

Bridge House Estates' Bridge Lighting Policy

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Adopted: [xxxx]

Introduction and Scope

1. This policy provides a list of criteria to be applied when considering requests for the artistic lighting of the external structures of the five Thames Bridges (“the Bridges”) owned, supported and maintained by the City of London Corporation (“City Corporation”) as charity trustee of Bridge House Estates (“BHE”/ “the charity”) (Charity Reg. No. 1035628).
2. The policy applies to all five Thames Bridges (unless specifically stated elsewhere in the policy) – London Bridge, Blackfriars Bridge, Southwark Bridge, Tower Bridge and Millennium Bridge.
3. The purpose of this policy is to provide a clear position on the criteria and approval process for third party requests as to lighting on and/ or of the Bridges.
4. With this policy having been agreed by the BHE Board, the Managing Director of BHE, and their delegate the BHE Chief Operating Officer, will be responsible for the interpretation, application and management of this policy for BHE, acting upon the advice of the BHE Director of Communications & Engagement, and with input from the City Remembrancer, the Comptroller & City Solicitor and the Executive Director of Communications and External Affairs.
5. This policy supersedes any former process/ policy in relation to lighting the Bridges.

Background

6. BHE is an unincorporated charitable trust. The City Corporation, acting by the Court of Common Council, is the corporate trustee of BHE (“the Trustee”), and the charity is administered by the City Corporation in accordance with the charity’s own governing documents, and the City Corporation’s usual procedures and governance framework. As charity trustee, the City Corporation has a legal obligation to always act in the best interests of BHE.
7. The primary object of BHE is to maintain and support five bridges crossing the River Thames – London Bridge, Blackfriars Bridge, Southwark Bridge, Tower Bridge and Millennium Bridge.
8. A cy-près charity scheme of 1995 permits income surplus to that required for the bridges to be used for other charitable purposes for the general benefit of the inhabitants of Greater London (this is known as the charity’s “ancillary object”). The income surplus is distributed in accordance with a policy agreed by the Court of Common Council following consultation. The current such policy is “Bridging Divides”, delivered in the name of City Bridge Trust (CBT) – the charity’s ‘funding arm’.
9. The City Corporation has charity trustee duties in respect of the five Thames Bridges and must first and foremost support and maintain the Bridges and seek to protect the charity’s reputation at all times, including as it relates to the Bridges. It also is considered to be consistent with the furthering of the charity’s ancillary

object that the Bridges may play an appropriate part in supporting, connecting and promoting London as a whole.

Lighting the Bridges

10. Requests to light the Bridges are received frequently (particularly at Tower Bridge), either at the request of internal stakeholders or external organisations to support third-party initiatives, anniversaries and events of national significance.
11. Decisions on whether or not to allow use need to be taken with extreme care, ensuring that it is in the best interests of the charity to do so. Each request must be considered on its own merits and agreement to one request does not set a precedent for another seemingly similar request, as each request will have its unique characteristics which need to be taken into account.
12. Having a set of criteria for assessment of requests as set out in this policy ensures that requests are considered fairly, and that an informed and reasoned decision is taken for each request.
13. This policy applies to all lighting requests on the Bridges. Activities on land outside BHE's control which may affect the appearance of the Bridges do not fall within the remit of this policy.

Criteria

14. In assessing a request to light any of the five Bridges, the criteria below should be considered.

Permissions

The lighting of the Bridges may be considered if it meets ALL of the permissions criteria below AND does not meet any of the criteria on the exclusions list.

- a. The request is from an organisation that is not seeking to promote its own activities (be it commercial or charitable), or that of an individual, but rather a common 'cause' or 'issue' of regional, national or international importance.
- b. The request does not include any visual representation of third-party branding or imagery.
- c. The request demonstrates that it is making a significant and demonstrable benefit to the City of London, London and/or the UK more widely.
- d. The request demonstrates that it is in no way compromising, diminishing or damaging the integrity, dignity and reputation of the Bridge, BHE or the City Corporation as trustee.
- e. The request demonstrates that there is no detriment to the physical structure of the relevant Bridge, its role as a major traffic (vehicle and pedestrian) route, or to the navigation of the River.

- f. The request demonstrates that there is no cost to BHE, or that any cost to BHE is proportionate to the promotion of its objects.
- g. The request is made in a timely manner to ensure that appropriate resources can be directed to the request.

Exclusions

- h. The request should not be used, considered or perceived as any form of advertising space and therefore sponsor logos, products etc. should not be publicly displayed in any form of artistic lighting as this could be perceived as an endorsement from the charity or the City Corporation.
- i. The request should not be used to support the gain, commercial or otherwise, of any individual or organisation.
- j. The request should not make a public statement on social, economic and political issues unless these relate to the charitable purposes of BHE, as otherwise it could amount to campaigning by the charity outside its charitable purposes and contrary to law and good practice as set out in Charity Commission CC9 Guidance.
- k. Requests for ‘awareness days’ or ‘awareness weeks’ will not be met, because the volume of requests for such events and their reoccurring nature is considered to present a disproportionate burden to the charity – unless the request was considered to be directly advancing the charity’s primary or ancillary object.

Approvals

15. Once a request is received by a third party it should be shared with the following officers for initial consideration:

- a. BHE Chief Operating Officer
- b. BHE Director of Communications and Engagement
- c. Director of Tower Bridge (as relevant to Tower Bridge)
- d. Assistant Director – Engineering (Environment Department)
- e. Director of City Operations (Environment Department)

16. The named officers above will consider the request against the criteria set out in this policy. All relevant officers must be satisfied that the use of the Bridge in each case is justifiable within these criteria. If one officer is unavailable at the time of consideration, for example they are on leave, their authorised delegator or delegate together with all other available officers mentioned above should be in agreement. Once the officers above are satisfied the request meets the requirements, it should be sent to the Managing Director of BHE for final approval (or in their absence the BHE Chief Operating Officer will normally take the decision).

17. If officers are satisfied that the criteria are met and the lighting would be in the best interests of BHE, then the request will be agreed subject to consultation with and endorsement by the Chair and Deputy Chair of the BHE Board.
18. If all named officers do not consider the criteria to be met and consider the lighting would not be in the best interests of BHE, then the request will be refused.
19. If the named officers cannot agree whether the request satisfies the criteria and is in the best interests of BHE or not, then further consultation should take place with the following City Corporation Departments: Comptroller & City Solicitor's, City Remembrancer's, the Corporate Communications and External Affairs Team, and the Town Clerk (as required). The Chair and Deputy Chair of the BHE Board should also be consulted. If, after such consultation, a unanimous view is reached, the decision will be taken to agree or refuse the request in accordance with paragraphs 16 or 17 above.
20. If agreement is still not reached, the request should be presented to the full BHE Board for consideration and agreement. The BHE Board must be satisfied on reasonable grounds that the activities meet the criteria, are in the best interests of the charity to support and that they are able to justify any BHE resources to be applied.
21. If approved by the relevant officers/ Members above, final agreement will be subject to the necessary consents being obtained.

Accountability and discretion

22. This policy is intended to ensure that the process for decision-making regarding lighting requests on the bridges is transparent and fair. These guidelines and criteria are to assist that transparency and provide a framework within which decisions can be made in the best interests of BHE.
23. If, after careful consideration, and having regard to this policy, BHE is not satisfied that the request is justifiable according to the established criteria it should reject the request as set out in paragraph 17 above.

Monitoring

24. The application of this policy will be monitored by the BHE Board. Any changes to the written policy will require approval from the BHE Board.

Applications

25. All requests by third parties should be directed to the following email address, which is monitored on a regular basis, BHE@cityoflondon.gov.uk.