

## **British Land response to BG/EO**

Site ID 115169 / HELAA Site ID: 40048

We note that the Councils are continuing to explore the number of hectares per employee to apply within the requirement for “Accessible Greenspace” (paragraph 3). These standards are important for promoters and developers of employment sites and mixed-use sites to understand as soon as possible, and we welcome the ability to review those standards as early as possible.

However, we would comment that the quantum of Accessible Greenspace that a proposal can deliver will very much be dictated by site context, constraints and opportunities. This will need to be recognised in the further draft of BG/EO.

Furthermore, it should be acknowledged that the best-in-class schemes, which adopt a design-led approach to place-making will naturally cater for accessible public realm and greenspace for future occupiers of the proposed development. In some instances, it will not be appropriate to prescribe a minimum quantum of greenspace to be delivered, if the scheme provides high-quality space as part of its response to the specifics of the site.

We would also suggest that for major mixed-use sites, a mandatory target of Accessible Greenspace, when considered in the round with statutory BNG, the proposed draft tree canopy policy, and the proposed public open space requirements for housing, may make viability and deliverability challenging.

On a matter of formatting and presentation, the lettering and numbering of the draft policy in paragraph 2, is confusing because at the sub-section labelling is inconsistent and it is unclear whether this reflects hierarchy or is an error.