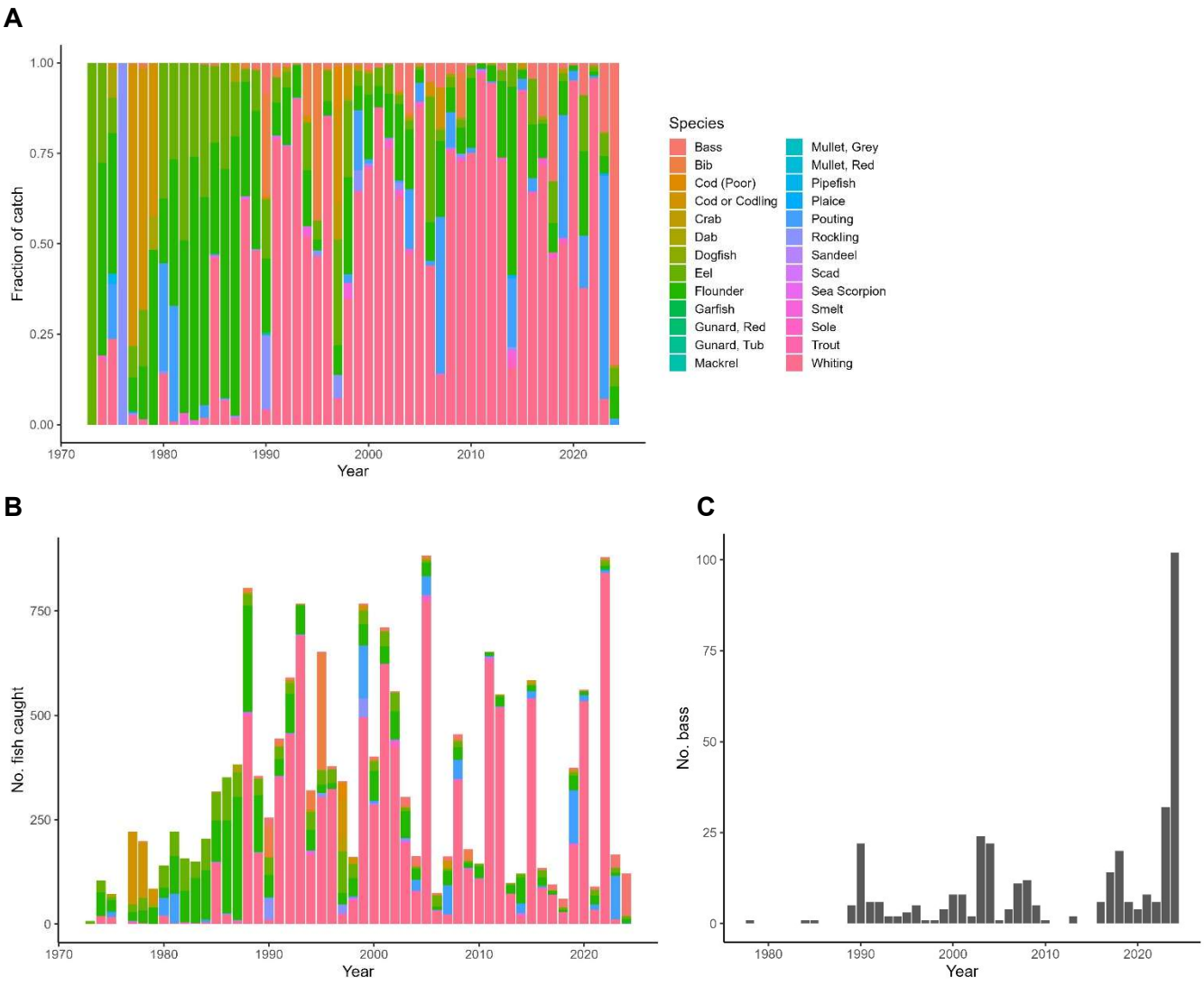

Fig. 3 Trends in species composition of the Thames Fishery Experiment through time as (A) fractions and (B) absolute numbers. Plot C shows only numbers of bass caught per year, with over 100 bass caught in 2024.

Methods

Sampling

On 4th October 2025 teams from the University of Essex, Sparsholt College and Kent & Essex IFCA set up sampling stations at the 2025 Thames Fishery Experiment Zones C and F, and spread ‘collectors’ along the full stretch of the experiment to transport bass and flounder to the sampling stations to dispatch and processing (Fig. 4). While we had been aiming for a sample size of up to 60 bass, the effects of Storm Amy resulted in only low catches. In total, 8 bass were lethally sampled for this project, and their otoliths, eyes and a muscle sample are now retained in the University of Essex Tissue Archive for potential future research.

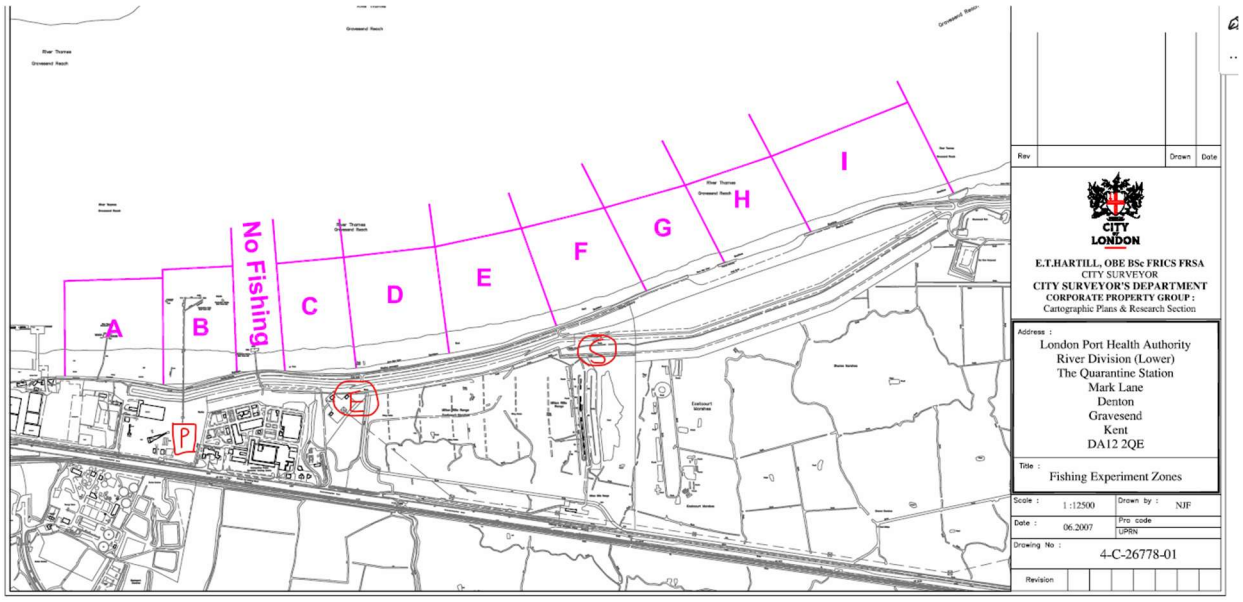

Fig. 4 Map of Thames Fishing Experiment Zones (A to I) with our sampling stations (E - Essex and S - Sparsholt).

Eye lens stable isotope analysis

The eye lens from each bass was extracted and the laminae serially sampled and the diameter re-measured after each lamina had been removed. The laminae were put into tin capsules, air dried overnight, weighed, then encapsulated and sent off for bulk carbon, nitrogen and sulphur isotope analysis. In brief, the relative abundance of carbon ($^{13}C/^{12}C$) and nitrogen ($^{15}N/^{14}N$) ($\delta^{13}C$ and $\delta^{15}N$) isotopes were measured using a Thermo Fisher Scientific (TFS; Bremen, Germany) IsoLink Elemental Analyser coupled to a TFS Delta V Plus isotope ratio mass spectrometer, using helium as the carrier gas at the National Environmental Isotope Facility (NEIF) Stable Isotope Ecology Laboratory at the Scottish Universities Environmental Research Centre (SUERC). The results of the isotopic analyses are presented in the conventional δ-notation in per mil (‰) relative to international standards calibrated to VPDB and AIR.

Results & Discussion

With such a small sample size (n=8) we would have insufficient statistical power to compare early life $\delta^{15}N$ values among age classes. As such, we analyzed full lifetime eye lens chronologies rather than only the inner laminae equivalent to our 0-group bass from our previous studies (indicated in the grey band on Fig. 5). The chronologies were interesting, showing large among-fish variation in all three isotopes, with the $\delta^{15}N$ data suggesting at least two groups that appear to have been feeding in different habitats for much of their first and second years' of life (note large differences in $\delta^{15}N$ – and also $\delta^{34}S$ - between the blue and red lines in Fig. 5 between lens diameters 1000-2200 µm). These isotopic differences became smaller later in life as presumably these groups of fish moved into a similar area prior to being sampled in the same stretch of the river in October 2025.

Future work will focus on comparing these isotopic fingerprints to our juvenile 0-group bass 'reference library' – from the Thames and other estuaries – and also analyzing element concentrations in their otoliths to identify the most likely the nursery areas, and to infer connectivity between areas. We will also return to the Fishery Experiment in 2026 to try and increase our sample sizes and tackle our main question around possible sewage impacts on juvenile bass survival and growth.

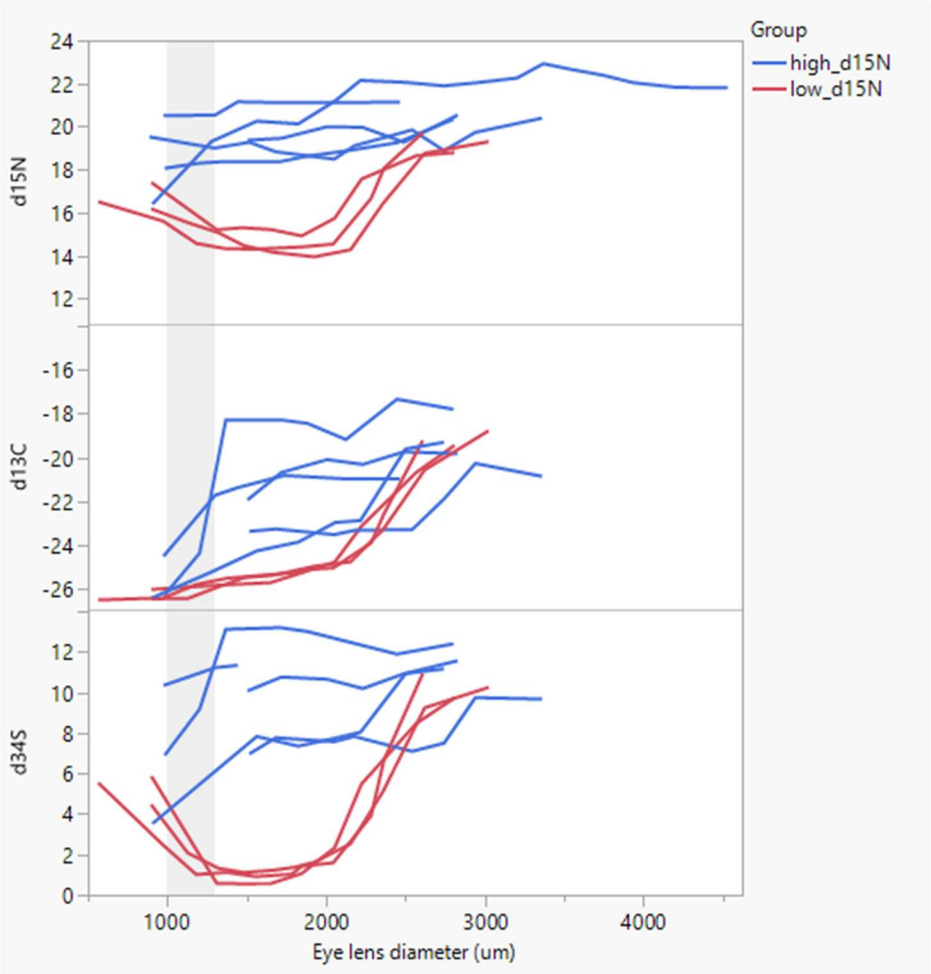

Fig. 5 Eye lens isotope chronologies for the eight bass sampled in October 2025 coloured by putative juvenile 'grouping' based on visual differences in $\delta^{15}N$. The grey bar indicates the approximate period when these fish had been newly settled in their nursery area as 0-group juveniles and thus age-equivalent to our previously-collected juvenile data from 2022-2024.

Acknowledgements

Thank you so much to Eric Fakan (UoE, now KAUST) for dissecting and preparing these lens samples, to Joanne Hill (City of London) and Mick Sharp for organising the day, to Phil Haupt and his colleagues at KEIFCA) for their support on the day and prior, and to Hayden Hurst (KEIFCA) for his help with the dispensations. We also thank Kerry Perkins, Ashlie Newman and their team for carrying out the sampling with us (Sparsholt College), to Peter Betts and Lucy Smith (UoE) for braving the winds to also help us with the sampling, and to Jason Newton and Rona McGill (SUERC) for generating the isotope data.

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University Centre Sparsholt Report from the 2025 Thames Fishing Experiment

Study leads: Kerry Perkins & Ashlie Newman (University Centre Sparsholt)

Similar exposure, different outcomes: Species-specific microplastic processing in Thames fish.

Having completed previous microplastic studies on local rivers this study aims to investigate the liver health of fish from the river Thames when faced with the combined impact of microplastics and Polychlorinated Biphenyls (PCBs). By determining if the combination of microplastics and PCBs has additive or synergistic effects important insights could be gained for river pollution management and further fish health monitoring.

Study aim

To determine if the combination of microplastics and PCBs has additive or synergistic effects, understanding this could provide an important insight for river pollution management and further fish health monitoring.

Objectives

- To measure the concentration of PCB found in the liver.
- To measure the abundance of microplastics found in the liver.
- Analysis of liver health.
- Determine if microplastics and PCB exposure has an additive or synergistic effect on liver health.
- Compare levels of PCBs and microplastics from previous data collected from the experiment.

This research is important because it helps to identify how PCBs and microplastics interact in aquatic environments and how they affect fish health, it can also provide further understanding on what this could mean for aquatic ecosystems, species diversity and human health. It will contribute to gaps in research as both PCBs and microplastics have been studied individually whilst only a few studies have looked at combined effects. It can also provide valuable data for environmental policy and conservation strategies.

Summary of results

Understanding whether microplastic ingestion reflects environmental exposure or biological processing remains a central challenge in aquatic pollution research. The study undertaken addressed this question by examining microplastic abundance and composition in European sea bass and European flounder across gut regions (stomach and intestine). Total microplastic abundance did not differ significantly between species or

gut regions, and no relationship was observed between fish weight and microplastic load. In contrast, strong species-specific differences in microplastic composition and distribution were identified, with a significant interaction between species and gut region. Fibres dominated across samples, but their distribution varied between species and digestive compartments, indicating that both ecological exposure and physiological processing influence retention. Sea Bass had a higher prevalence of fibres within the stomach region compared to flounder which contained a higher number within the intestine region (Figure 1).

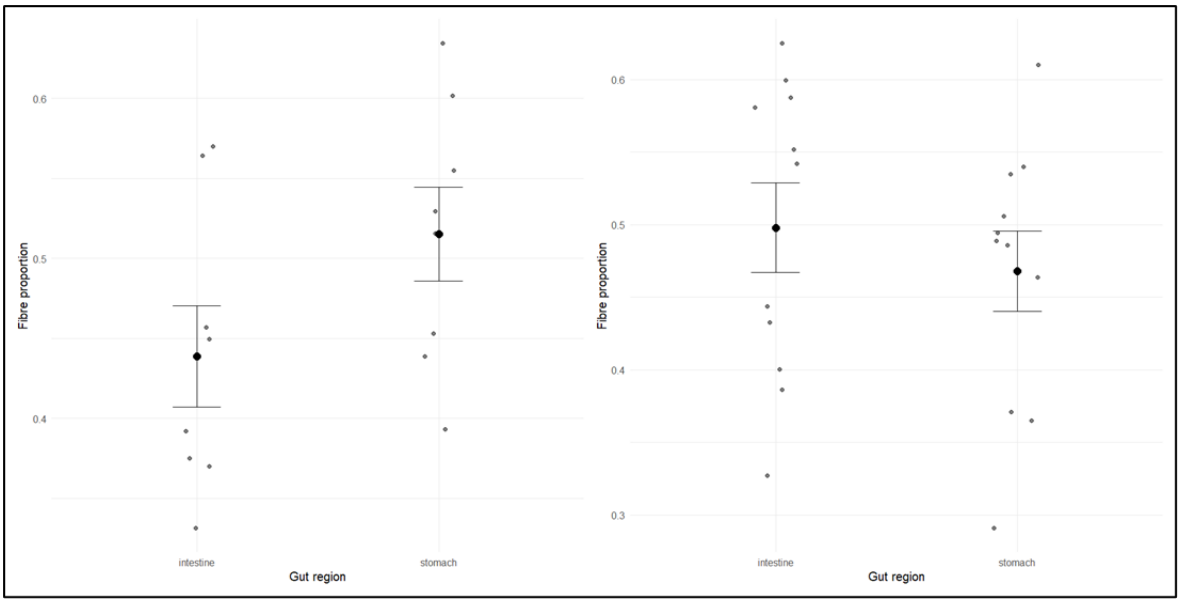

Figure 1: Boxplot visualising the interaction between sea bass (left side) and flounder (right side) between gut regions.

These differences within the species reflect variation in feeding strategy, habitat use, and gut transit dynamics, with benthic and pelagic species encountering and processing microplastics differently. Overall, Thames fish species prove an interesting model particularly around ingestion and retention of microplastics in commonly eaten fish.

City of London Corporation Committee Report

Committee(s): Port Health & Environmental Services	**Dated:** 21/07/2026
Subject: Revenue Outturn 2025/26	**Public report:** For Information
This proposal: • **delivers Corporate Plan 2024-29 outcomes** • **provides statutory duties** • **provides business enabling functions**	Leading Sustainable Environment Vibrant Thriving Destination Providing Excellent Services
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	n/a
What is the source of Funding?	n/a
Has this Funding Source been agreed with the Chamberlain's Department?	n/a
Report of:	Chamberlain Executive Director Environment
Report author:	Jenny Pitcairn, Chamberlain's Department

Summary

This report compares the revenue outturn for the services overseen by your Committee in 2025/26 with the budget for the year. Overall total net expenditure for the year was £20.930m, whereas the total agreed budget was £20.238m, representing an overspend of £0.692m as set out below:

Summary Comparison of 2025/26 Revenue Outturn with Budget			
	Budget £000	**Revenue Outturn £000**	**Variation (Better)/ Worse £000**
Direct Net Expenditure			
Environment	10,614	10,710	96
City Surveyor (including Cyclical Works Programme)	2,642	2,947	305
Total Direct Net Expenditure	**13,256**	**13,657**	**401**
Capital and Support Services	**6,982**	**7,273**	**291**
Overall Total	**20,238**	**20,930**	**692**

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

Recommendation

Members are asked to:

- Note the report.

Main Report

Revenue Outturn for 2025/26

1. Actual net expenditure for your Committee's services during 2025/26 totalled £20.930m, an overspend of £0.692m compared to the budget of £20.238m. A summary comparison with the budget for the year is tabulated below. In this and subsequent tables, figures in brackets indicate income, decreases in expenditure or increases in income.

Summary Comparison of 2025/26 Revenue Outturn with Budget			
	Budget £000	**Revenue Outturn £000**	**Variation (Better)/ Worse £000**
Local Risk			
Environment	10,606	11,027	421
City Surveyor	453	611	158
Total Local Risk	**11,059**	**11,638**	**579**
Central Risk			
Environment	8	(317)	(325)
Total Central Risk	**8**	**(317)**	**(325)**
Cyclical Works Programme	**2,189**	**2,336**	**147**
Capital and Support Services	**6,982**	**7,273**	**291**
Overall Total	**20,238**	**20,930**	**692**

2. The most significant local risk variations comprise:
    - **Environment, £0.421m overspend:**
        - unidentified savings of £0.753m;
        - a reduction in income from Animal Heath Services, £0.700m;
        - a planned reduction in transfers from reserves for Street Cleansing £0.320m
        - new grant income for waste management and recycling, (£0.372m)
        - reductions in contract costs from:
            - Waste Disposal, (£0.107m)
            - Street Cleansing, (£0.116m)
        - reductions in staff costs due to posts held vacant, (£0.338m)

- increases in income from:
    - Street Cleansing, (£0.300m)
    - City Environmental Health, (£0.113m)

- **City Surveyor, £158,000 overspend:**
    - increases in reactive repair works mainly at the Cemetery & Crematorium and Public Conveniences

3. The £325,000 central risk underspend relates to accounting adjustments for leases that have been deemed as capital assets under IFRS 16, the credit is the transfer between the revenue ledger and capital balance sheets of the annual lease payments.

4. The £147,000 overspend on the Cyclical Works Programme (CWP) is primarily in relation to changes in phasing of works, with increases for the Cemetery & Crematorium and Public Conveniences partly offset by a reduction at Heathrow Animal Reception Centre.

5. The £291,000 overspend on capital and support services is due primarily to increased capital charges, resulting mainly from changes in accounting requirements for leases. This is offset by corresponding underspends in Finance Committee.

6. Appendix 1 provides a more detailed comparison of the local risk outturn (including CWP) against the budget, including explanation of significant variations.

7. Appendix 2 shows the movement from the 2025/26 opening budget to the closing budget against which the outturn has been compared.

Local Risk Carry Forward to 2026/27

8. The Executive Director Environment has a local risk overspending of £0.421m on the activities overseen by your Committee. Across the wider Environment Department the Executive Director Environment had net local risk underspendings totalling £2.107m on activities overseen by other Committees. The Executive Director Environment has requested that £66,000 out of their maximum eligible underspend of £500,000 be carried forward, none of which relates to activities overseen by your Committee.

9. Carry-forward requests will be considered by the Chamberlain in consultation with the Chairman and Deputy Chairman of Resource Allocation Sub Committee.

Corporate & Strategic Implications

Strategic implications – none.

Financial implications – none.

Resource implications – none.

Legal implications – none.

Risk implications – none.

Equalities implications – none.

Climate implications – none.

Security implications – none.

Appendices

- Appendix 1 – Port Health and Environmental Services Committee Comparison of 2025/26 Local Risk Revenue Outturn with Budget
- Appendix 2 – Port Health and Environmental Services Committee Analysis of Movements 2025/26 Opening Budget to Closing Budget

Jenny Pitcairn
Chamberlain's Department

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Port Health and Environmental Services Committee
Comparison of 2025/26 Local Risk Revenue Outturn with Budget

	Budget	Revenue Outturn	**Variation (Better)/ Worse**	
	£000	£000	**£000**	
LOCAL RISK				Reasons
Environment				
City Fund				
Public Conveniences	494	461	**(33)**	
Waste Collection	2,330	1,894	**(436)**	1
Street Cleansing	4,323	4,197	**(126)**	2
Waste Disposal	1,172	1,038	**(134)**	3
Transport Organisation	383	379	**(4)**	
Cleansing Services Management	299	323	**24**	
Coroner	415	484	**69**	4
City Environmental Health	2,243	2,143	**(100)**	5
Animal Health Services	(508)	499	**1,007**	6
Trading Standards	493	404	**(89)**	7
Port & Launches	687	687	**0**	
Cemetery & Crematorium	(1,725)	(1,482)	**243**	8
Total Environment City Fund	**10,606**	**11,027**	**421**	
City Surveyor (incl. CWP)	**2,642**	**2,947**	**305**	9
TOTAL LOCAL RISK	**13,248**	**13,974**	**726**	

Reasons for Significant Variations

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

1. **Waste Collection** – this underspend is primarily due to:
    - new grant income of (£372,000) mainly in relation to the Extended Producer Responsibility for Packaging scheme and Simpler Recycling legislation, and;
    - a legal settlement of (£55,000) in relation to historic vehicle purchases.

2. **Street Cleansing** – this underspend is primarily due to:
    - a net decrease of (£116,000) in contract costs due to a combination of performance deductions and additional costs for third-party cleansing;
    - an increase of (£300,000) in income for third-party cleansing, partly offset by:
    - a planned reduction of £320,000 in transfers from reserves.

3. **Waste Disposal** – this underspend is mainly due to a decrease of (£107,000) in contract costs due to changes in throughput.

4. **Coroner** – this overspend is made up of a number of small variances

5. **City Environmental Health** – this underspend is primarily due to an income increase of (£113,000) in developer contributions for deconstruction and construction site monitoring.

6. **Animal Health Services** – this overspend is primarily due to:
    - unidentified savings of £753,000, which as reported during the year were met from underspends in other Committees in the Executive Director's portfolio;
    - a shortfall in income of £700,000, in line with previous performance;
    - a reduction of (£277,000) in staff costs due to posts held vacant.

7. **Trading Standards** – this underspend primarily relates to a reduction in staff costs of (£61,000) due to posts held vacant.

8. **Cemetery & Crematorium** – this overspend is primarily due to:
    - a reduction in income of £63,000 as a result of marginal changes in throughput;
    - an increase of £139,000 in computer costs due to implementation of the essential new IT system (delayed from 2024/25);
    - an increase of £63,000 in grounds maintenance costs mainly for tree survey and safety works.

9. **City Surveyor** – this overspend is due to:
    - an increase in reactive repair call-outs mainly to the Cemetery & Crematorium and Public Conveniences, £158,000;
    - an increase in CWP costs due to changes in phasing of projects, £147,000.

Port Health and Environmental Services Committee Analysis of Movements 2025/26 Opening Budget to Closing Budget

	£000
Opening Local Risk Budget (incl Cyclical Works Programme)	13,730
Adjustments:	
Central funding of apprentice posts towards the corporate target	300
Central funding of pay award and National Insurance adjustment	499
Corporate mobile phone savings	(17)
New approvals and changes to phasing of Cyclical Works Programme	(1,199)
Transfers to capital projects	(65)
Closing Local Risk Budget incl CWP	**13,248**
Opening Central Risk Budget	8
Adjustments:	
n/a	
Closing Central Risk Budget	**8**
Opening Capital & Support Services Budget	6,900
Adjustments:	
Change in recharges within fund	82
Closing Capital & Support Service Budget	**6,982**
TOTAL Opening Budget	20,638
Movement in Local Risk Budget incl CWP	(482)
Movement in Central Risk Budget	0
Movement in Capital & Support Services Budget	82
TOTAL Closing Budget	**20,238**

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City of London Corporation Committee Report

Committee(s): Planning and Transportation - For Decision Port Health and Environmental Services - For Information	**Date:** 22/06/2026 21/07/2026
Subject: Air Quality Supplementary Planning Document	**Public report:** P&T - For Decision PHES - For Information
This proposal: • **delivers Corporate Plan 2024-29 outcomes** • **helps to deliver statutory duties.**	**Corporate Plan Outcomes**: Leading sustainable environment. Providing excellent services. Diverse engaged communities. **Statutory duties**: Local Air Quality Management.
Does this proposal require extra revenue and/or capital spending?	No
Report of:	Katie Stewart, Executive Director, Environment.
Report author:	Ruth Calderwood, Air Quality Manager, Environment Department.

Summary

A draft Air Quality Supplementary Planning Document (SPD) was approved for consultation by the Planning and Transportation Committee in March 2026. It was also presented to the Port Health and Environmental Services Committee in April 2026. It provides detailed guidance on how applicants should manage and minimise emissions of air pollutants to comply with policies HL2: Air Quality and HL9: Health Impact Assessments in the City Plan 2040.

The draft SPD was published for consultation from 16 March to 15 April 2026. A Consultation Statement is attached at Appendix 1. Sixteen written representations were received, containing 100 comments. A table setting out all written comments received, with any subsequent changes made to the draft SPD as a result of the comment, is attached at Appendix 1a to the Consultation Statement.

The consultation led to relatively minor changes to the draft SPD. The final version is attached at Appendix 2 to this document. This report seeks authorisation to adopt the Air Quality SPD by the Government's deadline of the end of June, and to be used in planning decisions within the Square Mile from 16 November 2026.

Recommendation(s)

Planning and Transportation Committee Members are asked to:

- Approve the final Air Quality SPD, attached at Appendix 2, with the adoption date to be no later than 30 June 2026.
- Agree that the proposed implementation date of the SPD will be 16 November 2026, conditional on the prior adoption of the City Plan 2040, from which date the current Air Quality SPD 2017 will be revoked and will no longer apply.

Port Health and Environmental Services Committee Members are asked to:

- Note the report.

Main Report

Background

1. The planning system plays an important role in reducing emissions of air pollution and limiting exposure to poor air quality. A draft Air Quality SPD was approved for consultation by the Planning and Transportation Committee in March 2026. It provides detailed guidance on how applicants should manage and minimise emissions of air pollution to comply with policies HL2: Air Quality and HL9: Health Impact Assessments in the City Plan 2040.

2. The draft SPD and supporting material were published for consultation from 16 March to 15 April 2026. A Consultation Statement is attached at Appendix 1.

3. The documents were available to view at the City Corporation's principal offices, the Square Mile libraries and on the City Corporation website. The website also contained links to the 'Konveio' consultation portal. All people registered on the City Corporation's local plan database were informed of the consultation by email, including information on where to find the SPD and supporting documents.

4. In person and online consultation events also took place. These events were promoted and publicised via social media, City Resident newsletters, posters and leaflets and via other networks.

Consultation Response

5. A total of 16 representations were received, containing 100 comments. There was strong overall support for the proposals. The main issues raised were:

    - Some concern over the application of air pollution damage costs to life safety diesel generators
    - Concern over the proposal to not apply damage costs to the construction phase of a development
    - Requests for clarification, for example over emission limits, how cumulative emissions will be assessed and the use of abbreviations
    - Policy issues outside of the scope of the Air Quality SPD, including those covered by the Code of Practice for Deconstruction and Construction
    - Requests for further detail on how any money obtained through air pollution damage costs would be spent, with suggestions for additional allocation

6. A table containing all written comments received, and any changes made to the draft SPD as a result of each comment is presented at Appendix 1a to the Consultation Statement. Overall, relatively minor changes were made to the draft SPD, and the final version is attached at Appendix 2.

7. The SPD was prepared using the results of two rounds of engagement: early informal engagement in Autumn 2025 and formal Regulation 12 consultation in March/April 2026. The results of the consultation and engagement are set out in the Engagement Summary at: https://www.cityoflondon.gov.uk/assets/Services-Environment/SPD-Autumn-Engagement-What-We-Heard.pdf and the formal Consultation Statement included at Appendix 1. The Consultation Statement has been prepared to satisfy the requirements of Regulation 12a of the Town and Country Planning (Local Planning) Regulations 2012 (the 'Regulations').

8. A Strategic Environmental Assessment (SEA) screening opinion was sought from the Statutory Environmental Bodies in Autumn 2025. Comments received confirmed that a full SEA was not required and therefore has not been prepared (see Appendix 3).

Implementation

9. As the new Air Quality SPD provides guidance relating to Policies HL2, HL9 of the City Plan 2040, it can only be used in planning decisions once the City Plan has been adopted.

10. Subject to member approval, the SPD will be adopted before 30 June 2026. However, officers are recommending that its implementation is conditional on the prior adoption of the City Plan 2040, and that it is not fully implemented until 16 November 2026. Accordingly, any new requirements or obligations

should not be applied to planning permissions which are issued before this date. This will provide certainty for developers currently within the application process, especially those schemes which have an existing resolution to grant permission subject to a section 106 agreement which is being progressed.

Next steps

11. In accordance with Regulation 11 of the 'Regulations', an Adoption Statement will be prepared and made available on the City Corporation's website. This will serve to confirm the date of adoption and implementation; modifications made to the SPD following consultation; and notice of any person wishing to pursue judicial review on the process of adoption. Notice of the revocation of the current Air Quality SPD (2017) will also be given under the legislation.

Corporate & Strategic Implications

Strategic implications

12. The Air Quality SPD directly supports the City Plan 2040. It clarifies how development will be required to meet policies HL2: Air Quality and HL9: Health Impact Assessments.

13. The Air Quality SPD supports the delivery of the Corporate Plan 2024 - 2029, particularly for the following outcomes:

    - Leading sustainable environment
    - Providing excellent services

Financial implications

14. No new funding is being requested. The aim of the SPD is not to raise revenue but to encourage developers to minimise emissions of air pollution associated with their proposals. Where damage costs are applied, there is the potential for increased income.

Resource implications

15. The SPD has been developed within existing resources and will streamline internal assessment processes.

Legal implications

16. The SPD has been prepared in full accordance with the Town and Country Planning (Local Planning) Regulations 2012 and it reflects the requirements of the Community Infrastructure Levy Regulations, 2010 which set limitations on the use of planning obligations where they are to constitute a reason for granting planning permission (Regulation 122). In these circumstances a

planning obligation must be (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.

17. Legal advice has been sought in relation to the timing of the SPD adoption in relation to the City Plan adoption. The intention is that the SPD will be adopted in June 2026 (ahead of the Government deadline) but will not come into effect or be applied until 16 November 2026 following the City Plan's adoption. It is noted that at the time of adoption an SPD must not conflict with the adopted development plan, which at this time is the City of London Local Plan 2015. As the SPD is not intended to support the Local Plan 2015 and will not be applied until the City Plan 2040 has been adopted, it is not considered that there is any conflict with the Local Plan 2015.

Risk implications

18. Air quality is a departmental risk reviewed quarterly. Engagement with industry experts has helped to shape the SPD in order to mitigate any potential risks associated with its implementation.

Equalities implications

19. The Public Sector Equality Duty is an ongoing requirement and has been considered by officers throughout the preparation of the Air Quality SPD. An Equalities Impact Assessment was completed for the draft SPD (see Appendix 2 to Planning and Transportation Committee item, 13 March 2026). All protected and additional groups were assessed. The SPD is not expected to have a negative impact on any group. Improving air quality is beneficial for all sectors of the community.

Climate implications

20. By reducing emissions of air pollutants, the SPD will directly support delivery of the Climate Action Strategy and contribute to the City's transition to net zero by 2040.

Security implications

21. None.

Conclusion

22. The Air Quality SPD provides clear, updated guidance on how development proposals must address air pollution impacts to meet the requirements of the City Plan 2040. Its aim is to ensure emissions are avoided wherever possible, minimised where unavoidable, and compensated for through damage costs where necessary. The updated SPD will support improved air quality, better

health outcomes for City communities, and support progress towards a net-zero carbon City by 2040.

Appendices

- Appendix 1 - Air Quality SPD Consultation Statement (which includes the consultation responses and action taken).
- Appendix 2 - Air Quality SPD
- Appendix 3 - SEA Screening responses to the Air Quality, Celebrating Heritage, Planning Obligations and Offices SPDs

Background documents

- Report to the Planning and Transportation Committee on 13 March 2026- Draft Air Quality SPD

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Appendix 1

Air Quality SPD Consultation Statement

Introduction

This document is the 'Consultation Statement' under Section 12 (a) of the Town and Country Planning (Local Planning) Regulations, 2012. It sets out the dates and detail of the formal public consultation, and informal engagement, carried out with regard to the Air Quality SPD.

A 'What We Heard' document sets out the detail of the informal engagement which took place in Autumn 2025.

Scope of Regulation 12/13 consultation

The draft SPD and supporting material were made available for consultation from 16 March to 15 April 2026 at the City Corporation's principal offices, the Square Mile libraries and on the City Corporation website: Planning guidance - City of London. The website contained links to the 'Konveio' consultation portal.

All people registered on the City Corporation's local plan database were informed of the consultation by email, including information on where to find the SPDs and supporting documents. In addition, 24 key air quality stakeholders were emailed a copy of the consultation.

A series of consultation events took place as detailed below. These events were promoted and publicised via social media, City Resident newsletters, posters and leaflets and via other networks.

- 24 March 9:00 -10:30am SPD information session(external link) at Aldgate Centre EC3N 1AB
- 31 March 6:30 - 8pm Residents session(external link) at Artizan Street Library E1 7AF
- 1 April 10 -11:00am Online developer's technical session
- 14 May 9 - 10:00am In person meeting with City Property Association (CPA)

Summary of the main issues raised

A total of 16 written responses, which contained 100 comments, were received.

Main issues:

- There was strong overall support for the proposals
- Some concern was raised over the application of air pollution damage costs to life safety diesel generators
- Some concern was raised over the proposal to not apply damage costs to the construction phase of a development

- Points of clarification, for example over emission limits, how cumulative emissions will be assessed and the use of acronyms
- Policy issues outside of the scope of the Air Quality SPD, including those covered by City of London Air Quality Strategy and the Code of Practice for Deconstruction and Construction
- Request for further detail on how any money obtained through air pollution damage costs would be spent, with suggestions for allocation

Points were also raised in person at the consultation events, and when the draft document was presented to Planning and Transportation Committee and Port Health and Environmental Services Committee.

How those issues have been addressed in the SPD

In line with the requirements of the Regulations, all written responses, and how each comment has been addressed, are listed in Appendix 1a to this Consultation Statement.

In addition to the written comments, the points raised in person that resulted in a change to the draft SPD included:

- A request for clarity with acronyms to make it easier to read – this has been addressed by writing each item out in full at the start of each chapter.
- If idling vehicle engines can be incorporated – this has been added as a requirement for inclusion in the Delivery and Service Management Plan.
- Concerns relating to air pollution damage costs for life safety generators – detailed information was sent to the CPA demonstrating how costs can be substantially reduced by installing good technology, using cleaner fuel and through good management.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
Air Quality Team, Greater London Authority	The GLA welcome the City of London's draft air quality SPD. It includes a number of impactful policies which have the potential to positively contribute towards the City of London's and the Mayor's aim of aligning with the World Health Organization's air quality guidelines. We also welcome the publication of the Air Quality SPD EqIA alongside the SPD. The GLA are particularly supportive of the following themes outlined in City of London's draft air quality SPD: •Discouraging the use of CHP and biomass boilers. •The requirement for Delivery and Service Plans for all major developments. •A focus on commercial cooking including a requirement for zero-emission cooking appliances where possible, and specific requirements for the location of flues for cooking, generators, and other combustion sources. •Using building design to minimise pollution ingress and poor indoor air quality. •Encouraging contractors to use electric NRMM where available and requiring mains power supplies to all construction sites as soon as possible. •The use of an emergency power supply hierarchy where diesel generators are the least desirable power source. The Draft SPD sets out several proposals including a requirement for back-up generator testing to not take place during days when the Daily Air Quality Index is 'Moderate' or above, and when the weather is 'calm.' The GLA would welcome more detail for developers on how this is defined, including what is considered 'calm' weather, and which forecasting service needs to show moderate for this to be the case. The GLA has not reviewed the Draft SPD at a detailed policy level and therefore is not in a position to provide comments on individual policies set out in the SPD, nor	The support for the proposals listed in the consultation response is welcome. The definition of calm weather, and which forecasting service to use, to be clarified in the final SPD.	''still weather' amended to 'light wind', with definition given as wind speed < 5mph. Light used rather than calm to align better with Beaufort Scale 1-3. DAQI resource updated to 'current City of London contractor'. The contractor will be signposted in the monitoring section of the City of London Air Quality webpage; the Air Quality SPD now points to this.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
	the metrics included within. Following the consultation, should the City of London wish to discuss a specific policy within their draft SPD in detail with the GLA, we welcome them to contact airqualitylondon@london.gov.uk where we can set up a meeting.		
City Resident	The planning system plays an important role in reducing emissions of air **pollutants**, as well as minimising exposure to poor air quality through good design.	The text has been amended.	Changed 'pollution' to 'pollutants'.
City Resident	The City Corporation Air Quality Strategy 2025 to 2030 (AQS)[2] recognises this with its aim to deliver air quality that is better than national standards.	Acronyms have been reviewed and updated.	Introduced the acronym AQS for the City of London Air Quality Strategy 2025 - 2030. All acronyms have been written out in full at the start of each new chapter for ease of reading.
City Resident	The City Plan 2040 supports the aims of the **AQS**, principally through Policy HL2: Air Quality and Policy HL9: Health Impact Assessment	Acronyms have been reviewed and updated.	Introduced the acronym AQS for the City of London Air Quality Strategy 2025 - 2030. All acronyms have been written out in full at the start of each new chapter for ease of reading.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
City Resident	In addition to the policies in the City Plan **2040**, the Department for Environment, Food and Rural Affairs	The document text has been reviewed for consistency.	'City Plan 2040' is used throughout.
City Resident	This aligns with the broader shift in planning policy from input-based assessments toward an outcomes-focused approach with the overall aim being for the minimum amount of air **pollutants** to be emitted and for exposure to air pollution to be minimised.	The text has been amended.	Updated 'pollution' to 'pollutants'
City Resident	Air pollution damage costs will then be applied to any remaining operational emissions, to help to mitigate the adverse impact on health of the development, thereby supporting the delivery of Policy HL9 of the City Plan **2040.**	The document text has been reviewed for consistency.	'City Plan 2040' used throughout.
City Resident	The use of biomass for heating can give rise to significant emissions of particulate matter; and consequently, the use of biomass in the Square Mile **should not be considered.** Is there any justifiable reason for using biomass in a new development or retrofit?	The City Corporation cannot prevent the installation of a biomass boiler. It is very unlikely that one would be installed. However, should this happen, the air pollution damage costs would be high, reflecting the cost to society from the air pollution associated with it.	No change made.
City Resident	The Emergency Power Supply Hierarchy in the City Corporation Planning for **Sustainability** SPD[12] should be applied.	All acronyms have been reviewed and amended if required.	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
City Resident	**Testing should not be completed during still weather conditions, and when the Daily Air Quality Index (DAQI) within the Square Mile is 'Moderate' or above. Is the highlighted section correct?**	The definition of calm weather and which forecasting service to use has been clarified.	'still weather' has been amended to 'light wind', with a definition given as wind speed < 5mph. 'Light' used rather than 'calm' to align with Beaufort Scale 1-3. The Daily Air Quality Index resource has been clarified to be the City of London independent air quality data manager.
City Resident	Development in the Square Mile is required to be car-free15&16. A high number of delivery and service vehicles and taxis and Private Hire Vehicles (PHVs) **is** associated with development in the City of London, and emissions from these should be minimised **as far as** possible.	The document text has been amended.	'where' updated to 'as far as'.
City Resident	DSP requirements chart: It would be interesting to see the percentage of zero tailpipe emission vehicles in the Square Mile currently being used for deliveries and servicing. The higher the percentage, the sooner the use of such vehicles can be made mandatory. Except for some HGVs and NRMMs such as cranes, "where possible" is unnecessary. "Idling engines"?	The Delivery and Service Plan Requirements have been clarified.	DSP Requirements have been updated, with the following point added: 'Implementation of a no idling policy.'

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
City Resident	Electric appliances are the cleanest option for cooking and should be used **where possible.**	The document text has been reviewed and amended if appropriate.	No change made.
City Resident	Zero-emission cooking appliances should be used **where possible.**	The document text has been reviewed and amended if appropriate.	No change made.
City Resident	Through **the AQS**,the City Corporation has committed to a pathway to meet the 2021 World Health Organization (WHO) Air Quality Guidelines (AQGs).	All acronyms have been reviewed.	Introduced the acronym AQS for the City of London Air Quality Strategy 2025 - 2030. All acronyms have been written out in full at the start of each new chapter for ease of reading.
City Resident	The principles outlined in Building Regulations Ventilation Approved Document F23 must be followed to minimise the intake of external pollutants, particularly for development in areas that breach the aims of the **AQS.**	All acronyms have been reviewed.	Introduced the acronym AQS for the City of London Air Quality Strategy 2025 - 2030. All acronyms have been written out in full at the start of each new chapter for ease of reading

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
City Resident	In line with Policy OS4: Biodiversity Net Gain of the City Plan **2040**, all major developments are required to submit Urban Greening Factor	The document text has been reviewed for consistency.	'City Plan 2040' used throughout.
City Resident	Development should be designed to avoid air ingress to a building from ambient air that does not meet the aims of the **AQS**	All acronyms have been reviewed.	Introduced the acronym AQS for the City of London Air Quality Strategy 2025 - 2030. All acronyms have been written out in full at the start of each new chapter for ease of reading
City Resident	Major developments must achieve an **UGF** of 0.3 and 3BU/ha, as a minimum	All acronyms have been reviewed.	'an Urban Greening Factor' updated to 'a UGF'.
City Resident	Construction, deconstruction and demolition **is** a significant source of air pollution. Best practice for minimising emissions of air pollutants from these activities is outlined in the **CoP.**	The document text has been reviewed.	'can be a significant source of air pollution' updated to 'is a significant source of air pollution in the Square Mile'.
City Resident	The City Corporation encourages contractors to go above these standards and use **electric** NRMM where available.	The document text has been reviewed.	'electric NRMM' updated to 'alternatives to diesel NRMM'.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
City Resident	A mains **electricity** power supply, temporary or permanent, should be secured as soon as possible on all construction sites, unless it can be demonstrated that it is not reasonably practicable. The use of generators to provide electricity on site should be avoided. If it cannot be avoided, justification for the proposed use of the generator must be detailed in the SoPW. Generators should not be installed on a construction site to solely **power** electric or hybrid NRMM. These must be **powered** using mains power supply. Charged?	The document text has been reviewed.	Text changed from 'powered' to 'charge and/or powered'.
City Resident	In accordance with **the City Plan 2040** Policy HL2, HL9 and S26, the City Corporation will seek offset contributions towards air pollution resulting from emissions of air pollutants, **NOx** and **PM2.5.** These air pollution damage costs estimate the societal impacts of emissions on human health, productivity, wellbeing and the environment and have been developed by **Defra.**	The document text, abbreviations and acronyms have been reviewed.	Added text 'of the City Plan 2040'.
City Resident	Any on site combustion plant (boilers, generators, **CHP**) in major planning applications	All acronyms have been reviewed.	No change made.
City Resident	All offsetting calculations should be provided in the **AQIA**, or subsequent documentation submitted to discharge a planning condition.	All acronyms have been reviewed.	No change made.
City Resident	Offsetting costs will be used by the City Corporation for air pollution improvement projects in the Square Mile and contribute to the aims of the **AQS**. The schemes would support the delivery of the **AQS** and fall into four categories: transport and public realm, infrastructure, improving public health and research	All acronyms have been reviewed.	Introduced the acronym AQS for the City of London Air Quality Strategy 2025 - 2030. All acronyms have been written out in full at the start of each new chapter for ease of reading.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
City Resident	Applicants must demonstrate that any major development complies with the requirements of **this SPD** by submitting an **AQIA.**	All acronyms have been reviewed.	No change made.
City Resident	As detailed in the City Plan **2040** 34 all developments in the Square Mile are required to be 'Air Quality Neutral' (AQN), as defined by the Mayor of London **(2023)** London Plan Guidance (LPG)35.	The document text has been reviewed for consistency and amended where appropriate. The date of issue of the Air Quality Neutral LPG is provided in the footnote.	'City Plan 2040' used throughout.
City Resident	In line with the **LPG**, Air Quality Positive **(AQP**)36 and **the** City Plan **2040**, AQP Statements are required for developments subject to an **EIA**. The Statement**s** must outline measures taken forward during the design stage to achieve the best possible outcomes for air quality.	The document text and acronyms have been reviewed.	No change made.
City Resident	Combustion Plant: • **CHP** • Biomass/biofuel boilers • A combustion-based backup generator for business continuity	All acronyms have been reviewed.	No change made.
City Resident	Proposals for developments that have sensitive receptors e.g., a school or nursery, may also require air quality modelling. Any such proposals should be discussed with the Air Quality Team. Homes?	Schools and nurseries are provided as examples, other examples include health centres, hospitals, care homes and dwellings.	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
		All proposals need to be agreed with the Air Quality Team.	
City Resident	When modelling is undertaken, predicted concentrations for the opening year of the development must be compared to the **AQS's** aims using a worst-case scenario. The City Corporation has designated relevant exposure as any location outside that is accessible to members of the public. All **AQS** aims apply to exposure, regardless of the pollutant averaging period.	All acronyms have been reviewed.	Introduced the acronym AQS for the City of London Air Quality Strategy 2025 - 2030. All acronyms have been written out in full at the start of each new chapter for ease of reading.
City Resident	Pollutants table pg. 11: NOx is used instead of NO2 in the Introduction and below. Is it necessary to use words and abbreviations?	Emissions are presented as NOx, and concentrations are presented as NO2. Consistency of abbreviations has been reviewed and amended where required.	No change made.
Environment Agency	We are supportive of the production of the Air Quality SPD. We are pleased to see that air quality impact assessments will be required for all major development as well as some non-major development. The general content is strong, and we are pleased that the SPD encourages energy switches, air quality issues from construction as well as how they can be managed through design.	The support for the SPD is welcome. The Air Quality SPD supports the delivery of	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
	One way the SPD could improve is by providing some further commentary and data on the present air quality situation in the City of London and set out how the SPD will seek to improve this.	the City of London Air Quality Strategy which sets out current levels of air pollution and targets for improvement. Annual Status Reports are produced. These detail progress with the actions in the Strategy and contain the most up to date air quality concentrations.	

Clean Air London	CAL strongly supports the direction of travel of the proposals but encourages the Corporation to go much further, faster. In particular, CAL points to: 1. Please press for zero air emissions, wherever possible. 2. Please follow a 'One air' approach that would eliminate air pollutants and greenhouse gases. 3. 'Air quality neutral' means no worsening of air pollution. It does not mean the same as understood by carbon neutral or (more properly) zero carbon. AQN is a very weak standard to set, even as a minimum. 4. Please ensure that the City of London would comply fully with Directive (EU) 2024/2881 including its requirements to be met by 1 January 2030 and any conditions for subsequent postponements. This https://eur-lex.europa.eu/eli/dir/2024/2881/oj Our 27 neighbours are committed to compliance and the UK looks set to align. Please note that the Directive includes limit values for PM2.5 of 10ug/m3 and NO2 of 20 ug/m3 by 1 January 2030. 5. CHP should not be permitted in the City of London. It has a terrible track record of being over-specified and then operating below necessary operating standards, resulting in fumes. 6. Please do not allow BREEAM points to be obtained at the expense of air emissions. 7. Please check units used for emissions rates referred to on numbered page 6. They use commas not full stops. 8. All construction equipment should produce zero exhaust emissions or be electric or hydrogen-powered unless unavailable. See: https://www.knightsbridgeforum.org/best-practice-guidance-construction-standards-and-procedures/ 9. The Knightsbridge Neighbourhood Plan 2018-2037 (which was made on 11 December 2018) includes excellent policies on air, renewable energy, utilities, and health. Please see KBR 33, KBR 34, KBR 35 and KBR 40. For example, KBR35 highlights the need to minimise energy use, maximise energy efficiency and then use renewable energy. Please encourage developers to minimise 'unregulated' energy use i.e. used by occupants. CAL understands that many occupants no longer require standby emergency generators because information and activity exists in the 'Cloud'. https://www.knightsbridgeforum.org/media//documents/knp_made_version_december_2018_131218_website.pdf	The support for the SPD is welcome and the comments to go further and faster are noted. The proposals in the SPD support the delivery of net zero carbon across the City. The requirements of the SPD go beyond Air Quality Neutral. The SPD discourages the installation of Combined Heat and Power Plant. Construction equipment will be addressed in the update to the Construction Code of Practice. Comments noted regarding the Knightsbridge Neighbourhood Plan. The recommendation to set an accelerated pathway to achieve WHO 2021 Air Quality	Page 6: '273,15 updated to 273.15 and 101,3 updated to 101.3'.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
		Guidelines is noted. This is not an issue to be addressed by the SPD but is included in the City Corporation Air Quality Strategy which sets goals for air quality in the Square Mile to be on a pathway to meet the WHO 2021 Air Quality Guidelines. The units on page 6 have been amended. Indoor air quality is to be addressed through the development design, as detailed in Section 2.	
Barbican and Golden Lane Neighbourhood Forum	General comments 1.We note (see introduction) that the ultimate aim is for development in the City to have zero operational emissions. But the rest of the SPD doesn't seem to follow through on this. The targets are weaker than the WHO recommended targets, and more importantly the SPD should be insisting on the best available technology – because that will change over the life of the Plan and may enable dramatic improvements in air quality.	The overall aim is for zero operational emissions. Where emissions cannot be designed out of a development they need to be reduced by using	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
	The SPD should therefore be insisting on the best available technology with at a minimum the WHO limits.	'best available technology'. To reflect the fact that best available technology will change over the life of the plan, the SPD refers to a live checklist which will be available on the City Corporation web site. This will be updated to reflect best current technology and practice (see page 6). The SPD includes the requirement to design a development so that new cleaner technology can easily be installed as it becomes available.	
Barbican and Golden Lane Neighbourhood Forum	Specific comments 2.We query the hierarchy for emergency power supplies in 2.1.2. A secondary power source sounds good but is useless if the grid goes down. We wonder why battery storage is not the preferred option.	Where a secondary mains power supply is used, both the primary and secondary are taken from independent supplies. The developer	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
		must demonstrate that steps have been taken to ensure that they would not both fail at the same time. This is in line with BS8519. The emergency power supplies hierarchy was introduced in the City of London Planning for Sustainability SPD, published in 2025, and is consistent with the Air Quality SPD. An assessment of the options was completed across a number of variables ensuring compliance with existing standards and regulations.	
Barbican and Golden Lane Neighbourhood Forum	3.We remain surprised at the prominence given to commercial cooking as a source of PM2.5 in the City in the Air Quality Strategy. The City's own data show that very few of the City's many restaurants use charcoal or wood for cooking (https://www.the-ies.org/resources/pm25-emissions-inventory-and-source-apportionment-city-london-col). We find it hard to believe that it is a more important contributor than construction and street works.	The data is taken from the London Atmospheric Emissions Inventory, which is produced by the Greater London Authority. While charcoal	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
		and wood use in cooking is a source of particulates, the cooking process such as grilling and frying also contributes to PM2.5 emissions.	
Barbican and Golden Lane Neighbourhood Forum	4.The section on Construction, Deconstruction, and Demolition refers readers to the City's Code of Deconstruction and Construction, which is dated 2019 and is due for updating, but that has not yet happened. The current Code is weakly worded and very permissive; and experience as residents in the City living close to construction sites is that they are not models of well-regulated activity. They make noise and they pollute.	The SPD states that *'...references made in this document are current at the time of writing. Where documents are revised, the latest version(s) should be used.'* The CoP is currently being updated and when an updated version is adopted all development in the Square Mile will be required to adhere to this. The Deconstruction and Construction Code of Practice is being updated and will be published for	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
		consultation during 2026.	
Barbican and Golden Lane Neighbourhood Forum	5.It is also not clear why offset calculations are not required for emissions associated with construction. If the damage costs are meant to incentivise developers to design their buildings to improve air quality, it is not clear why the same incentives should not be required to incentivise developers' contractors to minimise emissions of environmental pollutants – particularly as construction sites are such as dominant activity in the City and contribute significant amounts of particulates and NO2 [see p 7 of the City's Air Quality Strategy 2025-2030].	The City of London Deconstruction and Construction Code of Practice details how construction activity must be managed to minimise emissions of air pollutants. A construction levy is charged on most construction and is used in part to ensure emissions are minimised.	No change made.
Barbican and Golden Lane Neighbourhood Forum	6.Instead of justifying the lack of mitigation measures (which the code allows contractors to do), developers and their contractors should – as required by the rest of the SPD -to pay damage costs if they fail to mitigate.	The City of London Deconstruction and Construction Code of Practice details how construction activity must be managed to minimise emissions of air pollutants. A construction levy is charged on most	No change made.

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		construction and is used in part to ensure emissions are minimised. The Deconstruction and Construction Code of Practice is being updated and will be published for consultation in 2026.	
DP9 on behalf of BNP Paribas	"Dear Sir / Madam, Representations on the Draft Air Quality SPD to support the implementation of the City Plan 2040 These representations are submitted to the City of London (CoL) on behalf of our client, BNP Paribas Asset Management ('BNPP AM') (formerly AXA Real Estate Investment Managers) (acting in its capacity as investment manager and advisor to its investors and clients) in respect of the consultation on the new and update SPD's. The SPDs are an update to the Planning Obligations SPD, and new SPDs covering Officers, Air Quality and Celebrating Heritage. These representations focus on the draft Air Quality SPD, and separate representations have been prepared on the other SPD's listed above where relevant. BNPP AM welcomes the opportunity to engage in this consultation that will feed into the City Plan 2040. Representations have been made previously on the City Plan 2040 Regulation 19 consultation (17 June 2024) and to the Tracked Changes' version of the City Plan 2040 Proposed Main and Additional Modifications to the Regulation 19 version (6 February 2026). The representations below provide commentary on specific items rather than comments on the entire draft SPD."	Comment noted.	No change made.

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DP9 on behalf of BNP Paribas	New Air Quality Damage Costs The proposed Air Quality Damage Cost set out in the draft Air Quality SPD would apply to the replacement of a combustion plant, which BNPP AM understands includes standby generators, with contributions in the region of £20,000–£80,000 based on emission rates. However, emergency standby generators serve a fundamentally different purpose from operational combustion equipment, they are legally mandated to provide life-safety and business-critical resilience for systems such as emergency lighting, fire pumps and essential medical infrastructure. Their operation is limited to infrequent testing and genuine power-failure events, meaning they do not contribute to routine emissions. As such, applying the full Air Quality Damage Cost to equipment that cannot be removed, substituted or avoided would be disproportionate and would not achieve the policy objective of influencing design choices. An explicit exemption for emergency-only standby generators is therefore necessary to ensure the SPD remains reasonable, justified and aligned with statutory safety requirements. In addition, BNPP AM would welcome further clarification on whether the damage cost contributions will be ring fenced to provide additional air quality mitigation measures in the City.	Secondary (or standby/emergency) power supplies for safety purposes are required for particular types of development where loss of power would present a serious risk to life, health, or critical operations. Examples include large commercial buildings, high rise residential, hotels and hospitals. The secondary supply can include an alternative mains supply, a battery or generator. The SPD directs developers to consider the cleanest option. Through the application of air pollution damage costs, developers are encouraged to use the cleanest technology, and operate the plant to minimise emissions. The	No change made.

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		SPD does not say that diesel generators are not allowed, though if they are installed damage costs would be applied to reflect the cost to society. If done carefully, the damage costs of a diesel generator used for life safety will be minimal. The damage cost contributions will be used to support the delivery of the City of Air Quality Strategy focussing on measures to improve air quality in the Square Mile.	
DP9 on behalf of BNP Paribas	Conclusion BNPP AM is pleased to have the opportunity to comment on draft Air Quality SPD to support the implementation of the City Plan 2040 and we would welcome the opportunity to further engage with Officers to discuss any specific elements within these representations. We trust the points raised in this representation will be taken into account and will be used to inform the final version of the Air Quality SPD. Should you have any queries or require any further information in respect of the above, please contact	Comment noted.	No change made.

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	Jonathan Smith or Elena Butterworth of this office. Yours faithfully DP9 Ltd.		
Marine Management Organisation	Dear City of London Planning Team, Apologies, I realise I've missed the 11am deadline today for this consultation. I hope you can still consider this response. MMO Marine Planning response to the City of London's Supplementary Planning Document (SPD) consultations on: • Air Quality SPD • Celebrating Heritage SPD • Offices SPD • Planning Obligations SPD Thank you for giving us the opportunity to comment on the above documents. Please find attached our standard response. I would just in addition recommend considering the Air Quality (AQ-1) and Heritage (HER-1) policies within the South East Marine Plan. We advise that you take note of any relevant policies within the South East Marine Plan documents in regard to areas within the Supplementary Planning Documents that may impact upon the marine environment. We recommend inclusion of the South East Marine Plan when discussing any themes with tidal or marine elements which extend up to Teddington Lock. Our policies can be referred to as a guide, demonstrating your regard to the marine plans, under the Marine and Coastal Access Act, 2009. It is important to note that marine plan policies do not work in isolation, and decision-makers should consider a whole-plan approach.	Comment noted.	No change made.

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	Please let me know if you have any questions regarding implementation of the marine plan.		
Newmark on behalf of CPA	CPA REPRESENTATIONS TO THE AIR QUALITY SPD 1. New Air Quality Damage Costs The proposed Air Quality Damage Cost set out in the draft Air Quality SPD would apply to the replacement of a combustion plant, which the CPA understands includes standby generators, with contributions in the region of £20,000–£80,000 based on emission rates. However, emergency standby generators serve a fundamentally different purpose from operational combustion equipment, they are legally mandated to provide life-safety and business-critical resilience for systems such as emergency lighting, fire pumps and essential medical infrastructure. Their operation is limited to infrequent testing and genuine power-failure events, meaning they do not contribute to routine emissions. As such, applying the full Air Quality Damage Cost to equipment that cannot be removed, substituted or avoided would be disproportionate and would not achieve the policy objective of influencing design choices. An explicit exemption for emergency-only standby generators is therefore necessary to ensure the SPD remains reasonable, justified and aligned with statutory safety requirements. In addition, the CPA would welcome further clarification on whether the damage cost contributions will be ring fenced to provide additional air quality mitigation measures in the City.	Secondary (or standby/emergency) power supplies for safety purposes are required for particular types of development where loss of power would present a serious risk to life, health, or critical operations. Examples include large commercial buildings, high rise residential, hotels and hospitals. The secondary supply can include an alternative mains supply, a battery or generator. The SPD directs developers to consider the cleanest option. Through the application of air pollution damage costs, developers are	No change made.

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		encouraged to use the cleanest technology and operate the plant to minimise emissions. The SPD does not say that diesel generators are not allowed, though if they are installed damage costs would be applied to reflect the cost to society, largely the impact on health. If done carefully, the damage costs of a diesel generator used for life safety will be minimal. The damage cost contributions will be used to support the delivery of the City of Air Quality Strategy focussing on measures to improve air quality in the Square Mile.	

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Local stakeholder	I support this SPD.	The support is welcome	No change made.
Natural England	Dear Sir or Madam Air Quality Supplementary Planning Document for the City of London Thank you for your consultation request on the above dated and received by Natural England on 16th March 2026. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Our remit includes protected sites and landscapes, biodiversity, geo-diversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature. Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment. Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again. Strategic Environmental Assessment/Habitats Regulations Assessment A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance. Please send all planning consultations electronically to the consultation hub at	Comment noted.	No change made.

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	consultations@naturalengland.org.uk		
Air Quality Consultants	The concept of "better by design" was embedded into the EPUK/IAQM guidance. AQ issues need to be considered at the outset of a project to influence design.	Comment noted.	No change made.
Air Quality Consultants	The only issue to bear in mind is that damage costs are in no way directly linked to the costs of abating the excess emissions. Where damage costs are applied, they should be focused towards the application site as far as practicable	Damage costs are designed to reflect the monetary cost of air pollution to society. The value will be specific to an application, and the mitigation will be focussed in the area around the application site as far as is reasonably practicable. However, emissions of pollutants, particularly PM2.5, readily disperse and affect air quality across the whole of the Square Mile.	No change made.
Air Quality Consultants	The proposed limits for gas fired CHP seem quite high – a report that AQC prepared for the CoL indicted that 25mg/m3 is achievable for CHP with SCR, and was used to inform GLAs revised AQN guidance	The emission limits for CHP have been amended.	The CHP emission limits have been updated, reduced to the following: 50 mg/Nm3 for CHP

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			≤ 500kWe 25 mg/Nm3 for CHP ≥ 500KWe Emission limits are at 5% oxygen.
Air Quality Consultants	The screening criteria for AADT flows are being investigated in the revised IAQM guidance – these flows are likely to be very stringent as they were derived from fleets dominated by Euro5 diesels.	Comment noted.	No change made.
Air Quality Consultants	Noted that the (damage cost) calculation is different from that in the GLA AQN guidance. Clarification on how these two calculations interface would be useful.	The document text has been amended.	Text updated to: As detailed in the City Plan 2040, all developments in the Square Mile are required to be 'Air Quality Neutral' (AQN), as defined by the Mayor of London AQN London Plan Guidance (LPG). The requirements of this SPD surpass the scope of AQN. Where AQN exclusions are

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			applicable to an application, only a short statement to confirm the development is AQN is required. In the event either of the Building Emissions Benchmarks or Transport Emissions Benchmarks are exceeded the Air Quality Team should be contacted. A development will not be subject to offsetting via AQN, only through the City of London methodology for air pollution damage costs.
Air Quality Consultants	Will the information be available to do a damage cost calculation - For outline applications possibly not – but can be picked up at Reserved Matters Application?	Where the information to complete a damage cost calculation is not	No change made.

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		available, such as for an outline application, a s106 agreement will be established whereby the AQ damage cost can be confirmed at a later date. The payment of air pollution offsetting will be required on completion of the development and prior to occupation.	
Port of London Authority	Does the CoL Air Quality Team intend to report income generated from damage costs, and where they have been directed, in air quality status reports or other reporting method?	An annual report will be produced detailing income generated from damage costs and where the money has been directed.	No change made.
Port of London Authority	For the CoL Air Quality Team's awareness, as part of the Port of London Authority planning application process for permanent river works licenses* we require applicants to complete a Green Technologies report which should detail efficient technologies considered and to be implemented in design of the works. This should not have any material implications to the requirements of this SPD.	Comment noted.	No change made.
London Borough of Newham	Excellent. Clear and logical framework for reducing air pollution impacts from new development. Each stage reinforces the others and encourages developers to prioritise meaningful emission reductions rather than relying solely on mitigation or	The support for the mitigation hierarchy is welcome.	No change made.

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	financial offsetting. It is far more effective to prevent emissions through design than to manage them later.		
London Borough of Newham	Strongly agree (with the application of air pollution damage costs), provided it is used transparently, consistently, and always as the final step in the hierarchy after all reasonable emission-reduction and mitigation measures have been applied.	The support for damage costs is welcome.	No change made.
London Borough of Newham	Applying air pollution damage costs to (items listed) in major developments is an effective and justified approach. It encourages cleaner design choices, promotes consistency in decision-making, and supports the City's long-term ambition to meet WHO Guidelines	The support for applying damage costs as detailed in the SPD is welcome.	No change made.
London Borough of Newham	The four categories (for allocation of S106 money received) are well-considered and collectively provide a balanced, strategic framework for reinvesting damage-cost funds. They ensure that money is directed not only toward reducing emissions but also toward protecting public health, improving environmental infrastructure, and supporting continuous learning and innovation.	The support for the allocation of money generated from Air Pollution Damage Costs is welcome.	No change made.
London Borough of Newham	The only other category worth considering could be – education. Or renaming the last one to: Research and Education.	Categories have been reviewed.	'Education' has been added to the 'Research' category
London Borough of Newham	The only issue I see here would be enforcement. How are you going to monitor compliance? (re life safety v business continuity generators)	Where a building operates a backup generator, the operator will be required to submit an annual testing report via a planning condition. This will be assessed against the application information.	No change made.
London Borough of Newham	Overall, if applicants submit a comprehensive and detailed Air Quality Assessment, the necessary data (for calculating damage costs) should be available at the	Where the information to complete a damage	No change made.

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	planning stage. However, some applications may require clarification or additional detail before calculations can be accurately completed.	cost calculation is not available, such as for an outline application, a s106 agreement will be established whereby the AQ damage cost can be confirmed at a later date. The payment of air pollution offsetting will be required upon completion of the development and prior to occupation.	
London Borough of Newham	Given the City's aim to phase out combustion where possible, it may be helpful to explicitly state the circumstances in which combustion plants might still be considered acceptable, and what evidence would be required to justify it.	The SPD aims to discourage combustion plant. Air pollution damage costs are only applied to emissions, where combustion plant cannot be avoided.	No change made.
London Borough of Newham	Clear reporting on how S106 air pollution damage-cost funds could be allocated would support transparency and demonstrate the real-world impact of the policy. Annual summaries or case studies?	An annual report will be produced detailing income generated from damage costs and where the money has been directed.	No change made.

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London Borough of Newham	Highlighting how cumulative emissions from multiple developments in close proximity are assessed could help address concerns about combined localised impacts, particularly in dense areas.	The assessment of cumulative operational impacts has been reviewed and amended.	Added text to Section 5 'The approach detailed in this SPD removes the requirement for cumulative assessment from most development. All developments will be required to remove all operational emissions, or reduce them as far as is reasonably practicable.' Added sentence to Section 5 'All relevant pollution sources, both existing and consented, should be included in the model.' Removed sentence in Section 5.2 table

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			Chapter 1 'Details of any consented developments in the locality that may lead to a cumulative impact upon air quality.'
Environment Agency	I like the approach that gives industry the options to be able to comply at each level-, screening the most of emissions and exposure through the first stage, applying measures of mitigation to the second stage and then lastly, any not caught by the first two can be used to create funds for projects to 'offset' the impact of the project.	The support for the approach is welcome.	No change made.
Environment Agency	It seems proportionate and a deterrent, which should hopefully see an increase in the use of the first two stages. So long as the money is used effectively to provide meaningful projects to offset the emissions of the project, where it can be implemented as locally as possible to that project also.	The support for the approach is welcome. Mitigation will be focussed in the area around the application site as far as is reasonably practicable. However, emissions of pollutants, particularly PM2.5, readily disperse and affect air quality across the whole of the Square Mile.	No change made.
Environment Agency	Combustion plant and back up power supply are emerging and very popular sources of emissions from development and ongoing use in that development. It is rightful	The support is welcome.	No change made.

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	that they should be discouraged and or have restrictions on their use and testing regimes to minimise emissions whilst still providing the minimal amount of testing to ensure the operational efficacy of that plant, and with the added inclusion of the emergency life-saving clarification is helpful. Vehicular emissions from transport and the DSP is also rightfully included. The approach seems proportionate.	Comments noted about the approach being proportionate.	
Environment Agency	In the way that they are listed (how and S106 offset payment would be spent), are they listed in a priority way? I think a couple of sentences here would be useful to the document user to see how the money could be spent/ describing a project with a brief example perhaps, as the majority of this section is focused on 'couping' the money and rationale behind why, but little is said on how it could be spent. I think some more transparency around this, such as what transport projects (given that the transport network was previously described as the highest level possible) could be feasible.	An annual report will be produced detailing income generated from damage costs and where the money has been directed.	No change made.
Environment Agency	I like the inclusion of the testing requirements firstly, but how will this be secured- i.e., will it have a section 106 to secure such ongoing use, or will the planning permissions be enough to regulate this? With regards the emission rates, as a regulator of MCP I am familiar with them and encourage the use of them.	Where a building operates a backup generator, the operator will be required to submit an annual testing report via a planning condition.	No change made.
Environment Agency	I am a big fan of this distinction (life safety v business continuity) and it is much needed to secure practical use and application of the principle as this can often be a point where grey areas are and unnecessary emissions created, however, what I believe the document doesn't do is define any different use between the two- this can include run times, testing times, emissions/ standard difference, or fuel difference (maybe there isn't a difference- maybe ALL liquid fuelled generators MUST hit the previous specifications on page 6 regardless of use, and maybe the business continuity use of back up power is absolutely discouraged?).	The emission rates are applicable for all liquid fuelled generators. Where an offsetting calculation is completed for a generator, this will be based on the specific information for each	No change made.

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		generator. The example calculation provided in Appendix 2 is for a life-safety generator. Where the proposed generator use is for Business Continuity, the Air Quality Team should be consulted to agree assumed hours of operation to be assumed (4 hours assumed for life-safety). This is referenced in the document.	
Environment Agency	The distinction between the two uses is important, but it doesn't tell us how it will be applied or what it means for the developer… I can only see that if you have combustion for business continuity, a further assessment may be required. From this, if this means that ALL business continuity proposals need ongoing assessment and what can be the outcome, will officers making the assessment have good guidance documents to use to make this assessment? In any circumstance, I think the criteria for assessment should form part of public knowledge so that the developer has the options to hand. Edit: I have just remembered/ read that it is most likely to result in offsetting costs on page 10. Perhaps you could introduce the 'penalty' for business continuity earlier in the document on page 6/7 and then reinforce it on page 10 again to make it clearer.	The emission rates are applicable for all liquid fuelled generators. Where an offsetting calculation is completed for a generator, this will be based on the specific information for each generator. The example calculation	No change made.

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		provided in Appendix 2 is for a life-safety generator. Where the proposed generator use is for Business Continuity the Air Quality Team should be consulted to agree assumed hours of operation to be assumed (4 hours assumed for life-safety).	
Environment Agency	Yes, however I have reservations of the use of the s106 process to capture them. The process itself is sound, however possibly more guidance on how to secure it/ word the s106 would be useful to planning officers. I like the 'when' that is applied to payment- but will the planning officers have appropriate tools for enforcement should the developer go ahead and start to occupy the development prior to payment being made? Is non-major development defined as anything below the definitions on page 13, i.e., lower than ten or more dwellings or lower than >/= 0.5ha?	The Planning Obligations SPD provides guidance on the mechanism through which planning obligations are secured. Enforcement under the Town and Country Planning Act 1990 is applicable in the event of non-payment. Non-major development is anything below the definition of Major Development presented on page 13.	No change made.

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Environment Agency	I find the second paragraph confusing on page 11. The requirements for developments in the square mile being AQN. The requirements of this SPD go beyond that but it doesn't state that this will become effectively AQPositive? More over, an AQN assessment is not needed unless the transport and building emissions benchmarks are exceeded from the AQN guidance, which effectively is still asking the developer to make an AQN assessment anyway.. only that It doesn't need submitting with the application I am guessing? Perhaps it can be worded better from the start to say that AQN benchmarks for transport and building emissions still have to meet or beat the AQN guidance, but a full AQN assessment does not need to be submitted? I do like the sentence about using AI in the AQIA.	The document text has been reviewed and amended where appropriate.	Text on page 11 updated to: As detailed in the City Plan 2040, all developments in the Square Mile are required to be 'Air Quality Neutral' (AQN), as defined by the Mayor of London AQN London Plan Guidance (LPG). The requirements of this SPD surpass the scope of AQN. Where AQN exclusions are applicable to an application, only a short statement to confirm the development is AQN is required. In the event either

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			of the Building Emissions Benchmarks or Transport Emissions Benchmarks are exceeded the Air Quality Team should be contacted. A development will not be subject to offsetting via AQN, only through the City of London methodology for air pollution damage costs.
Environment Agency	The modelling criteria is clear and well laid out as is the rationale for exceptions. What isn't clear to me, but I'm not that familiar with modelling, is the AQS aims table. Are those the limits designated for the whole of the square mile, similar to but much more ambitious as the national AQS objectives?, OR, are they the maximum modelling parameters as part of the process contribution from the development that is being applied for?	The limits designated are for the whole of the Square Mile. They are more ambitious than the national targets.	No change made.
Environment Agency	Yes it is a very inclusive list, however I would use the same language used previously in the report where possible, for example, 7, offset calculation; required: building plant emissions, where on page 10 we used the language any on site combustion plant (boilers….., and also any on site generators proposed for business continuity….	The document text has been amended.	Updated text from 'Building ' to 'Operational combustion'.

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	i am aware that the phrase 'building plant emissions' does cover both of these, but I think it might help if the same phrasing was used to remove confusion/ abuse.		
Environment Agency	First note- paragraph one, earlier in the document it states that offset damage costing was not applied to demolition and construction, whereas in this section it only states construction. To avoid confusion you should keep the phrasing the same and possibly use the term construction and demolition as it is normally used (rather than the other way around!).	The document text has been amended.	Text updated at the start of the document to: 'construction (which includes construction, deconstruction and demolition)'
Environment Agency	Second note, this will be the section which will be the most confusing and most abused. Clarity is key!	Comment noted.	No change made.
Environment Agency	DC: it is not explained how you get this information. I presume this is the information previously mentioned on page 10 developed by DEFRA? Does this information have a policy number, a document number, a defining identifying mark associated with it (i.e., 2025 damage report?)? You should include this to remove ambiguity in case there could be a misleading source or year used? (is it a requirement of the AQIA to submit which damage report was used? I understand you probably cannot directly link the guidance/ document as it may be updated annually and will change, but you could find a way to refer to the report and subsequent reports thereafter appropriate for the year of application. I think 'source sector' needs a footnote/ further expansion to explain what/ where/ how it is identified, to prevent abuse.	The most recent Defra Air Pollution Damage Costs document is referenced in the SPD, footnote 5. The source sector is defined in the Defra damage cost document.	No change made.
Environment Agency	One thing I have noticed is, with the two given examples of diesel generator use, the life safety one is significantly more expensive of a payment than the discouraged business continuity one, for the same runtime- is this 'weighted' correctly? You will see a lot more applications with business continuity generators in place rather than life saving reasons, with appropriate justification to save money! Doesn't this	It is an emission-based cost, regardless of use, and there is a distinction in terms of cost between	No change made.

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	encourage more use in business continuity and more testing hours/ more emissions, and consequently punish life safety critical users? Edit: I have just read the reason why underneath, apologies but rather than delete my earlier thoughts, I will leave them in situ as I'm sure many more will go through the same journey that I have and it might provide a user problem in the future. But on that note, is there any difference in the offset payments depending on the distinction of generator use? Would an identical life saving generator cost the same as a business continuity one, and the difference would come down to the ability to be able to have it in the first place, i.e., life saving ones are given priority over business continuity ones which are discouraged. Actually, thinking about it, there should be no difference in the use of the generator as this exercise is an emissions based cost- regardless of use, so there would be no difference in identical machines. Again, I could remove this comment, but it has been left to show you my thought process and considerations in case you receive more comments like this and decide to make it clearer in the document.	Life-Safety and Business Continuity.	
Cross River Partnership	The SPD sets out a clear three-stage approach to minimising emissions of air pollution from new development with a clear priority for development in the City of London to minimise emissions of the pollutants nitrogen oxides (NOx) and particulate matter (PM10 and PM2.5) and have zero operational emissions. It is clear that developments should be designed to reduce exposure of the occupiers and nearby populations to air pollution as a first priority. CRP would emphasise the need to ensure that developments are considering all potential air pollution mitigations before incurring air pollution damage costs and that this is not viewed as the default option for developers. CRP's view on offsetting residual emissions via damage costs is outlined in the following question responses	Comment noted.	No change made.
Cross River Partnership	CRP welcomes the principle of applying air pollution damage costs to emissions of air pollution and the City Corporation's proactive approach to addressing the societal impacts of emissions on human health, productivity, wellbeing and the	Comment noted.	No change made.

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	environment. CRP would emphasise the need to ensure that developments are considering all potential air pollution mitigations before incurring air pollution damage costs. CRP has direct experience of delivering projects funded through offset funding. An example is the Westminster City Council Westminster Climate Fund (WCF), a grant funding programme that utilises S106 carbon offset payments to support the decarbonisation of Westminster. CRP have used WCF funding to deliver collaborative projects that reduce emissions in Westminster, including supporting sustainable logistics and the Sustainable City Charter Innovation Challenge. The Innovation Challenge is designed to support Sustainable City Charter signatories and local innovators and will identify local SMEs with low carbon solutions and products and match them with signatories to trial these in real-world commercial settings. The aim of the Challenge is to reduce signatories' emissions, as well as drive the growth of the low carbon industry across the borough. CRP would encourage the City Corporation to consider funding a diverse range of innovative air pollution improvement projects through the offsetting costs as well as using it as an opportunity to involve and engage local organisations with the subject of air quality and urban health. CRP were involved in the governance refresh of the Westminster Climate Fund, providing guidance around potential project deliver and partnerships, and would be happy to provide any input to the City Corporation if this would be of value.	The SPD does ensure that developers consider all potential air pollution mitigations before incurring air pollution damage costs.	
Cross River Partnership	CRP has delivered multiple DEFRA and Mayor's Air Quality Fund-funded programmes focused on minimising the impact of freight on noise, air quality, traffic and pavement space in London as well as addressing the issue of over-dependence on private vehicles and increasing active travel.	Comment noted.	No change made.

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	Examples include Smarter Greener Logistics, Clean Air Logistics for London, Healthy Streets Every I & II, and JUST STREETS. Therefore CRP particularly welcomes the application of offsetting costs to any increase in emissions associated with vehicle movement, when compared to the current land use, in major applications. CRP also notes the key action to commit to using zero tailpipe emission vehicles where possible. CRP would encourage the City Corporation to consider the role that the Thames and river freight can play in reducing emissions from delivery and servicing. CRP have delivered a number of river freight trials, including the London Light Freight River Trial and River Freight Pilot Part Two, that have highlighted the potential to incorporate river freight into low emission logistics operations.		
Cross River Partnership	The SPD clearly presents four categories for allocation of any money received by S106 as air pollution damage costs. The categories have clear alignment to the goal of improving air pollution and allow for a range of air pollution improvement projects to be delivered. CRP would recommend for the category of 'Improving Public Health' to be reconsidered as a stand-alone category and instead incorporated as an essential focus of all categories to ensure that public health remains central to any project delivery. CRP would ask the City Corporation to consider a category focused on the delivering community projects that empower local community groups with the subject of air quality and encourage collaboration, co-design and local ownership. From CRP's experience of the Westminster Climate Fund, we would also ask the City Corporation to consider including feasibility studies within either the Infrastructure or Research category (should funding be externally available) to allow organisations to explore potential project delivery specific to their air quality requirements. CRP would welcome additional information on the types and scale of air pollution improvement projects the City Corporation envisage delivering in the Square Mile and if there will be opportunities for partnership organisations to be involved.	Community projects would be captured by the public health category. Feasibility studies would be part of the infrastructure and transport and public realm categories.	No change made.

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Cross River Partnership	CRP does not have specific expertise on generators emission limits, however, agrees with the need to consult with the City Corporation's Air Quality Team should limits outlined not be achieved.	Comment noted	No change made.
Cross River Partnership	CRP agrees with the definitions for Emergency Life Safety and Business Continuity generators.	Comment noted	No change made.
Cross River Partnership	The SPD provides a clear high-level overview of the offsetting process, however, additional detail around the governance and workings of the fund would be welcome. From a partnership perspective, CRP would welcome additional information on the types of air pollution improvement projects the City Corporation envisage delivering in the Square Mile and if there will be opportunities for external / partnership organisations to be involved in project delivery.	An annual report will be produced detailing income generated from damage costs and where the money has been directed.	No change made.
Cross River Partnership	CRP welcomes the requirement for applicants to demonstrate that any major development complies with the requirements of the Air Quality SPD by submitting an Air Quality Impact Assessment (AQIA). The demonstrates a clear commitment to achieving the best possible outcomes for air quality in the City. CRP does not have any specific comments on the modelling criteria from a developer perspective, however, welcomes the clear links to the City Corporation's Air Quality Strategy aims for maximum levels of exposure for NO2, PM10 and PM2.5. Providing a structure for AQIA submission and information required is helpful for developers to ensure it is as easy as possible to comply with the City Corporation exposure limits and generate positive action.	The support for the Air Quality Impact Assessment process is welcome.	No change made.
Cross River Partnership	The requirements of an Air Quality Impact Assessment as clearly outlined on page 12 and CRP recognise that the specific requirements as dependent on the type and scale of the development as stated in the SPD. CRP particularly welcomes the reference to Green Infrastructure (GI) within the 'Design Considerations: Exposure' chapter. CRP deliver a range of placemaking projects through programmes such as Healthy Streets Everyday II and JUST STREETS, that incorporate GI to function as a	The support for the reference to Green Infrastructure is welcome.	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
	porous vegetation barrier, altering local air dispersion patterns, and providing a greater surface area for increased deposition. CRP would also emphasise the co-benefits of GI for reducing air temperatures, provide shade and shelter, and encourage people to choose to walk, cycle, wheel or scoot through improving the public realm.		
Cross River Partnership	CRP welcomes the City of London's commitment to air quality evident in the Air Quality SPD and ambition to deliver air quality that is better than national standards, as outlined in the City Corporation Air Quality Strategy 2025 to 2032. CRP have firsthand experience of delivering air quality focused projects and value the City Corporation's priority on emphasising the need for Air Quality Neutral and Air Quality Positive developments and major schemes to be the default and for offsetting to only be used in unavoidable circumstances. CRP would emphasise the need to focus on the area beyond the building footprint and building operations for addressing the issue of air pollution in particular through urban greening and low emission transport and freight and servicing approaches. As a partnership supporting public, private and community organisations the opportunity to involve community groups in the topic of air quality and benefits to local population and visitor health should not be underestimated.	The support for the ongoing commitment to improving air quality is welcome.	No change made.
City and Hackney Public Health	The mitigation hierarchy (avoid, mitigate, compensate) represents a clear shift toward outcome-focused, health-protective planning and reflects best practice nationally. The requirement for major developments to aim for zero emissions wherever feasible is particularly welcome, given the burden of air pollution on cardiovascular, respiratory and developmental health, and its interaction with health inequalities. The application of Defra air pollution damage costs provides an important	The support for the overarching aims of the SPD is welcome.	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
	mechanism to recognise and address residual health harms, while reinforcing the polluter-pays principle.		
City and Hackney Public Health	The SPD would benefit from stronger and more explicit reference to exposure reduction for vulnerable groups, including children, older people, pregnant women, and those with existing respiratory or cardiovascular conditions. In particular, Public Health supports strengthened attention to schools, childcare settings, healthcare facilities, and care homes, alongside residential developments, where exposure reduction delivers disproportionate health benefits.	Exposure reduction is a key aspect of the design and assessment requirements. All vulnerable groups would be taken into account. The health impacts of air pollution, including vulnerable groups, are detailed in the City Corporation Air Quality Strategy 2025-2030.	No change made.
City and Hackney Public Health	Public Health recommends that Air Quality Impact Assessments, in line with the SPD's Structure of an Air Quality Impact Assessment Report, include a brief health-focused summary within the assessment of impacts and residual effects. This could describe the health relevance of predicted exposures, with explicit consideration of vulnerable groups and sensitive receptors, supporting a "Health in All Policies" approach.	The document text has been amended.	Added text to the table on page 12: 'A summary describing the health impact of the predicted exposure'.
City and Hackney Public Health	Public Health also supports the use of consistent, health-relevant indicators over time to help understand how planning-led air quality improvements contribute to longer-term population health outcomes. Examples of health-relevant indicators could include trends in PM2.5 and NO2 concentrations, exposure at sensitive locations such as schools, residential areas and healthcare settings (including St	These comments are captured by the wider work undertaken to mitigate the impact of air pollution on health. as	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
	Bartholomew's Hospital), and selected respiratory or cardiovascular hospital admissions during high-pollution periods	detailed in the City Corporation Air Quality Strategy.	
City and Hackney Public Health	UK evidence shows that short-term exposure to air pollution increases daily mortality and emergency hospital admissions for respiratory and cardiovascular conditions, with no safe threshold identified for particulate matter (Chief Medical Officer's Annual Report, 2022) Public Health therefore encourages closer alignment between planning policy, local alert systems (e.g. airTEXT), and NHS and community responses during high-pollution episodes, to ensure developments do not exacerbate acute exposure risks	Exposure reduction is a key aspect of the design and assessment requirements. All vulnerable groups would be taken into account. The outcome of the SPD is to reduce air pollutant emissions from operational buildings across the Square Mile. The s106 categories for air quality offsetting include improving public health and education. The SPD directs building occupiers to not test generators in light wind conditions and when pollution levels are moderate and above. This is to avoid increasing local levels of pollution and ensuring that any	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
		emissions are widely dispersed. The City Corporation supports air TEXT and the GLA air pollution warning system in addition to providing hyper-local air pollution data through our monitoring websites.	
City and Hackney Public Health	There is an opportunity for the SPD to explicitly recognise smokefree environments as a complementary measure to reduce exposure to harmful particulate pollution in public and shared spaces. Tobacco smoke is a source of PM2.5 with no safe level of exposure, and design-led approaches that support smokefree environments—particularly around schools, healthcare settings and residential spaces—can contribute to exposure reduction and health equity objectives alongside wider air quality measures. This aligns with the priorities of the City and Hackney Tobacco Control Alliance, which is focused on reducing smoking prevalence, protecting people from second-hand smoke, and addressing health inequalities.	City Corporation Street Environment Officers enforce smoking bans where smoking is strictly prohibited. There is a separate indoor air quality work programme which includes AirAware. This is outside of the scope of the SPD.	No change made.
City and Hackney Public Health	Where the SPD references indoor air quality, Public Health encourages consideration of how IAQ measures secured through planning are supported in practice. This includes through the inclusion of locally delivered air quality information programmes, such as Air Aware. This would help reinforce consistent messaging on ventilation, avoidance of indoor pollution sources, and exposure	There is a separate indoor air quality work programme which includes AirAware. This is	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
	reduction, particularly in high-occupancy or sensitive uses, while also ensuring public information complements planning-led mitigation.	outside of the scope of the SPD.	
City and Hackney Public Health	Public Health encourages clarity on how air quality damage costs secured through the SPD will be prioritised and applied, noting the value of directing these funds toward interventions with demonstrable health benefit. This could include measures that reduce exposure in high-risk locations and sensitive settings, as well as green infrastructure that delivers both air quality and wider health co-benefits.	An annual report will be produced detailing income generated from damage costs and where the money has been directed.	No change made.
City and Hackney Public Health	Public Health recommends the inclusion of locally delivered air quality information programmes, such as Air Aware, as a means of complementing planning-led mitigation and supporting consistent messaging on exposure reduction	The Air Aware platform was developed jointly by the City Corporation and is used locally	No change made.

City of London Corporation

Air Quality

Supplementary Planning Document | June 2026



CITY OF LONDON

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This document has been prepared by the City of London Corporation Air Quality Team
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Abbreviations

Abbreviations	Definition
AADT	Average Annual Daily Trip
AQDMP	Air Quality Dust Management Plan
AQG	Air Quality Guideline
AQMA	Air Quality Management Area
AQN	Air Quality Neutral
AQIA	Air Quality Impact Assessment
AQP	Air Quality Positive
AQS	City of London Corporation Air Quality Strategy 2025 - 2030
BAT	Best Available Technique
BNG	Biodiversity Net Gain
BREEAM	Building Research Establishment Environmental Assessment Method
CHP	Combined Heat and Power
CLP	Construction Logistic Plan
CoP	Code of Practice for Deconstruction and Construction Sites
DAQI	Daily Air Quality Index
Defra	Department for Environment, Food and Rural Affairs
DPF	Diesel Particulate Filter
DSMP	Delivery and Service Management Plan
EIA	Environmental Impact Assessment
EFT	Emission Factors Toolkit
EV	Electric Vehicle
GLA	Greater London Authority
HDV	Heavy Duty Vehicle
HIA	Health Impact Assessment
HGV	Heavy Goods Vehicle
HVO	Hydrotreated Vegetable Oil

Abbreviations	Definition
LAEI	London Atmospheric Emissions Inventory
LEZ	Low Emission Zone
LDV	Light Duty Vehicle
LGV	Light Goods Vehicle
LLAQM	London Local Air Quality Management
LPA	Local Planning Authority
LPG	London Plan Guidance
MCPD	Medium Combustion Plant Directive
NO_2	Nitrogen Dioxide
NO_x	Nitrogen Oxides
NPPF	National Planning Policy Framework
NPPG	National Planning Policy Guidance
NRMM	Non-Road Mobile Machinery
PHV	Public Hire Vehicle
PM	Particulate Matter
PM_{10}	Particulate Matter of a size less than 10µm in diameter
$PM_{2.5}$	Particulate Matter of a size less than 2.5µm in diameter
PTAL	Public Transport Accessibility Level
S106	Section 106
SCA	Smoke Control Area
SCR	Selective Catalytic Reduction
SoPW	Scheme of Protective Works
SPD	Supplementary Planning Document
SPG	Supplementary Planning Guidance
UGF	Urban Greening Factor
WHO	World Health Organization

1. Introduction

The planning system plays an important role in reducing emissions of air pollutants, as well as minimising exposure to poor air quality through good design.

Air quality has improved significantly over the past 20 years, and national standards are met everywhere in the City of London except adjacent to the busiest roads. However, it is generally recognised by health professionals that levels of air pollution below national standards will still have a negative impact on health[1]. The City Corporation Air Quality Strategy 2025 - 2030[2] (AQS) recognises this with its aim to deliver air quality that is better than national standards. It sets a pathway towards meeting tighter Air Quality Guidelines (AQGs) recommended by the World Health Organization (WHO)[3].

The City Plan 2040[4] supports the aims of the AQS, principally through Policy HL2: Air Quality and Policy HL9: Health Impact Assessment. This Supplementary Planning Document (SPD) has been produced to provide guidance on how development should be designed to comply with these policies.

1 Royal College of Physicians (2025), A breath of fresh air; Responding to the health challenges of modern air pollution

2 The City of London Corporation (2025), Air Quality Strategy 2025 - 2030

3 World Health Organization (2021) WHO global air quality guidelines

4 The City of London Corporation (2025), City Plan 2040

Policy HL2 states that developments will need to ensure acceptable air quality through appropriate design, layout, landscaping and technological solutions. It also states that developers will be expected to install non-combustion energy technology where available and that development that would result in a worsening of the City's pollution levels will be strongly resisted. Policy HL9 states that development will be required to deliver health benefits to the City's communities and mitigate any negative impacts. It also states that where significant impacts are identified, measures to mitigate the adverse impact of the development should be provided as part of the proposals or secured through conditions or a Section 106 Agreement.

In addition to the policies in the City Plan 2040, the Department for Environment, Food and Rural Affairs (Defra) has published interim guidance to ensure that national very fine particulate matter ($PM_{2.5}$) targets are considered in planning applications and when making planning decisions. The guidance moves away from a requirement to assess solely whether a scheme is likely to lead to an exceedance of a legal air quality limit and instead ensures that appropriate mitigation measures are implemented from the design stage. This aligns with the broader shift in planning policy from input-based assessments toward an outcomes-focused approach with the overall aim being for the minimum amount of air pollutants to be emitted and for exposure to air pollution to be minimised.

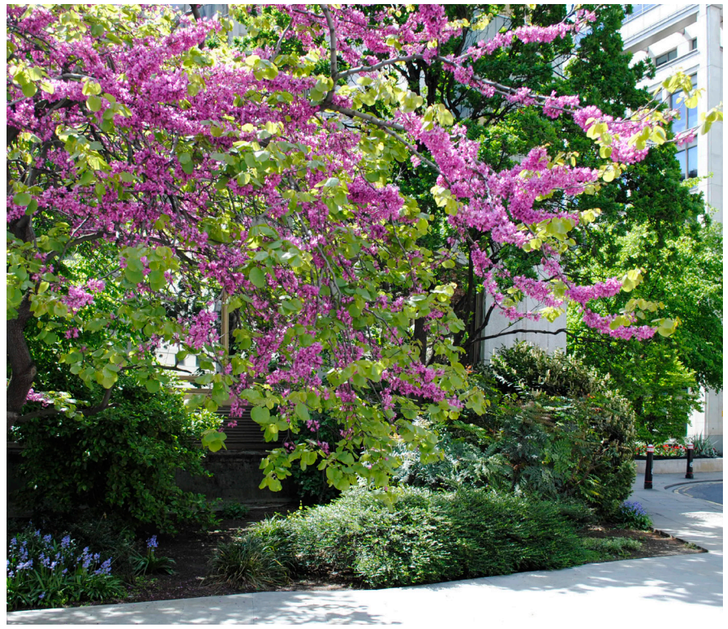
Key Considerations

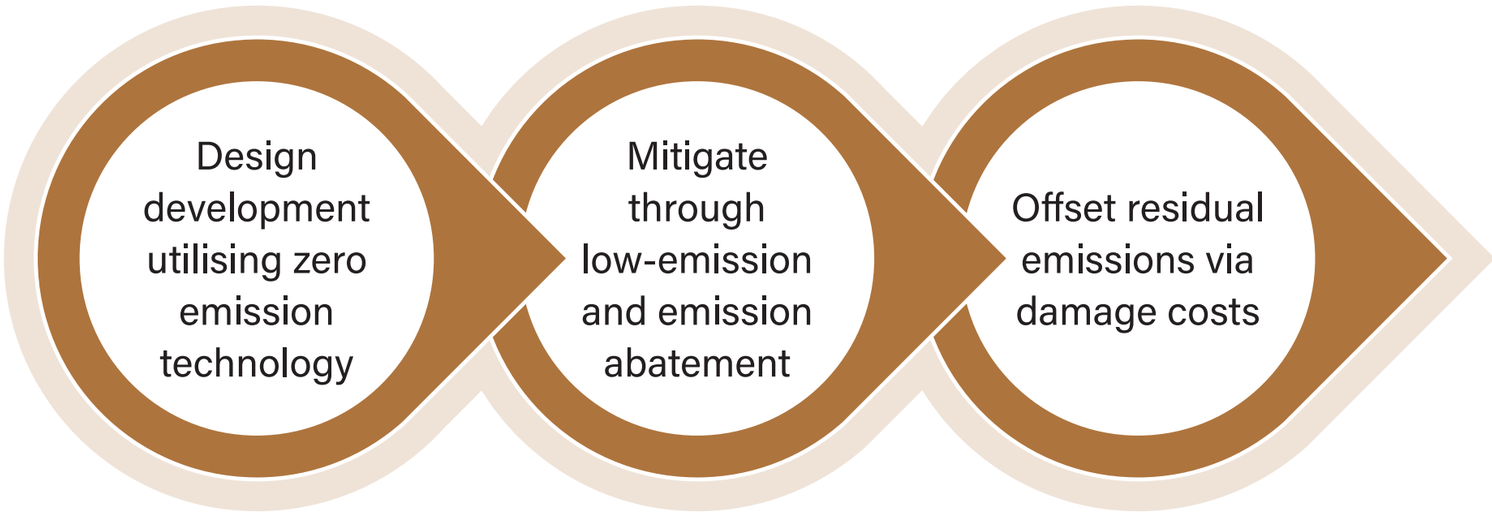
How has exposure to $PM_{2.5}$ been considered when selecting the development site?

What actions and/or mitigations have been considered to reduce $PM_{2.5}$ exposure for development users and nearby receptors and to reduce emissions of $PM_{2.5}$ and its precursors?

The primary aim therefore is for development in the City of London to have zero operational emissions of nitrogen oxides (NO_x) and particulate matter (PM_{10} and $PM_{2.5}$). Not only will this help to improve health outcomes for City of London communities, but it will also support the transition to a net zero carbon City by 2040. Development should also be designed to reduce the exposure of the occupiers to air pollution, and to minimise the impact of air pollution associated with the development on nearby receptors.

If emissions cannot be designed out of a development, they will need to be minimised wherever possible. Air pollution damage costs will then be applied to any remaining operational emissions, to help to mitigate the adverse impact on health of the development, thereby supporting the delivery of Policy HL9 of the City Plan 2040.





A framework for assessing damage costs has been developed by Defra[5]. It represents an estimate of the societal costs (on human health, productivity, wellbeing and the environment) that are associated with emissions of air pollution. Damage costs, in the form of an offset, would be applied to combustion plant as well as any increase in vehicle use associated with the development, when compared to the existing land use. Air pollution damage costs would not be applied to construction, including deconstruction and demolition, activity as this is managed through the City of London Code of Practice for Construction and Deconstruction (CoP)[6]. Further information can be found in Section 4 and Appendix B.

Any air pollution damage costs paid by a developer would be used by the City Corporation on measures that have a positive impact on air quality in the Square Mile as well as measures to reduce the impact of air pollution on the health of the City of London's communities.

Planning Objectives for Air Quality
Design emissions of air pollutants out of a development
Design exposure to air pollution out of a development
Minimise unavoidable emissions
Mitigate the negative health impacts of any unavoidable emissions through the application of air pollution damage costs

To demonstrate how proposals meet the requirements of this SPD, applicants will be required to complete an Air Quality Impact Assessment (AQIA) for all major development[7]. Additionally, there are instances where non-major development will be required to complete an AQIA. These instances, and the information required for an AQIA are detailed in Section 5. Applications subject to an Environmental Impact Assessment (EIA) will also be required to submit an Air Quality Positive (AQP) Statement.

This SPD replaces the 2017 Air Quality SPD[8] and should be followed for any proposal where air quality is a material consideration. It should be considered alongside relevant planning documents on the City Corporation website. The references made in this document are current at the time of writing. Where documents are revised, the latest version(s) should be used.

5 Air quality appraisal: damage cost guidance (2025). Available at: https://www.gov.uk/government/publications/assess-the-impact-of-air-quality/air-quality-appraisal-damage-cost-guidance

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

7 As defined in Appendix A

8 The City of London Corporation (2017), City of London Air Quality Supplementary Planning Document

1.1 Objectives

The objectives of this SPD are to:

- Provide guidance for complying with the air quality and health impact assessment policies of the City Plan 2040, together with national and regional policy
- Ensure that there is a consistent approach for managing air quality in planning applications
- Outline best practice for the design of a development to minimise its air quality impact
- Outline measures to mitigate residual emissions of air pollutants
- Provide guidance on the application of air pollution damage costs
- Detail when an AQIA is required, and the information to be included





2. Development Design

The design of a development will impact upon its ability to meet zero operational emissions. Suitable design can also reduce the exposure of occupants to ambient and indoor air pollution. An Air Quality Planning Checklist is available on the City Corporation website to provide guidance to developers on the type of design that can be incorporated. This will be updated periodically to reflect best practice. Synergies with neighbouring developments should be explored for shared heating and energy supply, combustion plant and delivery and servicing requirements. It is recommended that pre-application advice is sought from the Air Quality Team at an early stage.

2.1 Reducing Emissions Through Building Design

2.1.1 Heating and Energy Supply

A significant proportion of emissions of nitrogen oxides (NO_x) in the Square Mile are associated with heating and power generation[9]. The use of technology to generate heat and energy from zero emission sources such as heat pumps, solar water heating and photovoltaic panels will reduce emissions of NO_x and other pollutants. Energy and heating demand for new developments should therefore be sourced from zero emission plant where possible[10&11]. There should also be a focus on reducing energy use and maximising efficiency, and district heating should be considered where available, particularly when fuelled by zero emission plant.

Where zero emission technology is not feasible, plant with the lowest emissions of NO_x and particulate matter available must be used. In such instances, the development should be designed so that zero emission technology can be installed in the future as it becomes available.

Gas Boilers

NO_x emission rates from gas boilers should be as low as reasonably practicable, ideally ≤ 27mg/kWh. It should be noted that maximum Building Research Establishment Environmental Assessment Method (BREEAM) credits can be gained for the use of gas boilers with a NO_x emission rate of ≤ 24mg/kWh.

Biomass Boilers

The use of biomass for heating can give rise to significant emissions of particulate matter; and consequently, **the use of biomass in the Square Mile is discouraged.**

Combined Heat and Power

Combined Heat and Power (CHP) can give rise to significantly higher emissions of NO_x than regular boilers. Air quality monitoring in the Square Mile has shown that CHP can lead to very high localised levels of air pollution **therefore the use of CHP is discouraged**. If CHP is proposed, it is required to meet the following emission limits, at 5% oxygen:

CHP Engines ≤ 500kWe – 50 mg/Nm³
CHP Engines > 500kWe – 25 mg/Nm³

Key Actions
Zero emission energy and heating plant should be incorporated into new development where possible.
Development should be connected to heat networks if available.
Where non-zero emission plant is proposed, the plant must have the lowest emission rates of NO_x and particulate matter as reasonably practicable and be no higher than the emission rates stated.
If combustion plant is installed, the development should be designed so that zero emission technology can be installed in the future as it becomes available.

2.1.2 Backup Power and Emergency Plant

Backup and emergency power is an important aspect of a building's operation, ensuring life-safety equipment can function in the event of mains power loss. Diesel fuelled generators used for backup and emergency power can be a significant source of air pollution. Their use in the Square Mile is discouraged where alternatives are available. They will only be approved if deemed appropriate through consideration of relevant Building Regulations and Fire Safety Standards. Where possible, alternatives to diesel fuelled generators should be installed. The Emergency Power Supply Hierarchy in the City Corporation Planning for Sustainability Supplementary Planning Document (SPD)[12] should be applied.

Emergency Power Supply Hierarchy
1. Secondary electrical supply
2. Shared emergency provision
3. Battery storage solutions
4. Generators, non-diesel
5. Generators, hydrotreated vegetable oil (HVO)*
6. Generators, diesel
*HVO should be sustainably sourced

Applicants will be expected to demonstrate, in their Air Quality Impact Assessment (AQIA), that all stages of the hierarchy have been considered, and the use of any combustion generator must be justified. Best Available Technique (BAT) must be used to minimise emissions of pollutants. A Fire Statement must be completed for all major development proposals[13], and the backup power solution must be linked to this.

Generator Testing Requirements
Generator testing should be completed in-line with manufacturer's guidance with the aim of limiting the total number of hours of testing per year.
Testing should not be completed during light wind conditions[14], and when the Daily Air Quality Index (DAQI) within the Square Mile is 'Moderate' or above[15].
Where there are publicly accessible areas close to a generator flue, no testing should take place when the public is present.
Any generator should be Emissions Optimised rather than Fuel Optimised.

Where a building operates a backup generator, the operator will be required to submit an annual testing report for which a template will be provided.

Emission rates

All liquid fuelled generators are required to meet the following emission limits at a temperature of 273.15 K, a pressure of 101.3 kPa, 0% moisture and 15% oxygen:

NOx - 190 mg/Nm³
PM - 10 mg/Nm³

These are equivalent to the emission limits set in Table 2 Annex II of the Medium Combustion Plant Directive (MCPD)[16]. Exhaust aftertreatment such as Selective Catalytic Reduction (SCR) and diesel particulate filters (DPF) may be required to meet these emission limits. A SCR system requires a high temperature for the catalytic reaction to occur. This should be considered when calculating the power requirements.

In an event that the limits cannot be achieved, the Air Quality Team should be consulted.

9 Greater London Authority (2025), London Atmospheric Emissions Inventory 2022
10 For this purpose, zero emission is defined as zero on site emissions when operating the plant.
11 Policy HL2: Air quality (4.), City Plan 2040
12 City of London Corporation (2025), City of London Corporation: Planning for Sustainability
13 Policy S2: Safe and Secure City, City Plan 2040
14 Light wind conditions are to be wind speeds < 5mph
15 The DAQI should be taken from the contractor for City of London Air Quality Monitoring Data, available at https://www.cityoflondon.gov.uk/services/environmental-health/air-quality/air-quality-monitoring
16 Directive (EU) 2015/2193 of the European Parliament and of the Council of 25 November 2015 on the limitation of emissions of certain pollutants into the air from medium combustion plants

Generator use

A distinction is made below between emergency life-safety and business continuity. Any proposal for a combustion-based backup power supply for business continuity purposes will be subject to further assessment, see Section 5.2.

In addition to backup and emergency power, emissions should be controlled from any other plant associated with a building, e.g., sprinkler pumps. Zero emission options should be sourced where possible. In the event this is not possible, emissions must be as low as is reasonably practicable. This should be achieved using the BAT approach.

Combustion Exhaust Flues

Definitions
Emergency Life Safety – The provision of a backup power supply to ensure life safety and essential loads are not interrupted during an emergency.
Business Continuity – The provision of a backup power supply which is in addition to Emergency Life Safety requirements. For example, in a commercial building to allow business activities to continue.

The location and emission discharge velocity of all exhaust flues should be considered to ensure maximum dispersion of pollutants. All combustion plant flues must be vertical and must terminate above the roof height of the tallest part of the development, unless agreed with the Local Planning Authority (LPA). There should be no nearby obstruction(s) that could influence dispersion.

Key Actions
The selection of emergency power supply must follow the Emergency Power Supply Hierarchy.
Any combustion-based generator must meet the stated emission limits.
If combustion plant is proposed for business continuity, it will be subject to further assessment.
All flues must be vertical, located away from any air intake points and there should be no nearby obstruction that could influence dispersion. They must terminate above the roof height of the tallest part of the development. They must be at least 3m away from any publicly accessible roof spaces.

2.1.3 Sustainable Travel

The Square Mile has the highest grade of Public Transport Accessibility Level (PTAL) meaning that access to the existing public transport network is rated as excellent. The City Corporation promotes infrastructure that reduces the volume of traffic in the Square Mile together with modes of transport that result in a positive impact on air quality. To reduce vehicle numbers, and to enable sustainable modes of transport, a development must adhere to City Plan 2040 policies relating to transport.

To support the aims of this SPD, the following aspects should be completed / incorporated, where applicable:

Transport	City Plan 2040 Policy
1. Transport Assessments / Statements 2. Travel Plan (including Cycling Promotion Plan) 3. Construction Logistic Plan 4. Section 278 Drawings	Policy VT1
5. Car-Free Design 6. Cycle Parking	Policy AT3
7. Delivery and Servicing Management Plan 8. On-site Servicing Bays	Policy VT2
9. EV Charging: – Service Areas – Off-Street Parking	Policy VT2 & VT3
10.Pedestrian Movement	Policy AT1
11. Cycling Facilities	Policy AT2 & AT3

Development in the Square Mile is required to be car-free[17&18]. A high number of delivery and service vehicles and taxis and Private Hire Vehicles (PHVs) is associated with development in the City of London, and emissions from these should be minimised as far as possible.

17 Car-free defined as a development not having any parking space, not including designated Blue Badge spaces.
18 Policy VT3: Vehicle Parking, City Plan 2040
19 Policy VT2: Freight and Servicing, City Plan 2040

Delivery and Servicing Management Plans

A Delivery and Service Management Plan (DSMP) is required for all major developments[19] and any other developments or refurbishment that will cause significant transport impacts. To reduce the impact of operational vehicles, the DSMP should be completed in-line with the Freight and Servicing SPD[14] and Noise Strategy[20]. To support the aims of this SPD, the DSMP should set out the following:

DSMP Requirements
The estimated number of delivery and service trips associated with the development with no mitigation included.
The number of vehicle trips to be avoided through implementation of the DSMP. The unmitigated predicted vehicle trips should be reduced by at least 50%.
Procurement measures, including those taken jointly with other businesses/developments, that reduce the number of delivery and service trips and utilise zero tailpipe emission vehicles.
Commitment to the use of zero tailpipe emission vehicles where possible and providing infrastructure as part of the development to support the use.
Appropriate routing for vehicles, including to and from consolidation centres.
Implementation of a no idling policy.
Proposals for monitoring DSMP arrangements.

Key Actions
All development should be car-free, except for designated Blue Badge spaces.
The outcome of a DSMP should be to reduce predicted delivery and service vehicle trips by at least 50%.
A commitment must be made to use zero tailpipe emission vehicles where possible.

20 City of London Corporation (2018), Freight and Servicing Supplementary Planning Guidance

2.1.4 Commercial Cooking

Commercial Cooking can be a significant source of $PM_{2.5}$ emissions in central London. The Square Mile is a Smoke Control Area (SCA) therefore there are restrictions in place regarding the appliances and types of solid fuel that can be used for commercial cooking[22&23]. An additional level of ventilation and filtration, in line with EMAQ+ guidance[24], is required to minimise emissions of $PM_{2.5}$ and odour to ambient air. Electric appliances are the cleanest option for cooking and should be used where possible.

Key Actions
Zero emission cooking appliances should be used where possible.
All commercial cooking extraction flues should be located away from any air intake points and should terminate above the roof height of the tallest part of the development.
Kitchen ventilation and extraction must be designed to mitigate particulate emissions and odour.

2.2 Reducing Exposure Through Building Design

2.2.1 Building Ventilation

The impact of ambient air pollution on indoor air quality should be considered at the earliest stages of building design. Through its Air Quality Strategy (AQS), the City Corporation has committed to a pathway to meet the 2021 World Health Organization (WHO) Air Quality Guidelines (AQGs). The guidelines are applicable to both ambient and indoor air quality. Building design should ensure that the ingress of polluted air is avoided and internal exposure to elevated levels of air pollution is minimised.

The principles outlined in Building Regulations Ventilation Approved Document F[25] must be followed to minimise the intake of external pollutants, particularly for development in areas that exceed the aims of the AQS.

22 Authorised/Certified Fuels (2025). Available at: https://smokecontrol.defra.gov.uk/fuels-php/
23 Exempt Appliances (2025). Available at: https://smokecontrol.defra.gov.uk/appliances-php/
24 EMAQ+ (2022), Control of Odour and Noise from Commercial Kitchen Exhaust System
25 HM Government (2021), The Building Regulations 2010 Ventilation Approved Document F Volume 1: Dwellings / Volume 2: Buildings other than dwellings

2.2.2 External Amenity Space and Public Realm

The exposure to pollution of users of the proposed development should be minimised through good design. This should include the appropriate positioning and orientation of amenity spaces away from pollution sources such as busy roads or chimneys.

Where public realm forms part of the development, this provides an opportunity to provide areas where people can spend time away from sources of pollution. The development should incorporate design that provides low pollution routes through the development to reduce exposure. Recreational, seating and exercise areas should be located away from, or screened from, sources of pollution.

2.2.3 Urban Greening

As well as increasing biodiversity, plants can play a role in trapping pollution. The Mayor of London guidance on the use of green infrastructure[26] details that greening can impact air pollution through dispersion and deposition. The provision of urban greening[27] and biodiversity[28] should be integral to the design and layout of buildings and the public realm. In line with Policy OS4: Biodiversity Net Gain of the City Plan 2040, all major developments are required to submit Urban Greening Factor (UGF) and Biodiversity Net Gain (BNG)[29] calculations, demonstrating how the development will meet the City Corporation's target scores of 0.3 for the UGF and 3 biodiversity units per hectare (BU/ha), as a minimum.

26 Greater London Authority (2019), Using Green Infrastructure to Protect People from Air Pollution
27 Policy OS2: Urban Greening, City Plan 2040
28 Policy OS3: Biodiversity, City Plan 2040
29 Policy OS4: Biodiversity Net Gain, City Plan 2040



2.2.4 Combustion Flues

Flues and exhaust vents must be at least 3 m away in all directions from any area the public can access[30]. This includes recreational areas such as open spaces, roof terraces, balconies and gardens. They should also be located away from any air intake points to avoid ingress into a ventilation system. Flues in lightwells or atria will not be approved. Consideration also needs to be given to emission exhausts on neighbouring properties and how they may impact on the development.

Key Actions
Ventilation air intakes and openable windows must be located away from elevated levels of air pollution.
Ventilation systems must follow the principles outlined in Building Regulations Ventilation Approved Document F.
Development should be designed to avoid air ingress to a building from ambient air that does not meet the aims of the City of London Air Quality Strategy 2025 - 2030.
Major developments must achieve an Urban Greening Factor of 0.3 and 3BU/ha, as a minimum.

30 Policy HL2: Air quality (8.), City Plan 2040

3. Construction, Deconstruction and Demolition

Construction is a significant source of air pollution in the Square Mile. Best practice for minimising emissions of air pollutants from these activities is outlined in the City of London Code of Practice for Deconstruction and Construction (CoP).

Prior to construction, the Principal Contractor must agree a Scheme of Protective Works (SoPW) with the City Corporation. It must comply with the requirements of the CoP and include an Air Quality Dust Management Plan (AQDMP).

As detailed in Policy S9 and VT1 of the City Plan 2040, a Construction Logistic Plan (CLP), which includes construction, deconstruction and demolition, is required for all major developments. A CLP may also be required for refurbishments or other development that would have a significant impact on the transport network during construction. The CLP should comply with the measures set out in the CoP and should detail how vehicle movements will be minimised.

3.1 Non-Road Mobile Machinery

The Non-Road Mobile Machinery (NRMM) London Low Emission Zone (LEZ) requires that all engines used on construction sites with a power rating of between 37kW and 560kW must meet a specified emission standard. The emission standards, which get tighter over time, are detailed below. The City Corporation encourages contractors to go above these standards and use alternatives to diesel NRMM where available.

NRMM LEZ Requirements	
From 1 January 2025	Stage IV
From 1 January 2030	Stage V

All developments must comply with the requirements of the London Low Emission Zone for NRMM[31]. Prior to the commencement of any works, contractors must register relevant NRMM on the Greater London Authority (GLA) online register[32] and this must be kept up to date throughout the demolition and construction phases. Confirmation that this policy will be adhered to must be detailed in the SoPW. Further details about the NRMM Low Emission Zone can be found on the GLA NRMM website[33].

3.2 Construction Power Supply

A mains power supply, temporary or permanent, should be secured as soon as possible on all construction sites, unless it can be demonstrated that it is not reasonably practicable. The use of generators to provide electricity on site should be avoided. If it cannot be avoided, justification for the proposed use of the generator must be detailed in the SoPW.

Generators should not be installed on a construction site to solely charge and/or power electric or hybrid NRMM. These must be charged and/or powered using mains power supply.





31 Policy HL2: Air quality (7.), City Plan 2040
32 Welcome to NRMM. (2015) Available at: https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/non-road-mobile-machinery-register/login
33 Non-Road Mobile Machinery (NRMM). (2015) Available at: https://www.london.gov.uk/programmes-and-strategies/environment-and-climate-change/pollution-and-air-quality/nrmm

4. Offsetting via Air Pollution Damage Costs

Policy HL2 of the City Plan 2040 requires development to ensure acceptable air quality levels through appropriate design, layout, landscaping and technological solutions, and expects developers to install non-combustion energy technology where feasible. Policy HL9 requires development to deliver health benefits to the City's communities and mitigate adverse impacts. This should be done through measures incorporated into development proposals or secured through planning conditions or Section 106 (s106) Agreements where significant impacts are identified.

4.1 Section 106 Planning Obligations

S106 planning obligations are legal agreements where developers are required to provide site-specific mitigation measures in line with Policy S26 of the City Plan 2040. They should meet the following statutory tests under Regulation 122[34].

- Necessary to make the development acceptable in planning terms
- Directly related to the development
- Fairly and reasonably related in scale and kind to the development

Any air pollution damage (offsetting) costs will be secured via a s106 agreement. Further information can be found in the Planning Obligations Supplementary Planning Document (SPD)[35].

34 The Community Infrastructure Levy Regulations 2010, SI 2010/948, Regulation 11
35 City of London Corporation (2026), Planning Obligations Supplementary Planning Document

4.2 Offsetting Requirements

In accordance with Policy HL2, HL9 and S26 of the City Plan 2040 the City Corporation will seek contributions towards air pollution resulting from emissions of air pollutants, nitrogen oxides (NO_x) and very fine particulates ($PM_{2.5}$). These ***air pollution damage costs*** estimate the societal impacts of emissions on human health, productivity, wellbeing and the environment and have been developed by the Department for Environment, Food and Rural Affairs (Defra).

Offsetting costs will be applied to:

- Any on site combustion plant (boilers, generators, Combined Heat and Power (CHP)) in major planning applications
- Any on site generator proposed for Business Continuity use, in any application
- Any increase in emissions associated with new replacement combustion plant, when compared to the current plant, in non-major applications
- Any increase in emissions associated with vehicle movement, when compared to the current land use, in major applications

Offsetting costs will not be applied to the construction phase of a development as this is managed via the City of London Code of Practice for Deconstruction and Construction.

Air pollution damage costs are directly linked to the quantity of emissions of air pollutants, the lower the emissions, the lower the cost. Damage costs, and the corresponding impact of air pollution on the health of the City of London's communities, can be minimised by following the approach outlined in this SPD.

Air pollution damage costs are applied across the typical life of the combustion plant or vehicle. For generators this is assumed to be 30 years, for boilers 20 years and for vehicles five years. The costs apply per tonne of pollutant over the respective period. All offsetting calculations should be provided in the Air Quality Impact Assessment (AQIA), or subsequent documentation submitted to discharge a planning condition. Appendix B provides examples of how to undertake an air pollution damage cost calculation.

The payment of air pollution offsetting will be required on completion of development and prior to occupation. Offsetting costs will be used by the City Corporation for air pollution improvement projects in the Square Mile and contribute to the aims of the City of London Corporation Air Quality Strategy 2025 - 2030 (AQS). The schemes would support the delivery of the AQS and fall into four categories: transport and public realm; infrastructure; improving public health and education and research.



5. Assessing Air Quality Impacts

Applicants must demonstrate that any major development complies with the requirements of this Supplementary Planning Document (SPD) by submitting an Air Quality Impact Assessment (AQIA). There may also be instances where non-major planning applications are required to produce an AQIA, for example for a refurbishment that includes the installation of combustion plant. The approach detailed in this SPD removes the requirement for cumulative assessment for the majority of development. All developments are required to remove operational emissions or reduce them as far as is reasonably practicable.

As detailed in the City Plan 2040[36] all developments in the Square Mile are required to be 'Air Quality Neutral' (AQN), as defined by the Mayor of London AQN London Plan Guidance (LPG)[37]. The requirements of this SPD surpass the scope of AQN. Where AQN exclusions are applicable, only a short statement to confirm the development is AQN is required. In the event that either of the Building Emissions Benchmarks or Transport Emissions Benchmarks are exceeded, the Air Quality Team should be contacted. A development will not be subject to offsetting via AQN, only through the City of London methodology for air pollution damage costs.

In line with the Mayor of London Air Quality Positive (AQP) LPG[38] and the City Plan 2040, AQP Statements are required for developments subject to an Environmental Impact Assessment (EIA). An AQP Statement must outline measures taken forward during the design stage to achieve the best possible outcomes for air quality. The approach is very similar to that required for all major developments in this SPD. Where an AQP Statement is required, it should be incorporated into the AQIA.

The use of Artificial Intelligence (AI) to develop an AQIA is not prohibited by the City Corporation. However, it must be clear in the report if AI has been used and for what. An example of the type of information that should be provided is provided below.

AI Platform	Section / Page	Purpose
ChatGPT	Section 2: Policy Context	Used to summarise relevant air quality policies in the City Plan 2040.

36 Policy HL2: Air quality (3.), City Plan 2040
37 The Mayor of London (2023), London Plan Guidance, Air Quality Neutral
38 The Mayor of London (2023), London Plan Guidance, Air Quality Positive

5.1 Air Quality Modelling

Air quality modelling can be a useful tool to predict how emissions of air pollutants will impact on local air quality. It can also be useful to understand how users of a site might be exposed to air pollution.

The process set out in this document means that a modelling assessment should not generally be required. However, there are occasions when applicants will be asked to demonstrate the impact of a potentially significant source of pollution, examples are given in the box below. The Air Quality Team should be consulted if any of these criteria are relevant to a proposed development.

Air Quality Modelling Criteria

Combustion Plant:

- Combined Heat and Power (CHP)
- Biomass/biofuel boilers
- A combustion-based backup generator for business continuity

Vehicles[39]:

- Where the development results in predicted Average Annual Daily Trip (AADT) flows of:
  - 100 Light Duty Vehicles (LDVs)
  - 25 Heavy Duty Vehicles (HDVs)

The above list is not exhaustive. Proposals for developments that have sensitive receptors e.g., a school or nursery, may also require air quality modelling. Any such proposals should be discussed with the Air Quality Team.

When modelling is undertaken, predicted concentrations for the opening year of the development must be compared to the City of London Corporation Air Quality Strategy 2025 – 2030 (AQS) aims using a worst-case scenario. All relevant pollution sources, both existing and consented, should be included in the model. The City Corporation has designated relevant exposure as any location outside that is accessible to members of the public. All AQS aims apply to exposure, regardless of the pollutant averaging period.

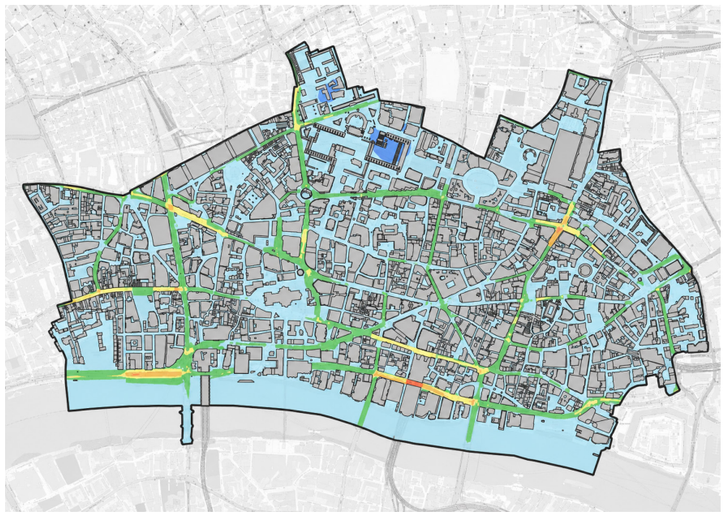
39 To include all vehicles associated with the development, with application to both the Construction Phase and Operational Phase.

Pollutant	Air Quality Strategy Aims / Short-term Objectives	Averaging Period
Nitrogen Dioxide (NO_2)	30µg/m^3	Annual mean
NO_2	200µg/m^3 not to be exceeded more than 3 times a year	1-hour mean
Fine particulates, (PM_{10})	15µg/m^3	Annual mean
PM_{10}	50µg/m^3 not to be exceeded more than 3 times a year	24-hour mean
Very fine particulates, ($PM_{2.5}$)	10µg/m^3	Annual mean

Modelling information should be presented in the appendices of the AQIA, with a brief summary of the methodology and results provided in the main body. A modelling checklist is available from the Air Quality Team. This should be reviewed prior to completing any air quality modelling.

5.2 Structure of an Air Quality Impact Assessment

An AQIA should be structured as shown below. Not all Chapters will be relevant to all applications. The amount of detail required will depend upon the type and scale of the development. Early consultation with the Air Quality Team is recommended so that the scope of the AQIA can be agreed prior to submission.



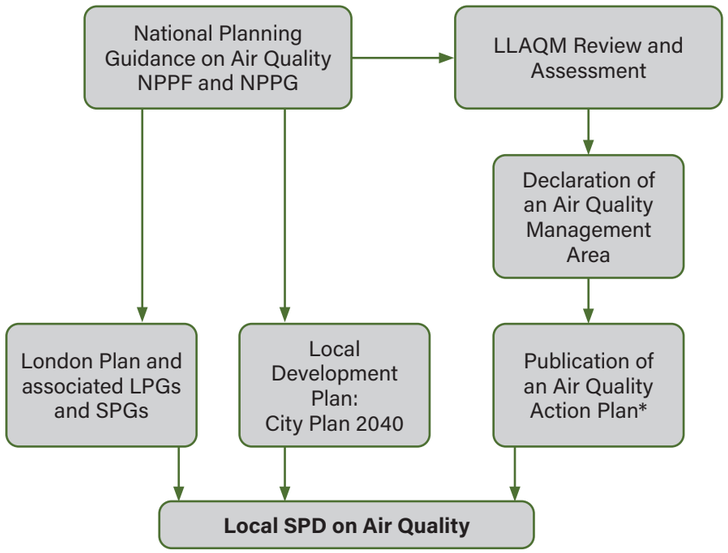
	Chapter	Information Required	
1	Description of the Development	A summary of the proposed development including relevant information from the Design and Access Statement. A brief description of the current air quality in the locality of the proposed development, with a red line boundary marked on the relevant London Atmospheric Emissions Inventory air quality concentration map.	Human receptors, particularly sensitive receptors[40], that may be negatively impacted by the development. Reference to any documents that should be read alongside the AQIA, e.g. Delivery and Service Management Plan, Energy Strategy, Transport Assessment, Fire Statement.
2	Design Considerations: Emissions	How emissions of air pollutants have been avoided through the design of the development, for example: Choice of heating and energy supply. Choice of backup/emergency power supply with reference to the Emergency Power Supply Hierarchy. The use of heat networks.	Future proofing the design to incorporate zero emission technology in the future. Measures taken to reduce vehicle numbers. Measures taken to reduce vehicle emissions. Measures taken to reduce emissions from cooking sources.
3	Design Considerations: Exposure	How exposure, both new and existing, has been considered in the design of the development, for example: Ventilation, including a plan with the location of ventilation inlets.	The design of external amenity space. Green infrastructure. Flue heights and efflux velocity with the location clearly shown on a plan.
4	Emission Sources	All emission sources associated with the proposed development. Justification for the use of any combustion plant. Emission rates, both NO_x and $PM_{2.5}$ for combustion plant. See Section 2.1 for emission limits. If a combustion generator is proposed, whether it is for Emergency Life Safety or Business Continuity, and proposed hours of testing.	Evidence that the back-up generator has been scaled appropriately to meet the energy demand of the development. Details of vehicle movements associated with the proposed development, presented as AADT and broken down by vehicle type. Any other emissions associated with the proposed development.
5	Mitigation of Emissions	How any emissions will be further mitigated. For emissions associated with construction: All construction sites in the City of London are designated High Risk as defined in the Mayor of London Supplementary Planning Guidance (SPG)[41]. The AQIA report does not need to include a Dust Assessment or Air Quality Dust Management Plan as this is covered by the City of London Code of Practice for Deconstruction and Construction (CoP). A statement to confirm that the construction phase is designated as high risk, and that a Scheme of Protected Works will be completed in-line with the CoP is sufficient.	Mitigation measures to minimise emissions from construction vehicles travelling on the road network should be provided in the AQIA. This should align with the measures to minimise vehicle movements outlined in the Construction Logistics Plan. For emissions associated with the operation of the building: The use of technology, including any abatement technology. The application of Best Available Technology. The use of alternative fuels.
6	Quantification of Emissions	Quantification of any residual annual emissions of NO_x and $PM_{2.5}$ from operational sources only, with details of the calculation methodology.	Quantification of construction related emissions are not required.
7	Offset Calculation	This should be completed for: Operational combustion plant emissions.	Operational vehicle emissions for any increase in vehicle movements associated with the development when compared to the existing land use. See Appendix B for calculation methodology and example calculations.
8	Further Assessment	Modelling to predict concentrations of air pollution will not normally be required unless a significant source of pollution is proposed, see Section 5.1 for further information. Where modelling is undertaken, a summary of the methodology and results should be provided. Detailed information should be placed in the Appendices. Predicted concentrations must be compared to the aims in the AQS using a 'worst-case' approach.	The City Corporation has designated relevant exposure as any location outside that is accessible to members of the public. All of the AQS aims apply to exposure, regardless of the pollutant averaging period. Demonstration that the cumulative impact of consented developments in the locality of the proposed development has been considered. Details of an AQN Assessment, if undertaken.
9	Conclusions	A summary of how the proposed development complies with the Planning Objectives for Air Quality, as detailed in Section 1.	A summary describing the health impact of the predicted exposure.
10	Appendices	A summary of relevant national, regional and local air quality policies. Reference to any Artificial Intelligence used in the AQIA. Technical information for combustion plant.	Full technical details and predicted concentrations from any modelling undertaken for Chapter 8. Where relevant, an AQP Statement.

40 This includes children's nurseries, schools, hospitals, GP surgeries/heath centres/nursing homes and care homes

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

Appendix 1: Air Quality Planning Policy and Guidance

The role of this SPD and its relationship to the national, regional and local policy, as well as its relationship to the London Local Air Quality Management (LLAQM) statutory requirements, are presented below.



* The City Corporation Air Quality Strategy 2025 - 2030 incorporates the Air Quality Action Plan.

Definitions

Major Development[42]:
- Residential development of ten or more dwellings or on a site of ≥ 0.5ha
- Development of other uses, where the floorspace to be created by the development is ≥ 1,000m^2, or the site area is ≥ 1ha

Environmental Impact Assessment:
- The City Corporation will determine whether the project is of a type listed in Schedule 1 or Schedule 2 of the 2017 Regulations[43]
- If listed in Schedule 1 an EIA is required in every case
- If listed in Schedule 2, the City Corporation will consider whether it is likely to have significant effects on the environment

42 For a full definition, see Part 1 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 (SI 2015/595)

43 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (SI 2017/571)

National Policy

National Planning Policy Framework and Guidance

The National Planning Policy Framework (NPPF) sets out government's planning policies for England and how these should be applied. The latest version of the NPPF should be reviewed prior to a planning submission being submitted. National Planning Policy Guidance adds further context and provides practical guidance on how to implement the NPPF.

$PM_{2.5}$ Targets: Interim Planning Guidance

At the time of writing the Department for Environment, Food and Rural Affairs (Defra) is developing guidance for applicants and Planning Authorities in England to demonstrate that they have appropriately considered the national $PM_{2.5}$ targets when making planning applications and planning decisions. The interim guidance moves away from a requirement to assess solely whether a scheme is likely to lead to an exceedance of a legal limit and instead ensures that appropriate mitigation measures are implemented from the design stage, ensuring the minimum amount of pollution is emitted and that exposure is minimised. This SPD reflects the requirements of the interim guidance.

Evidence is required in a planning application to show that sources of air pollution have been identified and appropriate action taken to minimise emissions of $PM_{2.5}$ and its precursors as far as is reasonably practicable. If quantitative evidence is not available, a qualitative approach can be taken. More detailed assessments are expected for developments which are closer to populations, and those which are likely to have higher emissions.

Industrial Processes

Some industrial operations are regulated by the Environment Agency (Part A1 processes) and the City Corporation (Part A2 and Part B processes) under Part 1 of the Environmental Protection Act 1990[44]. The planning process assumes that the operations comply with their permits and the Act. The planning process can consider whether a land use is appropriate, and it must consider the exposure to pollutants. For developments requiring planning applications this is done at the planning application stage.

Combustion plant between 1MW_{th} to 50MW_{th} in size are regulated by the Environment Agency under the Medium Combustion Plant[16] framework.

44 Environment Protection Act 1990, c.43



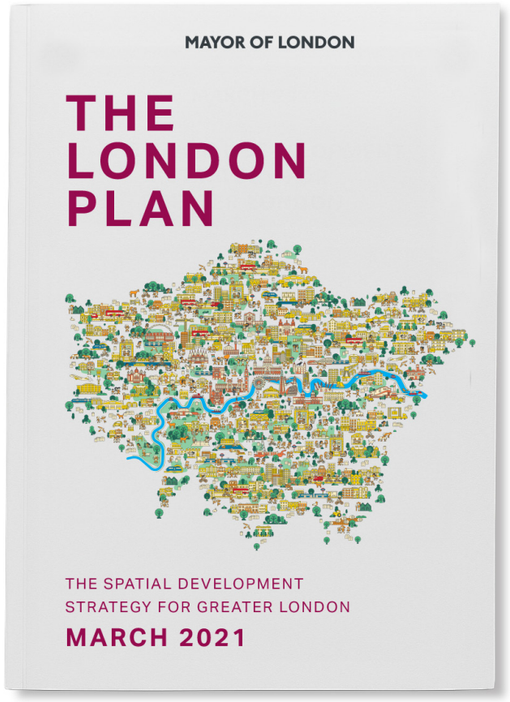
Regional Policy

The London Plan[45] is the Spatial Development Strategy for Greater London. It is part of the statutory development plan for London, and the policies inform decisions on planning applications across Greater London. At the time of writing, the relevant policies are in Policy SI 1: Improving Air Quality.

London Plan Guidance and Supplementary Planning Guidance provide further information on the appropriate implementation of the London Plan. To support Policy SI 1, the following documents have been produced:

LPG and SPG Documents

- Air Quality Neutral LPG[35]
- Air Quality Positive LPG[36]
- Control of Dust and Emissions SPG[39] and Practice Note[46]



45 The Mayor of London (2021), The London Plan: The Spatial Development Strategy for Greater London

Policy SI 1: Improving Air Quality

A. Development Plans, through relevant strategic, site-specific and area-based policies, should seek opportunities to identify and deliver further improvements to air quality and should not reduce air quality benefits that result from the Mayor's or Boroughs' activities to improve air quality.

B. To tackle poor air quality, protect health and meet legal obligations the following criteria should be addressed:

1. Development proposals should not:

a. lead to further deterioration of existing poor air quality.

b. create any new areas that exceed air quality limits or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits.

c. create unacceptable risk of high levels of exposure to poor air quality.

2. In order to meet the requirements in Part 1, as a minimum:

a. development proposals must be at least Air Quality Neutral.

b. development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retrofitted mitigation measures.

c. major development proposals must be submitted with an Air Quality Assessment. Air quality assessments should show how the development will meet the requirements of B1.

d. development proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to minimise exposure.

C. Masterplans and development briefs for large-scale development proposals subject to an Environmental Impact Assessment should consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach. To achieve this a statement should be submitted demonstrating:

1. how proposals have considered ways to maximise benefits to local air quality, and
2. what measures or design features will be put in place to reduce exposure to pollution, and how they will achieve this.

D. In order to reduce the impact on air quality during the construction and demolition phase development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance.

E. Development proposals should ensure that where emissions need to be reduced to meet the requirements of Air Quality Neutral or to make the impact of development on local air quality acceptable, this is done on-site. Where it can be demonstrated that emissions cannot be further reduced by on-site measures, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated within the area affected by the development.



Local Policy

This SPD details the steps that should be taken to meet the air quality requirements of the City Plan 2040, with particular reference to Policy HL2 and Policy HL9.

Policy HL2: Air Quality

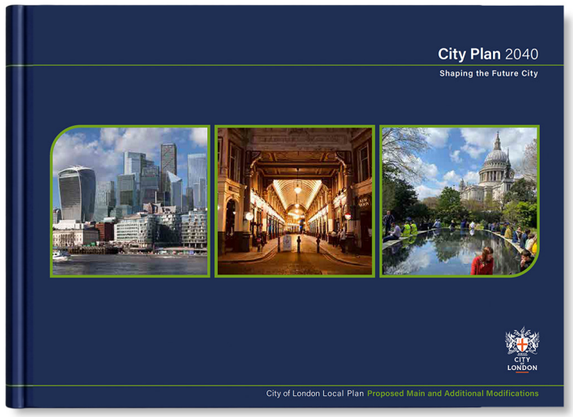
1. Developers will be required to effectively manage their proposal's impact on air quality. Major developments must comply with the requirements of the Air Quality SPD which includes requirements for Air Quality Neutral Assessments and Air Quality Impact Assessments (AQIAs).
2. Development that would result in a worsening of the City's nitrogen dioxide or PM_{10} and $PM_{2.5}$ pollution levels will be strongly resisted.
3. All developments must be at least Air Quality Neutral. Developments subject to an EIA should adopt an air quality positive approach. Major developments must maximise credits for the pollution section of the Building Research Establishment Environmental Assessment Method (BREEAM) assessment relating to on-site emissions of oxides of nitrogen (NO_x).
4. Developers will be expected to install non-combustion energy technology where available.
5. A detailed AQIA will be required for combustion based low carbon technologies (e.g. biomass, combined heat and power), and any necessary mitigation must be approved by the City Corporation.
6. Developments that include uses that are more vulnerable to air pollution, such as schools, nurseries, medical facilities and residential development, will be refused if the occupants would be exposed to poor air quality. Developments will need to ensure acceptable air quality through appropriate design, layout, landscaping and technological solutions.
7. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts to the fullest extent possible. Impacts from these activities must be addressed within submitted AQIAs. All developments should comply with the requirements of the London Low Emission Zone for Non-Road Mobile Machinery.
8. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest part of the development to ensure maximum dispersion of pollutants and be at least three metres away from any publicly accessible roof spaces.

Policy HL9: Health Impact Assessment (HIA)

The City Corporation will require development to deliver health benefits to the City's communities and mitigate any negative impacts.

3.10.7 HIAs must look at the issue of health comprehensively and not focus solely on access to health services.

Where significant impacts are identified, measures to mitigate the adverse impact of the development should be provided as part of the proposals or secured through conditions or a Section 106 Agreement.





46 The Mayor of London (2024), Practice Note – The Control of Dust and Emissions from Construction and Demolition

Appendix 2: Offset Calculation

This section presents examples of equations that can be used to calculate damage costs. All offsetting calculations should be provided in the AQIA, or subsequent documentation submitted to discharge a planning condition. An offset calculation is not required for emissions associated with construction (which includes construction, deconstruction and demolition).

Gas boilers

Where a gas boiler is proposed, it should meet NO_x emission rates detailed in Section 2.1.1. An emission offset calculation should be undertaken in the following scenarios:

Any on site combustion-based boiler in major applications	Any increase in emissions associated with a replacement combustion-based boiler, when compared to the current plant, in non-major applications

The standard damage cost values are given in tonnes, and this should be reflected in the emission rate. Gas boilers are assumed to have a typical life of 20 years. A 2% annual uplift is included in the calculation to account for inflation. If more than one boiler is proposed the calculation should be repeated for each boiler.

Damage Cost = (E x EU x DC) x ((1+0.02)^{20}-1) / 0.02

Where:
- E is boiler NO_x emission rate.
- EU is the predicted annual energy usage.
- DC is the current central damage cost value for the relevant source sector (£/t).
- Constants:
  - 20, the number of years for which the contribution is payable for.
  - 0.02, an uplift of 2% per annum is assumed.

Example

A gas boiler with an emission rate of 24mg/kWh is proposed within a commercial development that has a predicted total annual energy usage of 2,100,000kWh.
- E = 24mg/kWh
- EU = 2,100,000kWh
- DC = £21,315 per tonne

Damage Cost = (E x EU x DC) x ((1+0.02)^{20}-1) / 0.02
(£1,074.28) x ((1+0.02)^{20}-1) / 0.02

Offsetting Total: £26,102.08

Note - Ensure emissions are calculated as tonnes as damage costs are in £/t.

Generators

Where a combustion-based generator is proposed it should meet the emission limits detailed in Section 2.1.2. An emission offset calculation should be undertaken in the following scenarios:

All major applications where a combustion-based generator for Emergency Life Safety is proposed.	All applications where a combustion-based generator for Business Continuity is proposed.
	All applications where a replacement combustion-based generator(s) has greater emissions than the existing generator, regardless of proposed use.

The example below is for an Emergency Life Safety generator. The assumption is that each generator is used for four hours a year on average, in addition to testing. The standard damage cost values are given in tonnes, and this should be reflected in the emission rate. Generators are assumed to have a typical life of 30 years. A 2% annual uplift is included in the calculation to account for inflation.

Where the proposed use is for Business Continuity the Air Quality Team should be consulted to agree assumed hours of usage in the calculation.

The offsetting calculation should be completed for both NO_x and $PM_{2.5}$ emissions and repeated for instances where there is more than one generator.

Damage Cost = (E x (T + 4) x DC) x ((1+0.02)^{30}-1) / 0.02

Where:
- E is the generator emission rate, either NO_x or $PM_{2.5}$.
- T is the proposed total generator testing per annum (hours).
- DC is the current central damage cost value, for either NO_x or $PM_{2.5}$, for the relevant source sector (£/t).
- Constants:
  - 4, an assumption of actual usage per annum (hour). To be applied per generator.
  - 30, the number of years for which the contribution is payable for.
  - 0.02, an uplift of 2% per annum is assumed.

Examples

1. One diesel fuelled generator has been proposed as part of a commercial development. The generator is rated at 1750kW and is to provide the power requirements for life-safety building services. The generator is to be tested for a total of four hours per year.

- E = NO_x: 6.50g/kWh, $PM_{2.5}$: 0.03g/kWh
- T = 4 hours
- DC = NO_x: £21,315 per tonne, $PM_{2.5}$: £146,671 per tonne

Damage Cost = (E x (4 + 4) x DC) x ((1+0.02)^{30}-1) / 0.02

NO_x: (£1,939.67) x ((1+0.02)^{30}-1) / 0.02

$PM_{2.5}$: (£61.60) x ((1+0.02)^{30}-1) / 0.02

Offsetting Total: £81,187.55

* Ensure emissions are calculated as tonnes as damage costs are in £/t.

2. One diesel fuelled generator has been proposed as part of a commercial development. The generator is rated at 1750kW and is to provide the power requirements for life-safety building services. The generator is fitted with SCR and is to be tested for a total of four hours per year.

- E = NO_x: 1.304g/kWh, $PM_{2.5}$: 0.03g/kWh
- T = 4 hours
- DC = NOx: £21,315 per tonne, PM2.5: £146,671 per tonne

Damage Cost = (E x (4 + 4) x DC) x ((1+0.02)^{30}-1) / 0.02

NO_x: (£389.13) x ((1+0.02)^{30}-1) / 0.02

$PM_{2.5}$: (£61.60) x ((1+0.02)^{30}-1) / 0.02

Offsetting Total: £18,285.19

Note - Ensure emissions are calculated as tonnes as damage costs are in £/t

A significant reduction in offsetting total is experienced in Example 2 compared to Example 1 due to the reduction in NO_x emission rate. In this example evidence was provided that SCR would reduce the existing NO_x emission rate by 80%.

If CHP, biofuel or biomass boilers are proposed the Air Quality Team should be consulted to agree the offset calculation.

Operational Vehicle Emissions

For all major developments where an increase in operational vehicles is predicted when compared to existing use, an offsetting calculation is required. The calculation should be applied to vehicles over and above those associated with the existing site only.

Vehicle emissions should be defined for a five-year period, using a base year of the proposed year of opening. For the calculation, the total base year emissions remain constant for the five-year period, i.e. it is assumed that the emission rate will be constant over that time. The most recent Emissions Factors Toolkit (EFT) should be used, using the parameters below. Calculations should be undertaken for both NO_x and $PM_{2.5}$.

EFT Parameters

- Road Type: London – Central
- Speed: 15kph
- Link Length: 6km

Unless exact vehicle specifics are known, Diesel Light Goods Vehicle (LGV) and Rigid Heavy Goods Vehicle (HGV) (Diesel) within the 'All Vehicle Types' Traffic Format and the preset Euro Fleet for the opening year of the development should be used. Any proposals to deviate from these parameters should be discussed with the Air Quality Team.

Damage Cost = (E x DC) x ((1+0.02)^5-1) / 0.02

Where:

- E is the five-year total of vehicle emissions, either NO_x or $PM_{2.5}$ (t).
- DC is the current central damage cost value, for either NO_x or $PM_{2.5}$, for the road transport Central London source sector (£/t).
- Constants:
  - 5, the number of years for which the contribution is payable for.
  - 0.02, an uplift of 2% per annum is assumed.

Example

For a proposed commercial development, the predicted operational vehicle numbers have increased when compared to the existing development. The increase in AADT is 25 LGVs and 10 HGVs. The predicted opening year of the development is 2025.

- E:
  - LGV = NO_x: 0.1082t, $PM_{2.5}$: 0.0071t
  - HGV = NO_x: 0.1032t, $PM_{2.5}$: 0.0070t
- DC = NO_x: £72,737 per tonne, $PM_{2.5}$: £648,110 per tonne

Damage Cost = (E x DC) x ((1+0.02)^5-1) / 0.02

LGV NO_x: £8,194.15

LGV $PM_{2.5}$: £4,761.76

HGV NO_x: £7,812.23

HGV $PM_{2.5}$: £4,713.32

Offsetting Total: £25,481.47

Key Actions

Offsetting calculations should be completed for all applicable operational emissions.
All offsetting calculations should be presented in the AQIA, or subsequent documentation submitted to discharge a planning condition.
The payment of air pollution offsetting will be required on completion of development and prior to occupation.



47 Travel time measures for local 'A' roads: January to December 2022 report. Available at: https://www.gov.uk/government/statistics/travel-time-measures-for-the-strategic-road-network-and-local-a-roads-january-to-december-2022/travel-time-measures-for-local-a-roads-january-to-december-2022-report#:~:text=The%20lowest%20average%20speeds%20were,on%202019%20(39.3%20mph).

For further information contact:

The Air Quality Team
Environment Department
City of London Corporation
PO Box 270
Guildhall

London, EC2P 2EJ
Tel: 020 7332 3030
cityair@cityoflondon.gov.uk

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

CITY OF LONDON

From: [redacted]
To:
Date: 11/25/2025 10:17:17 AM
Subject: [redacted] REF: Celebrating Heritage Supplementary Planning Document - SEA Screening

THIS IS AN EXTERNAL EMAIL

Your Ref: Celebrating Heritage SPD - SEA Screening
Our Ref: 531963

Dear [redacted]

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has no comments to make on the SEA Screening report for the Celebrating Heritage SPD for the City of London Council.

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

Yours sincerely

[redacted]
Consultations Team
Natural England
Worcester Team

Enquiries line: 0300 060 3900
Email: consultations@naturalengland.org.uk
www.gov.uk/natural-england

Thriving Nature for people and planet

Please be aware there is a PLANNING DELIVERY NEWS page that highlights planning casework news. Please check this regularly.

This page also includes a link to the HR/HO pipeline, Area Team MI data as well as regular Hub statistics. This is your weekly source of planning updates and performance data, which is located within the Planning

Performance updates section.

Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see here
For further information on the Pre-submission Screening Service see here

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From: [redacted]
Date: 11/25/2025 10:08:31 AM
Subject: [redacted] REF: Office Use Supplementary Planning Document - SEA Screening
Attachments: Natural England Local Plan Advice Note.docx

THIS IS AN EXTERNAL EMAIL

Your Ref: Office Use SPD - SEA Screening

Our Ref: 531961

Dear [redacted]

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has no comments to make on the SEA Screening report for the Office Use SPD for the City of London Council.

However, please find attached Natural England's Local Plan Advice Note.

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

Yours sincerely

[redacted]

Operations Delivery

Consultations Team

Natural England

Worcester Team

Enquiries line: 0300 060 3900

Email: consultations@naturalengland.org.uk

www.gov.uk/natural-england



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From: "[redacted]

Date: 11/25/2025 10:01:00 AM

Subject: [redacted] REF: Culture Supplementary Planning Document - SEA Screening

Attachments: Natural England Local Plan Advice Note.docx

THIS IS AN EXTERNAL EMAIL

Your Ref: Culture SPD - SEA Screening

Our Ref: 531960

Dear [redacted]

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has no comments to make on the SEA Screening report for the Culture SPD for the City of London Council.

However, please find attached Natural England's Local Plan Advice Note.

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

Yours sincerely

[redacted]

Operations Delivery

Consultations Team

Natural England

Worcester Team

Enquiries line: 0300 060 3900

Email: consultations@naturalengland.org.uk

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Natural England Advice Note – Local Plans
February 2024

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. This advice note sets out the natural environment issues that Natural England consider should be incorporated in Local Plans to take forward relevant policies of the National Planning Policy Framework.
Information on consulting Natural England on plans and development proposals is set out in Planning and transport authorities: get environmental advice on planning - GOV.UK (www.gov.uk)

		NPPF paragraph
The Spatial Development Strategy		
Vision and Objectives	The Plan should include the natural environment in its long-term vision and objectives for the plan area. These should be based on local characteristics and circumstances and include locally specific goals for nature recovery and enhancement, supported by policies and proposals in the plan.	8(c), 20(d), 123, 181
The spatial strategy and allocating land for development	In setting an overall strategy to guide development and allocate land the Plan should: conserve and enhance the natural environment, including landscapes and green infrastructure (GI) make as much use as possible of previously developed or 'brownfield' land allocate land with the least environmental or amenity value. It should be recognised that some previously developed land is important for biodiversity as it can contain the open mosaic habitats (dataset), a priority habitat.	11, 32, 89, 123, 124(b) (c), 181, 181, 172, 186(a), 187, 188, 191
Biodiversity and Geodiversity		
Designated sites	The Plan should include policies and proposals to protect and enhance biodiversity, including designated nature conservation sites (internationally, nationally and locally designated sites of importance for biodiversity). The direct and indirect impacts of proposed development on designated should be considered, including impacts on water quality and the impacts on air quality from increased traffic, intensive agriculture or industrial developments. The Plan should identify and map local wildlife sites and include appropriate policy for their protection and enhancement, reflecting their role in the wider ecological network and for nature recovery. Criteria-based policies to guide development should include application of the mitigation hierarchy and how the direct, indirect and cumulative impacts of development on designated sites will be addressed. Further information on designated sites is at Designated Sites View (https://designatedsites.naturalengland.org.uk/). Natural England's Impact Risk Zones (IRZ) on MAGIC maps (www.magic.defra.gov.uk) identify potential development impacts. In some Plan areas strategic mitigation solutions may exist or be desirable to address the cumulative impacts of development on designated sites e.g. recreational pressures or nutrient impacts. Where this is the case further advice should be sought from Natural England and robust evidence will be needed to support any strategic approach.	181, 186(a)(b) (c), 187,188 and Glossary
Irreplaceable Habitats including ancient	The Plan should protect irreplaceable habitats (including ancient woodland and ancient and veteran trees) from loss or deterioration and seek their enhancement wherever possible. Further advice can be found in Natural England's standing advice- Ancient woodland and veteran	186(c), Glossary

woodland and ancient and veteran trees	trees: protecting them from development.	
Biodiversity Net Gain (BNG)	The Plan should identify and pursue opportunities for securing measurable net gains for biodiversity. This should include setting a percentage target level of provision of at least 10% net gain, higher targets should be supported by evidence. The Plan should also set out the BNG strategy including: requirements for on-site and off-site provision identifying priority opportunities of strategic significance (habitats and areas) for BNG, for instance through mapping ecological networks advising on the metric to use to calculate gains, for example the most up to date version of Defra's Biodiversity Metric. The Plan should also aim to achieve wider environmental gains, going beyond BNG, to include wider natural capital benefits such as improved water and air quality and recreation. Natural England's Environment Benefits from Nature tool **can help identify opportunities.**	180(d), 185(b), 186(d)
Nature recovery	The Plan should include policies and proposals for nature recovery. It should recognise the potential of a connected network of wildlife-rich habitats to improve biodiversity. For instance the protection and recovery of priority species and habitats and supporting habitats outside designated sites for protected species. Consideration should be given to wider benefits such as carbon capture, flood risk management and enhanced access to nature. The Plan should map local ecological networks, including buffers and wildlife corridors and set out policies and proposals to safeguard and enhance the network, including contributions through development where appropriate. These could draw on Local Nature Recovery Strategies where available.	8(c), 185(a) (b), Glossary
Priority species and habitats	The Plan should protect and enhance priority habitats and species. This should include appropriate protection and restoration of deep and shallow peatlands, found in fen and bog priority habitats that are valuable for biodiversity and as a carbon store. Other priority habitats include upland and lowland heathland, traditional orchards, meadows, woodlands and coastal habitats. Details can be found on the Joint Nature Conservation Committee website and on MAGIC maps (www.magic.defra.gov.uk)	185(b), Glossary
Geodiversity	The Plan should make explicit reference to geological conservation (including protection for geological SSSIs and local geological sites) and the need to conserve, interpret and manage geological sites and features in the wider environment.	180, 175
Landscape		
Designated landscapes	The Plan, including site allocations, should give great weight to conserving and enhancing designated landscapes (National Parks, The Broads and National Landscapes (Areas of Outstanding Natural Beauty). This should reflect their natural beauty and special qualities (as identified in their Management Plans). Policies should help in furthering the statutory purposes of designated landscapes. Policies can be informed by landscape character and sensitivity assessments. The scale and extent of development should be limited in these areas. The Plan should consider both the direct and indirect impacts of development on the designated landscape and its setting. Policy should guide any development in these areas to meet the highest standards of design and environmental quality and seek opportunities to enhance the landscape and improve access to nature. The Plan should set out a definition of major development to guide the determination of planning applications against the 'major developments test.' Policy should also consider how development will be managed in the setting of a designated landscape, with development being sensitively located and designed to avoid or minimise adverse impacts.	20(d), 180, 182,183
Wider landscapes	The Plan should include policies and proposals for conserving and enhancing the landscape. The Plan should identify, protect and enhance locally valued landscapes, informed by landscape character assessments.,	129, 135(c), 180(a)(b)

	Policies for development in or adjacent to rural areas and urban fringe should ensure they reflect the character of the countryside, as well as seeking opportunities for enhancement and improved access to nature. Local design codes and guides can set out how development can respond to and enhance landscape character.	
Heritage Coasts	Where relevant, the Plan should identify and include policy protection for defined Heritage Coasts, to retain and enhance their special character	184
Light Pollution and Tranquillity	The Plan should include a policy to reduce light pollution. Lighting can be harmful to wildlife and undermine enjoyment of the countryside or night sky, especially in intrinsically dark landscapes, such as protected landscapes and nature reserves. Where appropriate the Plan should identify areas of tranquillity and include policies to protect them.	191 (b)(c)
Green infrastructure, open space, access and design		
Green Infrastructure (GI)	GI is a network of multi-functional green and blue spaces and other natural features that can deliver a wide range of benefits for people, places and nature. Plans should consider the role of GI strategically throughout the plan area as well as links to adjoining areas. The Plan should address unequal access to natural green space and the needs of different user, age, and socio-economic groups. The Plan should set out a clear vision for delivering GI, including identification of deficiencies in provision and opportunities for new and enhanced GI. Plans can be supported by a GI strategy. GI policy should support and align with other natural environment policies, such as those on sustainable drainage systems, biodiversity, access, active travel and open space protection and enhancement. Plans can make use of the Natural England's Green Infrastructure Framework (GIF) to help prepare a GI evidence base that can support policies, site allocations and local design codes. Specific guidance for plan-makers is provided in the GI Process Journeys. The Green Infrastructure Map can be used to identify inequalities in access to greenspace and plan for new GI. The GI standards can be applied locally in policies and design codes.	20(d), 96,167(c)
Open Space and Local Green Space	The Plan evidence base should include a robust and up-to-date assessment of open space requirements and opportunities, with policies and proposals to remedy deficiencies in greenspace provision, including through land allocation. In assessing greenspace provision, consideration should be given to the quality and accessibility of space, as well as the various uses that may need separate provision such as children's play space, opportunities for connecting with nature, formal sports areas and facilities for groups with a variety of needs. Open space provision can use Natural England's Accessible Greenspace Standards to determine needs based on size, proximity capacity and quality. The Plan should identify, designate and have policies to protect and enhance areas of Local Green Space that are of particular importance to local communities.	88(d), 97(a), 102, 103, 105-107
Public Rights of Way and access	The Plan should have policies to maintain and improve access to nature and enjoyment of the countryside. Policies should be in place to protect and enhance public rights of way, access land and national trails, including the England Coast Path. Policies should provide for better connections and address unequal access to nature to support health and well-being outcomes. The design of new or improved routes should consider a range of modes of access including walking, cycling and horse riding, as well as a range of users including children and older people, different socio-economic groups and people with disabilities.	104
Design	L Natural England's GI Design Guide provides details of what good GI design looks like. The guide is linked to the ten characteristics of well-designed places set out in the National Model Design Code and the National design guide. Landscape and townscape character assessments can also inform good design.	132, 133
Green Belt	Plan policies and proposals should positively enhance land within the	147, 150, 151

	Green Belt. This should include compensatory improvements to environmental quality and accessibility of remaining Green Belt where land is removed from the Green Belt. Green Belt land can often be degraded 'urban fringe' landscapes. Therefore, there will be opportunities to 'green' the Green Belt and deliver environmental benefits such as landscape enhancement, habitat creation and enhancement and improved access to nature.	
Agricultural Land and Soils		
Best and Most Versatile agricultural land	The Plan should contain policies to protect Best and Most Versatile (BMV) agricultural land (Grades 1, 2, 3a). Polices should avoid the loss of BMV land. The Plan should recognise that development has an irreversible adverse impact on the finite national stock of BMV land. Any development proposed on BMV land should be informed by a detailed soil survey. .	180(b)
Sustainable management of soils	The Plan should have a policy for the protection of and sustainable management of soils on development sites. This should set out mitigation measures to minimise soil disturbance and retain as many ecosystem services as possible through careful soil management during the construction process and appropriate soil re-use. The Plan should recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils. The impact of all types of development on soils should be considered. Healthy soils are not only important for agriculture, but soils with high environmental value (e.g. wetland carbon stores such as peatland and low nutrient soils) are also important to ecological connectivity. Development should be supported by soils surveys and management plans - see Defra's Code of Practice for the sustainable use of soils on construction sites.	180(a)
Coast		
Coastal Change	Where relevant, the Plan should consider the implications of coastal change and opportunities for nature and improved access. The Shoreline Management Plan should be used to inform the evidence base for the Plan. Coastal Change Management Areas should be identified with appropriate policies set out for development and to manage the change. Policies should reflect and enhance the character of the coast and maintain the route of the England Coast Path. Opportunities for enhancing biodiversity, landscapes and access to nature should also be secured.	14, 20(b), 176, 177, 178, Glossary
Marine environment	Where relevant, the Plan should have policies in place to ensure effective alignment of the terrestrial and marine planning regimes, for instance in plan areas on estuaries or areas with tidal rivers. This should include reference to the relevant marine plan.	176
Climate Change		
Climate Change	The Plan should contain policies to mitigate and adapt to climate change impacts on the natural environment. The Plan should recognise that climate change mitigation and adaptation and biodiversity loss are interlinked. Many habitats provide essential ecosystem services to allow adaptation to climate change e.g. natural flood management, as well as mitigation e.g. through tree planting and retaining peat as a carbon store. Policies should set out appropriate nature-based solutions for climate mitigation and adaptation such as woodland or wetland creation or peatland restoration. Policies should address water use, promoting the use of sustainable drainage systems (SuDS) and water sensitive design as part of a wider green infrastructure approach. In areas of known water constraint, plans should include policies to manage available resources, such as water efficiency or water reuse measures. Consideration also needs to be given to the likely impacts of climate change on protected sites, habitats and species. See the Climate Change Adaptation Manual, Carbon Storage and Sequestration by Habitat and National biodiversity climate change vulnerability model.	11(a), 20(d), 158 and Glossary

Site Allocations

The strategy for allocating land for development should:
avoid protected sites and apply the biodiversity mitigation hierarchy (NPPF 180a)
give great weight to conserving and enhancing designated landscapes
avoid the loss of best and most versatile agricultural land.
Selecting sites and setting design principles for their delivery should conserve and enhance the natural environment. This includes considering potential impacts and opportunities set out int the table above, as well as the issues set out in the table below secured through planning policy.

Evidence	An appropriate evidence base should be used to support the selection of sites and inform the policies for their delivery. This should include: Landscape and Visual Impact Assessments, Landscape Sensitivity Assessments and Landscape Character Assessments. Soil surveys and mapping (Agricultural Land Classification available on Magic maps) ecological surveys, green infrastructure and biodiversity opportunity mapping.
Assessments	Site selection must also be informed by the relevant environmental assessments. These are: **Sustainability Appraisal incorporating Strategic Environmental Assessment**: it should be clear how this has informed and provided justification for the sites selected for allocation assessed against reasonable alternatives. Recommendations and findings from the assessments should also be used to inform mitigation measures and design principles for the allocated sites. **Habitats Regulations Assessment**: mitigation and avoidance measures identified through the HRA should be secured through policies in the Plan. Where mitigation or avoidance is not possible the site should not be allocated.
Environmental requirements	Plans should set requirements, opportunities and detailed design guidance for site allocations to conserve and enhance the natural environment. This should include measures secured through policy covering: **BNG:** This could include specifying whether and what BNG should be delivered on-site given the scale of development anticipated, or if off-site provision will be required. Site allocations should be supported by a baseline assessment of biodiversity value for example using the latest version of Defra's Biodiversity Metric. **GI strategy:** Allocations should set out measures to protect, enhance and improved connectivity of GI within and beyond allocation sites. Consideration should also be given to setting appropriate GI standards for allocation sites. **Landscape features:** Allocation policy should incorporate and enhance existing landscape features within the development This could include hedgerows, walls, ancient and veteran trees, woodland and wildlife corridors. **Agricultural land and soils:** Allocations should be based on a detailed soils survey and have policies should secure a soil management plan. **Access**: Policies for allocations should incorporate and enhance public access to the natural environment. This includes Public Rights of Way that run through or adjacent to allocated sites, as well as linking from the site to the wider route network.

From: [redacted]

Date: 11/11/2025 9:00:31 AM

Subject: RE: SEA Screening

THIS IS AN EXTERNAL EMAIL

Dear City of London Planning Policy Team,

Thank you for consulting us on the SEA Screening Opinion for:

- Culture SPD
- Celebrating Heritage SPD
- Air Quality SPD
- Offices SPD
- An Inclusive City SPD
- Planning Obligations SPD

The Environment Agency, together with other bodies in England and Wales, is a statutory consultee in the SEA process. We must be consulted by plan-makers (or "responsible authorities") at certain key stages. We appreciate that the said plan may require a strategic environmental assessment (SEA) under the Directive and early SEA screening is advised. The Environment Agency may be able to assist the Local Planning Authority at this stage by advising on whether your plan will result in significant environmental impacts within our remit. However, please note that we do not advise on whether the plan falls under the requirements of the SEA Directive.

Considering our current resources and remit, we are unable to provide bespoke comments on SEA Screening Opinions. However, should the Local Planning Authority determine that an SEA is required, please consult us on the scope to ensure our key environmental issues are addressed. We can also provide baseline information and data, as required.

We hope the above information makes sense. Should you have any questions, please let me know.

Best wishes,

[redacted]

[redacted](MSc., BSc.)
Planning Specialist (Hertfordshire), Hertfordshire and North London Sustainable Places
Environment Agency | | Alchemy, Bessemer Road, Welwyn Garden City, AL7 1HE

HNLSustainablePlaces@environment-agency.[redacted]
Tel: 020 3025 5835
Pronouns: she/her (why is this here?)

Creating a better place for people and wildlife

City of London Corporation Committee Report

Committee: Port Health and Environmental Services Committee	**Dated:** 21/7/2026
Subject: Environment Department Business Plan 2025/26: Progress Report (End of Year: 1 October 2025 – 31 March 2026)	**Public report:** For Information
This proposal: • **delivers Corporate Plan 2025-30 outcomes** • **provides statutory duties** • **provides business enabling functions**	• Leading Sustainable Environment • Vibrant Thriving Destination • Providing Excellent Services
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	£N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of:	Katie Stewart, Executive Director Environment
Report author:	Joanne Hill, Environment Department

Summary

This report provides the end of year update on progress made towards delivering the Environment Department's high-level Business Plan 2025-30 by the service areas that fall within the remit of your Committee:

- Port Health and Public Protection
- The Cleansing Service

Key performance information is summarised within the report and presented in more detail at Appendices 1 and 2. Overall, performance during 2025/26 has been positive with all priority workstreams delivered as planned and the majority of associated performance measures meeting or exceeding their targets. Additional performance information for the Cleansing Service and the Port Health and Public Protection Division is provided at Appendices 3 and 4, respectively.

Recommendation(s)

Members are asked to:

- Note the content of this report and its appendices.

Main Report

Background

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

2. The Environment Department's high-level Business Plan 2025-30 was approved by your Committee in January 2025. This year marked a transition to a multi-year Business Plan which sets out the priority workstreams for the next five years and specified the actions that would be taken during 2025/26 to deliver them. The Plan will be reviewed and refreshed annually to detail the actions for the following financial year.

3. Progress made against priority workstreams is assessed by monitoring performance measures and the achievement of milestones. Performance is reviewed regularly by Directors and their Management Teams and is reported to your Committee every six months to enable Member scrutiny.

4. In addition, the priority workstreams identified in this high-level Business Plan flow through local team service plans and the individual performance plans of members of staff, which provide further methods of assessing progress. This also enables individual officers to fully understand how their work feeds into divisional, departmental and corporate activities, aims and objectives.

Current Position

Priority workstreams

5. The high-level Business Plan sets out the priority workstreams for 2025-30 for all service areas that report to your Committee. All workstreams support the delivery of the Corporate Plan 2024-29 outcomes, and other cross-cutting strategies and programmes.

6. Throughout 2025/26, teams made good progress against delivery of all workstreams and achievement of intended outcomes. A list of the workstreams with a summary of their key deliverables and outcomes is provided below and detailed progress updates are set out in Appendix 1.

a) **Deliver an environmentally enhanced City.**
This workstream includes delivery of the Air Quality Strategy 2025-30, the Circular Economy Framework; and the Cleansing Service. Outcomes include cleaner air and improved health for residents, workers and visitors; more efficient use of resources through a circular economy and an increase in environmental resilience.

b) **Protect and promote Public, Animal and Environment Health and Consumer Protection.**
This workstream covers delivery of the Port Health and Public Protection Division's statutory services. Outcomes include the provision of effective biosecurity controls at the border; promotion of animal health and welfare; protection of residents and consumers; support for businesses; and reassurance for Members in relation to the residents they serve.

c) **Ensure provision of appropriate facilities to enable delivery of services.**
This workstream includes a strategic review of operational facilities including the Cemetery and Crematorium; public conveniences; Port Health Service accommodation; Heathrow Animal Reception Centre; and Walbrook Wharf. Delivery will enable the continued delivery of high-quality statutory services to customers and stakeholders in the most efficient and sustainable manner.

d) **Financial security and development**
This workstream focuses on consideration of commercial development opportunities and adaption of services to meet the needs of customers and optimise income. This will enable sustainable, high-quality services and maintain the City of London's reputation for delivery of excellent public services within the Square Mile and beyond.

Performance measures

7. Priority workstreams have one or more associated performance measures to assess progress. These measures were monitored throughout the year and details of performance is provided at Appendix 2. Overall, the results show that progress towards achieving the workstream objectives is on track. For any indicator which has slipped or is not on target at the mid-year point, an explanation is given.

Health and Safety

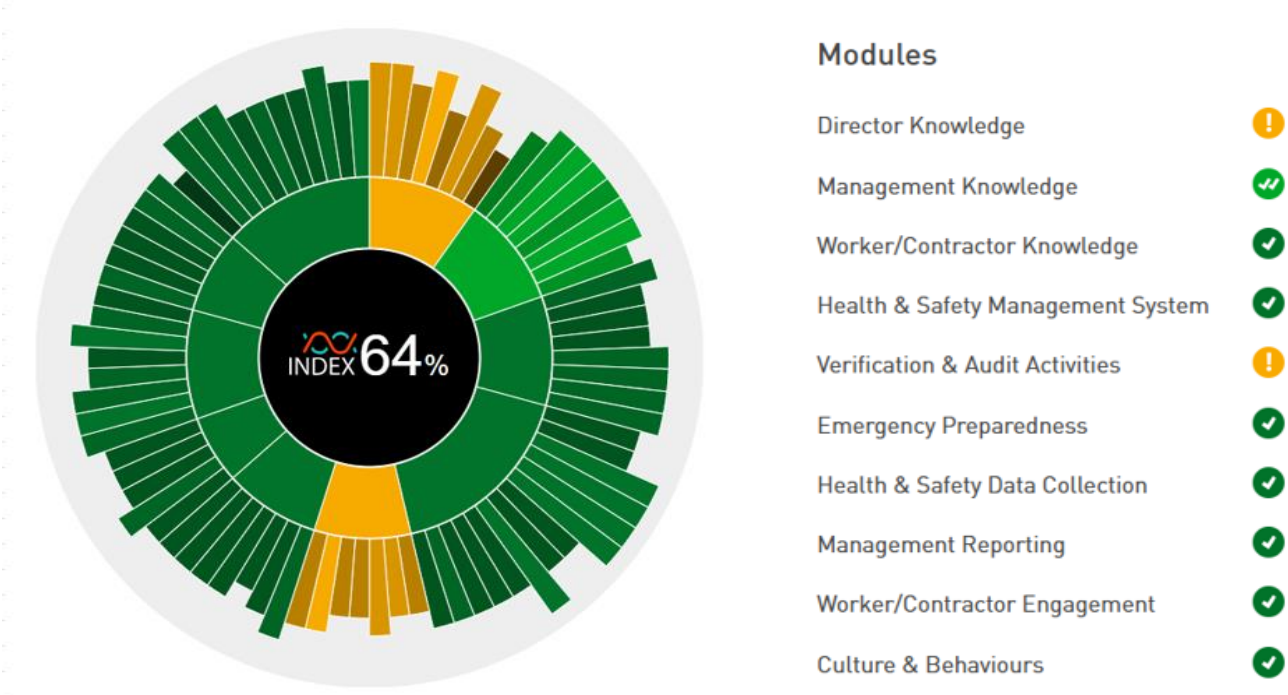
8. The CoL uses the Safe365 digital platform as a tool for monitoring, auditing, and driving improvements in health and safety management across the organisation, particularly for high-risk departments and functions. The platform is used to assess departmental and sub-departmental safety management systems, providing a consistent framework for assurance and improvement. It supports an active, continuous improvement process in integrating health and safety into business operations.

9. The Safe365 profile generates a ‘starburst’ with key information tested across 10 modules required for successful health and safety management. It verifies 74 areas required for effective safety management. Each module is RAG rated and a key number as a percentage, the safety index, is clearly displayed at the centre of the starburst. Departments and teams with a Safe365 profile must be working towards a Safety Index of 65%.

10. The Environment Department’s Safe365 maturity rating will be reported to your Committee within these bi-annual Business Plan progress reports to provide assurance that it remains committed to strengthening its safety culture and continues to make progress towards achieving and maintaining the target maturity level.

11. The Environment Department’s average maturity rating has shown improvement over the last six months, increasing from 63% to 64%, which indicates proactive maturity and is approaching the organisational target of 65%. The Department is showing a proactive approach to safety management, including workshops and an active Health and Safety Working Group.

Environment Department Safe 365 Snapshot (2 March 2026)



Corporate and Strategic Implications

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

Financial implications – Financial implications are addressed within the separate Chamberlain's Outturn report, which is also presented to this Committee.

Resource implications – None.

Legal implications – None.

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

Equalities implications – None.

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

Security implications – None.

Appendices
Appendix 1 – Progress against priority workstreams
Appendix 2 – Progress against performance measures
Appendix 3 - Cleansing Service: Additional performance information
Appendix 4 - Port Health and Public Protection Division: Additional performance information

Background Papers
'Environment Department high-level Business Plan 2025-30' (PH&ES Committee, 7 January 2025)

Contact
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Appendix 1

Progress against priority workstreams
End of Year 2025/26: 1 April 2025 -31 March 2026

Workstream	Progress to End of Year (1 April 2025-31 March 2026)
a) Deliver an Environmentally Enhanced City	
1. Implement and deliver the Air Quality Strategy 2025 – 2030 • *Commence delivery of the Strategy actions* • *Prepare and submit the Annual Status Report.* ***Q1 2025/26*** • *Assess the % of the City's area that meets the World Health Organisation air quality guidelines.* ***Q2 2025/26****.* • *Commence work in* ***Q3 2025/26*** *towards the refresh of the Air Quality SPD.* 2. Deliver the Action Plan of the Circular Economy Framework. • Establish a baseline for circular economy metrics which can be measured in future years. ***Q4 2025/26*** 3. Deliver an effective, high-quality and responsive Cleansing Service which aligns with Member-approved service levels and meets the needs of City residents, businesses and visitors. • *Agree way forward with Veolia Contract (Extend/Re-Tender).* ***Q1 2025/26***	**1. Air Quality Strategy** All targets for 2025/26 were achieved: • The Statutory Annual Status report was submitted to the GLA and was presented to the Port Health and Environmental Services Committee in July 2025. • The % area of the City that met the WHO Air quality guidelines in 2024 was assessed as 70%. • The Draft Air Quality Supplementary Planning Document (SPD) was published for consultation in March 2026. **2. Circular Economy Framework** • Good progress has been made throughout the year on implementing the Circular Economy Framework Action Plan with a strong focus on establishing firm foundations for long-term delivery. • A significant amount of work was completed to map existing activity, improve data visibility and develop initial baselines across key material and waste streams. • Several practical circular economy initiatives have advanced, including the ROMULUS construction reuse pilot which delivered clear environmental and social value and generated learning that is informing future projects. • Work on engagement and behaviour change has also progressed well. Food waste services have been significantly expanded in line with Simpler Recycling, alongside continued reuse campaigns, Give and Take Days and repair activity. NCIL funding has also been secured for a Library of Things at the Barbican, due to launch in April 2026, providing a practical reuse offer for residents and workers.

Workstream	Progress to End of Year (1 April 2025-31 March 2026)
	3. Cleansing Service • The Cleansing Service continued to operate efficiently, with high standards of service maintained across the City as reflected in the most recent Keep Britain Tidy (KBT) Local Environmental Quality (LEQ) scores. These outcomes demonstrate sustained quality in service delivery throughout the City. • Reports have been presented to the appropriate Committees setting out options for the future of the Waste Collection and Street Cleansing Contract, culminating in a decision that provides a stable and secure basis for future service delivery.
b) Protect public, animal and environmental health at the borders	
1. Embed the Border Target Operating Model (BTOM) at the Ports for food and feed and at Heathrow for live animals (AVI). • Finalise development of the services to move to 'business as usual' operations by ***Q3 2025/26***. 2. Deliver high quality statutory services and support for businesses. • Promote the Healthier Catering Commitment (HCC) Scheme to relevant City food establishments. • Deliver the Food Law Enforcement Plan. • Deliver the Health and Safety Cooling Towers regime. • Deliver a 24/7/364 Noise Response Service. • Support the Planning and Development Service as a statutory consultee and provide expert advice. • Develop and prepare for the 2026-2036 Noise Strategy. (for publication in 2026/27). • Actively participate in multi-agency partnership, Operation Broadway, to disrupt investment fraud in and around the square mile.	**1. Border Target Operating Model** • The Port Health Service is now delivering the BTOM, however, this did not impact imports of live animals for the Animal Health and Welfare Service. • Close engagement continues with Defra to understand and, where possible, influence the EU/UK SPS (Sanitary and Phytosanitary) Agreement which will apply at the Ports for food and feed and to live animals at Heathrow. **2. Statutory services** • The Healthier Catering Commitment Scheme was paused, with funding withdrawn. However, advice to businesses continued to be provided as part of a programme of interventions. • Delivery of the Food Law Enforcement Plan and the Health and Safety Cooling Towers regime remained on track, and annual targets were met. • Throughout the year, there was a marked increase in the number of newly registering food businesses. The number of new businesses exceeded the number of those that ceased trading for the first time since before the Pandemic.

Workstream	Progress to End of Year (1 April 2025-31 March 2026)
	• 90% of noise complaints were resolved satisfactorily and 100% of noise complaints received out of hours were responded to within 15 minutes. • The Pollution Team continued to support the Planning and Development Service with statutory consultee responses on Air Quality, noise, odour and contaminated land. • A Project Group was formed to develop the new 2026-2036 Noise Strategy. Timelines have been set out and an evidence base established. • The Trading Standards Team continued to actively participate in Operation Broadway deployments to disrupt investment fraud. Deployments have become more intensive due to the nature and scale of the investigations; while the total number of deployments has reduced, there has been no reduction in time commitment.
c) Ensure Provision of appropriate facilities to enable delivery of services	
1. Carry out a strategic review of operational facilities to ensure that they are fit for purpose to enable efficient, effective and sustainable service delivery. Review to include: • Cemetery and Crematorium. • Public conveniences. • Port Health Service accommodation. • Heathrow Animal Reception Centre. 2. Agree long term strategy for Walbrook Wharf as the sustainable cleansing waste transfer station and commence implementation of agreed option. **Q2 2025/26**	**1. Review operational facilities** • The new administration system for the Cemetery and Crematorium has been implemented successfully, supporting more efficient and sustainable service delivery. • Work to increase the number and type of graves available continued, including obtaining Committee approval for the development of an additional area of the site. • A comprehensive review of public convenience signage, wayfinding and information was completed, alongside significant investment in the refurbishment of the Tower Hill toilets. This programme of work has improved visibility, accessibility and overall provision. • Substantial maintenance work was undertaken at the Heathrow Animal Reception Centre (HARC) as part of the Cyclical Works Programme.

Workstream	Progress to End of Year (1 April 2025-31 March 2026)
	• Officers continue to engage with Defra and Heathrow Airport Limited, to assess impact of potential changes to rules on import, and of HARC site in relation to cargo development. **2. Walbrook Wharf** • The review of long-term options for Walbrook Wharf has resulted in members approving the extension of the existing Waste Transfer contract until 2032. This will ensure the Wharf remains a base for the cleansing and waste collection operations and allow more time for complementary uses to be explored post 2032.
d) Financial security and development	
1. Consider commercial development opportunities for Port Health and HARC across London and a wider area. 2. Adapt Cemetery and Crematorium services to provide a variety of options relevant to the needs and preferences of customers and optimise income.	**1. Port Health and HARC** • For the Port Health Service, border controls are cost neutral. The regime for feed and food import controls will continue to provide an efficient and effective service, keeping costs as low as practicable so as to support trade through the entry points. • A commercial consultant and PR firm have been engaged to undertake a four-month project to identify and promote HARC opportunities which aim to diversify income generation. **2. Cemetery and Crematorium** • Grave availability and choice have now doubled across all types as planned. This process will continue into 2026/27 with the expansion of the Cremation memorialisation offer.

Appendix 2

Progress against Performance Measures
End of year 2025/26: 1 April 2025 to 31 March 2026

Performance Measure	Target 2025/26	Performance 2025/26 (at mid-year)	Performance 2025/26 (Full year)
a) Deliver an environmentally enhanced City			
% of the City's area that meets the health-based Limit Values and WHO Guidelines for nitrogen dioxide levels.	**90%**	N/A *Annual Measure*	95% (2024)
% of streets with unacceptable levels of litter, detritus, graffiti and flyposting (NI 195).	**<5%**	2.83%	2.85%
***1** Air Quality data is per calendar year. 2025 data will not be available until the autumn; the 2024 figure is reported here as the most recent available.			
b) Protect and promote Public, Animal and Environmental Health and Consumer Protection			
% of checks undertaken on low and medium risk food and feed imports.	**N/A**	N/A	N/A ***2**
% of flight collections attended within 30 minutes of the flight offloading.	**95%**	98%	98%
% of relevant food businesses signed up to the Healthier Catering Commitment Scheme.	**50%**	N/A	N/A***3**
% of justifiable noise complaints investigated which result in a satisfactory outcome.	**90%**	100%	100%
% of planned food hygiene/food control interventions completed.	**100%**	47%	96% ***4**
% of planned Cooling Tower inspections completed.	**100%**	40%	100%

Performance Measure	Target 2025/26	Performance 2025/26 (at mid-year)	Performance 2025/26 (Full year)
Number of Operation Broadway deployments.	**80**	39	60 *5
*2 It was not possible to set a target for this measure in 2025/26 due to national issues with the processing of imported food and feed under the new BTOM. An alternative appropriate target has been set for 2026/27. *3 The Healthier Catering Commitment Scheme did not commence as intended and funding has been withdrawn. However, advice continued to be provided to businesses as part of a programme of interventions. *4 100% of premises in hygiene risk categories A to D, due or overdue, received an appropriate intervention. 60% of interventions in lower-risk category E premises were completed. Throughout the year, there was a marked increase in the number of food businesses registering, with a business 'churn' of over 20%. *5 Deployments continued to be more intensive due to the nature and scale of the investigations, while the number of deployments has reduced there has been no reduction in time commitment. The target has been reduced accordingly for 2026/27.			
c) Ensure provision of appropriate facilities to enable delivery of services.			
There were no appropriate performance measures for this workstream for 2025/26; instead, progress was assessed and reported through narrative updates only (as provided in Appendix 1).			
d) Financial security and development			
Cemetery and Crematorium to provide an additional 300 lawn graves by the end of Q4 2025/26.	**300**	280	357

Business Plan 2025/26

Key Performance Information

Cleansing Service Q3&4: Oct 25 – Mar 25

Local Environmental Quality - Overall % (NI195)



Local Environment Quality - Breakdown (NI195)

2.67%	5.67%
Litter %	Graffiti %
0.17%	1.00%
Detritus %	Flyposting %

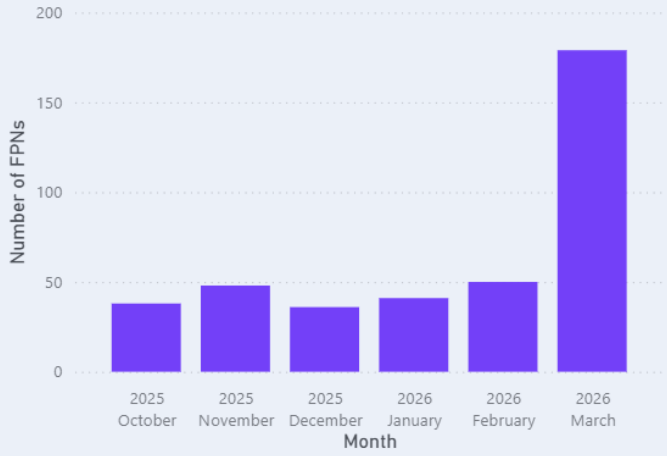
Kg of General Waste per household (NI191)



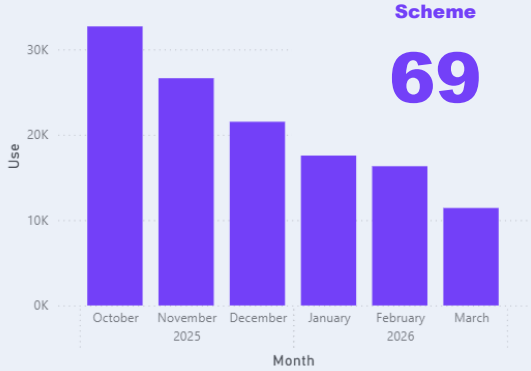
Overall Recycling Rate (NI192)



Total FPNs Issued



Public Convenience Usage



Community Toilet Scheme

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Port Health and Public Protection Performance information 1 October 2025 - 31 March 2026

Public Protection

444
food hygiene inspections conducted
(2025/26 -Full year total = 920)

1
Number of prosecutions/legal action in relation to unlicensed street trading.
(2025/26 - Full year total = 2)

Food Hygiene Rating Scheme: profile of food businesses

(2025/26 Full year result 97% broadly compliant)

Require improvement (0-2 rating)	Broadly compliant (3-5 rating)
3%	97%
(49)	(1,623)

2218
Trading Standards complaints & service requests received
(2025/26 - Full year total = 4097)

216
noise complaints investigated
(2025/26 - Full year total = 929)

Port Health

Products of Animal Origin consignment checks

1138
physical checks
(2025/26 -Full year total = 4320)

Products of Non Animal Origin consignment checks

1592
physical checks
(2025/26 - Full year total = 6297)

Animal Health

192
Animal Health inspections carried out
(2025/26 - Full year total = 423)

5088
consignments of animals through Heathrow Animal Reception Centre
(2025/26 - Full year total = 11,240)

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City of London Corporation Committee Report

Committee: Port Health and Environmental Services Committee	**Dated:** 21/7/26
Subject: Risk Management Update	**Public report:** For Information
This proposal: • **delivers Corporate Plan 2024-29 outcomes** • **provides statutory duties** • **provides business enabling functions**	• Providing Excellent Services • Vibrant Thriving Destination • Leading Sustainable Environment • Dynamic Economic Growth
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of:	Katie Stewart, Executive Director Environment
Report author:	Joanne Hill, Environment Department

Summary

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

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

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

- Port Health and Public Protection
- The Cleansing Service

Recommendation

Members are asked to:

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

Main Report

Background

1. The Risk Management Framework of the City of London Corporation requires each Chief Officer to report regularly to Committee on the key risks faced by their department.

2. To fulfil this requirement, the key risks of the service areas of the Environment Department which fall within the remit of the Port Health and Environmental Services Committee are presented to the Committee every four months.

3. Risk Management is discussed regularly by the Department's Senior Leadership Team and at the meetings of each service area's Senior Management Team.

4. Between Management Team meetings, risks are reviewed in consultation with risk and control owners, and updates are recorded in the corporate risk management system.

Current Position

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

   - Port Health and Public Protection
   - Cleansing Service

Summary of key risks

6. The register of key risks held by the Port Health and Public Protection Division and the City Operation Division's Cleansing Service includes one departmental level risk (Air Quality) and three service level risks, as summarised below. The detailed risk register is presented at Appendix 2.

7. **ENV-SLT 005 Air Quality**
   (Current risk score: Green 3, Possible/Minor)
   Since this risk was added to the register in 2015, the score has reduced from Red 16 (Likelihood: likely; Impact: major) to Green 3 (possible; minor). The target is now to reduce the risk further by the end of 2026. This reflects the City of London's long-term commitment to improving air quality in the City.

Apart from at a very small number of busy roadside locations, the air quality in the City consistently meets statutory targets. This significantly reduces the impact on health. Air quality data collected in 2025 (the most recent available data) demonstrated that levels of particulate air pollution PM10 and PM2.5 both met the health-based standards. Nitrogen dioxide was measured at 91 locations and just 4 of these locations breached the required standard.

A new Air Quality Strategy for 2025 to 2030 has been adopted. The Strategy aims to exceed national standards, further demonstrating the City of London's commitment to maintaining and improving air quality. Delivery of the Strategy's Action Plan is monitored and reported on annually. The annual assessment and progress report for 2025 has been submitted to the Greater London Authority and will be presented to this Committee in September 2026.

8. **ENV-PHPP 001 Border controls – Impact on Port Health and Animal Health**
   (Current risk score: Red 24, Possible/Extreme)
   The risk remains high (Red 24) due to continued uncertainties with the new regime and the new Government desire for a closer relationship with the EU, including discussions regarding a future veterinary agreement with the EU. The Port Health Service continues to engage with stakeholders and respond to the government's consultations.

9. **ENV-CO-GC 002 - Road traffic collision caused by City of London staff or contractor who is unfit to drive while on City business**
   (Current risk score: Red 16, Unlikely/Extreme)
   All employees must complete a mandatory 'Driver Check' questionnaire. If that questionnaire identifies them as someone who drives on City of London business, they are automatically registered with an online licence checking system. Obtaining automated reports to determine compliance with the initial 'Driver Check' questionnaire continues to be problematic, and a manual system has been in place for some time. Officers are now working to find a solution using the new SAP (HR and Finance) system, but have a manual system in place in the meantime. Once a new automated system is in place, the risk will be reassessed and the score reduced if appropriate.

10. **ENV–CO-GC 006 - A major incident, such as flooding or fire, makes Walbrook Wharf unusable as a depot**
    (Current risk score: Amber 8, Unlikely/Major)
    This risk remains at a score of Amber 8: unlikely, but with a major impact on the ability to deliver cleansing and waste services should it occur. A robust Business Continuity Plan is in place. A Business Continuity exercise was undertaken in February 2026 and actions identified are now being implemented. This risk has also been identified as a longer-term risk linked to Climate Change and is being addressed as part of the Climate Adaptation Action Plan. Officers continue to undertake a range of actions to control the likelihood and impact of the risk, and keep it under review, but are unable to reduce the score any further at present.

Identification of New Risks

11. New and emerging risks are identified through several channels, the main being:
    - Directly by Senior Management Teams as part of the regular review process.
    - In response to ongoing review of progress made against Business Plan objectives and performance measures, e.g., slippage of target dates or changes to expected performance levels.
    - In response to emerging events and changing circumstances which have the potential to impact on the delivery of services, such as a border control agreement between the UK and EU.
    - The risk register may be refreshed over and above the stated process for review and oversight, in response to emerging issues or changing circumstances.

Corporate and Strategic Implications

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

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

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

Conclusion

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

Appendices

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

Contact

Joanne Hill, Business Planning and Compliance Manager, Environment Department
Joanne.Hill@cityoflondon.gov.uk

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

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

(A) Likelihood criteria

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

(B) Impact criteria

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

(C) Risk scoring grid

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

(D) Risk score definitions

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

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

Contact the Corporate Risk Advisor for further information. Ext 1297

October 2015

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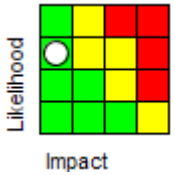
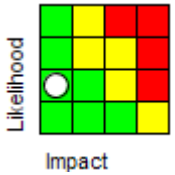
Port Health and Environmental Services Committee - ENV risks

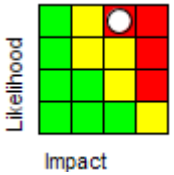
Report Type: Risks Report
Generated on: 01 July 2026

Risk Code	ENV-SLT 005	Risk Title	*Air Quality*

Description	
	Cause: Levels of air pollution in the City, specifically nitrogen dioxide and fine particles, impact on the health of residents, workers and visitors. The City Corporation has a statutory duty to take action to improve local air quality. **Event:** The City of London Corporation is insufficiently proactive and resourced, and does not have the right level of competent staff, to be able to fulfil statutory obligations, as a minimum, in order to lower levels of air pollution and reduce the impact of existing air pollution on the health of residents, workers and visitors. **Effect:** The City Corporation does not fulfil statutory obligations and air pollution remains a problem, impacting on health. Potential for legal action against the Corporation for failure to deliver obligations and protect health. Adverse effect on ability to deliver the Corporate Plan 2024-29 outcomes.

Current Risk		
Risk Score	**Likelihood**	**Impact**
3	Possible	Minor
Green	**Trend**	Constant

Target Risk		
Risk Score	**Likelihood**	**Impact**
2	Unlikely	Minor
Green	**Target Date**	31-Dec-2026

Original Risk		
Risk Score	**Likelihood**	**Impact**
16	Likely	Major
Red	**Creation Date**	07-Oct-2015

Latest Note	No change from the existing risk rating. Since this risk was added to the register in 2015, the score has reduced from Red 16 (Likelihood: likely; Impact: major) to Green 3 (possible; minor). This reflects the CoL's long-term commitment to improving air quality in the City. Apart from 2 isolated busy roadside locations, the air quality in the City meets statutory targets. This significantly reduces the impact on health. Air quality data collected in 2025 (the most recent available data) demonstrated that levels of particulate air pollution PM10 and PM2.5 both met the health-based standards. A new Air Quality Strategy for 2025 to 2030 has been adopted. The Strategy aims to exceed national standards, further demonstrating the City of London's commitment to maintaining and improving air quality. Delivery of the Strategy's Action Plan will be monitored and an annual assessment and progress report completed to demonstrate compliance.	***02-Jun-2026***

Risk Level	Departmental	**Risk Approach**	Reduce
Department	Environment	**Risk Owner**	Gavin Stedman

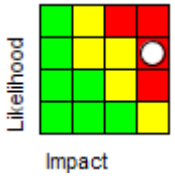
Associated Actions

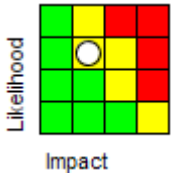
Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
ENV-SLT 005n Air Quality Strategy Annual Review	Complete an annual assessment and progress report to demonstrate compliance with the aims of the Air Quality Strategy.	The annual assessment and progress report for 2025 has been submitted to the Greater London Authority and will be presented to PHES committee in September 2026	25-Jun-2026	Ruth Calderwood	30-Sep-2026

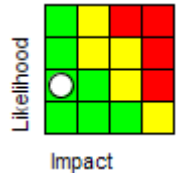
Appendix 2

Risk Code	ENV-PHPP 001	Risk Title	***Border Controls - Impact on Port Health and Animal Health***

Description	**Cause:** The outcome of the negotiations with the EU over border controls are not yet known. It is uncertain whether they will secure continuity of contracts, access to talent, ongoing grant funding and/or security of supply chains. **Event:** The City Corporation services fails to prepare appropriately for a new SPS (Sanitary and Phytosanitary) Agreement from the EU. Uncertainty over the outcome of the negotiations until it is too late to react. **Effect**: There is a range of potential impacts. The City Corporation's services are disrupted due to changes in trade and as supply chains and contracts are reassessed, potentially increasing cost and reprioritisation of resources. Increased risk to public, animal and environmental health due to legislative changes. Increased risk and cost to consumers. Reduction in income if charging regimes are not established as part of a new regime.

Current Risk		
Risk Score	**Likelihood**	**Impact**
24	Possible	Extreme
Red	**Trend**	Constant

Target Risk		
Risk Score	**Likelihood**	**Impact**
6	Possible	Serious
Amber	**Target Date**	30-Jun-2027

Original Risk		
Risk Score	**Likelihood**	**Impact**
2	Unlikely	Minor
Green	**Creation Date**	08-Nov-2016

Latest Note	N.B. The title of this risk has been amended to replace the word 'Brexit' with 'Border controls' to better reflect the current situation. The risk remains high (Red 24) due to continued uncertainties with the new regime and the new Government desire for a closer relationship with the EU, including discussions regarding a future veterinary agreement with the EU. In view of this, the target date has been extended to June 2027.	***25-Jun-2026***

Risk Level	Service	**Risk Approach**	Reduce
Department	Environment	**Risk Owner**	Gavin Stedman

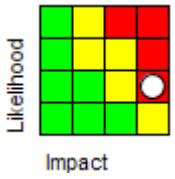
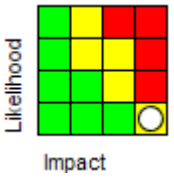
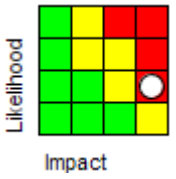
Associated Actions

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
ENV-PHPP 001c Liaison with Remembrancer and other CoL depts.	Engage with stakeholders to assist in the identification of impacts and possible mitigations. Ensure Remembrancer and CoL departments are fully aware of the implications of Brexit on PH&PP and that they lobby accordingly.	Although the BTOM regime has now been implemented, the service continues to engage with stakeholders to ensure an effective border in light of the current discussions around a new EU/UK SPS (Sanitary and Phytosanitary) Agreement. This action is ongoing and will be kept under review.	25-Jun-2026	Gavin Stedman	30-Jun-2027
ENV-PHPP 001d Respond promptly to developments	Respond promptly to policy decisions from the UK Government and the outcome of negotiations.	The Port Health Service will continue to respond accordingly to the government's stakeholder consultations on the development of the new EU/UK SPS Agreement. A Port Health Brexit Readiness Project Team continues to develop training and processes to ensure an effective border, taking into account the latest developments. This is an ongoing action and will be kept under review.	25-Jun-2026	Gavin Stedman	30-Jun-2027

Appendix 2

Risk Code	ENV-CO-GC 002	Risk Title	***Road traffic collision caused by City of London staff or contractor who is unfit to drive while on City business***

Description	**Cause:** A member of staff/contractor who is unfit or unqualified to drive causes ... **Event:** a road traffic collision which results in ... **Effect:** death or injury; financial claim.

Current Risk			Target Risk			Original Risk		
Risk Score	**Likelihood**	**Impact**	**Risk Score**	**Likelihood**	**Impact**	**Risk Score**	**Likelihood**	**Impact**
16	Unlikely	Extreme	***8***	Rare	Extreme	***16***	Unlikely	Extreme
Red	**Trend**	Constant	Amber	**Target Date**	30-Sep-2026	Red	**Creation Date**	18-Feb-2015

Latest Note	The new system SAP (HR and Finance) system and the old City Learning system are currently not able to provide a correct report to demonstrate which members of staff have or have not undertaken the compulsory 'Driver Check'. The team is working on the report, and, although a new report has been supplied, there are issues with it. The target date of the risk has been extended to the end of September to reflect the ongoing delay in resolving the issues. The relaunch of 'Driver Check' to address the corporate risk is being investigated and is now being factored in as part of onboarding of the new SAP system alongside the development of a mandatory course. This will clarify who is a driver for and on behalf of the City of London, and who is not. In the meantime, audits are capturing details of City vehicle drivers, and a report based on mileage claims is identifying any new grey fleet drivers.	***01-Jul-2026***

Risk Level	Service	**Risk Approach**	Reduce
Department	Environment	**Risk Owner**	Joe Kingston

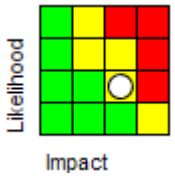
Associated Actions

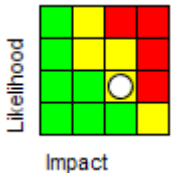
Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
ENV-CO-GC 002c Business as usual mitigation	• Monitor the percentage of City of London staff who have completed Driver Check and ensure that it remains above 92.5%. • Monitor the percentage of City of London staff who have been identified, through Driver Check, as drivers (or managers of drivers) who have completed the Corporate Transport Policy online training course and ensure that it remains above 92.5%. • Monitor overall completion rates for both Driver Check and the online training course and ensure that it remains above 92.5%. • Monitor the collection and periodic monitoring of driver licence details (and, in the case of grey fleet drivers, vehicle details).	The new system SAP (HR and Finance) system and the old City Learning system are currently not able to provide a correct report to demonstrate which members of staff have or have not undertaken the compulsory driver check. The team is working on the resolving issues with reporting in the new SAP system, and this will include an overall % compliance score. In the meantime, compliance is rated as 'high risk'. The relaunch of ‘driver check’ to address the corporate risk is being investigated, alongside the development of a mandatory course. This will clarify who is a driver for and on behalf of the City of London, and who is not. In the meantime, audits are capturing details of City vehicle drivers, and a report based on mileage claims is identifying any new grey fleet drivers.	01-Jul-2026	Vince Dignam	30-Sep-2026

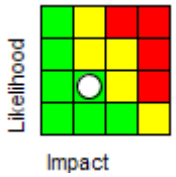
Appendix 2

Risk Code	ENV-CO-GC 006	Risk Title	***A major incident, such as flooding or fire, makes Walbrook Wharf unusable as a depot***

Description	**Cause:** A major incident, such as flooding or fire. **Event:** Walbrook Wharf unusable as a depot. **Effect:** Unable to clean streets, collect waste or maintain City of London Police vehicles. City of London unable to meet its contractual arrangements with third parties who use the depot for their commercial purposes.

Current Risk		
Risk Score	**Likelihood**	**Impact**
8	Unlikely	Major
Amber	**Trend**	Constant

Target Risk		
Risk Score	**Likelihood**	**Impact**
8	Unlikely	Major
Amber	**Target Date**	30-Sep-2026

Original Risk		
Risk Score	**Likelihood**	**Impact**
4	Unlikely	Serious
Green	**Creation Date**	13-Feb-2015

Latest Note	A robust Business Continuity Plan is in place and is discussed in quarterly partnership board meetings. A Business Continuity exercise was carried out in February 2026 with the Town Clerk's Contingency Planning Officer. Actions were identified and these are with the Cleansing Service, City Surveyor's Department, Veolia (our contractor) and Cory Environmental to implement. The Business Impact Assessment has undergone a detailed review. This risk has also been identified as a longer-term risk linked to Climate Change and is being addressed as part of the Climate Adaptation Action Plan.	***01-Jul-2026***

	We continue to undertake a range of actions to control the likelihood and impact of the risk, and keep it under review, but are unable to reduce the score any further at present. The target date shown is the date that the risk will next be reviewed.	

Risk Level	Service	**Risk Approach**	Accept
Department	Environment	**Risk Owner**	Joe Kingston

Associated Actions

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
ENV-CO-GC 006a Business Continuity Exercise	Conduct regular Business Continuity Exercise.	A robust Business Continuity Plan is in place and is discussed in quarterly partnership board meetings. A Business Continuity exercise was carried out in February 2026. Actions identified through the exercise are being implemented.	01-Jul-2026	Vince Dignam	30-Sep-2026
ENV-CO-GC 006b Fire prevention/safety	Maintain fire prevention / fire safety procedures.	The City Surveyor's Department has updated Mechanical and Engineering (M&E) provision at Walbrook Wharf, including new fire walls, smoke cameras and sprinklers within the depot and around the electric vehicles and vehicle charging areas. The current fire risk assessments and Fire Strategy are due to be reviewed by an appointed contractor and we are awaiting confirmation of dates. The City Surveyor's Department reviewed all Walbrook Wharf fire safety measures in April 2026; the outcome of the review is awaited.	01-Jul-2026	Vince Dignam	30-Sep-2026

		Systems are checked and tested on a regular basis. This is an ongoing action.			
ENV-CO-GC 006c Flood control	Reduce the impact of potential flooding.	Mitigations have been put in place for weak flood defence areas due to the close proximity of the river, but the risk of flooding remains. To prevent flood water ingress, an old roof and all windows have been renewed. For our contractors, we have a Business Continuity Plan to enable them to operate from another department if necessary.	01-Jul-2026	Vince Dignam	30-Sep-2026

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Date: 07 July 2026

Report of Action Taken:

DELEGATED DECISION UNDER STANDING ORDER NO. 40(A)

Crematorium Catafalque Replacement – use of Reserve Fund

Summary

- The following decision was approved via the Urgency process (SO40A): to agree to the use of Cemetery and Crematorium Reserve Funds (£120K) to purchase two catafalques and associated upgrading to the current lifting mechanisms.

Recommendation

The Committee is asked:

- To note the report.

Background

The current catafalques (raised platforms in the chapel) at the City of London Crematorium in Manor Park E12 are in a poor condition and not conducive to premium service provision, particularly given that the lift mechanisms frequently break down.

It was recommended that £120K from the Cemetery and Crematorium Reserve Fund (currently £1.5M) be allocated to purchase replacement equipment to mitigate the risk of equipment failure. The spend needed to take place ahead of the £2.5m CWP refurbishment project taking place over the summer.

REASON FOR URGENCY:

Procurement and planning as part of the Cyclical Works Programme (due to finish by 16 October 2026) needed to begin ahead of a new carpet being laid which was expected to take place in late June 2026 – if the decision was to have been delayed to 21 July 2026 (the next PHES meeting) then the reopening of the chapels would have been delayed, with a negative impact on income from cremations and ancillary activities.

Jayne Moore
City of London Corporation

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