



Natural Environment Board INFORMATION PACK

N.B: These matters are for information and have been marked * and circulated separately. These will be taken without discussion, unless the Clerk has been informed that a Member has questions or comments prior to the start of the meeting.

Date: THURSDAY, 11 DECEMBER 2025

Time: 11.00 am – or at the rising of the West Ham Park Committee, whichever is later.

Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

5. ***HIGH-LEVEL BUSINESS PLAN 2025-30 MID-YEAR PROGRESS REPORT**

Report of Executive Director, Environment.

For Information
(Pages 3 - 16)

7. ***NATURAL ENVIRONMENT OPERATIONAL FINANCE PROGRESS REPORT Q2 2025/26**

Report of the Chamberlain.

For Information
(Pages 17 - 36)

8. ***SENIOR OFFICER RECRUITMENT**

Report of Executive Director, Environment.

For Information
(Pages 37 - 48)

9. ***PLANNING AND INFRASTRUCTURE BILL**

Report of the City Remembrancer and Executive Director, Environment.

For Information
(Pages 49 - 56)

This page is intentionally left blank

City of London Corporation Committee Report

Committee: Natural Environment Board	Dated: 11 December 2025
Subject: Environment Department High-level Business Plan 2025-30 – Progress Report (Mid- Year)	Public report: For Information
This proposal: <ul style="list-style-type: none"> • delivers Corporate Plan 2025-30 outcomes • provides business enabling functions 	<ul style="list-style-type: none"> • Diverse engaged communities • Vibrant thriving destination • Providing excellent services • Flourishing public spaces • Leading sustainable environment
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 a mid-year update on progress made by the Natural Environment Division and the City Gardens Team towards delivery of the Environment Department’s high-level Business Plan 2025-30.

Key performance information is summarised within the report and presented in more detail at Appendices 1 and 2. Overall, performance during the period 1 April-30 September 2025 has been positive with all priority workstreams remaining on track to meet their targets.

An update on the financial position to the end of Quarter Two is presented to this Committee in a separate report of the Chamberlain.

Recommendation

Members are asked to:

- Note the content of this report and its appendices.

Main Report

Background

1. The Environment Department's high-level Business Plan 2025-30 was approved by the Natural Environment Board in February 2025. This year marks a transition to a multi-year departmental Business Plan which sets out the priority workstreams for the next five years and specifies the actions that will 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.
2. Progress against priority workstreams is assessed by monitoring the achievement of milestones and performance measures. Performance is reviewed regularly by the Directors and their Management Teams and is reported to your Board every six months to enable Member scrutiny.
3. Detailed business plans for each of the Natural Environment charities set out the specific priorities and activities of each charity and progress against them is reported regularly to the relevant Charity Management Committees.
4. The priority workstreams identified in this high-level departmental Business Plan flow through charity business plans, team 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 Environment Department's high-level Business Plan sets out the priority workstreams for 2025-30 for the Natural Environment Division and City Gardens. All workstreams support the delivery of the Corporate Plan 2024-29 outcomes, and other cross-cutting strategies and programmes.
6. During the first six months of the year, good progress has been made against delivery of all workstreams. A list of the workstreams is provided below and details of the actions being taken during 2025/26 to deliver each one are set out in Appendix 1, along with progress updates. The first four Natural Environment Division workstreams reflect the suite of core Natural Environment Strategies.
 - a) Nature conservation and resilience.
 - b) Community engagement.
 - c) Access and recreation.
 - d) Culture, heritage and learning.
 - e) Develop a sustainable business model.
 - f) City Gardens: Effectively manage the green spaces within the Square Mile

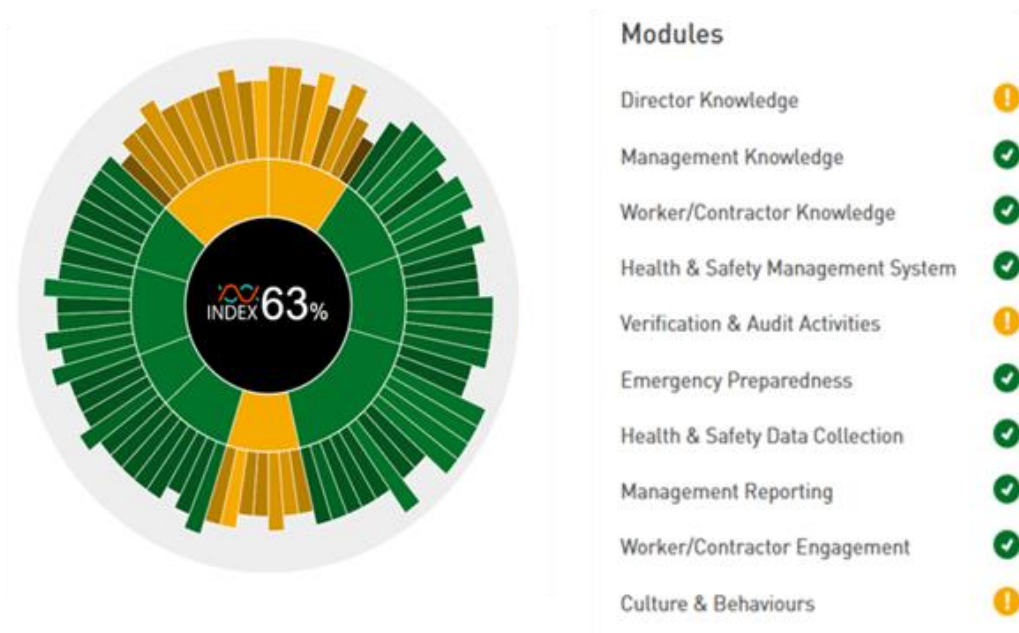
Performance measures

7. Priority workstreams have one or more associated performance measures to assess progress. These measures are monitored during the year and, overall, the mid-year results show that progress towards achieving the workstream objectives is on track. Six of those key performance indicators are annual measures, but performance against the remaining eight (for which mid-year data is available) is provided at Appendix 2.

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 Board 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 62% to 63%, which indicates proactive maturity but is not yet at 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, and a sub-group focusing on Health and Safety in relation to our many open spaces. Action plans are in place to address the modules currently rated amber.

Environment Department Safe 365 Snapshot (29 September 2025)



Corporate and Strategic Implications

Strategic implications – The monitoring of key 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 in the separate Chamberlain's Revenue Outturn report.

Resource implications – Recruitment to vacant posts across the service areas is progressing well.

Risk implications - Risks to achieving the objectives set out in the Business Plan are identified and managed in accordance with the City of London Risk Management Framework. Risk Registers are reported to the Natural Environment Board and the Charity Management Committees quarterly.

Climate implications – The Climate Action Strategy is supported by a range of workstreams being undertaken by the Natural Environment Division and City Gardens. Progress against these is regularly reported to Members.

Charity implications - The Natural Environment sites are registered charities. Any decisions must be taken in the best interests of the relevant charity.

Appendices

Appendix 1 – Progress against priority workstreams

Appendix 2 – Progress against performance measures

Background Papers

- ‘Environment Department High-Level Business Plan 2025-30’ (Natural Environment Board, 6 February 2025)
- Operational Finance Progress Report - Quarter 2 2025/26 (Natural Environment Board, 11/12/25)

Contact

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

This page is intentionally left blank

Progress against priority workstreams
Mid-year report: 1 April – 30 September 2025

Ref:	Workstream	Progress to mid-year (1 April – 30 September 2025)
a) Nature conservation and resilience		
	<ol style="list-style-type: none"> 1. Develop CSS and Woodland Management Schemes across our sites. Ongoing 2. Ensure effective engagement with the planning system to influence the protection of our open spaces in the most relevant way. Ongoing 3. Deliver the Climate Action Strategy's Carbon Removals Project to protect and enhance carbon sequestration level. 2027 	<p>A wide range of actions have been taken across all natural environment sites to deliver this key workstream, protecting and enhancing the biodiversity and resilience of our green spaces. The work also directly supports the Corporate Plan Outcome: Leading Sustainable Environment. Examples include</p> <p>CSS and woodland management</p> <ul style="list-style-type: none"> • Hosting an International Conference on the Biodiversity of Pollarded Trees in collaboration with Ancient Tree Forum and the Arboricultural Association. This was a highly regarded event, attended by delegates from across the world, and further raised the profile of the CoL as experts in this field. • Cutting fire breaks and development of Woodland Management Plans at Epping Forest. • Grassland management and species monitoring across the North London Open Spaces. • Tree works to ensure safety and conservation of vulnerable and ancient trees has continued at all sites. This has also contributed to the mitigation of the associated tree safety risks which are held by several of the charities. <p>Climate Action Strategy</p> <ul style="list-style-type: none"> • The Climate Action Strategy (CAS) carbon removals project has also continued to progress, including the provision of wildfire management training for staff; ecological monitoring surveys; and the identification of suitable sites for the construction of leaky dams which significantly increase the long-term resilience of green spaces.

Ref:	Workstream	Progress to mid-year (1 April – 30 September 2025)
b) Community engagement		
	<ol style="list-style-type: none"> 1. Build and sustain meaningful and lasting partnerships with the communities we serve <ul style="list-style-type: none"> • Develop volunteering programmes across our sites. Ongoing 2. Continue to develop the quality and range of our communications to ensure they reach, and are understood by, our communities and service users. 	<p>All sites have hosted and supported a range of well attended events to diverse audiences and there has been extensive volunteer involvement with a wide range of activities. The associated interaction with members of the public helps officers to build and develop services that meet the needs of the communities they serve.</p> <p>Volunteering partnerships</p> <ul style="list-style-type: none"> • Highly valued volunteers continued to support the sites, with hundreds of volunteer hours donated by supporters of the open spaces and heritage assets. • During the period, volunteers were also recognised at CoL volunteer celebration event. • Some examples of the contribution of volunteers to support the CoL and its green spaces, include: <ul style="list-style-type: none"> ○ Epping Forest volunteers have been trained to carry out fortnightly butterfly and reptile transect surveys. Training has now commenced for grassland condition assessment surveys. ○ The Epping Forest Engagement team took the 'Epping Forest Roadshow' to local events over the summer. The team also promoted volunteering opportunities within Epping Forest. ○ At West Wickham and Coulsdon Commons, volunteers have supported biodiversity monitoring of reptiles, skylarks and butterflies over the period. ○ Heath Hands and Friends of West Ham Park continue their work to support our NLOS sites. <p>Communications</p> <ul style="list-style-type: none"> • Volunteering opportunities for all sites continue to be promoted locally and via the CoL website. • The Epping Forest Engagement team promoted volunteering opportunities to those who attended their summer 'Roadshow'.

Ref:	Workstream	Progress to mid-year (1 April – 30 September 2025)
c) Access and recreation		
	<ol style="list-style-type: none"> 1. Upgrade and install new on-site signage to enhance wayfinding and access to information. 2. Provide easily accessible and clear pre-visit information through digital platforms. 3. Build understanding and knowledge about the open spaces through engagement and instruction. 	<p>Appropriate messaging is used across the sites to improve accessibility, wayfinding, and to encourage visitors to respect the sites and use them responsibly. Officers continued to identify improvements and additions to this during the period. Some examples are provided below</p> <p>Wayfinding Five of six new byelaw boards were installed at Ashted Common, this will improve wayfinding and enhances the visitor journey. In addition, most of the design work, preparation and installation of these boards has been undertaken by volunteers.</p> <p>Accessibility</p> <ul style="list-style-type: none"> • At Epping Forest, the new Brambly Hedge Trail opened. Each of the wooden characters feature their names in braille and include a tactile panel, adding a variety of ways to experience the Trail. • Installation of the new Gloucester Ride surfaced path at Epping Forest, using sustainable 'no dig' installation techniques, improves access between the visitor centre and Connaught Water. • Sports facilities at Hampstead Heath and West Ham Park remained very popular and saw high levels of use, particularly over the summer season. <p>Building understanding and knowledge</p> <ul style="list-style-type: none"> • Learning Team continued to facilitate children and young people to connect with nature through active learning in our green spaces: nature connection in childhood is the foundation for pro-environmental behaviours in adulthood. During the period, thousands of school students participated in outdoor learning programmes, including orienteering, eco-art and habitats. • The London Fire Brigade hosted a media event on Wanstead Flats to promote responsible land management to prevent wildfires.

Ref:	Workstream	Progress to mid-year (1 April – 30 September 2025)
		<p>There has also been a well-received social media campaign to raise awareness and consequences of fly-tipping.</p> <ul style="list-style-type: none"> • All these actions help to catalyse improved behaviours in our spaces where needed.
d) Culture, heritage and learning		
	<ol style="list-style-type: none"> 1. Develop our communities of interest. 4. Provide more opportunities for children to engage in outdoor play. 2. Protect and enhance our built heritage, landscape heritage and archaeological assets and promote them as part of our visitor and learning offers. 	<p>Communities of interest</p> <ul style="list-style-type: none"> • Officers have continued to build meaningful engagement with a diverse range of communities of interest, including Ambition Achieve Aspire; the East Africa Collective; City of London Virtual School; Epping Forest Youth Council; SOS-UK (Students Organising for Sustainability); the London Wildlife Trust; and the UK Youth Climate Coalition. <p>Outdoor play</p> <ul style="list-style-type: none"> • School, play and youth programmes have continued to thrive. The learning programmes are continuing to engage large numbers of participants from some of London's most economically disadvantaged communities. • Evaluation showed an increase in confidence and wellbeing, comparing levels before and after participation in our learning sessions <p>Protect, enhance and promote heritage assets</p> <ul style="list-style-type: none"> • The Heritage Team worked directly to support and deliver activities including: • Launch of the Keats House 100 Exhibition. • Hampstead Summer Festival, to celebrate the culmination of their 2025 fundraising campaign for Keats Community Library and Hampstead School of Art. • Open House and Heritage Open Days to open Keats House for free as part of their pan-London festivals; and

Ref:	Workstream	Progress to mid-year (1 April – 30 September 2025)
		<ul style="list-style-type: none"> • City Lit, hosting three days of their creative writing workshops inspired by Keats. • The Monument Conservation Management Plan has been finalised. • City Surveyor's and their appointed specialist contractors continued to progress surveys and remedial conservation works for several key heritage assets, including Keats House & Ten Keats Grove; The Grotto, Wanstead Park; and the Hill Garden Pergola, Hampstead, to ensure these heritage assets are preserved for future generations to enjoy and learn from.
e) Develop a sustainable business model		
	<ol style="list-style-type: none"> 1. Begin to implement the recommendations of Natural Environment Charity Review. <ul style="list-style-type: none"> • Update Charity Financial models to allow for improved asset management and to improve financial security for the charities. 2025-2030 2. New agreement and changed ways of working/governance regarding management and condition of assets. <ul style="list-style-type: none"> • Work with CSD to ensure improved condition and environmental performance of built assets. Q4 2025/26. 3. Seek opportunities to increase income generation. Ongoing 	<p>Natural Environment Charity Review</p> <ul style="list-style-type: none"> • A Grant Funding Agreement is in draft and will begin its route through Committees in late 2025/early 2026. <p>Asset management</p> <ul style="list-style-type: none"> • An agreement has been reached with City Surveyors to focus CWP priorities on key lodges with income generation potential, this work is now planned/underway. • Extension of the Grant Funding Model to Central and Risk and Recharge elements of Charity budgets will take place in next 12-18 months and this will shape future service level agreements regarding maintenance of properties. • A full audit of potential opportunities and constraints regarding Complementary Land is also underway, with consultants appointed to produce a report. <p>Income generation</p> <ul style="list-style-type: none"> • An independent report on fundraising potential and roadmap have been completed, and recommendations are being drawn up for action, including high priority areas and projects, the skills and

Ref:	Workstream	Progress to mid-year (1 April – 30 September 2025)
		<p>systems required to achieve them, and how corporate identity plans can best benefit these outcomes.</p> <ul style="list-style-type: none"> • A BNG Assessment of CoL Open Spaces was undertaken to identify opportunities to develop habitat banks and sell biodiversity units to support the long-term enhancement, management, maintenance, and monitoring of our open spaces.
f) City Gardens: Effectively manage the green spaces within the Square Mile		
	<ol style="list-style-type: none"> 1. Provide well maintained and accessible spaces. <ul style="list-style-type: none"> • Carry out an audit of green spaces within the Square Mile for accessibility standards to establish a baseline which can be monitored in future years. Q4 2025/26 2. Progress Biodiversity Action Plan <ul style="list-style-type: none"> • Continue to progress Biodiversity Action Plan. Q4 2025/26 	<p>Well maintained and accessible spaces</p> <ul style="list-style-type: none"> • All our City Gardens are well maintained year-round through the hard work and dedication of the 36 gardeners. • The recent reopening of Finsbury Circus is a shining example of how the team is contributing towards providing well maintained and accessible spaces. A full accessibility audit will follow. • An audit of green spaces across the Square Mile has commenced in consultation with the Access Team within the Planning Division. 64 site visits and assessments will take place over the next quarter, establishing a robust accessibility baseline to be monitored in future years. <p>Biodiversity Action Plan (BAP)</p> <ul style="list-style-type: none"> • The BAP continues to progress with a key success being the joint hosting of an Urban Pollinators event with Pollinating London Together. The event was held at the Tower of London and attracted around 70 people to listen to experts discuss the importance of pollinators in the urban environment and what we can do to support them. • The BAP continues to make good progress, with the latest BAP Partnership Group meeting held in October. Focus will now turn to ensuring that all outstanding actions are completed by the end of 2026, in line with agreed targets.

Progress against Performance Measures
Mid-Year 2025/26: 1 April to 30 September 2025

Performance Measure	Performance 2024/25 (Full year)	Target 2025/26	Performance 2025/26 (1 Apr-30 Sept)
a) Nature conservation and resilience			
Respond to 100% of Local Authority planning consultations.	100%	100%	N/A <i>Annual Measure</i>
Increase carbon sequestration by 0.21kt per annum.	-16.23 ktCO ₂ e	0.21 ktCO₂e	N/A <i>Annual Measure</i>
b) Community engagement			
Increased number of volunteer work hours	44,775	>45,000	22,859
Greater number of visitors to the open spaces' pages on the CoL website.	1,329,543	1 million	1,543,606
c) Access and recreation			
% of public facilities with accessibility information available on our website.	N/A New measure for 2025/26	100%	N/A <i>Annual Measure</i>
Seasonal engagement sessions provided on site (minimum four per site each year).	>16	16 (minimum)	8
d) Culture, heritage and learning			
Number of visitors to Keats House.	7,664	tbc	5,089
Number of visitors to The Monument.	102,966	tbc	53,739
Increased number of learning and play participants per annum.	42,798	39,000	26,171

Performance Measure	Performance 2024/25 (Full year)	Target 2025/26	Performance 2025/26 (1 Apr-30 Sept)
Reduction in the number of heritage assets on the Heritage at Risk Register.	4	3	3
e) Develop a sustainable business model			
Higher percentage of surveyed properties with an EPC rating of D or above.	42%	100%	N/A Annual measure
Achievement of charities' increased income targets.	38% * ¹	5% increase on 2024/25 totals	N/A Annual measure
* ¹ A large proportion of the additional income achieved in 2024/25 represented the Countryside Stewardship grant which officers worked very hard to secure. The target for 2025/26 is lower in comparison.			
f) City Gardens: Effectively manage the green spaces within the Square Mile			
Greater number of trees planted.	21	20	0 * ²
The area of climate resilient public realm and open space enhanced (sqm).	10,559 sqm	4,977 sqm	N/A Annual measure
* ² Trees are planted between October and March, therefore the result will be nil until the second half of the year.			

City of London Corporation Committee Report

Committee(s): Natural Environment Board	Dated: 11/12/2025
Subject: Operational Finance Progress Report - Quarter 2 (September 2025) 2025/26 – Natural Environment Division	Public report: For Information
This proposal: <ul style="list-style-type: none"> • delivers Corporate Plan 2024-29 outcomes • provides statutory duties 	Providing Excellent Services Flourishing Public Spaces
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	£0
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of:	Chamberlain
Report author:	Clem Harcourt, Chamberlain's Department

Summary

This report provides an update on the operational finance position for Quarter 2 for 2025/26 for the Natural Environment Division's (including City Gardens) revenue budget to date to the end of September 2025 and projected year-end outturn position, current live capital projects and outstanding debt position. It also provides additional information on the various reserve funds held and other relevant finance information for the Natural Environment Division services and Charities which fall within the remit of your Board.

As part of the ongoing Charity Review, future training sessions will be designed for both Members and Officers on key aspects of charity finance.

Recommendation(s)

Members are asked to:

- Note the content of this report and its appendices.

Main Report

Background

1. For additional context, various financial appendices and commentary have been produced to enable greater clarity of revenue budgets and other financial information needed to allow greater scrutiny of the financial performance of the Natural Environment Division and City Gardens as well as to provide assurance that the Executive Director Environment remains within her local risk resources for 2025/26.
2. To ensure your Board is kept informed, an update on progress made against budgets as well as other financial matters will be reported to you on a periodic (quarterly) basis. This approach will allow Members to ask questions and have a timely input into areas of particular importance to them.
3. Members should also note that detailed information regarding the financial position of individual Natural Environment charities will be reported separately to the relevant service committees.
4. Please be advised that in the report below, income and favourable variances are represented by brackets, whereas figures without brackets indicate expenditure or adverse variances.

Revenue Operating Budget – 2025/26

5. The budget for the Natural Environment Division (including City Gardens) for 2025/26 amounts to £27.284m net expenditure. Actual net expenditure as at September 2025 amounted to £12.163m with a current forecast outturn for 2025/26 of £27.575m net expenditure. This amounts to a projected net overspend for 2025/26 of £291k, equivalent to 1.07% of the total net expenditure budget.
6. A summary of the revenue budget position for 2025/26 is shown in Table 1 below, with further detailed information provided in Appendix 1, including reasons for significant budget variances. Information has also been presented in a way that distinguishes between expenditure and income budgets in line with best practice for the financial reporting of charities. Please note that the information presented below comprises operating revenue budgets (local and central risk) as well as budgets for recharges and support services and repairs and maintenance budgets managed by the City Surveyor.

Table 1 – Revenue Operating Budget Summary – 2025/26

	Budget	Actual –	Forecast	Budget	Variance
	£'000s	Sep 2025	Outturn	Variance	%
		£'000s	£'000s	£'000s	
Gross Expenditure	40,586	17,522	41,456	870	2.14
Gross Income	(13,302)	(5,359)	(13,881)	(579)	(4.35)
Net Expenditure	27,284	12,163	27,575	291	1.07

7. As can be seen from the table above, the Natural Environment Division and City Gardens are currently forecasting a total net overspend of £291k compared with the total net expenditure budget for 2025/26. Members should note that this represents an improvement of £115k compared with the projected overspend of £406k as at June 2025 reported previously to your Board. The budgetary position for the Environment Department as a whole will be kept under review for the remainder of the current financial year to ensure that the Executive Director Environment remains within her local risk resources for 2025/26.
8. The primary reasons for the projected overspend are set out below:
- £160k projected net overspend for The Monument which is attributable to income from admissions having not yet returned to pre-pandemic levels. Members should note however that this represents an improvement of £35k compared with the position reported to the end of June 2025. Additional income is now forecast as a result of an increase in visitor numbers at The Monument which will help to offset the overspend currently forecast for 2025/26. Please also be aware the Natural Environment Division are currently exploring future options to address the existing budget shortfall with discussions ongoing regarding the potential transfer of The Monument to another department.
 - £153k forecasted overspend at City Gardens largely explained by an overspend on employment budgets following a staffing budget adjustment accumulated from previous years.
 - £122k additional expenditure projected on the Cyclical Works Programme (CWP) managed by the City Surveyor comprising £87k at City Gardens following the rephasing of works at sites including St. Bride's Churchyard and Portsoken Street and £35k at Keats House for rephasing of CWP projects including for roof works. Please note that the CWP does not form part of the City Surveyor's local risk budget, and any variances will be carried over to 2026/27. Variances on budgets are adjusted for the life of the programme to allow for the completion of works which can span multiple financial years.
 - £65k overspend on budgets managed by the Highways Division relating to the cyclical cleaning, safety checks and maintenance of irrigation sites and ornamental fountains at the City's Open Spaces.
9. The projected overspend for 2025/26 is partly mitigated by a (£198k) underspend currently forecast at Hampstead Heath which can be explained by additional income generated from filming and car parking as well as savings in employment costs arising from vacant posts.

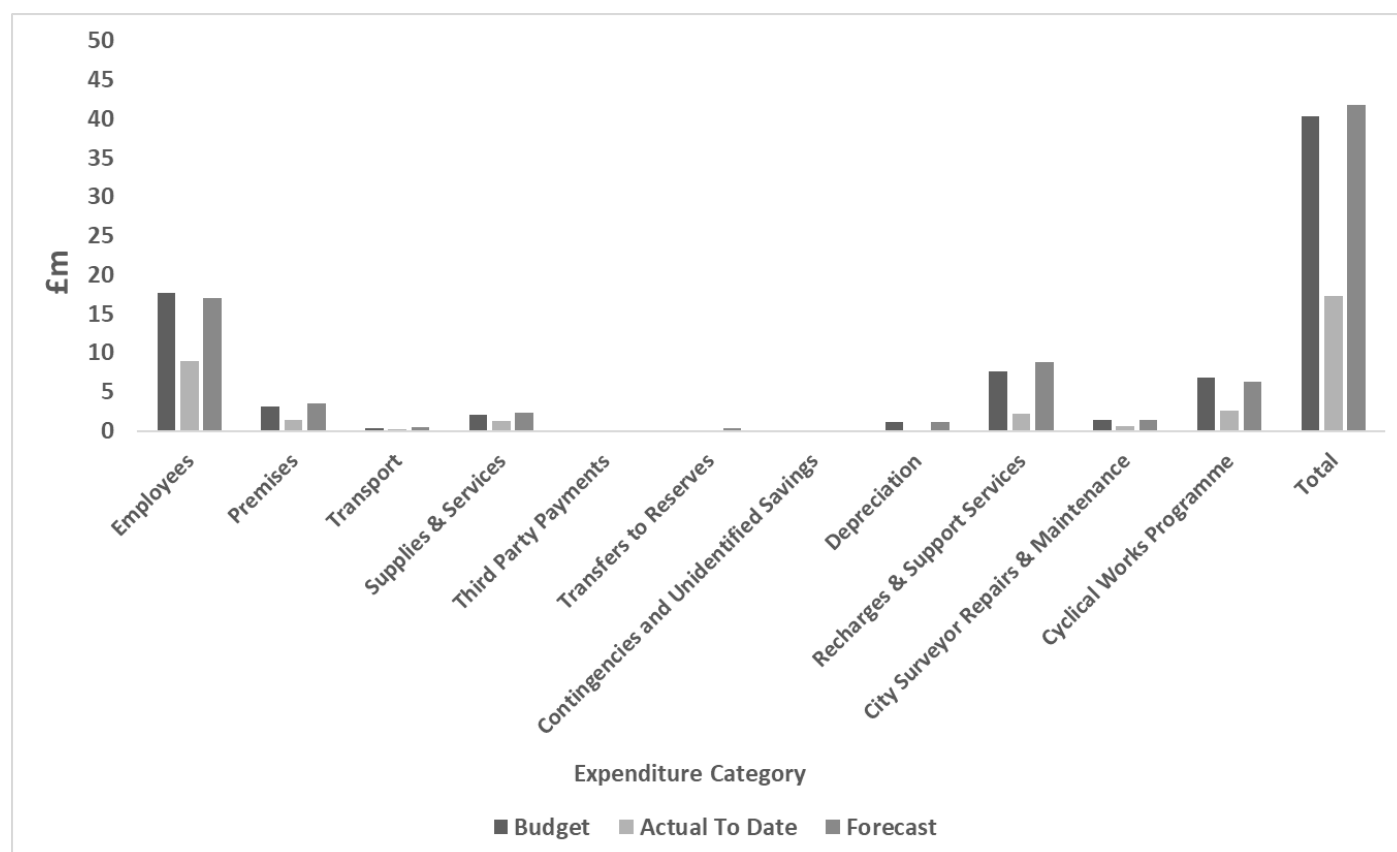
Expenditure

10. As at September 2025, total gross expenditure for the Natural Environment Division and City Gardens amounted to £17.522m. This represents 43.17% of the total gross expenditure budget for 2025/26 of £40.586m.

11. For 2025/26, the Natural Environment Division are currently forecasting total gross expenditure of £41.456m amounting to an overspend of £870k, 2.14%, compared with the total gross expenditure budget for 2025/26 of £40.586m.

12. Graph 1 below provides a summary of the different categories of expenditure incurred to September 2025 along with current forecasts for 2025/26.

Graph 1 – Expenditure Categories – Natural Environment Division – 2025/26



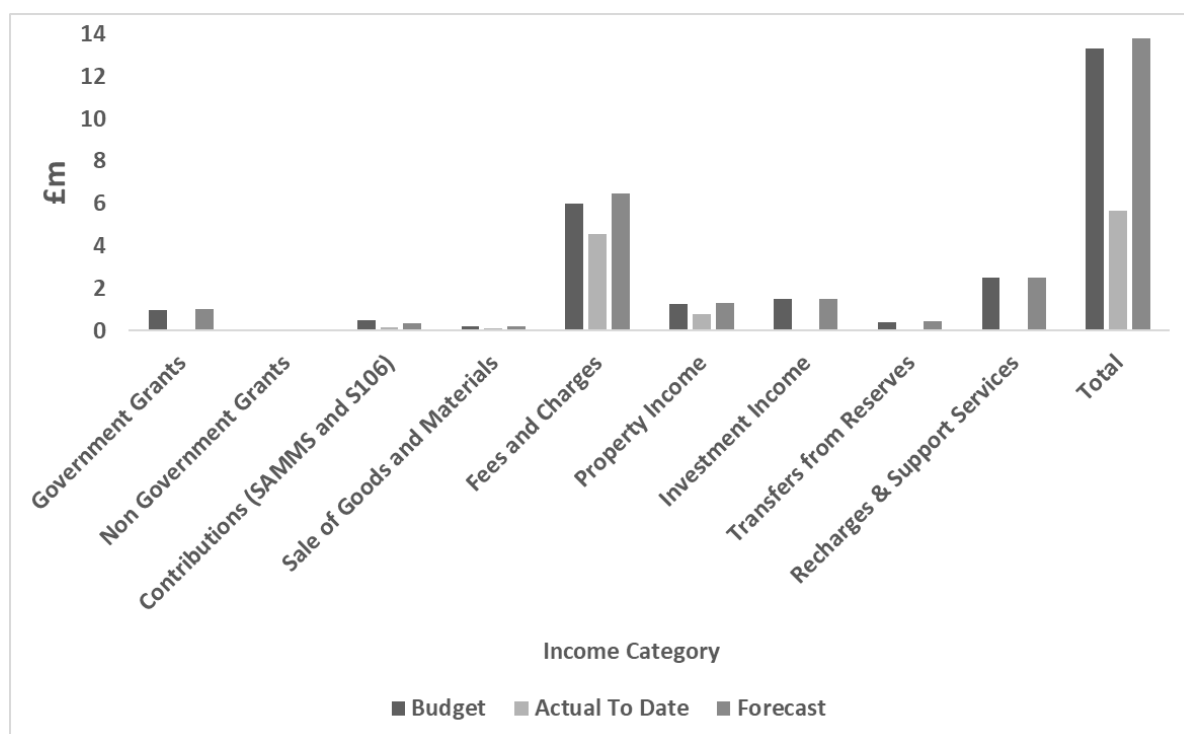
Income

13. As at September 2025, total gross income for the Natural Environment Division and City Gardens amounted to (£5.359m). This represents 40.29% of the division's total gross income budget for 2025/26 of (£13.302m).

14. For 2025/26, the Natural Environment Division are currently forecasting total gross income of (£13.881m), amounting to an increase in gross income of (£579k), (4.35%), compared with the latest gross income budget of (£13.302m).

15. Graph 2 below provides a summary of the different categories of income received to September 2025 along with current forecasts for 2025/26.

Graph 2 – Income Categories – Natural Environment Division – 2025/26



Capital Projects

16. Appendix 2 outlines the current list of live capital projects in progress against their currently approved budget. It should be noted that the “current approved budget” is the amount currently agreed by Committee to progress the project to either the next project gateway or until Officers request further release of capital funds to progress the scheme and may not equal the total estimated cost of the project to finalisation.
17. Out of a current approved budget of £13.373m, £9.612m has been spent or committed to date, leaving a remaining budget of £3.761m to progress the various projects to the next project gateway, release of further capital funds or completion.

Outstanding Debts

18. At the end of September 2025, total outstanding debts for the Natural Environment Division and City Gardens was £107,431. As part of a previous best value review into outstanding debts, the maximum age of debt set by the Chamberlain to fully recover outstanding sums was set at 120 days. During this period, automatic debt reminder letters, physical debt chasing of customers and liaison with Comptrollers & City Solicitors takes place to ensure debts are resolved within the corporately agreed debt repayment terms. Graph 3 below sets out the trend of the division’s outstanding debts over 120 days over the previous six-month period. As can be seen from the graph, debts over 120 days amounted to £22,568 in September 2025, a reduction of £3,321 (12.83%) compared with

August 2025 and a total decrease of £13,400 (37.26%) over the previous six-month period. The reduction in debts over 120 days compared with April 2025 can largely be attributed to a reduction in amounts owed by customers at Keats House, Hampstead Heath and City Gardens.

Graph 3 – Outstanding Debts Over 120 Days – April to September 2025



19. Table 2 below also provides a breakdown of outstanding debts over 120 days according to each section of the division.

Table 2 – Natural Environment Outstanding Debts Over 120 Days – September 2025

Section	Outstanding Debts Over 120 Days	% of Total Debt Outstanding Over 120 Days
Burnham Beeches	£5,210	23.09
City Gardens	£220	0.97
Epping Forest	£3,635	16.11
Hampstead Heath	£11,104	49.20
Highgate Wood	(£3)	(0.01)
Keats House	£228	1.00
Learning Team	£1,485	6.58
Queen's Park	£419	1.86
West Ham Park	£367	1.63
West Wickham & Coulsdon Commons	(£97)	(0.43)
Total Outstanding Debts Over 120 Days	£22,568	100.00%

20. As can be seen from the table above, debts over 120 days include £11k owed from debtors at Hampstead Heath. This predominantly relates to amounts owed from utility providers with such debts currently being chased.
21. Meanwhile, outstanding debts over 120 days of £5k at Burnham Beeches and £4k at Epping Forest largely consist of historical wayleave debts such as motorgates which are currently being reviewed. Please also note that provisions for these debts are currently held in the event that there is a requirement for such debts to be written off.

Charity Funds (Restricted, Unrestricted, Designated and Endowments)

22. Appendix 3 (Epping Forest and Commons Committee) and Appendix 4 (Hampstead Heath, Highgate Wood & Queens Park Committee; West Ham Park; and Keats House) lists the various restricted, unrestricted, designated and endowment funds held by each charity. It details the opening balance for 2025/26 and any movements in the current financial year to date. Appendix 3 and Appendix 4 also provide a definition for each type of charity reserve fund.
23. A summary of the current balances held by each Natural Environment charity for each type of reserve fund is shown below in Table 3:

Table 3 – Natural Environment Charities Reserve Funds Summary – September 2025

	Restricted	Unrestricted	Designated	Endowments	Total
	£'000s	£'000s	£'000s	£'000s	£'000s
Ashtead Common	£411	£0	£23	£0	£434
Burnham Beeches	£1,517	£4	£953	£0	£2,474
Epping Forest	£1,558	£572	£7,652	£0	£9,782
Hampstead Heath (inc. Hampstead Heath Trust)	£81	£11	£22,493	£40,459	£63,044
Highgate Wood and Queen's Park	£0	£200	£297	£0	£497
Keats House	£137	£157	£44	£0	£338
West Ham Park	£0	£0	£800	£0	£800
West Wickham and Coulsdon Commons	£54	£4	£672	£0	£730
Total	£3,758	£948	£32,934	£40,459	£78,099

24. Members should be aware that funds held by an individual charity cannot be consolidated or utilised by a separate charity. It is key that individual charity funds are not viewed as being available to be 'offset' against each other, bearing in mind the different objects held by each charity.

25. It should also be noted that the external audit of the 2024/25 accounts for the Natural Environment charities is still taking place and the opening balances shown for reserve funds in Appendix 3 and Appendix 4 may be subject to revision.

Contributions from City's Estate

26. The existing funding model is for each charity's total net expenditure to be fully funded from City's Estate. This includes the cost of any capital expenditure incurred during the year as well any works managed by the City Surveyor under the CWP carried out over the year. It should be noted that any changes to the amount of expenditure incurred or income generated over the course of the year by an individual charity will have an impact on the overall contribution required by the charity at year end. The total contribution for each charity is therefore

calculated based on its **actual total net running costs for the year** in addition to any capital expenditure and CWP costs incurred.

27. Members should note that for 2025/26, both Epping Forest and West Ham Park have moved to a grant funded model with all other Natural Environment charities except for Keats House becoming grant funded from 2026/27. It is assumed that each charity will receive a grant for its operational (local risk) activity with other elements of the charity's budgets continuing to be deficit funded for the time being. A request for recommendation of approval of the principles is being presented to the relevant committees in November and December 2025 alongside reports requesting recommendation for approval of the 2026/27 budget estimates.

28. The table below details the actual level of contribution provided from City's Estate to each of the individual Natural Environment charities for the previous four financial years along with the current forecast projected for 2025/26. Please note that funding provided by City's Estate is unique to each individual charity and cannot be used to offset the level of funding provided to a separate charity. Please also be aware that the figures shown in Table 4 for 2024/25 are currently provisional as the external audit for the Natural Environment charities has not yet been completed.

Table 4 – Contributions from City's Estate – 2021/22 to 2025/26

	2021/22	2022/23	2023/24	2024/25 (Prov.)	2025/26 (Est.)
	£'000s	£'000s	£'000s	£'000s	£'000s
Ashted Common	471	524	609	730	1,030
Burnham Beeches and Stoke Common	896	1,051	949	1,138	1,401
Epping Forest	4,527	4,879	6,573	8,400	10,220
Hampstead Heath	5,356	4,842	8,591	6,236	6,776
Highgate Wood and Queen's Park Kilburn	1,033	1,255	1,533	2,601	2,027
Keats House	292	394	324	572	386
West Ham Park	1,250	1,933	1,234	1,414	1,504
West Wickham Common and Spring Park Wood, Coulsdon and Other Commons	1,046	1,249	1,010	1,770	2,371
Total Contribution from City's Estate	14,871	16,127	20,823	22,861	25,715

29. As seen from the table above, there was an increase for 2024/25 in the total contribution from City's Estate to the Natural Environment charities. This amounted to additional contributions totalling £2.038m (9.79%) compared with the previous financial year. This increase can be attributed to increased expenditure on CWP projects across all charities to meet the backlog of works for projects falling under the CWP. This was on top of contributions to fund increased expenditure such as additional employment costs following cost of living pay rises to staff. Please note that the reduced contribution provided to Hampstead Heath compared with 2023/24 can be largely explained by one-off funding being provided to the charity in 2023/24 for capital expenditure incurred on the Parliament Hill Athletics Track Resurfacing project.

30. Table 4 also illustrates the increased contribution projected to be provided from City's Estate for 2025/26. Total contributions to the Natural Environment charities are forecast to increase by £2.854m (12.48%) compared with the provisional total contribution for 2024/25. This increase is explained by additional expenditure on works falling under CWP projects managed by the City Surveyor as part of the backlog of works as well as inflationary increases projected to be incurred on other expenditure headings such as staffing. The increase is also explained by extra capital expenditure forecast for Epping Forest in 2025/26 relating to capital projects including the Baldwins & Birch Hall Park Ponds project.

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

Conclusion

31. This report provides an update on the operational finance position for Quarter 2 for 2025/26 for the Natural Environment Division (including City Gardens) on a range of financial related matters to the end of September 2025.

Appendices

Appendix 1 – Natural Environment Division and City Gardens Revenue Budget – 2025/26

Appendix 2 – Natural Environment Capital Projects 2025/26 – Quarter 2

Appendix 3 – Charity Funds (Restricted, Unrestricted and Designated) - Epping Forest & Commons Committee

Appendix 4 - Charity Funds (Restricted, Unrestricted, Designated and Endowments) - Hampstead Heath, Highgate Wood and Queen's Park Committee; West Ham Park Committee; and Keats House

Clem Harcourt

Finance Business Partner (Natural Environment)

T: 020 7332 1363

E: clem.harcourt@cityoflondon.gov.uk

This page is intentionally left blank

Natural Environment Division and City Gardens Revenue Budget - 2025/26 - Quarter 2

APPENDIX 1

	Gross Expenditure				Gross Income				Net Expenditure			
	Budget	Actual	Forecast		Budget	Actual	Forecast		Budget	Actual	Forecast	Projected Variance
	£'000s	£'000s	£'000s		£'000s	£'000s	£'000s		£'000s	£'000s	£'000s	£'000s
City Fund												
City Gardens	2,854	1,520	3,222		(842)	(91)	(905)		2,012	1,428	2,317	305
Total City Fund	2,854	1,520	3,222		(842)	(91)	(905)		2,012	1,428	2,317	305
City's Estate												
Natural Environment Directorate	2,174	712	2,259		(2,174)	0	(2,259)		0	712	0	0
Learning Team	702	290	584		(173)	(51)	(73)		529	239	511	(18)
Bunhill Fields	221	118	221		0	0	0		221	118	221	0
Epping Forest	11,508	4,224	11,671		(3,082)	(1,574)	(3,245)		8,426	2,650	8,426	0
Burnham Beeches	1,894	903	2,005		(449)	(203)	(558)		1,445	700	1,447	2
Stoke Common	53	10	54		(25)	(2)	(26)		28	8	28	0
West Wickham and Coulsdon Commons	2,530	1,115	2,595		(181)	(71)	(221)		2,349	1,043	2,374	25
Ashted Common	1,082	474	1,066		(63)	(5)	(42)		1,019	469	1,024	5
Hampstead Heath	12,468	5,827	12,407		(5,246)	(2,802)	(5,383)		7,222	3,025	7,024	(198)
Highgate Wood	944	468	965		(86)	(59)	(98)		858	409	867	9
Queen's Park	1,339	546	1,360		(143)	(86)	(185)		1,196	460	1,175	(21)
West Ham Park	1,932	747	1,932		(338)	(156)	(351)		1,594	591	1,581	(13)
Keats House	474	221	509		(135)	(51)	(135)		339	171	374	35
The Monument	411	349	606		(365)	(209)	(400)		46	140	206	160
Total City's Estate	37,732	16,002	38,234		(12,460)	(5,268)	(12,976)		25,272	10,735	25,258	(14)
Total Natural Environment Division and City Gardens	40,586	17,522	41,456		(13,302)	(5,359)	(13,881)		27,284	12,163	27,575	291

Notes

1. Projected overspend explained by additional costs incurred by the Highways Division on cyclical cleaning, safety checks and maintenance of irrigation sites and ornamental fountains at the City's Open Spaces. This is in addition to a forecasted overspend at City Gardens following a staffing budget adjustment accumulated from previous years as well as additional expenditure incurred on the Cyclical Works Programme (CWP) relating to the re-phasing of works at St. Bride's Churchyard and Portsoken Street.
2. Forecasted underspend at Hampstead Heath explained by an increase in income from parking and filming as well as savings from employment costs due to staff vacancies.
3. £35k overspend forecast at Keats House attributable to expenditure arising from the rephasing of projects falling under the CWP in relation to roof repairs at Keats House.
4. Projected net overspend explained by income levels having not yet returned to pre-pandemic levels with the overspend currently estimated to amount to £160k for The Monument for 2025/26. This represents an improvement of £35k compared with the position reported to the end of Quarter 1 as a result of improved income levels.

This page is intentionally left blank

Natural Environment Capital Projects - 2025/26 - Quarter 2

Capital Projects by Division of Service	Total Estimated Cost of Project £'s	Current Approved Budget £'s	Prior Year Actual Spend £'s	In Year Actual Expenditure £'s	In Year Committed Expenditure £'s	Current Approved Budget Unspent £'s
<u>City Gardens</u>						
Finsbury Circus Reinstatement	5,783,229	5,428,006	4,440,789	415,198	319,209	252,810
Tower Hill Play Area Replacement Project	41,000	36,000	25,793	0	0	10,208
	5,824,229	5,464,006	4,466,581	415,198	319,209	263,017
<u>Epping Forest and Commons</u>						
Epping Forest Various Sites - BEMS Upgrade Phase 2	221,000	138,978	20,000	0	25,603	93,375
Wanstead Park Ponds Project	743,000	444,933	2,699	0	0	442,234
Baldwins & Birch Hall Park Ponds	1,514,000	440,600	238,975	0	1,543	200,082
Climate Action Strategy - Carbon Removals Phase 2	302,000	520,000	239,547	0	12,819	267,634
Climate Action Strategy - Carbon Removals Phase 3	459,388	750,000	209,416	188,559	61,413	290,612
Climate Action Strategy - Carbon Removals Phase 4	298,400	298,400	1,080	0	62,313	235,008
Deer Control - Year 5	83,000	83,000	10,693	0	0	72,307
Great Gregories Yard - Future Proofing Building	388,993	393,494	388,993	0	0	4,501
Rookery Wood Reservoir Remedial Works	122,000	122,000	0	0	0	122,000
Epping Forest Window Replacements (Cyclical Works Programme)	207,000	207,000	0	0	0	207,000
Epping Forest High Voltage Works (Cyclical Works Programme)	325,000	325,000	0	71,408	22,215	231,377
Epping Forest Roof Works (Cyclical Works Programme)	758,000	758,000	0	596,000	0	162,000
Great Gregories Farm - Electrical Housing Replacement (Cyclical Works Programme)	54,410	60,000	43,068	11,341	0	5,590
Wanstead Flats - Landscaping Jubilee Pond (Cyclical Works Programme)	145,000	145,000	0	0	0	145,000
The Warren - Carbon Reduction Measures (Climate Action Strategy)	462,612	462,612	0	90,003	0	372,609
The Grotto Restoration (Cyclical Works Programme)	600,000	600,000	0	215,102	280,186	104,713
City Commons - Entry Board Replacement	142,517	160,000	10,300	4,000	128,217	17,483
City Commons - Livestock Fencing Replacement	92,000	92,000	34,146	0	18,925	38,929
	6,918,319	6,001,017	1,198,918	1,176,412	613,233	3,012,454
<u>Hampstead Heath, Highgate Wood and Queen's Park</u>						
Hampstead Heath Swimming Facilities - Safety, Access & Security Impr.	1,010,564	1,010,564	944,453	(19,506)	72,181	13,436
Parliament Hill Lido Photovoltaic Panels (Climate Action Strategy)	138,339	293,530	136,839	900	600	155,191
Golders Hill Park - Bandstand Roof Replacement (Cyclical Works Programme)	66,000	66,000	0	0	0	66,000
Heathfield House Complex - Window Replacement (Cyclical Works Programme)	55,000	55,000	0	0	55,000	0
Highgate Wood Pavilion - Works to Public Toilets (Cyclical Works Programme)	84,000	84,000	0	0	84,000	0
Parliament Hill Fields Lido Buildings Complex - Mains Water Pipe Replacement (Cyclical Works Programme)	72,000	72,000	0	0	0	72,000
Queen's Park Play Area and Sandpit Replacement of Equipment	148,500	152,000	144,181	0	4,319	3,500
	1,574,403	1,733,094	1,225,473	(18,606)	216,100	310,127
<u>West Ham Park</u>						
West Ham Park Changing Room - Boiler Replacement (Cyclical Works Programme)	60,000	60,000	0	0	0	60,000
West Ham Park Vehicle Shed - Roof Replacement (Cyclical Works Programme)	55,000	55,000	0	0	0	55,000
	115,000	115,000	0	0	0	115,000
<u>Keats House</u>						
Keats House Main House - Roof Replacement (Cyclical Works Programme)	60,000	60,000	0	0	0	60,000
	60,000	60,000	0	0	0	60,000
<u>Natural Environment Total</u>	14,491,951	13,373,117	6,890,972	1,573,004	1,148,542	3,760,598

This page is intentionally left blank

Charity Funds (Restricted, Unrestricted and Designated) - Quarter 2 2025/26

	Opening Balance 2025/26	Income	Expenditure	Gains, (Losses) & Transfers	Current Balance 2025/26
	£'s	£'s	£'s	£'s	£'s
<u>Epping Forest</u>					
Restricted Funds:					
Campaign Donations	1,060				1,060
Countryside Stewardship Scheme	595,883		132,808		463,075
Strategic Access Management and Monitoring Strategy (SAMMS)	1,299,316		205,160		1,094,156
	1,896,259	0	337,968	0	1,558,291
Unrestricted Funds:					
Unrestricted Funds	572,468	15			572,483
	572,468	15	0	0	572,483
Designated (Unrestricted Fund):					
Tangible Fixed Assets (Land & Buildings, Infrastructure, Vehicle & Plant, and Equipment)	5,588,752				5,588,752
Heritage Assets	376,029				376,029
Epping Forest Fund Reserve (Capital Fund)	1,314,206				1,314,206
Ancient Trees Maintenance Fund	15,000				15,000
Golf Course Machinery Fund	105,178		19,370		85,808
Knighton Wood Maintenance	5,801				5,801
Future Green Infrastructure fund	3,911				3,911
Cattle Purchase Fund (Grazing Account)	143,763	24,402	5,680		162,485
Wanstead Park/ Flats future Projects fund	100,000				100,000
	7,652,640	24,402	25,050	0	7,651,992
Total Epping Forest	10,121,367	24,416	363,017	0	9,782,766
<u>Burnham Beeches and Stoke Common</u>					
Restricted Funds:					
Legacy Income - Pond Maintenance	60,014				60,014
Campaign Donations	9,738	455			10,193
Section 106 Contributions	164,765		26,926		137,839
Strategic Access Management and Monitoring Strategy (SAMMS)	1,135,072		25,142		1,109,930
Countryside Stewardship Scheme	199,404				199,404
	1,568,992	455	52,067	0	1,517,380
Unrestricted Funds:					
Unrestricted Funds	3,306	426			3,732
	3,306	426	0	0	3,732
Designated (Unrestricted Fund):					
Stoke Common	140,627				140,627
Tangible Fixed Assets (Land & Buildings, Infrastructure, Vehicles & Plant and Equipment)	812,441				812,441
	953,068	0	0	0	953,068
Total Burnham Beeches	2,525,366	881	52,067	0	2,474,180
<u>West Wickham Common and Spring Park Wood, Coulsdon and Other Commons</u>					
Restricted Funds:					
Campaign Donations	2,560	70			2,630
Countryside Stewardship Scheme	51,452				51,452
	54,012	70	0	0	54,082
Unrestricted Funds:					
Unrestricted Funds	3,547	658			4,205
	3,547	658	0	0	4,205
Designated (Unrestricted Fund):					
Tangible Fixed Assets (Land & Buildings, Infrastructure, Vehicles & Plant and Equipment)	672,319				672,319
	672,319	0	0	0	672,319
Total West Wickham Common and Spring Park Wood, Coulsdon and Other Commons	729,878	728	0	0	730,606
<u>Ashted Common</u>					
Restricted Funds:					
Countryside Stewardship Scheme	411,394				411,394
	411,394	0	0	0	411,394
Designated (Unrestricted Fund):					
Ancient Trees Reserve	2,936	1,320			4,256
Tangible Fixed Assets (Assets Under Construction)	18,845				18,845
	21,781	1,320	0	0	23,101
Total Ashted Common	433,175	1,320	0	0	434,495
Total Epping Forest and Commons Committee	13,809,786	27,346	415,085	0	13,422,048

Note:

The various sub-totals shown above should not give the impression that the individual funds held by each individual charity can be either consolidated or cross-utilised. It is key that individual charity funds are not viewed as available to be 'offset' against each other, bearing in mind the different objects held.

Please note that the external audit of the 2024/25 charity accounts has not yet been completed and the above opening balances shown for each reserve fund are subject to revision.

There are various types of funds held which have different rules as to how they can be spent and time periods held. These are categorised in the following way:

Restricted Fund - funds have been given to the charity for application for a specific element of the charity's objects and can only be spent in accordance with the requests of the donor or the specific campaign under which funds were raised. As these are income funds, they should be spent within a reasonable period of time.

Unrestricted Fund - incoming resources that become available to a charity and can be applied by the Trustee to any of the charity's objects. Unrestricted funds should be spent within a reasonable period of time and should not be held for the long term, although the Trustee should set a policy for the minimum required level of funds which is a target minimum to be held in case of particular identified risk. In the case of the City's Estate funded charities, the model means that no such minimum can be identified, as at year end the difference between income and expenditure is currently balanced by the deficit funding grant from City's Estate.

Designated (Unrestricted Fund) - are those unrestricted funds which have been set aside by the Trustee for an essential spend or future purpose. Whilst there is no legal restriction on their use for general purposes, and they can be undesignated by those acting on behalf of the Trustee at any time, these funds are effectively 'ring-fenced' and no longer form part of your free reserves/general funds. Designated funds must be spent within a reasonable period of time and should not be held for the long term.

Charity Funds (Restricted, Unrestricted, Designated and Endowments) - Quarter 2 - 2025/26

	Opening Balance 2025/26 £'s	Income £'s	Expenditure £'s	Gains, (Losses) & Transfers £'s	Current Balance 2025/26 £'s
Hampstead Heath, Highgate Wood and Queen's Park Committee					
<u>Hampstead Heath</u>					
Restricted Funds:					
Campaign Donations	41,431	1,170			42,601
Parliament Hill Outdoor Gym	2,233				2,233
Installation of Non-Turf Pitches	35,969				35,969
	79,633	1,170	0	0	80,803
Unrestricted Funds:					
General Funds	11,180				11,180
Designated (Unrestricted Fund):					
Tangible Fixed Assets (Buildings, Infrastructure & Equipment)	22,489,222				22,489,222
Capital Fund	3,331				3,331
	22,492,553	0	0	0	22,492,553
Total Hampstead Heath	22,583,366	1,170	0	0	22,584,536
<u>Hampstead Heath Trust Fund</u>					
Permanent Endowment	38,667,859				38,667,859
Expendable Endowment	874,362				874,362
Unrestricted Funds:					
General Funds	916,451				916,451
Total Hampstead Heath Trust Fund	40,458,672	0	0	0	40,458,672
<u>Highgate Wood and Queen's Park</u>					
Unrestricted Funds:					
General Funds	200,134				200,134
Designated (Unrestricted Fund):					
Tangible Fixed Assets (Land, Buildings and Infrastructure)	233,816				233,816
Water Play Feature Project	62,696				62,696
Total Highgate Wood and Queen's Park	496,646	0	0	0	496,646
Total Hampstead Heath, Highgate Wood and Queen's Park Committee	63,538,684	1,170	0	0	63,539,854
<u>West Ham Park Committee</u>					
Unrestricted Funds:					
General Funds	0	140			140
Designated (Unrestricted Fund):					
Tangible Fixed Assets (Equipment)	799,893				799,893
Total West Ham Park	799,893	140	0	0	800,033
Total West Ham Park Committee	799,893	140	0	0	800,033
<u>Culture, Heritage & Libraries Committee (Keats House)</u>					
Restricted Funds:					
Heritage Assets - Keats Love Letter & Watercolour	101,423				101,423
Grant Funding	35,541				35,541
Campaign Donations	0	10			10
	136,964	10	0	0	136,974
Unrestricted Funds:					
General Funds	156,193	752			156,945
Designated (Unrestricted Fund):					
Tangible Fixed Assets (Plant & Equipment)	43,754				43,754
Total Keats House	336,911	762	0	0	337,673
Total Culture, Heritage & Libraries Committee (Keats House)	336,911	762	0	0	337,673

Note:

The various sub-totals shown within Appendix 4 should not give the impression that the individual funds held by each individual charity can be either consolidated or cross-utilised. It is key that individual charity funds are not viewed as available to be 'offset' against each other, bearing in mind the different objects held.

Please note that the external audit of the 2024/25 charity accounts has not yet been completed and the above opening balances shown for each reserve fund are subject to revision.

There are various types of funds held which have different rules as to how they can be spent and time periods held. These are categorised in the following way:

Restricted Fund - funds have been given to the charity for application for a specific element of the charity's objects and can only be spent in accordance with the requests of the donor or the specific campaign under which funds were raised. As these are income funds, they should be spent within a reasonable period of time.

Unrestricted Fund - incoming resources that become available to a charity and can be applied by the Trustee to any of the charity's objects. Unrestricted funds should be spent within a reasonable period of time and should not be held for the long term, although the Trustee should set a policy for the minimum required level of funds which is a target minimum to be held in case of particular identified risk. In the case of the City's Estate funded charities, the current funding model means that no such minimum can be identified, as at year end the difference between income and expenditure is balanced by a grant from City's Estate.

Designated (Unrestricted Fund) - are those unrestricted funds which have been set aside by the Trustee for an essential spend or future purpose. Whilst there is no legal restriction on their use for general purposes, and they can be undesignated by those acting on behalf of the Trustee at any time, these funds are effectively 'ring-fenced' and no longer form part of your free reserves/general funds. Designated funds must be spent within a reasonable period of time and should not be held for the long term.

Endowment - these are funds of the charity that must be invested and are intended to be held for the long term. There are two classes of endowment:

Permanent Endowment - must be invested and held in perpetuity. These funds can either be invested to provide income to support the charity's purposes. The other class of permanent endowment is a functional permanent endowment where assets must be retained and used for the charity's purposes.

Expendable Endowment - an expendable endowment fund is a fund that must be invested to produce income, but the Trustee has the power to convert all or part of it into an income fund which can then be spent.

City of London Corporation Committee Report

Committee(s): Natural Environment Board - For information. West Ham Park Committee- For information. Epping Forest & Commons Committee- For information. Hampstead Heath Consultative Committee Hampstead Heath, Highgate Wood and Queen's Park Committee- For information.	Dated: 11/12/2025 11/12/2025 09/01/2026 13/01/2026 03/02/2026
Subject: Senior Officer Recruitment	Public report: For Information
This proposal: <ul style="list-style-type: none"> • delivers Corporate Plan 2024-29 outcomes • provides statutory duties • provides business enabling functions [delete as appropriate – details should be added in the strategic implications section]	Leading Sustainable Environment; Flourishing Public Spaces; Providing Excellent Services
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	£
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:	Emily Brennan Natural Environment Director

Summary

This report outlines the process for recruiting a new Deputy Director for the Natural Environment Division, following the resignation of the previous postholder. It details interim arrangements to ensure continuity of leadership and the steps for permanent recruitment, in line with the Senior Officer Recruitment Procedure. Members are asked to note the report and endorse the proposed approach.

Recommendation(s)

Members are asked to:

- Note the report.
- Endorse the recruitment plan for the Deputy Director, including interim arrangements and committee involvement.

Main Report

Background

1. The Deputy Director of the Natural Environment Division has resigned and will be leaving the Corporation at the end of January 2026. This is a critical senior management position, essential for strategic, operational, and stakeholder leadership within the Division.

Current Position

2. The responsibilities and job description for the Deputy Director have been reviewed and updated to reflect the evolving needs of the Division. The role remains unchanged in grade and core duties but now includes line management of Head Rangers for The Commons and removal of Stakeholder Engagement Officer role (Appendix 1).

Proposals

3. To ensure continuity of leadership and maintain delivery of statutory obligations and Corporate Plan outcomes, the following steps are proposed:

Interim Appointment

An internal interim Deputy Director will be appointed on a six-to-nine month secondment/acting-up basis. This provides stability for the Natural Environment Division and offers a development opportunity for existing staff and will enable a handover with the outgoing postholder.

Permanent Recruitment

An external recruitment process for the permanent Deputy Director will run concurrently with the interim arrangements. The process will follow the Senior Officer Recruitment Procedure, with the Chair and Deputy Chair of the Natural Environment Board involved in shortlisting and interviews.

The job description has been updated to reflect current needs, including line management of the Commons Head Rangers.

Timeline

Interim appointment: Beginning of January 2026 – September 2026.
Permanent recruitment: campaign launched early March, appointment expected by early September.

Risk Mitigation

This approach minimises management risk, ensures continuity of leadership, and supports staff engagement during the transition period.

Corporate & Strategic Implications

Strategic implications - The recruitment plan directly supports the delivery of the Corporate Plan 2024–2029. It ensures strong leadership for environmental sustainability and climate resilience under the outcome of Leading Sustainable Environment. It also secures the stewardship of green spaces in line with Flourishing Public Spaces and maintains continuity of high-quality services for communities and visitors under Providing Excellent Services. By implementing this plan, the Natural Environment Division can continue to meet its statutory obligations and strategic priorities without disruption.

Financial implications – None.

Resource implications - The interim appointment will be managed through an internal secondment, making use of existing staff resources and minimising additional costs. The permanent recruitment process will require support from the Human Resources team and involvement from the Chair and Deputy Chair of the Natural Environment Board during shortlisting and interviews. No additional capital expenditure is anticipated, and any minor costs, such as advertising, will be met from existing budgets.

Legal implications – None.

Risk implications - If no interim arrangements were in place, there would be a significant risk of leadership gaps affecting statutory compliance, project management, operational delivery and communications. Delays in the permanent recruitment process could extend the interim arrangements, but this risk is mitigated by running both processes in parallel. There is also a reputational risk if continuity is not maintained, which will be addressed through a structured handover and clear communication with stakeholders.

Equalities implications – The recruitment process will comply fully with the Public Sector Equality Duty 2010. All stages, including advertising, shortlisting, and interviews, will be conducted in a fair and transparent manner to ensure equal opportunity for all candidates. The proposals within this report are not expected to have a negative impact on individuals protected under existing equality legislation, such as age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, and pregnancy and maternity. Where appropriate, reasonable adjustments will be made to support candidates throughout the process.

Climate implications – None.

Security implications – None.

Conclusion

4. This report sets out the approach to recruiting a replacement for the outgoing Deputy Director of the Natural Environment Division. By appointing an interim Deputy Director and commencing the permanent recruitment process in parallel, the Division will maintain continuity of leadership, safeguard statutory obligations, and ensure delivery of Corporate Plan outcomes.

The updated job description reflects current operational priorities (Appendix 1), and committee involvement in the recruitment process provides assurance of transparency and governance. These measures collectively mitigate operational and reputational risks while supporting staff development and organisational stability.

Appendices

- Appendix 1 – Updated Job Description

Emily Brennan

Natural Environment Director

E: emily.brenann@cityoflondon.gov.uk



JOB DESCRIPTION	
Job Title	Natural Environment Deputy Director (Interim)
Department	Environment Department, Natural Environment Division
Grade	Grade I
Duration	This post is being offered as an internal 'acting up' opportunity for six to nine months' duration.
Location	Guildhall or one of the Natural Environment site offices (post holder is required to be flexible across all Natural Environment sites)
Responsible to	Natural Environment Director
Responsible for	<p>Direct:</p> <p>Head of Learning</p> <p>Head of Heritage & Museums</p> <p>Head Ranger Burnham Beeches</p> <p>Head Ranger West Wickham & Coulsdon Commons</p> <p>Head Ranger Ashted Common</p> <p>Carbon Removals Project Manager</p> <p>Indirect</p> <p>Learning team (12 staff)</p> <p>Heritage and Museums team (8 staff)</p> <p>Carbon Removals Project Officer</p>

Main Purpose of Job

The Deputy Director of Natural Environment is responsible for supporting the Executive Director Environment and Natural Environment Director to shape the strategic direction of the division by leading the implementation of the vision, mission, strategies, stakeholder engagement plans and a five-year transformation and improvement plan with a strong focus on best practice, income, and sound fiscal management.

With the Natural Environment Director, lead on delivering the Natural Environment Vision, Mission and Strategies in collaboration with operational leads / committee chairs and reporting to committees.

To lead the Consultancy function of the Natural Environment Division, including learning, natural and cultural heritage, and projects.

To lead The Commons Teams.

To support the Natural Environment Director and Assistant Director Charities and Commercial in all aspects of developing and delivering the Natural Environment Charity Income Strategy, ensuring maximum impact achieved through charity fundraising and other means of generating income which includes working more widely across the Environment Department in relation to the Operational Property review.

To drive, innovate and collaborate in identifying new trends and challenges as they emerge taking account of relevant legislation and guidance, and government thinking.

Have corporate oversight and be responsible for advising Members, Departments, and external stakeholder on any aspect of Environmental Resilience and how to meet the climate challenges within the Natural Environment.

To lead the development and implementation of a stakeholder engagement plan across the Natural Environment Division, to improve and build on relationships with key stakeholders including HSE (Health and Safety Executive), DEFRA (Department for Environment Food & Rural Affairs), Natural England, the Rural Payments Agency, local authorities, NGOs, businesses and landowners.

Play a key role in the strategic leadership and direction of the Natural Environment Division, deputising as required for the Executive Director, Natural Environment.

Main Duties & Responsibilities

1. Working with the Exec Director, Natural Environment Director and Assistant Director Charities and Commercial to develop and implement a range of strategies and plans including stakeholder engagement, natural capital, environmental resilience, visitor engagement, land management, cultural heritage, and sports and leisure as well as an income generation strategy for the Division.

2. Lead the development and management of the Division's Consultancy function including leading the Learning Team, Heritage & Museums team and project teams including the Carbon Removals Project team.
3. Lead the development and management of the three Commons Teams, acting as Superintendent for The Commons.
4. Ensure the Division operates in a whole systems way, utilising resources across the Division in a manner consistent with City of London aims and policies and professional standards expected of the Division. Improvements are needed so an improvement plan will be essential.
5. Work with Members and Directors to drive strategy development and implementation, service delivery and change. Identify, develop, and implement recommendations to the relevant Committees regarding the future governance of the spaces, including consideration of the current and any new charitable trusts, ability to effectively fund the habitat, estate, and visitor management activities at the spaces over the long term, and ensure best practice for charitable trusts.
6. To co-develop, co-lead and ensure implementation of strategies and plans across the various operational satellite sites, including the identification of opportunities, drafting funding applications and supporting staff in income generation activities overseeing, and coordinating bidding processes and monitoring and leading monitoring and evaluation.
7. With the Assistant Director Charities and Commercial, ensure that the governance arrangements are fit for purpose to deliver the strategies and that each section of the charity review is further developed and delivered. Providing guidance to colleagues to ensure that all aspect of the CoL Natural Environment charities are managed in compliance with regulations.
8. With the Assistant Director Charities and Commercial, keep under close review the strategic direction of each charity, in line with the charity objects, working with key partners to identify whether it is possible to extend the scope of services that can be offered so that positive impacts and outcomes can be demonstrated and promoted, internally and externally.
9. Represent the Corporation at a strategic level with Government departments, the GLA (Greater London Authority) and other external organisations and partnerships such as C4O, Resilient Cities and businesses to achieve the Corporation's strategic aims and objectives.
10. Exercise robust budgetary management and control of all designated budgets for the division, and in accordance with directorate and corporation policy take positive steps to secure and maximise income where appropriate. Ensure that

the charities, capital and revenue budgets for the Division are developed, monitored, and managed effectively in accordance with departmental arrangements, Corporation policy, standing orders and charity legislation; identifying opportunities for increased income and funding streams, including but not limited to commercial initiatives.

11. With the Director, have overall responsibility for all areas of functions and legal jurisdiction of the Division, including on highly complex and contentious issues and be a primary source of advice to Members.
12. Provide briefings for and advise the Executive Director, Environment, Director Natural Environment, Town Clerk, Chair of Policy & Resources, Members and Committees of the Corporation on all areas of responsibility.
13. Embed a culture which is motivational, fosters excellence performance, innovation and trust amongst staff, and facilitates cross-team working and a strong team culture; and to promote continuous improvement that values learning, development, commitment to equality, diversity & inclusivity.
14. Ensure that staff are developed to realise their potential and that individual and team performance is reviewed and monitored throughout the year to ensure quality service provision. To lead staff and ensure they are all supported in their development and continual learning; build a collaborative working environment and an innovative culture; and encourage staff to develop specialisms to broaden in-house capabilities.
15. Be responsible for the effective and efficient use of the resources and to take responsibility for the management of all relevant risks in their area of responsibility, in line with good practice and legal & regulatory requirements.
16. Lead division-wide planning, prioritisation, and performance assessment; helping the team to understand and commit to the execution implications of strategic ideas and goals, while maintaining cost effectiveness and a pragmatic and agile approach to staffing and resourcing.
17. Proactively lead implementation of the City of London's Occupational Health and Safety Policy in relation to the duties of the post, and at all times give due regard to the health and safety of both themselves and others when carrying out their duties.
18. Actively seek to implement the City of London's Equal Opportunity Policy and the objective of promoting equality of opportunity in relation to the duties of the post.
19. To undertake any other duties that may reasonably be requested appropriate to the grade.



PERSON SPECIFICATION	
Job Title	Natural Environment Deputy Director (interim)
Department	Environment Department
Grade	I

Please find below the key skills, experience and core behaviours required to undertake this post.

This leader should have extensive experience in the environmental and/or leisure sectors, ideally both, in addition to strong leadership and management capability.

Professional Qualifications / Relevant Education & Training

- Education to at least degree level or ability to demonstrate equivalent experience of working in a similar role within the charity, grant making or public sector. (A)
- Recognised Project Management Qualification or demonstrable experience (A)

Experience Required

- Extensive knowledge of the environmental and/or parks, sport/ leisure, charitable and/or voluntary or public sectors. (A)
- Knowledge of the relevant national and local government bodies and legislation relating to the environment, conservation, climate change and biodiversity. (A/I)

- Thorough experience of working in the conservation and/or sport/ leisure sectors, ideally in the charitable sector (A)
- Significant experience of developing ambitious programmes to increase conservation activities and/or sport/leisure and recreation activities (A/I)
- Experience of developing collaborative, influential partnerships and programmes with relevant stakeholders (A)
- Experience at a senior level in a similar organisation, and experience of working with boards of directors/trustees/elected members (A/I)
- A record of significant and innovative accomplishment in building and implementing effective strategies and programme delivery, and ideally fundraising campaigns (A/I)
- Proven track record at senior level leading a professional team through change that results in measurable outcomes, including monitoring, evaluating and reporting impact to key stakeholders (A/I)
- Experience of managing and developing staff, including setting and measuring objectives and managing performance. (A)
- Experience of delivering balanced budgets (A)
- Experience of working co-operatively as part of a team. (A)

Technical and General Skills/Behaviours

- A passion for the natural environment – the successful candidate will be driven by a concern to make a positive difference (I)
- Strategic thinker driven by impact and evidence, curious to keep up to date with new ideas and innovations and sees the positive potential in change (A/I)
- Strong interpersonal skills, emotional intelligence and authenticity in order to communicate with impact to different audiences, from Members and other senior political figures to volunteers, children and staff (A/I)
- Resilient – able to cope with a senior role carrying significant responsibility, juggling competing priorities and potentially demanding requirements by Members (I)
- An ability to deliver through others and build a high performing team (I)
- An ability to communicate complex issues clearly (I)
- Excellent verbal communication skills with the ability to engage with, advise and speak assertively and persuasively on complex matters, internally and externally, at all levels of seniority. (I)
- Excellent written communication skills with the ability to write high quality detailed committee reports, policy and strategy documents on the assessment, development and management of grants and grant-making and make compelling arguments to key stakeholders in relation to funding recommendations. (A/I)
- Ability to negotiate favourable positions and influence strategies which achieve strategic and organisational aims and objectives (A/I)

- Understanding of the motivations, concerns and values of different groups and stakeholders, ensuring communicative approaches are tailored accordingly. (A/I)
- Willingness to work flexibly, and sometimes out of regular office hours is required (A/I)

Recruitment – Note to Applicants

The qualifications, experience and technical skills will be used in the decision-making process for recruitment. Please give examples of how you have exhibited these behaviours in your previous role(s). It is essential you address the criterion marked as (A) on your application form in the section for supporting information.

Be as specific as possible, we cannot guess or make assumptions, but will assess your application solely on the information provided. Try to provide evidence, by examples, where possible, of skills, knowledge and experience contained in this person specification.

This page is intentionally left blank

Committee(s): Natural Environment Planning and Transportation	Dated: 11 December 2025 2 December 2025
Subject: The Planning and Infrastructure Bill	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	Dynamic Economic Growth Leading Sustainable Environment Vibrant Thriving Destination Flourishing Public Spaces
Does this proposal require extra revenue and/or capital spending?	N/A
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: Paul Wright, City Remembrancer, Katie Stewart, Executive Director of Environment	For Information
Report author: Philip Saunders, Parliamentary Affairs Counsel	

Summary

1. The proposals in the gargantuan Planning and Infrastructure Bill that attracted the most media attention were those intended to speed up and streamline the delivery of new buildings and infrastructure. Many of those high profile provisions relate to energy projects, consenting and offshore electricity transmission. The Bill runs to 111 clauses and 190 pages.
2. Some aspects of the Bill have generated controversy, not least those related to the environment. There was robust argument about the proposals for a national scheme of delegation of planning decisions, that would create a standardised national framework about which planning functions should be dealt with by planning officers, by planning committees and sub-committees.
3. Other proposals include:
 - Changes to the existing schemes of mitigations and controls relative to the environmental impacts of developments
 - A reduction in the number of statutory consultees in planning applications
 - New arrangements for local planning committees, and increasing the capacity of local planning authorities (LPAs)
 - That LPAs will be permitted to recover the cost of planning fees.
 - Reforms to the compulsory purchase order process
 - Changes to the process of street works approval in order to accelerate the installation of electric vehicle public charge points

The provisions of most interest to the City Corporation are outlined in this Report, which has been written in collaboration with officers in Natural Environment and Planning. The Bill is nearing the end of its Parliamentary process, as it has completed its Third Reading in the House of Lords, its second House.

Parliamentary Commentary

4. Labour's General Election manifesto contained provisions that have made their way into the Planning and Infrastructure Bill, most notably commitments to increase the rate of housebuilding, to introduce a presumption in favour of sustainable development, the building of new towns, reforming compulsory purchase compensation rules and implementing changes to environmental protections. Labour also committed to making it simpler to deliver national infrastructure projects.
5. Introducing the Bill, the then Secretary of State for Housing, Communities and Local Government Angela Rayner said the measures were crucial for achieving economic growth, building more houses, and fast-tracking 150 major infrastructure projects. Responding for the Opposition, Kevin Hollinrake said the Bill represented a "top-down model driven by arbitrary targets and central diktat", and that it would side-line local voices. He supported some of the moves to simplify the planning system. For the Lib Dems, Gideon Amos agreed with Conservative opposition to centralisation, but gave his support to building more houses and permitting local flexibility on planning application fees. He said the party was "gravely concerned" about the effect of the Bill on nature.
6. At committee stage, there were tense debates on proposals for a national scheme of delegation of planning decisions. Whilst the Minister alluded to the benefits of "greater consistency and certainty" about which decisions are made at planning committee, opposition Members described it as a "power grab" and "centralising".
7. Particular criticism was aimed at the parts of the Bill related to environmental protections. Labour backbenchers tabled substantive amendments to the measures, politicians on all sides, the Government's own Office for Environmental Protection, and campaign groups objected to the changes as being detrimental to the natural environment. In an unusual move, on the final day of the committee stage on the Bill, a group of 81 leaders of environmental organisations, lawyers, academics, professional bodies and businesses released a statement calling for a "pause" on these elements of the Bill. The Government rejected those entreaties.
8. Local Government Minister Matthew Pennycook asserted that the Bill would not permit developers to harm the environment without consequences. He said the Bill was "not a means of making unacceptable development acceptable" and that the Bill would give Natural England the ability to request planning conditions. He insisted that existing protections for important sites and species in national planning policy would not be changed. He said the Bill would not allow for "irrecoverable harm", such as the destruction of irreplaceable habitats.
9. In the House of Lords, following many weeks of debate, the Government inserted several new provisions intended to strengthen some environmental protections. The broad effect will be to encourage the retention of environmental features on development sites, rather than permitting environmental improvements at other sites to make up for damage at development sites.

Infrastructure and Planning

10. The intentions set out in Labour's 2024 manifesto included increased building and improvements to transport and energy infrastructure, which the Government regards as critical in relation to major infrastructure projects such as Sizewell C and the Lincolnshire Reservoir. Highlighted below are the aspects that are of most relevance to the City Corporation.

Electric Vehicles

11. Installation of electric vehicle charging points on the public road network is currently subject to several different statutory schemes and consents procedures. The New Roads and Street Works Act 1991 (NRSWA) and the Traffic Management Act 2004 (TMA), for example, require those carrying out street works to apply for either a permit or a licence under NRSWA from the relevant Highway Authority before carrying out works. Permits are available to those with a statutory right to carry out works on the highway, whereas those who do not have a statutory right can apply for a NRSWA licence. The Bill builds on a Conservative Government proposal to grant electric vehicle charge point operators access to the street works permit scheme. Consequently, the Bill will remove the need for licences where the works are capable of being authorised by permits.

Pre Planning Consultation in Nationally Significant Infrastructure Projects

12. Nationally Significant Infrastructure Projects (NSIPs) were introduced as a statutory concept in the Planning Act 2008. Examples of projects qualifying as NSIPs include power stations, railways, offshore wind farms and reservoirs.
13. The Bill sets out a new power for the Secretary of State to give a direction disapplying the requirement for development consent for certain specified development falling within the meaning and description of an NSIP. During debates in Commons committee, the Government introduced a new clause that removed the requirement for NSIP applicants to consult before making their application. In the future, an applicant submitting an application for development consent will no longer be required by statute to consult statutory consultees, landowners, local authorities and the community before submitting their application to the Secretary of State. As a consequence of this change, the Bill also removes the definitions of local authorities and categories of persons for the purposes of the statutory consultation and the requirement for an applicant to take responses to consultation and publicity into account when preparing their application.
14. The effect is that an applicant is no longer required to provide a consultation report as part of the documentation required when submitting their application for development consent to the Secretary of State. As the requirement to prepare a consultation report has been removed, the Bill also removes the requirement for the consultation report to be made available to the public for inspection.

Planning Fees

15. In 2024, the previous Government sought views on how to ensure the consenting processes for delivering transport infrastructure were effective and resilient. Building on that consultation and in a change that will enable the City Corporation to recover its costs of running planning application services, the Bill proposes that local planning authorities (LPAs) will be able to charge more flexibly. This is likely to result in local and regional variations in planning fee rates. Authorities - including the City Corporation - will be permitted to recover the costs of delivering

their relevant planning functions, namely the full expenses incurred by LPAs carrying out their relevant planning function related to the processing and determining of planning applications, including for technical specialists. The fee must not exceed cost recovery.

16. This aspect of the Bill will come into force 2 months after Royal Assent, most likely in the early part of 2026.

Planning Committee Reform

17. In new arrangements that will affect the City Corporation - and as forecast in a Government working paper produced in February 2025 - planning committees will be reformed. Much of the detail will be contained in regulations to be produced separately. In outline, the changes include introducing a national scheme of delegation that will (through subsequent regulations) set out which planning functions should be delegated to planning officers for a decision and which should go instead to a planning committee or subcommittee. The Bill sets out a power to limit the size of planning committees.
18. The Government's stated aim in relation to a national scheme of delegation is to ensure that there is greater consistency and certainty across England about who in a local planning authority (LPA) will be responsible for making planning decisions. It is also intended to speed up decision making by ensuring that planning committees focus their resources on complex or contentious development where local democratic oversight is required.
19. Following objections, the Government will not pursue proposals for dedicated planning committees on strategic development.
20. Planning committee members will be required to undertake mandatory training before they can make planning decisions. The details of this new system will be set out in separate regulations, but could include matters such as determining applications for planning permission, issuing enforcement notices and determining applications for advertisement consent. Only those who are certified as having satisfactorily completed training will be permitted to be involved in planning decisions. LPAs must publish on their websites which of their committee members hold valid certificates confirming the completion of the training. The Mayor of London and anyone authorised to deputise for him will be subject to the same regime.

Compulsory Purchase

21. The Bill changes the Compulsory Purchase Orders (CPO) process and land compensation rules to enable more effective land assembly through public sector-led schemes. This includes allowing statutory notices to be delivered electronically, simplifying information required to be included in newspaper notices, more delegation of decisions, quicker vesting of land/properties, and changes to the loss payments regime.

National Policy Statements

National Policy Statements (NPSs) are produced by the Government and comprise the Government's objective for the development of nationally significant infrastructure projects. The following matters are within the scope of NPSs: energy infrastructure, transport, hazardous and waste water. Currently, planning authorities, including at the City Corporation, rely on NPSs as a framework for decision

making in those specified areas. The Bill introduces, through amendments to the Planning Act 2008, a new requirement for NPSs to be subject to a full review and updated at least every five years.

Nature

Overview

22. This part of the Bill is of significant interest in relation to the City Corporation's open spaces.
23. The existing regimes of environmental protection, the obligations on developers and the approach to mitigations are highly complex and are typically discharged on a project-by-project basis. The Bill proposes to replace the current approach to environmental mitigation and protection with a more generalised approach. The Bill establishes a Nature Restoration Fund (NRF) as an alternative approach – allowing developers new ways to discharge certain environmental obligations relating to protected sites and species.
24. The NRF will be made up of contributions from developers through a nature restoration levy. This will provide funding for Natural England (or another designated delivery body) to bring forward Environmental Delivery Plans (EDPs), that will set out the strategic action to be taken to address the impact that development has on a protected site or species.

Environmental Delivery Plans ("EDP")

25. In a significant change to current arrangements, where an EDP is in place and a developer utilises it through paying the nature restoration levy, the developer would no longer be required to undertake its own assessments, or deliver project-specific onsite interventions.
26. Natural England will produce EDPs on one or more environmental effects of development relating to a specific geographic area and will specify the amount and type of development that will be within the scope of a Plan. The EDP will also set out how interventions will be monitored. Natural England will be required to publish reports on an EDP at the halfway and end points.
27. EDPs will set out:
 - the environmental feature the EDP seeks to protect. This will be an ecological feature of a protected site (for example, a European Site, SSSI or Ramsar site), or a protected species
 - the environmental impacts the EDP seeks to address. This includes information on the type and amount of development that can benefit from the EDP's cover
 - the conservation measures to be taken, both to address those impacts and contribute to nature restoration. It should clearly set out whether conservation measures are being delivered locally or at the broader network scale
 - the amount payable in relation to a development will cover the costs of these conservation measures. Whilst EDPs will usually be voluntary, there may be circumstances where use of an EDP may be mandatory if that is necessary
 - the environmental obligations that are disapplied once the developer is liable to pay the nature restoration levy

28. Through an EDP, developers will be relieved of the requirement to conduct relevant environmental assessments, to the extent that the impacts covered by that requirement is instead dealt with through payment to the EDP. Natural England will then take responsibility for delivering the conservation measures in the EDP.
29. When preparing an EDP, Natural England must:
- notify the Secretary of State that it is preparing an EDP on a particular issue in a particular area
 - prepare the draft EDP having regard to relevant strategies and guidance
 - consult the public, statutory consultees, local authorities and any other bodies Natural England or the Secretary of State considers relevant, taking their views into account
 - send the final EDP to the Secretary of State for consideration as to whether to approve the EDP.
30. When making a decision on whether to make an EDP, the Secretary of State must be satisfied that the conservation measures set out in the EDP outweigh the negative effects of the development. In making this decision, the Secretary of State will benefit from the views of consultees and, where applicable, the expertise of Natural England in preparing the EDP, as to the adequacy of the proposed measures and the safeguards included in the EDP.
31. Once made, EDPs will have a defined 6-week challenge period.
32. In response to the negative reactions to this part of the Bill at committee stage, including from the Office for Environmental Protection and most nature conservation organisations, the Government introduced measures aimed at reassuring critics. These new measures include requiring EDPs to demonstrate how conservation measures will be maintained and over what period, strengthening the requirement on the Secretary of State so that they must be satisfied that conservation measures outweigh environmental harms, clarifying that the negative effect the Secretary of State must consider relates to the maximum amount of development described in an EDP, and ensuring that Natural England has sufficient powers of entry to survey or investigate land.
33. In a last-minute change in the Lords, intended to allay continued concerns about environment protections, the Government changed the Bill so as to place a requirement on the Secretary of State to make regulations setting out a prioritisation of the different ways in which the negative effect of development which may be subject to an EDP may be addressed. The Minister summarised the change as being to provide transparency as to how Natural England will undertake the preparation of an EDP and how it should prioritise the actions available to it to deliver the overall improvement test. This amendment will allow the Government to bring forward regulations setting out the appropriate prioritisation of actions taken to address the negative effect of development through an EDP. Overall, the change will express the principles of the existing mitigation hierarchy in the Bill's new arrangements.
34. The City Corporation's Natural Environment officers remain concerned at the lack of clarity regarding environmental mitigation hierarchies (which are prioritised, step-by-step frameworks for addressing the environmental impacts of a project, starting with avoidance of impacts, followed by mitigation, then restoration, and finally offsetting any unavoidable residual impacts). Whilst a Ministerial Statement has recognised the use of mitigation hierarchies in EDPs,

parliamentarians are likely to continue to pressure the Government to add certainty to their status in the planning system.

Conclusion

35. Officers will closely monitor changes to NSIP consultations and engage with the Government as the regulations, guidance and consultations develop – to reinforce the importance of collaboration and local involvement during the NSIP process. The City Corporation will have a new level of interaction at the level of development and open space protection with developers and Natural England.
36. On planning, the Bill attracted significant media and public attention, but the matters of interest to the City Corporation are relatively limited in number. Administrative changes will be required to the Corporation's planning committee arrangements to align with the requirements outlined above.

Philip Saunders

Parliamentary Affairs Counsel

02073321201

philip.saunders@cityoflondon.gov.uk

This page is intentionally left blank