

The City of London's draft Local Plan – City Plan 2040 (the Plan) MAIN MATTERS, ISSUES AND QUESTIONS (MIQs)

FR04 – Fred Rodgers Statement re Main Matter 12 – Open Spaces & Green Infrastructure (Policies S14 and OS1 to OS5)

12.1 Are the requirements for Open Spaces & Green Infrastructure set out in Policies S14 and OS1 to OS5 justified by appropriate available evidence, having regard to national guidance, and local context, and are they in 'general conformity' with the London Plan?

FR. I submitted a full response to *Open Spaces and Green Infrastructure* on 29 April 2024 as part of the public Regulation 19 consultation. I hope this has been seen by the Inspectors as it forms part of my evidence.

Strategic Policy S14

The first paragraph suggests that a greener City will only be *promoted* by City Corporation working *in partnership with developers, landowners, the churches and other agencies* which would limit the potential of the proposal. Although partly funded by Transport for London, as compensation for the use of the site for storage during the construction of Crossrail, City Corporation is regenerating Finsbury Circus Gardens through directly appointed consultants and other contractors. An amendment through the addition of ***both on its own and*** between ***work*** and ***in*** would seem to be appropriate.

Although supported by numerous local authorities, including all but two London Boroughs, as well as numerous politicians, scientists and other organisations, City Corporation refused to support the recent Climate and Nature Bill (CAN). Its previous Executive Director for Environment said it was because City Corporation had refused to declare a climate emergency but its Lead Member for Climate Action, Sustainability and Biodiversity said it was merely “virtue signalling”.

CAN was lost, after government intervention promising possible adoption in a limited form. However, its intentions were enough to secure more than significant support which suggests City Corporation is happy to talk the talk but refuses to walk the walk when it comes to enhancing biodiversity and urban greening.

As mentioned in **FR01**, the Bazalgette Embankment is due to open to the public in April, long before the Plan is adopted. It will be a significant open space which is being provided by Thames Water. I don't know how much of the space will be hard landscaped but, being built out into the River Thames, it will be a welcome addition to the Square Mile (**S14.2**).

Even so, like many privately funded interventions into the public realm, such as the sunken garden at the junction of Cheapside and New Change, the City Gardens team is inheriting and becoming responsible for maintaining badly designed and laid out planting approved by City Corporation. The failure to involve those charged with maintenance in design and layout amounts to a

waste of resources and leads to unsustainability. City Corporation should reverse its policy of not consulting with the City Gardens team in this respect if the policy of enhancing biodiversity and green infrastructure is real.

Promoting climate resilience is very important but excluding the City Gardens team from design and layout of necessary schemes, such the Fann Street proposal, simply adds an unnecessary layer to delivery and hampers ongoing maintenance (**S14.4**).

Provision of green corridors and stepping stones is welcome but this must be more than simply description. Identification, along with purpose, must be publicised both locally and online. The recent upgrading of signage at The Roman Wall, Noble Street, is a good example of what is needed but there is an error in Figure 18 the reference to Sites of Importance for Nature Conservation (SINCs) as not all are SBINCs (**S14.8**).

3. **12.1.3** *How the Policy Works* is blank. Public access to City Corporation's Barber-Surgeons' Garden, a public open space, is limited because of no step-free access. However, this hasn't been addressed since it was laid out over fifty years, raising the question, not "how" but "why doesn't" the policy work (**S14.3**).

Policy OS3: Biodiversity

The various SINCs referred to in **12.4.1/2** were agreed following a survey nearly **ten** years ago. Although three new SLINCs will be created, an existing SLINC upgraded to a Grade II SBINC and an existing Grade II SBINC upgraded to Grade I, these changes won't be effective until the Plan is adopted, whenever that might be. That is completely unacceptable, particularly as, in the meantime, other areas should have been considered either as SLINCs or upgraded, had City Corporation being sincere in enhancing biodiversity and green infrastructure.

For instance, with the inclusion of the Golden Lane Estate, the currently excluded parts of both the Barbican landscape and 1 London Wall Place, the planted areas of Clarendon Court and the various street trees, the proposed Barbican Estate, St Alphage Garden and Barber-Surgeons' Garden Grade I SBINC could be upgraded to a SMINC. Areas that have either been upgraded or created since 2016 included 25 Cannon Street, Distaff Gardens and St Bartholomew the Great Churchyard to name but three.

Certainly, it should not be another ten years before creation and/or upgrade occurs and, if that is because of the "system", the system needs urgent change (**12.4.1/2**)

Planting must not be limited as per **12.4.3** but shrubs, hedges and weeds, which are wildflowers after all, should be included, as well as non-native varieties. However, green walls over two metres high have no part to play here and should not be encouraged for various reasons, including water demand and need for maintenance.

12.4.6 refers to the proliferation of honeybees in the City. Not only should beehives be excluded from development schemes but City Corporation must

also include a commitment to both ascertain the whereabouts of existing beehives and the removal of those that are not either occupied or supervised. Access should be enabled on public health grounds.

Although Greenspace Information for Greater London (GiGL) collects data from various monitoring sites in the Square Mile, including Barbican Wildlife Garden, its “free” data is of only limited use, often being several years out of date. Even so, City Corporation accepts, at face value, that data in submitted Ecological Impact Assessments (EIA). City Corporation should require all submitted EIA to contain the latest, paid for, GiGL data, in addition to requiring third party reviews of the EIA. At the same time, City Corporation should require third party reviews of all submitted EIA, including for its own developments **(12.4.8)**.

OS4: Biodiversity Net Gain

The argument against on site delivery of BNG is simply that investment in existing green space, particularly City Corporation sites, is more cost effective, sustainable and can be targeted. The financial cost of both creating and maintaining roof gardens, for instance would be more effectively spent at ground level.

As the government’s Planning and Infrastructure Bill will now include the creation of a *Nature Restoration Fund* which is intended to remove site specific environmental improvements and require developers to pay into to support nature restoration at a strategic level. Contributing to a similar City Corporation fund should be the only BNG requirement, with CoLC determining what and where with a 20% discount on the cost of providing on site BNG. Apart from green walls over two metres high. beehives and sterile planting, developers would then be free to landscape developments appropriately to their required outcome.

The current fashion for roof gardens and high-level viewing platforms could well be the early 21st Century version of the mid-20th Century Pedways. Although the pedway system is now largely contained within the Barbican/London Wall area, there is the opportunity to use them for urban greening and biodiversity enhancement where Bassishaw Highwalk fills this role.

Both the bridge to Barbican Station and the bridge to 21 Moorfields used to enhance urban greening and biodiversity but, unfortunately, there don’t seem to be any plans to resume this role nor to extend it to the bridge to Aldermanbury Square when the redevelopment of Number 2 is completed. Of course, the tragedy here are the Rotunda and Engineers’ Garden, both established over fifty years ago at Landon Wall West which City Corporation are on a journey to destroy and deny their contribution to the Square Mile’s biodiversity and urban greening for five years or more.

Now should be the time for linking up buildings again above street level, not only reducing pedestrian congestion there but providing urban greening and biodiversity level two storeys or so above ground level. In the meantime, the

current programme of garden enhancement, including Barber-Surgeons' Garden, by City Gardens team must be welcomed.

12.2 Are the policies relating to Open Spaces & Green Infrastructure positively prepared 'in a way that is aspirational but deliverable'?

FR: There is too much dependency on third party delivery and ongoing maintenance. As such policies are "deliverable" but, without sufficient, not just powers but also commitment to ensure, both delivery and ongoing maintenance, the policies remain simply aspirational.

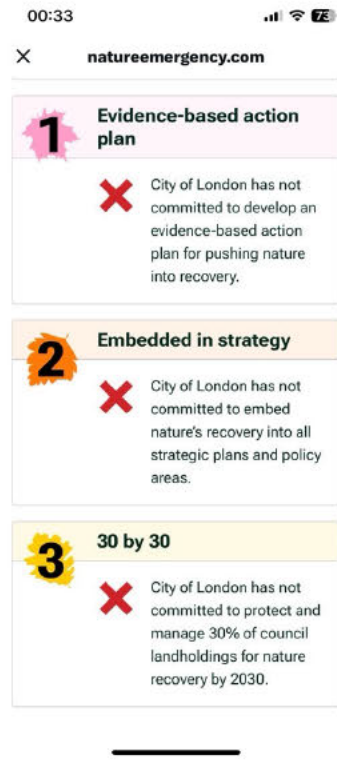
The problem can be resolved. A change in emphasis in wording, such as the use of "must" instead of "should" would be a start as it would send out a clear message, as would ceasing the use of unqualified vacant expressions such as "where possible". However, the introduction of something similar to the proposed *Nature Restoration Fund* would make a big difference to achieving delivery of aspiration.

12.3 Do the policies give clear direction as to how a decision maker should react to a development proposal?

FR: As presented for examination, this is not the case. There is no established hierarchy of policies resulting in a hierarchy of convenience to City Corporation's assumed direction of travel. As that is contrary to the need to enhance biodiversity, achieve net zero before 2040 and not only restore nature but extend it to all areas of the Square Mile, then decision makers are compromised. Added to the problem is the constant recommendation to decision makers to approve planning applications that support that direction of travel.

NOTE: The above comprised my original statement submitted on 03 March. However, on the same day, the charity, Woodland Trust, announced its Nature Emergency UK Scorecard. This was developed with the charity mySociety and Climate Emergency UK, which supports UK local councils to achieve carbon neutrality by 2030. Each April it publishes Climate Action Scorecards for each UK local authority's actions towards net zero.

Below are the Nature Emergency UK Scorecards for City Corporation - its latest, 2023, Climate Action Scorecard placed it behind all its adjoining London Boroughs. In considering not only the above but, also, all the other part of the Plan, I ask that the deficiencies revealed below are also addressed and that the adopted Plan contains adequate enabling policies.



05 March 2025



Fred Rodgers



1773 words