

City of London – City Plan

Matter 12 – Open spaces and green infrastructure (Policies S14 and OS1 to OS5)

Policy OS4

In paragraph 12.5.0 the Corporation states:

Due to the City's highly urban nature and the high proportion of sites with a zero (or close to zero) baseline for biodiversity, the mandatory 10% BNG is not an appropriate mechanism for delivering meaningful biodiversity improvements in the Square Mile. An approach using biodiversity units per hectare (BU/ha) is more appropriate. The City's BNG policy is in addition to government's BNG regulations and should be read in conjunction with NPPF, BNG legislation, regulations and BNG Planning Practice Guidance.

This is contrary to national policy. The Corporation should adhere to the national method. As paragraph: 006 Reference ID: 74-006-20240214 of the Planning Practice Guidance observes:

Plan-makers should be aware of the statutory framework for biodiversity net gain, but they do not need to include policies which duplicate the detailed provisions of this statutory framework. It will also be inappropriate for plans or supplementary planning documents to include policies or guidance which are incompatible with this framework, for instance by applying biodiversity net gain to exempt categories of development or encouraging the use of a different biodiversity metric or biodiversity gain hierarchy.

It is unnecessary and unhelpful for the City of London to make separate policy on BNG.

Nor should the Corporation set a target greater than the 10 per cent statutory requirement. As the guidance says:

Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented.

Also, on 19 February 2025 the Government published additional practice guidance on how Local Nature Recovery Strategies should be integrated with the local plan making. This guidance adds further weight to the comments we made in relation to the BNG policy in this plan at the Regulation 19 stage. We would encourage the Corporation to review the new guidance and fully consider its implications for this Plan. See <https://www.gov.uk/guidance/plan-making> and <https://www.gov.uk/guidance/natural-environment#local-nature-recovery-strategies> .

Paragraph: 048 Reference ID: 8-048-20250219 refers to the role of Local Nature Recovery Strategies being devised to enable BNG to be provided offsite, and potentially outside of the City of London too, if it cannot be achieved in whole onsite. We recommend that the local plan is changed to refer to this as an option, especially if a Local Nature Recovery Strategy is published by the GLA to complement the new London Plan expected next year.