



**City of London Corporation**  
**City Plan 2040 — Examination in Public**  
**Matters Statement**

**Main Matter 12: Open Spaces & Green Infrastructure**

- **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 LP?**

The policies relating to Open Spaces and Green Infrastructure as set out in Chapter 12 of the CP are justified by appropriate available evidence, having regard to national guidance, and local context and are in ‘general conformity’ with the LP. In addition to the evidence set out below, and as set out in Matter 1, a Habitat Regulations Assessment was also conducted (ED-OGI3).

Chapter 15 of the NPPF is concerned with conserving and enhancing the natural environment. Paragraph 188 (Paragraph 181, 2023 version) states that local plans should “...distinguish between the hierarchy of international, national and locally designated sites;...take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure;” and “Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks...” (see paragraph 192 (a) (paragraph 185(a), 2023 version)).

Strategic Policy S14 responds to these requirements by seeking to protect existing open space and promote enhancements to open spaces and greening across the City. The CP sets out the hierarchy of open space and all of the Sites of Importance for Nature Conservation (SINCs) and green corridors are defined on the Policies Map (LD2), and in the CP’s Key Diagram (See Figure 1 and Figure 18). The City has 10 existing SINCs and following a comprehensive review of these sites through the Biodiversity Action Plan (BAP) (see paragraph 4.0 of ED-OSI4) three new sites were identified, two existing to be upgraded and extensions agreed. As identified in paragraph 12.4.2 of the CP, the Biodiversity Action Plan (BAP) (ED-OGI4) sets out the framework to ensure all legislative requirements relating to particular species or habitats, the management of green spaces, and identifies and prioritises actions for biodiversity within the Square Mile. This ensures that the impact of new developments would not impact on the City’s priority species and habitats (see Policy OS3 (2)). All open spaces are also identified and mapped (see CP Figure 17) through Policy OS1.

Paragraph 187(d) of the NPPF (December 2024) seeks to minimise the impacts and provide net gains for biodiversity and paragraph 192(b) (paragraph 185(b), 2023 version) states to protect and enhance biodiversity, plans should: “...identify and pursue opportunities for securing measurable net gains for biodiversity”. CP Policy OS3 of the CP ensures SINCs are protected and identifies green corridors in accordance with LP Policy G6(A) and (B) of the LP. In addition the City’s Biodiversity Action Plan (BAP) identifies opportunities for biodiversity. Policy OS4 (Biodiversity Net Gain) seeks to secure measurable net gain for biodiversity by applying a bespoke approach to BNG (see below).

Policy S14 of the CP sets out the overarching strategic direction for the plan and the other policies within the chapter (Policies OS1-OS5). The CP policies (S14, OS1 to OS4) are in

general conformity with the LP policies (G1- G4 to G7 and G9). Policy G1(C) of the LP states that Development Plans should use evidence, including green infrastructure strategies, to: *“identify key green infrastructure assets, their function and their potential function”* and *“identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions”*. The City Corporation has used an evidence-based approach to identify green infrastructure assets. Table 8.1 of the LP sets out the open space categorisation, of which small open spaces, pocket parks and linear open spaces are located in the Square Mile. The open spaces are regularly monitored through the Open Space Audits and Monitoring Reports, and Table 1 below sets out the hierarchy for spaces within the Square Mile.

Table 1- LP Public Open Space Categorisation

Open Space Category	Spaces in the Square Mile
Small Open Spaces	1) St Giles Terrace 2) Thomas More Garden 3) Broadgate Circle 4) Inner Temple Garden 5) Middle Temple Garden 6) St Paul’s Churchyard 7) Barbican Lakeside Terrace 8) Exchange Square
Pocket Parks	419 separate spaces
Linear Open Spaces	City Riverside

The CP responds to the requirements of the LP by protecting open space (1) and identifying the green infrastructure assets (See Figure 17); seeking the provision of new and enhanced spaces (2), (3) and (4); and seeking a joined-up approach to enhancements (5) to (8), while acknowledging the challenges.

The City Corporation works with Greenspace Information for Greater London (GiGL) (London’s environmental records centre) to support the preparation and designation of sites of biodiversity importance in the Square Mile. GiGL receives, collates and manages detailed information on aspects of open spaces and ensures that the datasets are maintained and updated. Paragraph 12.2.1 recognises existing deficiencies and where new additional open space and greening has an important role to play. This approach has informed policies within Chapter 12 and the areas-based approaches within Chapter 14. As set out in paragraph 12.1.2 of the CP, *“...it is crucial that development provides greening and improves biodiversity on-site and contributes as appropriate to wider improvements to green infrastructure”*.

Policy G4 (A) of the LP sets out several requirements for Development Plans to *“undertake a needs assessment of all open space to inform policy”* (1), include designations (2), promote new open space (3) and ensure that space remains accessible (4). In relation to needs, the

Open Spaces Strategy SPD (2015) (ED-OGI5) provides a baseline of open space provision and enhancement opportunities identifying much of the City as Areas of Deficiency (AOD) in ‘Access to Nature’, with the eastern part of the City being more poorly provided for (see paragraphs 3.8.4 to 3.8.6 of the SPD). More recently the City Corporation has updated this information by engaging with GiGL to identify the AoD in Access to Nature (SINCs) and AoD in Access to Public Open Spaces (POS). The AoD to POS mapping is based on pan-London methodology utilising walking distances and open space categories within Table 8.1 of the LP. The areas of deficiency are mapped by GiGL and are referenced within CP paragraphs 12.2.1 (AoD in Access to Public Open Spaces) and 12.4.1 (AoD in Access to Nature). The City of London seeks to focus on alleviating AoD in access to, small parks and pocket parks as these form the provision in the Square Mile, and which the City Corporation has the most influence in seeking to reduce deficiencies through development. The City Corporation produces regular monitoring reports to provide important analysis of the City’s open spaces and identify what new or enhanced open space has been provided through development to assist in meeting these deficiencies. However as set out in Local Plan Monitoring Report Open Spaces and Recreation (2021) (ED-OGI6) it is predicted there would be an overall net increase in open space of 1.51 hectares between 2021/22 and 2025/26.

Policy G5(B) of the LP states that *“Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments”*. The Urban Greening Factor (UGF) Study (ED-OGI2) explains the UGF planning tool and provides recommendations for the City of London. Paragraph 6.5 of the UGF Study suggests *“...that the GLA’s proposed scoring scheme is amended for the City, in order to encourage certain categories of greening, particularly tree planting, good quality green roofs (of adequate soil depth) and green walls”*. Therefore some of the ‘Surface Cover Type’ scores provided in Table 9 of the UGF Study are bespoke to the City of London. Policy OS2 (2) sets a threshold UGF target score of 0.3 for commercial development and 0.4 for residential development. A localised response is appropriate as recognised in paragraph 8.5.4 of the LP which states that *“London is a diverse city so it is appropriate that each borough develops its own approach in response to its local circumstances”*. It is also expected through OS2 (1)(a) that all developments in the Square Mile should provide the ‘maximum feasible’ levels of greening.

LP Policy G6(D) states *“Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain”*. Policy OS4: Biodiversity Net Gain (BNG) also reflects the requirements of the Environment Act (2021). Schedule 7A of the Town and Country Planning Act 1990 requires a minimum 10% BNG for relevant schemes. However, due to low or no baselines, the mandatory BNG requirement would not consistently deliver meaningful BNG for the Square Mile. The approach to BNG is supported by evidence within the BNG Study (ED-OGI1) and the Viability Assessment (ED-IMP1). This justifies an alternative approach in accordance with Planning Practice Guidance (PPG) (paragraph: 006 Reference ID: 74-006-20240214) which states: *“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”.*

As set out on page 1 of the BNG Study, the study reviewed 35 major applications in the Square Mile from 2010 to 2023 identifying that on average over this period they achieved 1.54 BU/ha (including latterly through application of the UGF requirements) concluding that if the same developments maximised green/blue infrastructure on site they could have achieved 3.41BU/ha. The Study therefore concludes that it *“appears feasible and reasonable to expect all development proposals in the Square Mile to deliver 3 BU/ha”*. Paragraph 8.2 (bullet point 5) of the Viability Assessment states that the impact of the urban greening and biodiversity emerging policies have been tested for impact on viability and states that *“The combined impact of these requirements on the residual land values is marginal”*. Therefore in addition to the statutory requirements, a percentage uplift a Biodiversity Unit per hectare (BU/ha) is proposed within Policy OS4 of the CP. This will apply to major developments, many of which would be exempt from statutory requirements due to their low baselines.

This policy approach has also been tested within the City’s Sustainability Appraisal Main Report (ED-SUS1) and concluded on page 87 that the draft Policy OS4 policy has *“...a more relevant approach seeking absolute increases (rather than a percentage uplift) has been set out in policy, supported by recent evidence”*.

- **Are the policies relating to Open Spaces & Green Infrastructure positively prepared ‘in a way that is aspirational but deliverable’?**

Paragraph 16(b) of the NPPF states that plans should “*be prepared positively, in a way that is aspirational but deliverable;*” and the policies set out in Strategic Policy S14: Open Spaces and Green Infrastructure of the CP achieve this by seeking provision of new publicly accessible open spaces, encouraging high quality green infrastructure, and protecting and enhancing biodiversity.

The policies relating to Open Space and Green Infrastructure have been designed to avoid repetition of national policy and the LP and aspire to go further. The policies are aspirational and seek urban greening by multiple means (through the Urban Greening Factor (UGF), Biodiversity Net Gain (BNG) and protection and enhancement of existing). The City recognises the positive impact of providing green spaces for recreation, nature and wellbeing and going a step further to providing further open spaces, increase the public realm and promote sustainable buildings which feature green roofs and more attractive spaces for people to dwell. Policy OS4 (Biodiversity Net Gain) is particularly aspirational by seeking to ensure the aims of the Environment Act (2021) in terms of facilitating a net increase in biodiversity are tailored to the City’s local context. As highlighted in the response above, the 10% statutory requirement would not deliver meaningful BNG in the City as many sites have zero baselines making them exempt from national requirements. Paragraph 2.3 of the BNG Study recognises the local challenges of applying a baseline-uplift approach, identifying that “*...it is common to find developments delivering relatively few biodiversity units but achieving thousands, if not, tens of thousands of percentage gain, which can be misleading...and be subject to misuse or ‘greenwashing’*”.

The policies are also informed by analysis of past and projected delivery trends, development capacity and detailed testing to ensure that the policy requirements are deliverable as set out for example in the BNG Study (ED-OGI1). Therefore the policy will ensure that qualifying developments will contribute to the aims of BNG which would not have been achieved otherwise and will result in an increase in environmentally rich green infrastructure in new developments.

The policies are also deliverable as shown by the Local Plan Monitoring Report on Open Spaces (2021) (ED-OGI6) which shows net increases in hectares and projected forecasts in the pipeline, as well as qualitative improvements through City public realm enhancements (see page 11). Since BNG became a statutory requirement (12 February 2024) the City of London has received a total of 13 major planning applications. Although the policy has not yet been adopted, the City Corporation has promoted BNG within its pre-application processes and eight of these sites will achieve on average 2.77 biodiversity units per hectare (BU/ha).

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

In accordance with Paragraph 16(d) of the NPPF the policies *“are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;”*. Policies set out in Chapter 12 are positively worded in relation to supporting urban greening (Policy OS2) and clear in terms of promoting a greener City. Strategic Policy S14 of the CP seeks to protect, enhance and increase open spaces in the Square Mile (1), (2) (4), increasing public access (3), and promoting greening and BNG throughout the Square Mile (6), (7) and (8). This sets the direction in relation to open spaces and green infrastructure and for the non-strategic policies (OS1 to OS5) which sit underneath it. Each policy contains policy text and the supporting text is divided into the *‘Reason for the policy’* and *‘How the policy works’* sections which clearly distinguish between setting the context and why the policy is required, and the policy application. For example, Paragraph 12.4.0 (Reason for the Policy) in Policy OS3 of the CP states in that *“Protecting and improving biodiversity involves enhancing wildlife populations and their habitats”*. Paragraph 12.4.2 (How the policy works) states *“Measures to enhance biodiversity should provide habitats that benefit the City’s target species...The City of London BAP provides further details about the target species, their target habitats and action plans”*.

The policies also include clear thresholds (for example, OS2 requires an Urban Greening Factor for major development), and criteria-based approaches to make clear where a loss of open space may be acceptable (OS1 (1)).