

British Land response to BG/TC

Site ID 115169 / HELAA Site ID: 40048

Draft Policy BG/TC introduces a minimum future canopy cover of 30% on site, unless “there are significant ecological, historical, landscape or operational reasons to justify a lesser figure”.

We suggest that the delivery of 30% tree canopy cover will be extremely challenging on certain sites where green infrastructure coverage is already high and where there are competing statutory requirements, most notable of which is BNG and which is guided by the Defra metric which can, in some cases, prioritise open grassland (without tree shading) and penalise the delivery of woodland.

The draft policy refers to ‘significant’ reason, which carries no definition. We would question what constitutes a ‘significant’ reason? Is BNG or the delivery of UK BAP Priority Habitats ‘significant’? When considered together, these may well provide a conflicting requirement and impact the delivery of sites.