

# **City of London**



## **City of London Air Quality Supplementary Planning Document Consultation Statement**

**July 2017**

## **Introduction**

This Consultation Statement sets out details of the consultation the City of London Corporation has undertaken in the preparation of a Supplementary Planning Document (SPD) to provide guidance on the application of Local Plan Policies for air quality entitled: **City of London Air Quality Supplementary Planning Document**.

## **Consultation Requirements**

This consultation statement has been prepared in accordance with the Town and Country Planning (Local Plan) (England) Regulations 2012. Regulation 12 requires that the City Corporation to prepare a consultation statement setting out the persons consulted when preparing the SPD, a summary of the main issues raised by those persons and how these have been addressed in the SPD.

Key officers from City of London Corporation Departments and City of London members were consulted in the preparation of the Air Quality SPD consultation draft and as part of the public consultation process.

## **Consultation on the draft SPD**

Consultation on the draft SPD took place between the 3<sup>rd</sup> February and 31<sup>st</sup> March 2017 following committee approval at the following committee meetings:

- Port Health and Environmental Protection Committee: 22<sup>nd</sup> November 2016
- Planning and Transportation Committee: 13<sup>th</sup> December 2016

The following stakeholder groups were also consulted:

- Statutory consultees as identified in the City of London Statement of Community Involvement
- City of London Members
- Stakeholders who have expressed an interest in planning policy and are included in the Local Plan's consultation database.

Under the statutory Duty to Co-operate the following organisations were approached for comment:

- London boroughs
- Mayor of London
- London Enterprise Panel
- Transport for London
- The Environment Agency
- Historic England
- Natural England
- The Civil Aviation Authority
- Clinical Commissioning Groups in and around the City of London
- NHS England
- Office of Rail Regulation
- Highways Agency
- The Marine Management Organisation

The City of London Air Quality SPD was made available for consultation on the City's web site. Emails and letters were distributed to relevant stakeholders to provide details on the consultation period. Printed copies of The City of London Air Quality SPD were made available at the Department of the Built Environment Enquiries Desk and the City's five libraries, during their normal opening hours.

## **Responses**

The consultation period triggered 48 comments from 12 respondents. All representations were reviewed and appropriate changes made to the City of London Air Quality SPD. Table 1 shows the comments received, the person or organisation making them, the City Corporation's response to each comment and how the comments have been addressed, where appropriate, in finalising the SPD.

This Consultation Statement should be read in conjunction with the Statement of Adoption which states the amendments to the document following the public consultation.

**Table 1: Comments Received in response to the public consultation on the draft Air Quality SPD**

Ref	Organisation	Name	<p style="text-align: center;"><b>Comment</b></p> <p style="text-align: center;">All comments have been reproduced in full except where ** indicates that a comment has been summarised.</p>	<p style="text-align: center;"><b>City of London Response</b></p>
1/1	Natural England	Piotr Behnke	Having looked at the documents which are being consulted on with regard to the City's Air Quality SPD Natural England would not have an issue with the findings of either the Equalities Impact Assessment (EIA) screening or the Strategic Environmental Assessment (SEA) screening documents. Given the fact there are no designated sites in or near to the City of London directly and given the impacts of this work will, if implemented correctly, have a positive impact upon the environment, there are no reasons to require a full assessment being carried out.	Comments noted. No changes required.
1/2	Natural England	Piotr Behnke	The main supplementary planning document relating to Air Quality covers the main areas which would be expected given the subject matter in question and draws very effectively upon various other policies in the City's Local Plan and its subsidiary documents.	Comments noted. No changes required.
1/3	Natural England	Piotr Behnke	Given the lack of any designated sites within the local authority area itself or nearby (with the nearest being Walthamstow Marshes 5.2km to the north east along with the Lee Valley Special Protection Area (SPA) and Ramsar Sites just north of that) the main areas for assessment will be those will include improvements for local residents and those who visit and work in the City.	Comments noted. No changes required.

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1/4	Natural England	Piotr Behnke	Ensuring that developments within the square mile area are at least “air quality neutral” is a step toward improving overall levels of pollution however hopefully this would lead to more and more developers competing to be the cleanest developer and thus leading to “air quality positive” developments in due course.	Comments noted. Text amended to reflect emerging air quality positive guidance (5.2.2).
1/5	Natural England	Piotr Behnke	As such Green Infrastructure (GI) use will be important in this aspect, with any inclusion on new build or renovation work having huge potential to improve the local air quality as well as helping to deal with climate change and its impacts into the future (paragraphs 2.3.6 and 2.3.7 are good examples of this).	Comments noted. No changes required.
1/6	Natural England	Piotr Behnke	Given the size of the local authority area promotion of walking and cycling would be simple ways to help potential road users choose other means of transport. Improvements to cycle lanes and promotion of bus routes and tube stations will ensure that visitors can more easily choose how to get about and avoid creating more congestion on the roads by using taxis or renting a vehicle.	<p>Comment noted. No changes required.</p> <p>Promotion of matters stipulated dealt with by the Mayor of London. Also, City of London Travel Plan Guidance referenced in the SPD, which is available via:  <a href="http://www.cityoflondon.gov.uk">www.cityoflondon.gov.uk</a>.</p>
1/7	Natural England	Piotr Behnke	The planting of trees along walking routes and near to roads in particular would help to filter the air in the local area and contribute to cleaning it for those who are walking or cycling around the local authority area.	<p>Comment noted. No changes required.</p> <p>The City Public Realm SPD deals with highway planting.</p>

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1/8	Natural England	Piotr Behnke	The Public Realm SPD and Open Spaces Strategy SPD policies highlighted within this SPD will help to reinforce the reasons why it's important to improve the health and wellbeing of local residents as well as those who work in and visit the City.	Comment noted. No changes required.
1/9	Natural England	Piotr Behnke	Broadly what has been set out in the Air Quality SPD is a positive step forward in cleaning up the air in central London as a whole and this will ensure the City is doing its part in that overall aim.	Comment noted. No changes required.
2/1	Environment Agency	Scott Hawkins	Having reviewed the Air Quality SPD, we agree with the measures that have been proposed and have no particular comments to make on the document. We agree with the Strategic Environmental Assessment Screening Statement, that the SPD would overall have a positive impact on air quality. We do not think the SPD would have any significant environmental effects based on the environmental issues within our remit.	Comments noted. No changes required.
3/1	Greater London Authority /TfL	Kevin Reid	As you are aware, all development plan documents have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004.	Comments noted. No changes required.
3/2	Greater London Authority	Kevin Reid	The Mayor supports the principle of a design led approach to preventing emissions of and reducing exposure to air pollution as set out in this document. Overall therefore the draft SPD is in conformity with London Plan policy 7.14 on air quality.	Comments noted. No changes required.

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3/3	Greater London Authority	Kevin Reid	<p>The energy hierarchy in GLA policies may change with the development of the London Environment Strategy (due to be published as a draft in late spring 2017 and finalised in late 2017) and the new London Plan (due to be published as a draft in late 2017, with an Examination in Public during the latter half of 2018 and published in its final form during 2019). The City of London Corporation may wish to revise section 3.2 as these policies emerge.</p>	<p>Comment noted. Text updated to highlight emerging policy (3.2.3).</p>
3/4	Greater London Authority	Kevin Reid	<p>The defined scope for air quality impact assessments is broadly supported, however compliance with the GLA's emissions limits for CHP or biomass boilers &gt;50 kWth must not be taken to mean that this equipment does not need to be assessed. The emissions limits for CHP and biomass set out in our "Sustainable Design and Construction" SPG are not sufficient to guarantee that significant local impacts will be avoided. The SPG states:</p> <p><i>"The emission standards ... are target minimum standards. If an assessment indicates that significant air quality effects may occur even when meeting the emission standards, additional measures (such as stack height increase, enforcement of more stringent standards etc.) should be considered in order to produce an acceptable level of impact."</i></p> <p>In order to accord with our guidance CHP systems and biomass plant over 50 kWth should therefore be subject to the full assessment as set out for smaller units in the draft document.</p>	<p>Comment noted. Text updated to require all CHP to be modelled.</p>

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3/5	Greater London Authority	Kevin Reid	Similarly we would recommend that where Clean Air Act chimney height approvals are required these should be subject to a full air quality impact assessment, rather than a D1 calculation.	<p>Comment noted. No changes made.</p> <p>Where an Air Quality Impact Assessment is required, this will include a detailed assessment of such plant.</p>
3/6	Greater London Authority	Kevin Reid	Any large appliance, such as a CHP unit, should be subject to post-installation testing to demonstrate that it meets the standards expected in the Air Quality assessment, this could be done via planning conditions as mentioned in the Mayor's Sustainable Design & Construction SPG.	Comment noted. Text updated to highlight this will happen (3.4.5).
4/1	Off Grid Energy Ltd	Matthew Pencharz	<p>The items [in blue text] are the suggested additions/amendments:</p> <p>3.5.2 Where an available TBS is identified as being of insufficient capacity, battery storage technology must be employed to re-enforce grid supply to cater for peaks in power demand (such as for cranes and hoists for example) and so eliminate the need to install a temporary diesel generator.</p>	<p>Comment noted. No changes made.</p> <p>Comment will be considered for inclusion within guidance to be added to Appendix B and the revision of the City's Code of Practice for Deconstruction and Construction.</p>
4/2	Off Grid Energy Ltd	Matthew Pencharz	3.5.3 Where the need for temporary power generators on a construction site is absolutely unavoidable any generator must use the very latest Euro standard engines in a hybrid system with battery storage technology.	<p>Comment noted. No changes made.</p> <p>Comment will be considered for inclusion within guidance to be added to Appendix B and the revision of the City's Code of Practice for Deconstruction and Construction.</p>

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4/3	Off Grid Energy Ltd	Matthew Pencharz	3.5.7 In temporary applications if the use of diesel generators is unavoidable, they must be of the newest Euro standards and be part of a hybrid solution that uses battery storage technology to reduce generator size and running hours, cut fuel consumption and so reduce emissions and noise to the lowest possible level.	<p>Comment noted. No changes made.</p> <p>Comment will be considered for inclusion within guidance to be added to Appendix B and the revision of the City's Code of Practice for Deconstruction and Construction.</p>
5/1	Mother Goose Nurseries	Krish Brown	Very pleased that there is a high emphasis to reduce pollution in many way. It is also pleasing to see that part of the plan will also be looking at more electric, rapid charge points to share vehicles. Great promoting electric vehicles and the benefits that come with owning one. I still feel that there is a lot more local authority's need to do to make electric vehicle worthwhile owning.	<p>Comments noted. No changes required.</p> <p>The City of London Corporation is currently working with Transport for London to review opportunities for on and off street rapid charging facilities. At present, we are currently identifying where it may be possible to provide such facilities. As this work progresses, more information will be made publicly available when sites have been identified and are scheduled for delivery.</p>
5/2	Mother Goose Nurseries	Krish Brown	As an owner of an electric vehicle I feel that drivers are not complying with the 20 mph speed limit. More should and must be done to address this issue too in enforcing the speed restriction.	<p>Comment noted. Outside the scope of this SPD. No changes required.</p> <p>Feedback from the City of London Police demonstrates that speed checks are regularly conducted as part of normal duties on various days, roads and times and there are</p>

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				<p>periodic Speed Campaigns coordinated across Europe. The last City campaign resulted in: 29 prosecutions, 13 FPNs and 29 speed awareness courses.</p>
5/3	Mother Goose Nurseries	Krish Brown	<p>Also very much in favour of promoting cycling, walking to work and or school. I am very much in favour of working with the local authority in promoting a school travel plan for our nurseries.</p>	<p>Comment noted. No changes required.</p> <p>Respondent advised to contact relevant Local Authority.</p>
6/1	Resident	Sarah Hudson	<p>1. It is well written, easy to read, downloads quickly without messy graphics.</p>	<p>Comment noted. No changes required.</p>
6/2	Resident	Sarah Hudson	<p>2. The provisions and intentions are commendable. However, having read an Air Quality Impact Assessment submitted by a developer – namely Taylor Wimpey in support of its Bernard Morgan House project – the reality seems to fall far short of what might be expected from the provisions in the SPD.</p>	<p>Comments noted. Text updated with guidance (5.3.4 and 5.3.5)</p> <p>It is anticipated that by providing the SPD, clearer guidance is available for developers when preparing their assessments.</p>
6/3	Resident	Sarah Hudson	<p>Are Impact Assessments reviewed by a suitably qualified officer or consultant acting on behalf of the Planners?</p>	<p>Comment noted. No changes required.</p> <p>Air Quality Impact Assessments are reviewed by relevant City Officers and comments provided to the planning department.</p>

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6/4	Resident	Sarah Hudson	Do developers have to submit a model so that assumptions can be checked?	<p>Text amended to require assumptions to be included in the report when modelling conducted (5.3.6).</p> <p>Where modelling is required, the baseline and future projection are based on either the London Atmospheric Emission's Inventory (LAEI) or Defra background modelled data.</p>
6/5	Resident	Sarah Hudson	It would seem that the model can be massaged to show pollution levels below EU limits – whereas it seems likely from Citizen Science recording of local data that this is not actually the case.	<p>Comment noted. No changes required.</p> <p>Some modelling is based on worst case or no improvements in air quality; others are based on predicted improvements associated with GLA and Central Government policies.</p>
6/6	Resident	Sarah Hudson	How are the modelling and assumptions checked?	The SPD text has been amended to include the requirement to provide model assumptions and parameters within the report so they can be checked by the relevant Officer

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				(5.3.6).
6/7	Resident	Sarah Hudson	How rigorous is the review process by planners?	As detailed above, appropriate Officers are consulted regarding the content of submitted reports.
6/8	Resident	Sarah Hudson	3. There is no mention in the document of the Low Emission Neighbourhood. Is the LEN recognised by the Planning process as having special and more rigorous controls on building and traffic emissions?	<p>Comment noted. No changes required.</p> <p>The Low Emission Neighbourhood (LEN) project is in its infancy and therefore not currently a recognised planning entity and this SPD only provides guidance for exiting Local Plan policies.</p>
6/9	Resident	Sarah Hudson	4. Page 11 section 2.3.7 There is more recent research on the positive impact of plants on air quality than the Imperial College study (May 2012).	Comment noted. Text updated to be flexible to emerging research and guidance (2.3.7).
6/10	Resident	Sarah Hudson	5. Very often it is in the management of the building after the end of the construction phase when all the good practice required by planning is lost sight of. The SPD should be more explicit on how the City seeks to monitor and control emissions when buildings are in daily use – either as offices or residential.	<p>Comment noted. No changes made.</p> <p>Emissions are controlled through the type of plant installed and its location as per this SPD (which are conditioned). Further considerations are dealt with through the City Corporation's CityAir business</p>

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				programme.
7/1	Surrey CC	Maureen Prescott	Thank you for consulting Surrey County Council on the Air Quality SPD. We have no comments to make on this consultation document.	Comment noted. No changes required.
8/1	Diocese of London	Brian Cuthberts	We consider this is a fine piece of work. It commands our confidence.	Comment noted. No changes required.
8/2	Diocese of London	Brian Cuthberts	The Diocese generally supports these proposed requirements. The key difficulty is to manage measures to (1) reduce local air pollution and (2) limit GHG emissions in such a way that they complement each other rather than conflict. This has proved a knotty problem in recent years, fraught with the law of unintended consequences, for example the notorious increase in NO <sub>2</sub> emissions from diesel vehicles (even after improved filtration), when purchase of diesel was encouraged as an intended contribution to reducing CO <sub>2</sub> emissions.	Comments noted. No changes required.
8/3	Diocese of London	Brian Cuthberts	In general however we do consider that the Corporation's approach is comprehensive and appropriately aligned with the issues.	Comment noted. No changes required.
9/1	City of London Freight Team	Edward Jackson	<p><i>1.7.1 &amp; Appendix B</i></p> <p>Refer to DSP Guidance and forthcoming Freight SPD. We will also have a number of Delivery and Servicing Case</p>	Comments noted. Changes made in main text (2.2.3) and Appendices B and C

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			study documents that can be included here, they will demonstrate best practice for various aspects of freight management. Should be available in summer.	
9/2	City of London Freight Team	Edward Jackson	<p><i>Figure 1- Section 4</i> Refer to requirement to produce Construction Logistics Plan in line with TfL best practice.</p>	Comments noted. Changes made in main text and Appendix B.
9/3	City of London Freight Team	Edward Jackson	<p>2.2.3 Refer to DSP Guidance and forthcoming Freight SPD. Also City Travel Plan advice notes;</p>	Comments noted. Changes made in main text (2.2.3) and Appendices B and C.
9/4	City of London Freight Team	Edward Jackson	<p>2.2.4 Can this be broadened to incorporate freight and servicing and construct logistics plans as per Local Plan CS16 4(v)? No mention of mode shift to river**</p>	Comments noted. Changes made within 2.2.3 as this section deals with this policy.
9/5	City of London Freight Team	Edward Jackson	<p><i>Section 4</i> Requirement or encouragement for adherence to FORS standards? Not in Local Plan but included in London Plan 6.1.</p>	<p>Comments noted. No changes made.</p> <p>This can be incorporated into the revision of the City's Code of Practice for Deconstruction and Construction.</p>
9/6	City of London Freight Team	Edward Jackson	<p>5.3.2 It's clearly detailed and has been thought through, but where have these criteria for an AQIA come from? I assume they</p>	<p>Comments noted. No changes made.</p> <p>Wording provided by the GLA and</p>

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			<p>are London-wide or national criteria, as they seem out of step with central London - we would not have any developments that have anything like 100 parking spaces or an increase of 5% AADT. Is there scope to review this criteria to suit the City environment?</p>	<p>therefore kept.</p>
10/1	Aecom	Puciato, Honor	<p>Paragraph 5.3.4 (e) of the Draft AQ SPD states that CoL will use the Association of London Government (ALG) 2006 test on significance. Can you please send me a link to this document and provide an explanation why significant criteria are based on this document have been selected and not on the latest published Air Quality guidance?</p>	<p>Comments noted. Text updated (5.3.4e) to reflect ALG significance guidance and reference to the Institute of Air Quality Management Guidance.</p> <p>Consultee contacted and link provided (and included in SPD) <a href="http://www.londoncouncils.gov.uk/our-key-themes/environment/air-quality/london-councils-air-quality-and-planning-guidance">http://www.londoncouncils.gov.uk/our-key-themes/environment/air-quality/london-councils-air-quality-and-planning-guidance</a></p>
11/1	Resident	David Coleman	<p>This is an important issue to me as a City resident and I strongly support the measures proposed.</p>	<p>Comment noted. No changes required.</p>
11/2	Resident	David Coleman	<p>5.3.2 (a): The riverside should be included as a sensitive land use. As is clear from fig.2, the riverside offers very valuable respite from the generally high levels of NO2 throughout the City. The Noise and Open Spaces strategies draw attention to the value of the riverside for its peace and quiet, with the major contribution to health and wellbeing</p>	<p>Comment noted. No changes made.</p> <p>The current choice of 'sensitive land use' (5.3.2(a)) relates to those identified in the Local Plan (which is under review) and relate to where</p>

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			which this can make. All policy levers should be harnessed to maintain this position, including the Air Quality SPD.	people spend extended amounts of time (e.g. residential clusters and schools). The measures within the SPD (for example, low NOx boilers and emission control measures during development etc.) are mandatory for all developments (not just those in close proximity to sensitive land use) and will ensure the riverside is protected.
12/1	Goldsmith & Co (XEN) Ltd	Jonathan Goldsmith	<p>Your document states that air pollution is particularly affected on main roads such as Upper Thames Street and Victoria Embankment, and similar main roads. The plan attached to your document shows this.</p> <p>Please explain how the building of cycle lanes that are hardly used, actually helps traffic flow and decreases pollution? This foul air quality is of your own making, as now vehicle lanes are so narrow that emergency vehicles can not pass through traffic and even motorbikes, which should be able to filter through traffic, now have to queue and also create pollution. In bad weather, because motorcyclists now have to stand still and get wet, many are now moving back to cars and vans when if they are able to keep moving the airflow keeps them dry.</p> <p>The preoccupation with cycling over vehicles that actually</p>	<p>Comments noted. No changes made.</p> <p>Comments sent to GLA (in association with the respondent) for consideration</p>

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			<p>pay for road use is bizarre ! and this preoccupation of trying to get (YOUNG) people on bicycles is mainly effective during warmer seasons yet the pollution caused by making traffic stand still happens all year !</p> <p>Either remove the cycle lanes, make them much narrower to be able to allow cars to have sufficient width to overtake or pass a broken down vehicle, or at least allow motorcyclists to use cycle lanes with a 20mph speed limit .... Cycles are frequently faster than that with no restrictions at all, even going through red lights and near missing pedestrians !</p>	
12/2	Goldsmith & Co (XEN) Ltd	Jonathan Goldsmith	<p>The pollution in Central London and The City is also not helped by the ever increasing business rates and rents for retail premises. This means shops close down and purchases are instead made on line.... These minor items that would normally be carried home in a pocket or back-pack are now delivered in vans by Amazon with all the relevant paper packaging, all damaging the environment even further.</p> <p>The usual response from British local and central government to compensate for damage to the environment THEY actually create, is to tax the poor people who suffer the consequences of Government actions that created the problem in the first place!</p>	<p>Comments noted. No changes made.</p> <p>Comment from Chamberlains: The Rateable Value of each individual property in the City is set by the Valuation Office Agency (VOA) – an executive agency of Her Majesty’s Revenues and Customs (HMRC). Central government determines the national multipliers that are used to calculate the business rates paid on any single property. The City of London has no power to determine either the rateable value or the multipliers.</p>

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				<p>There is no evidence to suggest an increase in the number of empty shops in the City and the overall number of shops has increased from 1,221 in April 2010 to 1,300 in April 2017.</p> <p>The City of London Corporation is in the process of delivering a transport strategy, which will include a Freight SPD. Both will be consulted on in due course.</p>
12/3	Goldsmith & Co (XEN) Ltd	Jonathan Goldsmith	<p>In conclusion, IF you are serious about reducing pollution in the centre of London stop restricting the FREE FLOW of traffic, allow delivery/collection vehicles 15mins delivery time on single yellow bands so they do not have to spend time driving round in circles looking for parking spaces. Increase the number of motorbike spaces in The City (Woefully short!), and allow motorcycles to use the cycle lanes with a 20mph speed limit. At least Motorcyclist obey the highway code and have tax and insurances.</p>	<p>Comments noted. No changes made.</p> <p>The City of London Corporation is in the process of delivering a transport strategy. This will review our policies and objectives of scheme deliverables, waiting and loading restrictions and motorcycle parking policy. The strategy will be consulted on in due course.</p>

