

City of London Complementary Land and Associated Assets Policy

Development: Terms of Reference 12/06/2025

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 objects, 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, however they were purchased to support the objects, operations and resourcing of the NE Charities.

2. Membership

The Task and Finish Group will be chaired by the Natural Environment Director. The following stakeholders 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 (including Superintendents). Representatives from Planning and from the Climate Action Programme will be invited into meetings as needed. The Task and Finish Group will engage with Member representatives throughout the process to test the draft Policy and to develop the approach and content at key stages of the process.

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 (taking into account potential for conflicts of interest);
- 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 and/or disposal of Complementary Land;
- 7) Provides a clear framework for financial arrangements relating to the management, acquisition and disposal of Complementary Land;
- 8) Captures charity- and site- specific information as necessary in appendices to the overarching Policy to ensure that this is considered in decision-making.

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 firstly to the NE Committees and then to Policy & Resources Committee in 2025 for approval.

5. Governance

A policy recommendation from the Complementary Land Task and Finish Group will be brought firstly to the NE Committees for consideration. The policy recommendation will then be taken to Policy & Resources (P&R) Committee for final approval as Complementary Land assets are held by the CoLC in City's Estate or City Fund. Prior to this, Natural Environment Committees and Consultative Committees and Groups will be engaged on the content of the Policy as the use and management of Complementary Land assets will 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, Communication and Process

The Complementary Land Policy Task and Finish Group will meet regularly. An initial report outlining the 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. Internal and external communications will be drafted to support officers and members with managing the messaging of the work.