Community Planning Alliance Response to Planning Reform Working Paper: Brownfield Passport

Introduction

The government has invited views on further action within the planning system to support the development of brownfield land in urban areas.

The Community Planning Alliance (CPA) is in general agreement with this initiative, subject to the caveats set out in our responses to the questions below, which, in summary, require:

- Genuine community involvement in shaping the places where they live
- Real protections for land that supports climate mitigation or nature's recovery
- National prerequisites to be kept to a minimum (one size does not fit all) – the brownfield "passport" should benefit from national guidance but should be locally defined
- A benefit in the form of 50% affordable housing in return for public money invested to support regeneration
- Ensuring lessons in increased, but pragmatic, densities are learned from other countries
- A focus on sustainable passenger and freight transport
- A tangible effort to enable multiple SME builders to successfully deliver small schemes.

a) Could national policy be clearer if it were explicit that development on brownfield land within urban settlements is acceptable unless certain exclusions apply?

Yes, but those exclusions must be paramount (see response to question b below), not subject to viability clauses or other means of diluting safeguards.

It should be noted that when development in urban areas is primarily investor homes, airbnbs and/or second homes (as has been the case in cities like Manchester), the benefits of increased densification (increased population catchment for shops and other local services, improved economic potential, access to a labour force) do not apply!

b) What caveats should accompany any general expectation that development on brownfield land within urban settlements is acceptable?

As mentioned in the report, the caveats must include environmental considerations and current benefits from the land, such as flood or other climate mitigation, ecological/biodiversity assets, and land that has been gifted as, or is currently acting as, urban green space to local communities.

c) How best can urban areas be identified and defined if this approach is pursued?

All such developments should be subject to genuine community participation to ensure that citizens are shaping the places where they live. Communities also have the best local knowledge of land that may be suitable for such developments, including very small sites in their neighbourhoods.

Brownfield registers should be extended to identify "fast-track" small sites such as those that are intended to be the focus of this initiative. Community participation should be mandated in the updating of brownfield registers to ensure they are as accurate, up to date and complete as possible.

SME builders should also be approached at the earliest stage to encourage their involvement in identifying and defining small sites that could come forward and the issues that may arise with their development.

d) Could national policy play a role in setting expectations about the minimum scale of development which should be regarded as acceptable in accessible urban locations?

Whilst we strongly believe that national direction should be minimised to ensure local priorities are identified by communities and delivered with support from Councils and developers, there are two areas that would benefit substantially from government policy, advice and guidance:

- Appropriately increased densities, which are key to resolving a number of problems

- Sustainable supporting infrastructure, to be provided in advance of the development being occupied.

Government should clearly articulate the benefits of high-density developments, which reduce land take, increase community spirit, reduce car use, increase active travel and increase viability of public transport and other services. Policy guidance should include examples of density levels for different land areas that can be consulted upon and included in local plans, with an expectation that urban areas achieve higher minimum density levels unless exceptional circumstances apply.

There should also be clear direction from the government that increased densities must be supported by increased infrastructure – in advance of development being delivered. There must be sufficient public services to meet the needs of expanded communities, including school places, doctors and dentists. Government must also prioritise (and fund) sustainable passenger and freight transport, rather than continuing with the previous emphasis on building new roads. Driving a car, or an HGV, through urban areas should be the exception not the rule!

e) What parameters could be set for both the scale of development and accessibility?

Parameters should be set within local plans, taking into consideration the government guidance mentioned above and local circumstances. The substantive content of the brownfield 'passports' should be based on national guidance but must be locally driven. In addition to density levels, those parameters should include the requirements of sustainable development, as mentioned in our response to question f.

f) Could more use be made of design guidance and codes to identify specific forms of development that are acceptable in particular types of urban area?

There is currently a danger that targets will overshadow issues such as design, affordability and the components that make a development sustainable: mobility (walkability, cycle infrastructure, public transport, cars as guests); connection to nature; mixed use including social housing; human scale (shared spaces, community participation); public services; retail amenities and local jobs.

We also note that LPAs appear to limit the definition of 'sustainable' to the materials with which buildings or roads, etc are constructed. There should, therefore, be an improved definition of sustainable development within national guidance, and this must include the requirement for all such developments to be supported by:

- committed, extensive sustainable passenger and freight transport
- amenities, services and jobs near homes (and available on completion of development)
- green spaces and access to nature
- measuring, valuing and protecting natural capital
- demonstrating that proposals will not exacerbate climate change and/or flooding
- consideration of anticipated air, noise, light, vibration and water pollution.

g) What sort of areas would be most suited to this approach, and at what geographic scale could such guidance and codes be used?

Typically, the sites will be those identified in the paper (vacant, derelict or underused brownfield sites in urban areas). The size and scale of the developments will, however, vary in different communities and should be subject to genuine consultation with local communities.

In terms of geographic scale, the more local, the better. Even on a regional basis (the whole of Greater Manchester, for example), there will be variations (the needs of, and land in, the city centre is very different to those of the smaller market towns).

h) How could Local Development Orders be best used with these proposals?

Again, any LDOs should be subject to genuine consultation with local communities and should include a requirement that, where public funding has been made available to support the regeneration of the brownfield land, at least 50% of the development must be genuinely affordable homes (social housing).

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i) Are there any other issues that we should consider if any of these approaches were to be taken forward, in particular to ensure they provide benefits as early as possible?

A public relations campaign is essential to changing mindsets. Many British people have been persuaded that car-dependent sprawl is the only way to do housing and can be wedded to that concept.

There should be a detailed review of the excellent examples of high density (often brownfield) development elsewhere. There are many great case studies in reports such as Urban design experimental project in Vienna by Timirlans Abidovs - Issuu and Freiburg's Vauban and Rieselfeld, both high density brownfield urban extensions, remain two of the best examples (Freiburg Briefing pack.pdf urbed.coop).

j) In addition to streamlining permissions on urban brownfield sites, where else do you consider this type of policy could be explored to support economic growth?

The Community Planning Alliance (CPA) very much welcomes the brownfield first focus in this paper and the emphasis on higher densities. We also welcome the clarification that this initiative is focused on urban settlements. Policy must be clear that, whilst our cities and towns are the engine rooms of our commercial economy, our farmland is the route to future food security and that the rural economy is just as essential to the country's long-term prosperity. The government must, therefore, provide guidance that the best and most versatile agricultural land should be safeguarded for our future food security and that developments such as solar farms, for example, should be constructed on buildings, car parks and other appropriate sites.

In considering whether any of these proposals could apply to non-brownfield land in urban areas, we believe there are sufficient brownfield sites to meet the Country's needs, and we would be very concerned if non-brownfield sites in urban areas were considered to have a 'passport'.

As mentioned above, communities should drive initiatives such as these in the most suitable locations in their areas, including repurposing commercial and retail sites for residential, where that is appropriate. Some such sites may not be centrally located, which would require significant investment in public transport and social amenities to ensure the development is sustainable.

About the Community Planning Alliance

The Community Planning Alliance[1] is an umbrella group founded in March 2021, with over 700 communities nationwide, all campaigning against inappropriate development, shown on our Map[2]. Our key aims are to support groups with their campaigns and to level the playing field, because most of the other players have deep pockets and are not working on a voluntary basis. We also lobby for a more effective planning system which actively involves communities in decision-making, protects land that supports climate mitigation, nature's recovery and future food security, and that delivers the right homes, particularly genuinely affordable homes, in the right places.

[1] https://www.communityplanningalliance.org/
[2] Community Planning Alliance Map of Campaign Groups https://www.google.com/maps/d/viewer?ll=53.47449661936109%2C-0.5107540124339236&z=6&mid=1nFg3i1Ft5-K4LadaEMCb0wr17-l33Kk