



## Natural Environment Board

**Date:** THURSDAY, 1 MAY 2025  
**Time:** 9.30 am  
**Venue:** COMMITTEE ROOMS - 2ND FLOOR WEST WING, GUILDHALL

**MEMBERSHIP OF THIS COMMITTEE WILL BE CONFIRMED AT THE ANNUAL MEETING OF THE COURT OF COMMON COUNCIL ON 25 APRIL 2025.**

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**Ian Thomas CBE**  
**Town Clerk and Chief Executive**

# AGENDA

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

## Part 1 - Public Agenda

1. **APOLOGIES**

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

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

To receive the Order of the Court of Common Council dated 25 April 2025.

**For Information**  
*(To follow after Court of Common Council on 25 April 2025)*

4. **ELECTION OF CHAIRMAN**

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

**For Decision**

5. **ELECTION OF DEPUTY CHAIRMAN**

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

**For Decision**

6. **MINUTES**

To agree the public minutes and non-public summary of the previous meeting held on Thursday 06 February 2025.

**For Decision**  
(Pages 5 - 10)

7. **APPOINTMENT OF A REPRESENTATIVE TO THE STREETS AND WALKWAYS SUB-COMMITTEE**

The Committee are invited to appoint one Member as the Natural Environment Board representative on the Streets and Walkways Sub-Committee.

**For Decision**

8. **\*YOUTH NATURAL ENVIRONMENT BOARD - PROGRESS UPDATE**

The Committee to receive a progress update from Simon Lightman of King Edward's Witley.

**For Information**

9. **\*CLIMATE ACTION STRATEGY 2020 - 2040 - UPDATE**

The Committee to receive a presentation by Officers of the Environment Department.

**For Information**

10. **\*RISK MANAGEMENT UPDATE REPORT**

Report of the Executive Director, Environment.

**For Information**

**Open Spaces**

11. **TERMS OF REFERENCE FOR THE NATURAL ENVIRONMENT  
COMPLEMENTARY LAND POLICY AND COMPLEMENTARY LAND USE  
APPRAISAL**

Report of the Executive Director, Environment.

**For Discussion**  
(Pages 11 - 22)

12. **\*TRANSFORMATION FOR THE NATURAL ENVIRONMENT CHARITIES –  
PROJECT UPDATE AND GOVERNANCE ARRANGEMENTS FOR  
IMPLEMENTATION PHASE**

Joint Report of the Chamberlain and the Executive Director, Environment.

**For Information**

**City Gardens**

13. **\*CITY GARDENS UPDATE - VERBAL**

The Committee to receive a verbal update from Officers from the Environment Department.

**For Information**

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

15. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREE SHOULD BE CONSIDERED**

16. **EXCLUSION OF THE PUBLIC**

**MOTION:** That under Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

**For Decision**

**Part 2 - Non-Public Agenda**

17. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the previous meeting held on Thursday 06 February 2025.

**For Decision**  
(Pages 23 - 26)

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

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

## NATURAL ENVIRONMENT BOARD Thursday, 6 February 2025

Minutes of the meeting of the Natural Environment Board held at Committee Rooms  
- 2nd Floor West Wing, Guildhall on Thursday, 6 February 2025 at 11.00 am

### **Present**

#### **Members:**

##### **Present:**

Caroline Haines (Chair)  
Eamonn Mullally (Deputy Chairman)  
Andrew McMurtrie  
Wendy Mead OBE  
James St John Davis  
Heather Barrett-Mold  
Tony Leach

#### **In attendance:**

Benjamin Murphy  
Alderman & Sheriff Gregory Jones KC (Ex-Officio Member)  
Catherine Bickmore (Observer)  
Verderer Paul Morris (Observer)

#### **Externals:**

Sam Brook, Nuffield Scholar

#### **Officers:**

Clem Harcourt	- Chamberlain's Department
Jack Joslin	- City Bridge Foundation
Anna Cowperthwaite	- Comptroller and City Solicitor's Department
Katie Stewart	- Executive Director, Environment
Emily Brennan	- Environment Department
Ben Bishop	- Environment Department
Joanne Hill	- Environment Department
Jo Hurst	- Environment Department
Andrew Impey	- Environment Department
Joe Kingston	- Environment Department
Geoff Sinclair	- Environment Department
Jake Tibbetts	- Environment Department
Maria Traynor	- Environment Department
Ben Dunleavy	- Town Clerk's Department
Zoe Williams	- Town Clerk's Department

### 1. **APOLOGIES**

Apologies were received from Deputy Alpa Raja, Vladislav Dobrokhoto, and William Upton KC.

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

There were no declarations.

3. **MINUTES**

**RESOLVED** – That, the public minutes and non-public summary of the previous meeting held on 10 December 2024 be agreed as a correct record of the meeting.

*Items 16 to 20 were considered before item 4.*

4. **NUFFIELD SCHOLAR PRESENTATION**

The Committee received a presentation from Sam Brooks, a Nuffield Scholar.

The Chair asked whether the scholar was considering the issue of sustainable substrate being more expensive as part of his research. The Committee heard that it is twice as expensive to fill a pot with peat-free substrate and the crops grow slower. The scholar noted that it will be important to find the balance between sustaining the business and moving to greener growing methods.

5. **YOUTH NATURAL ENVIRONMENT BOARD - VERBAL UPDATE**

The Chair provided an update on the Youth Natural Environment Board.

6. **CARBON ACTION STRATEGY PRESENTATION**

The Committee received a presentation from Officers from the Innovation and Growth Department about the Climate Action Strategy.

During the discussion, the following points were noted:

- a) A Member queried how 100 tonnes of carbon had been captured through the Climate Action Strategy. The Committee heard that the framework had been created through planting more greenspaces that will eventually absorb the carbon. The Officer noted that the absorption will take time, which is why the captured carbon is not measured in the sequestration target.
- b) Another Member noted that in previous discussions it was suggested that if the City Corporation could not meet its carbon targets, it could purchase more lands to be used as green spaces. The Member queried whether any progress had been made in this space. The Officer responded that this is not currently part of the plan. However, if there were other City Corporation reasons to purchase land, this may have a consequential benefit on the Climate Action Strategy.
- c) The Chair noted that Open Spaces are an effective part of the Climate Action Strategy as they are currently achieving green in all of their targets.

**RESOLVED** – That, Members received the report and noted its contents.

*Item 13 was considered before item 7.*

*The Chair left the meeting.*

*Eammon Mullally (Deputy Chair) took the Chair at 12.23pm.*

**7. RISK MANAGEMENT UPDATE REPORT**

The Committee received a report of the Executive Director of Environment which provided an update on risk management procedures in place within the Natural Environment Board.

During the discussion, a Member noted that risk appetite appears to be changing due to factors such as change in government. The Member asked Officers for this to be reflected in the overall risk register.

**RESOLVED** – That, Members received the report and noted its contents.

**8. FIRST CONSIDERATION: ENHANCED BIODIVERSITY DUTIES OF PUBLIC AUTHORITIES**

The Committee received a report of the Executive Director of Environment which set out what the City Corporation can do to conserve and enhance biodiversity.

During the discussion, the following points were noted:

- a) A Member was interested in what sorts of actions had been taken to increase biodiversity. The Committee heard the gardens and cleansing team had been delivering the four key areas of the Biodiversity Action Plan, and the Planning and Development division have been working to get their biodiversity policies into the City Plan 2040. The specific biodiversity actions in garden were elaborated on in the City Gardens Update.
- b) In response to a query about working with Local Nature Recovery Strategies, the Officer noted that the strategies have provided a forum to collaborate across departments.

**RESOLVED** – That, Members received the report and noted its contents.

**9. ENVIRONMENT DEPARTMENT HIGH-LEVEL BUSINESS PLAN 2025-30**

The Committee considered a report of the Executive Director of Environment which set out the high-level Business Plan for the Environment Department for 2025 to 2030.

A Member requested that the 'Outcomes/Impacts' column in Section C be amended to solely reflect impacts, and the outcomes be moved to the prior columns to avoid confusion. The Officer agreed that they will take on this suggestion.

**RESOLVED** – That, Members:

- Noted the factors taken into consideration in compiling the Environment Department's high-level Business Plan 2025-30

- Approved, subject to the incorporation of the above change sought by the Committee, Section C of the Environment Department's high-level Business Plan 2025-30 (as set out in Appendix A), which covers the service areas for which the Natural Environment Board is responsible.

#### **10. REVENUE AND CAPITAL BUDGETS 2025/26**

The Committee considered a report of the Chamberlain and the Executive Director of Environment which set out the revenue and capital budgets for the Natural Environment Board for 2025/26.

During the discussion, a Member noted that the central recharges cost has gone up significantly and in turn, is taking up a significant portion of the Open Spaces budget. The Member noted that there is currently a review taking place that is examining these recharges.

**RESOLVED –** That, Members:

- Noted the latest revenue budget for the Natural Environment Board for 2024/25
- Approved the proposed revenue budget for 2025/26 for the Natural Environment Board for submission to the Finance Committee.
- Approved the City Garden's capital and supplementary revenue budgets for 2025/26 for submission to the Finance Committee.
- Agreed that amendments to 2024/25 and 2025/26 budgets arising from changes to recharges or any further implications arising from corporate contracts, energy price increases, changes to the Cyclical Works Programme, and capital charges during budget setting be delegated to the Chamberlain in consultation with the Executive Director of Environment.
- Noted the provisional 2025/26 revenue budget estimates for the services overseen by the other Natural Environment Committees as set out in Appendix 3.

#### **11. OPERATIONAL FINANCE PROGRESS REPORT - QUARTER 3 (DECEMBER 2024) 2024/25 - NATURAL ENVIRONMENT DIVISION**

The Committee received a report of the Chamberlain which provided a quarterly update on the operational finance position for the Natural Environment Division's revenue budget.

**RESOLVED –** That, Members received the report and noted its contents.

#### **12. CITY GARDENS UPDATE**

The Committee received a report of the Executive Director of Environment which provided an update on City Gardens projects.

During the discussion, the following points were noted:

- a) In response to a query about the status of the garden near the Member's carpark, the Committee was informed that scaffolding had to be erected



in the garden for emergency works on the cladding of the neighbouring building.

- b) A Member requested that the Officer share the presentation with the Committee.
- c) A Member was interested in the lessons that City Gardens had learnt from the projects it had delivered this year. The Officer responded that various failed plants had taught the team about the best planting mediums for various environments and lead them to develop a catalogue on climate resilient planting.
- d) The Member also asked whether there was an action plan in place to replace the felled trees in Houndsditch. The Officer responded that there will be 43 trees planted this year. The failure of the previous trees in Houndsditch was likely to be a result of poor drainage in the area. The Officer noted that they will planting trees that are more resilient to the area's conditions in the near future.

**RESOLVED** – That, Members received the report and noted its contents.

### 13. TOWER HILL PLAY PROJECT

The Committee considered a report of the Executive Director of Environment which presented a new design for the play area in Tower Hill.

During the discussion, the following points were noted:

- a) In response to a query, the Committee heard that the funding for the budget envelope of £250,000 had been allocated through the City Fund budgets and Section 106 agreements.
- b) When asked about the location of the play area, the Committee heard that the boundary of the City of London and Tower Hamlets runs through the middle of the play area.
- c) A Member asked whether the whole life costs for renewing the playground had been considered in the budget for future years. The Officer noted that this had not as there should be less ongoing management than the current play area. The Member encouraged the Officer to consider the play area renewal costs in the budget.
- d) A Member noted that this project was closely related to the Destination City programme, and route-marking and signage would be important to support that link.

**RESOLVED** – That, Members:

- Approved the design for a new play area at Tower Hill Gardens
- Authorised preparation and submission of planning applications to Tower Hamlets to secure planning permission for the works, along with authority for officers to negotiate and enter any related planning agreements before a gateway 5 report can be developed to draw down the remaining budget and proceed to the build stage.

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

There were no questions.

**15. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREE SHOULD BE CONSIDERED**

There were no urgent items.

**16. EXCLUSION OF THE PUBLIC**

**RESOLVED** – That, under Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

**17. NON-PUBLIC MINUTES**

**RESOLVED** – That, the non-public minutes of the previous meeting held on 10 December 2024 be agreed as a correct record of the meeting.

**18. TRANSFORMATION FOR THE NATURAL ENVIRONMENT CHARITIES - OUTCOMES OF THE NATURAL ENVIRONMENT CHARITIES REVIEW**

The Committee received a report of the Executive Director of Environment, the Interim Managing Director of City Bridge Foundation, and the Chamberlain.

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

There were no questions.

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

There were three non-public items of urgent business.

**The meeting ended at 12.59 pm**

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Chairman

**Contact Officer: Callum Southern**  
**Callum.Southern@cityoflondon.gov.uk**

## City of London Corporation Committee Report

<b>Committee(s):</b> Hampstead Heath Consultative Committee – For Discussion Natural Environment Board – For Discussion West Ham Park Committee – For Discussion Hampstead Heath, Highgate Wood & Queen’s Park Committee – For Discussion Epping Forest & Commons Committee – For Discussion	<b>Dated:</b> 29/04/2025  01/05/2025 01/05/2025 20/05/2025 29/05/2025
<b>Subject:</b> Terms of Reference for the Natural Environment Complementary Land Policy and Complementary Land Use Appraisal	<b>Public report:</b> For Discussion
<b>This proposal:</b> <ul style="list-style-type: none"> <li>• <b>delivers Corporate Plan 2024-29 outcomes</b></li> <li>• <b>provides statutory duties</b></li> <li>• <b>provides business enabling functions</b></li> </ul>	Dynamic Economic Growth Leading Sustainable Environment Vibrant Thriving Destination Flourishing Public Spaces
<b>Does this proposal require extra revenue and/or capital spending?</b>	Yes
<b>If so, how much?</b>	Up to £50,000 will be needed to pay for a consultant to carry out an independent appraisal of the Complementary Land Use Appraisal
<b>What is the source of Funding?</b>	Funding will be sought from the Transformation Fund
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	Chamberlains has been consulted and has advised that an application can be made for Transformation funding.
<b>Report of:</b>	Katie Stewart, Executive Director Environment
<b>Report author:</b>	Emily Brennan, Natural Environment Director

## **Summary**

The City of London Corporation (CoLC) has commissioned a review of its eight Natural Environment charities (NE charities) as part of a wider charity review. The Natural Environment Charities Review (NECR) is a transformation programme delivering improvements to the governance and management of the NE Charities to ensure that the City of London Corporation (CoLC), as trustee, can demonstrate compliance with its various legal obligations, and that the charities can operate in a more self-determining and financially sustainable way into the future.

The NE charities own and manage an extensive portfolio of land and built assets outside of the Square Mile. A number of CoLC-owned assets which were originally purchased to support charity operations and/or to support income generation for the NE charities are managed in complement with those charities.

This report proposes the scope and terms of reference for two specific pieces of work to review and improve management of these assets: (a) the development of an updated Complementary Land Policy and (b) a Complementary Land Use Appraisal. The ToRs for the Complementary Land Policy and the Complementary Land Use Appraisal are being submitted to your Committee for consultation. Amendments suggested as a result of that consultation will be taken into account in preparing a final draft of the paper and accompanying ToRs which will be submitted to Policy & Resources Committee for decision on 12 June.

## **Recommendation(s)**

Members are asked to:

- Consider the report and appendices;
- Suggest any amendments and/or changes to the proposed Terms of Reference (ToRs) for (a) the work to develop a Natural Environment Complementary Land Policy (Appendix 1), and (b) the Natural Environment Complementary Land Use Appraisal (Appendix 2). Any proposed amendments and changes by your Committee and by other NE Committees will be considered in the preparation of the version of the ToRs which will be submitted to the Policy & Resources Committee on 12<sup>th</sup> June 2025 for decision.

## **Background**

1. The City of London Corporation (CoLC) manages a number of greenspaces and buildings in or around London, which are located outside of the Square Mile. Most of these assets are held by the CoLC in its capacity as the sole trustee of the NE charities, but some are held by the CoLC in its corporate capacity with the aim of supporting charity operations and/or funding. These assets are managed

in complement to the activities of the NE charities.

2. It is proposed that land assets which are managed, used and/or occupied by the Natural Environment charities, but which are held by the CoLC in a non-charity trustee capacity, will be referred to henceforth as Complementary Land, replacing previously used terms such as 'Buffer Land' and 'Pink Land'.
3. For the purposes of this report and appendices, reference to Complementary Land also includes any built assets associated with it, such as sheds, offices, lodges and otherwise.
4. Land held by the NE charities is managed and administered in line with the objects of the relevant charity, which generally require the preservation of these greenspaces in perpetuity for the recreation and enjoyment of the public. As land held by CoLC in a non-charity trustee capacity, Complementary Land is not restricted to these objects (although it may be subject to other, site specific constraints); however, the purpose of such land when acquired was and historically has remained to support and protect the land which is subject to those charitable objects. Many Complementary Land sites are essential for operations and host buildings and facilities such as sheds and offices; however, a large area, mainly to the north of Epping Forest, is tenanted farmland, grassland, woodland or other open space, and is not subject to the restrictions of the Epping Forest Act and so offers broader potential opportunities for income generation or other uses. The North London Open Spaces only have one site of Complementary Land, Heathfield House, which is used as office space. The majority of Complementary Land is located at Epping Forest, and there are also several parcels at The Commons.

## **Current Position**

5. The NECR has recommended that updated governance arrangements should be developed for these land parcels and their associated built assets. The 'Buffer Land Policy', which was principally articulated in a series of decisions of the Epping Forest and Open Spaces and Policy and Resources Committees in the 1990s, does not meet current management or governance needs and does not include all Complementary Land assets associated with the NE charities.

## **Proposals**

6. In order to better manage these Complementary Land assets, a Complementary Land Policy will be developed as part of the existing NECR programme. The policy development process will review existing policies relating to the acquisition and management of Complementary Land, including the existing 'Buffer Land Policy' for Epping Forest, with a view to replacing and consolidating them as appropriate within the Complementary Land Policy. This paper sets out the proposed Terms of Reference (ToRs) for the development of the Complementary Land Policy (Appendix 1).
7. The aims of the Complementary Land Policy are to set out a framework for CoLC's governance, resourcing and management of Complementary Land, as

well as for determining the optimum use for each asset moving forwards, considering the aims and objectives of the CoLC in its roles and responsibilities including as Charity Trustee. It will also consider priorities such as income generation potential, restrictions on potential uses and/or disposal of assets, and existing commitments such as contribution to the CoLC's Climate Action Strategy (CAS) targets. No additional funding is required for this piece of work as it is being funded as part of the existing NECR programme.

8. This paper also sets out the proposed ToRs for second piece of work: a Complementary Land Use Appraisal (Appendix 2). This piece of work will help inform the development of the Complementary Land Policy, but was a distinct piece of work requested by Policy & Resources Committee on 13<sup>th</sup> February 2025 following a debate about future potential uses of Loughton Golf Course (a Complementary Land asset in Epping Forest). This Appraisal will involve appointing a consultant to carry out an independent, detailed options appraisal for each Complementary Land asset.
9. The Policy and Appraisal are both critical to the NECR as commissioned by Finance Committee in 2023, and the P&R request to look afresh at how Complementary Land may be used against wider Corporation and/or NE Charities' objectives.
10. The Appraisal will be commenced as soon as possible in order to start assembling the necessary evidence for a site-by-site assessment as requested by Committee, but recommendations to P&R on the ultimate use of each site will be made in view of the final Policy that is developed. A recommendation for the future use of each asset will be proposed and will be put to P&R for decision following consultation with the NE charities' management committees and with other key stakeholders, including consultative committees. This assessment will consider what options are viable for each asset, strategic priorities, any restrictions on usage / disposal, potential for income generation, operational requirements, whether or not that asset is still delivering its original purpose, and whether that purpose is still valid – all against the newly developed Policy.
11. As part of the proposed Complementary Land Policy Review and Appraisal, there is also a requirement to fully understand and articulate their modern context, including the services they continue to provide to the charities such as operational function, climate mitigation, protection from encroachment, access, and income generation. It is also important to identify and explore the opportunities associated with these assets, such as income generation, environmental improvements including carbon sequestration, recreational and operational uses. Key constraints on existing or potential uses also need to be identified including legal and environmental restrictions and/or designations, national and local planning policies and frameworks, and any existing commitments (e.g. usage for carbon credits or biodiversity offsetting). It is proposed that this current and potential value should be formally, independently assessed alongside the benefits and risks of disposal options, including for housing, commercial or other development.

12. In the longer term it may be desirable for simplification of CoLC and charity administration to seek formal changes to the governing documents of relevant NE charities, to ensure they have appropriate powers to facilitate the management of a broader range of land and assets than currently envisaged in their charitable objects and founding Acts. The routes to achieve this are either through a Various Powers Act, or potentially through Charity Commission processes, either of which would be significant projects in themselves.

## **Corporate & Strategic Implications**

**Strategic implications:** The CoLC NE Complementary Land Policy and the Complementary Land Use Assessment both satisfy the City of London Corporate Plan outcome 'Leading Sustainable Environment'; *'We have a responsibility to ensure that we act as a leader on environmental sustainability and strive to enhance it in all aspects of how we work. Climate action, resilience, air quality, and sustainability are all facets of ambitious targets for the entire City to be net zero by 2040'*. They will also contribute to 'Providing Excellent Services' and 'Flourishing Public Spaces'.

**Financial implications:** The Appraisal does not fall within the original scope of the NECR therefore additional funding is sought to cover the cost of appointing an independent consultant to deliver it. The cost is anticipated to be in the region of £50,000 and funding will be sought from the CoLC's Transformation Fund. The need for additional budget for the legal input necessary to support the Land Use Assessment will be assessed as the detailed scope of the project is defined, and included within any funding bids as appropriate.

It should be noted that as Members have indicated that this work is a priority and should be completed by mid to late 2025, the Executive Director Environment has approved the appointment of a consultant to enable work to be progressed, underwritten by the Department's budget, which will ensure the work is not delayed.

**Resource implications:** The Terms of Reference at Appendices 1 and 2 outline membership of officer task and finish groups for oversight and delivery of these two workstreams.

**Legal implications:** Comptrollers and City Solicitors representation is included in both the Policy Development and Land Use Assessment work streams. The Complementary Land parcels were acquired at different times and have differing legal contexts. For example, while the majority are held in City's Estate, there are parcels adjacent to Epping Forest held in City Fund. Some parcels will have specific restrictive covenants on their titles. These factors will need to be taken into account during the review, and are particularly relevant to the 'constraints' element of the Land Use Assessment. The Complementary Land Policy will need to reflect the distinctions between CoLC in its charity trustee capacity and in its City's Estate/Fund capacities in the use and management of the various parcels, with appropriate supporting internal governance mechanisms identified and implemented.

**Risk implications:** Risks of both Complementary Land Policy Development and Complementary Land Use Assessment will be recorded on NECR Risk Register and managed by the Task and Finish Group for each project stream.

**Equalities implications:** Equalities implications will be taken into account where relevant as the Complementary Land Policy and Land Use Assessment are developed.

**Climate implications:** The City of London Climate Action Strategy will be taken into account both in the development of the Complementary Land Policy and in the Land Use Assessment. The latter will also include existing Natural Capital Assessment data and Biodiversity Net Gain potential, in combination with other considerations such as mitigation of local development pressures.

**Security implications:** To be included as part of Land Use Assessment (for example, if change of use of all or part of an existing land parcel presented a security concern to a charity or CoLC property).

### **Appendices**

Appendix 1: Terms of Reference: Complementary Land Policy Development

Appendix 2: Terms of Reference: Complementary Land Use Appraisal

### **Emily Brennan**

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# **City of London Complementary Land and Associated Assets Policy**

## **Development: Draft Terms of Reference 8/4/2025**

### **1. Introduction**

The City of London Corporation (CoLC) manages a number of greenspaces in and around London, which are located outside of the Square Mile. Most of these greenspaces are held by the CoLC in its capacity as the sole trustee of the charities, but some assets are held by the CoLC in its corporate capacity with the aim of supporting charity operations and/or funding, henceforth described as 'Complementary Land'.

Land held by the NE charities is managed and administered in line with the objects of the relevant charity, which generally require the preservation of these greenspaces in perpetuity for the recreation and enjoyment of the public. Complementary Land is not restricted to these objects, but its purpose originally and historically has been to support and protect the land which is subject to those charitable objects. For instance, many Complementary Land assets are essential for operational purposes and host buildings and facilities such as farm buildings and offices. However, a large area of Complementary Land around the northern sections of Epping Forest, is a mosaic of tenanted farmland, grassland, woodland or other open space and is not directly covered by the obligations of the Epping Forest Act. Similar sites exist at other Natural Environment sites but not to the same scale as at Epping Forest.

This document sets out the terms of reference for the Complementary Land Policy, to create a policy for managing what we now describe as 'Complementary Land' – defined as land parcels and associated assets that are close to (usually bordering) and managed in complement with the Natural Environment charities' assets. Complementary Land assets are not charity assets, instead being owned by the CoLC and held in City's Estate or City Fund.

### **2. Membership**

The Task and Finish Group will be chaired by the Natural Environment Director. The following departments/teams will be represented on the Group: City Surveyor's, the City Bridge Foundation (Central Funding and Charity Management Team), Comptrollers & City Solicitors, Town Clerk's, The Policy Unit, Chamberlains, and the Natural Environment Division. Representatives from Planning and from the Climate Action Programme will be invited into meetings as needed.

### **3. Purpose**

The purpose of this work is to undertake a review of Complementary Land and to create a policy that:

- 1) Updates and/or replaces extant policy and governance documentation relevant to the land parcels and assets, in particular the Epping Forest Buffer Land Policy;
- 2) Creates a framework for the City Corporation governance, resourcing and management of Complementary Land;

- 3) Considers the intention for which Complementary Land was originally purchased or transferred including specific circumstances arising;
- 4) Defines what Complementary Land needs to provide to support the charities now and considers if the original purchase intentions remain relevant;
- 5) Provides recommendations for any long-term charity governance and legislative powers required for the charities to manage Complementary Land;
- 6) Fully considers and clarifies the process for acquisition/disposal of Complementary Land;
- 7) Provides a clear framework for financial arrangements relating to the management, acquisition and disposal of Complementary Land.

#### **4. Duration**

The Complementary Land Task and Finish Group will exist until the Complementary Land Policy is approved and associated implementation processes and procedures have been agreed. Officers aim to bring the Complementary Land Policy to Policy & Resources Committee in 2025 for approval.

#### **5. Governance**

A policy recommendation from the Complementary Land Task and Finish Group will be brought to Policy & Resources Committee for decision as these assets are held by the CoLC in City's Estate or City Fund. Prior to this, Natural Environment Committees and other key stakeholders will be consulted on the content of the Policy as the use and management of Complementary Land assets may have implications for the management of charity sites and operations. Feedback from these engagements will be shared with P&R along with the proposed policy.

#### **6. Legal Advice**

Initial legal advice has been sought from C&CS and external legal advisors; this will be considered as part of policy development through C&CS representation on the Task and Finish Group. Further advice will be obtained as necessary as work progresses.

#### **7. Financial Advice**

Initial advice on financial arrangements has been sought from external legal advisors and CHB. Further advice will be considered through Chamberlains' representation on the Task and Finish Group.

#### **8. Meetings and Process**

The Complementary Land Policy Task and Finish Group will meet regularly. Initial reports outlining background, ToRs, timelines and long-term aims will go to NE and P&R committees in late spring to early summer 2025. This work is within scope of the Natural Environment Charities Review and will be funded from the agreed NECR budget.

# **City of London Complementary Land Use Appraisal **Draft** Terms of Reference**

08/04/2025

## **1. Introduction**

The City of London Corporation (CoLC) manages a number of greenspaces in and around London which are located outside of the Square Mile. Most of these greenspaces are held by the CoLC in its capacity as the sole trustee of the charities, but some assets are held by the CoLC in its corporate capacity with the aim of supporting charity operations and/or funding, henceforth described as 'Complementary Land'. Complementary Land assets are not charity assets, instead being owned by the CoLC and held in City's Estate or City Fund.

Land held by the NE charities is managed and administered in line with the objects of the relevant charity, which generally require the preservation of these greenspaces in perpetuity for the recreation and enjoyment of the public. Complementary Land is not restricted to these objects, but its purpose originally and historically has been to support and protect the land which is subject to those charitable objects. For instance, many Complementary Land assets are essential for operational purposes and host buildings and facilities such as farm buildings and offices. However, a large area of Complementary Land around the northern sections of Epping Forest is a mosaic of tenanted farmland, grassland, woodland or other open space and is not directly covered by the restrictions of the Epping Forest Act. Similar assets exist at other Natural Environment sites but not to the same scale as at Epping Forest.

Complementary Land parcels and the built assets on them may provide opportunities for income, environmental buffering and improvements, commercial ventures, recreation, operational uses and other projects. They may also present opportunities for housing or other development. In order to fully inform decisions over these assets a full impartial assessment by an external consultant is proposed, which will consider all relevant criteria and associated risks, constraints and obligations. This document sets out the Terms of Reference (ToRs) for a Complementary Land Use Appraisal.

## **2. Membership**

The Task and Finish Group will be chaired by Rob McNicol, Assistant Director Planning Policy & Strategy, and will report to the Executive Director Environment, Katie Stewart. The following departments/teams will be represented on the Group: City Surveyor's, the City Bridge Foundation (Central Funding and Charity Management Team), Planning, Transformation, Comptrollers & City Solicitors, and the Natural Environment Division. Representatives from Town Clerk's, Chamberlains and the Climate Action Programme will be invited into meetings as needed.

## **3. Purpose**

A methodology will be established for appraisal of Complementary Land parcels and their associated built assets and the Task & Finish Group will oversee an independent appraisal of all Complementary Land parcels according to the agreed criteria, ultimately identifying

preferred option(s) for each land parcel and making recommendations to relevant senior officer boards and committees. Key objectives are:

- 1) To define what Complementary Land needs to provide to support the charities now and reasonably foreseeable future, having regard to the intention of why the complementary land was originally purchased;
- 2) To quantify and value options for future use, with regard to corporate, charity, local, environmental, financial priorities and strategies;
- 3) To assess the potential viability of each site alternative use, e.g. housing, commercial development or other development, and/or for natural conservation (i.e. biodiversity net gain) of whole or part of those land parcels, in view of the corporation and Charities' priorities; subject to planning permission and taking into consideration such matters as changing National Green Belt policy, Local Plan and new housing targets for local authorities;
- 4) To understand and compile an assessment of constraints and obligations against those land parcels and assets;
- 5) To fully articulate upfront costs and risks alongside opportunities and value (current or potential) for each option;
- 6) To calculate and apply scoring and weighting to each element to assess highest priority opportunities;
- 7) To establish said scoring and weighting as a standard for future plans, disposals and acquisitions.

#### **4. Duration and Resourcing**

Engagement of a suitable consultant will take place by June 2025 with completion of the appraisal by end of 2025. Recommendations to senior officer panels and appropriate Committees will be made by the end of 2025.

This work, in particular the potential for housing or commercial use of these land parcels, has been requested by Policy & Resources Committee and is outside of the budgeted scope of the Natural Environment Charities Review (although the overarching Complementary Land Policy is included within scope). It is estimated that up to £50,000 will be needed to engage a suitably qualified consultancy firm to carry out this independent assessment to the required standard.

#### **5. Governance**

The appraisal with recommendations for each of the land parcels at each location will be brought to each of the local Natural Environment Management Committees and Resource Allocation Sub-Committee for consultation and then brought to Policy &

Resources Committee for approval as these assets are currently held by the CoLC in City's Estate or City Fund.

Following approval of the assessment and options, delegated authority will be sought from Policy & Resources Committee to manage the implementation of recommended options, alongside any necessary changes to standing orders or terms of reference.

## **6. Legal Advice**

Initial legal advice has been sought from C&CS and external legal advisors; this will be considered as part of developing the methodology for assessment, and through C&CS representation on the Task and Finish Group. Further advice will be obtained as necessary, (particularly in relation to understanding constraints, obligations and risks) as work progresses. The level of input needed will be scoped as the methodology of assessment is developed further, and reflected in future funding requests as necessary.

## **7. Financial Advice**

Initial advice on financial arrangements and internal governance mechanisms relating to management of Complementary Land was received during the scoping phase of the NECR. Further advice will be considered through CHB representation on the Task and Finish Group, and obtained externally as required.

## **8. Meetings and Process**

The Complementary Land Use Appraisal Task and Finish Group will meet on a regular basis. Initial reports outlining background, Terms of Reference, timelines and long-term aims will go to committees in spring to early summer 2025.

## **9. Funding**

This appraisal work is outside the agreed scope of the Natural Environment Charities Review and is a corporate review of non-charitable land and property assets and therefore additional funding will be necessary to support this workstream. A request for Transformation funding will be made.

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