

Strengthening planning policy for brownfield development questions

<https://www.gov.uk/government/consultations/strengthening-planning-policy-for-brownfield-development>

You should read the full call for evidence and review the guidance for respondents (above in this document) before completing your response.

1. Do you agree we should change national planning policy to make clear local planning authorities should give significant weight to the benefits of delivering as many homes as possible [yes/no]?

If not, why not?

Yes.

2. Do you agree we should change national planning policy to make clear local planning authorities should take a flexible approach in applying planning policies or guidance relating to the internal layout of development [yes/no]?

If not, why not?

Yes.

3. If we were to make the change set out in question 2, do you agree this change should only apply to local policies or guidance concerned with the internal layout of developments [yes/no]?

If not, what else should we consider?

We regard the NPPF and associated policies and guidance as a strong vehicle for implementing the proposed changes.

Risks and benefits arising from the proposed changes are geospatially constrained and cross political boundaries. Developers and landowners are more likely to engage if proactive mitigation measures are in place nationally that give them the confidence to bring a site forward for development. Such measures could include a better (national) understanding of potential risks such as contamination and land stability.

In our experience, these risks are best presented using digital geospatial tools supported by strong evidence based that is consistent with policy e.g. the award-winning brownfield ground risk calculator (<https://storymaps.arcgis.com/stories/d9a6caa9b2b34377980e80faf7b4fffa>; and <https://www.groundsure.com/products/groundscreen/>).

Examples of new national guidance might include the following:

- Outline of key barriers including a linked knowledge base to point people to the latest data and information on contamination and land stability hazards (e.g. CL:AIRE water and land library + BGS GeoIndex).
- Update of the remediation and dereliction cost guidance published by HCA in 2016.
- Methodologies for the assessment and evaluation of benefits, values and impact of building on brownfield land e.g. <https://environment-analyst.com/brn/110115/evaluating-remediation-benefits-through-natural-capital>. Such guidance could be consistent with other policies e.g. biodiversity net gain and the natural capital approach (e.g. Natural England policy)
- Creating shared evidence through the submission and curation of digital geological borehole logs from all construction and infrastructure projects to provide economic benefits and de-risk brownfield redevelopment project e.g. <https://www.bgs.ac.uk/geology-projects/the-common-ground-project/>.

4. In addition to the challenges outlined in paragraph 13, are there any other planning barriers in relation to developing on brownfield land?

The National Brownfield Forum (NBF) conducted the 23/24 Sector Review on the barriers to brownfield development. As part of this, the British Geological Survey and the CL:AIRE secretariat compiled evidence from >200 respondents from private and public sector bodies and individuals. The report will be published in Spring 2024. The report identified:

1. Overwhelming support for proactive Government policies to support the redevelopment of brownfield land in the UK
2. Barriers to expedient and cost-effective development to be complex and include excavated soils and waste management, land contamination, [environmental] permitting issues, and land use planning processes
3. A strong sense of importance and value for the regulatory role offered by local authorities and national agencies
4. Regulatory roles to be insufficiently funded
5. Opportunities to improve the quality and efficiency of land contamination advice and support available to the brownfield sector
6. Existing frameworks such as the National Quality Mark Scheme (which focuses on professional competency) requiring more to be done to widen its acceptance
7. Recruitment into the sector remains challenging, notwithstanding clear proactive organisational policies and initiatives such as equality, diversity and inclusion and training

5. How else could national planning policy better support development on brownfield land, and ensure that it is well served by public transport, is resilient to climate impacts, and creates healthy, liveable and sustainable communities?

Geological conditions for brownfield land are an important aspect of their development. National planning policy could support this process better by ensuring that knowledge of geological conditions for brownfield land is assessed at early stages of the planning process – e.g. in the development of Local Development Plans.

The British Geological Survey (BGS) produces a range of datasets that could support this process, e.g. by providing information about ground conditions, geological hazards and resources. Our data include geological maps ([BGS Geology](#)), the [National Geotechnical Properties Database](#), geochemical data sets for soils and stream sediments ([G-BASE](#)), ground stability/ shallow geohazard susceptibility maps ([GeoSure](#)), a suite of maps of engineering properties and considerations ([BGS Civils](#)), and maps highlighting potential for Sustainable Drainage Systems ([BGS Infiltration SuDS](#)).

National planning policy could be further supported by creating publicly available, collaborative and co-designed digital geospatial decision support tools that provide transparent and systematic evidence to decision makers.

The British Geological Survey has a track record in developing such tools, including:

- The award-winning brownfield ground risk calculator – a geospatial tool for assessing ground risk and remediation (<https://storymaps.arcgis.com/stories/d9a6caa9b2b34377980e80faf7b4fffa>; and <https://www.groundsure.com/products/groundscreen/>)
- Feasibility assessment of a remediation and sustainable grow tool for the environment agency (Jacobs and BGS) [reports could be made available] (<https://environment-analyst.com/brn/110115/evaluating-remediation-benefits-through-natural-capital>)
- A critical review of decision support systems for brownfield redevelopment (<https://doi.org/10.1016/j.scitotenv.2021.147132>)
- Digital tools for brownfield redevelopment: Stakeholder perspectives and opportunities (<https://doi.org/10.1016/j.jenvman.2022.116393>)
- The development of a novel decision support system for regional land use planning for brownfield land (<https://doi.org/10.1016/j.jenvman.2023.119466>)

6. How could national planning policy better support brownfield development on small sites?

Measures could include:

- Reducing the qualification size of site for brownfield registers.
- Expanding brownfield registers to other end uses related to housing.

See also responses to Q3, 4, and 5.

7. Do you agree we should make a change to the Housing Delivery Test threshold for the application of the Presumption in Favour of Sustainable Development on previously developed land [yes/no]?

No comment.

8. Do you agree the threshold should be set at 95% [yes/no]? Please explain your answer.

No comment.

9. Do you agree the change to the Housing Delivery Test threshold should apply to authorities subject to the urban uplift only [yes/no]?

If not, where do you think the change should apply?

No comment.

10. Do you agree this should only apply to previously developed land within those authorities subject to the urban uplift [yes/no]?

No comment.

11. Do you agree with the proposal to keep the existing consequences of the Housing Delivery Test the same [yes/no]?

If not, why not?

No comment.

12. For the purposes of Housing Delivery Test, the cities and urban centres uplift within the standard method will only apply from the 2022/23 monitoring year (from the 2023 Housing Delivery Test measurement). We therefore propose to make a change to the policy to align with the publication of the Housing Delivery Test 2023 results. Do you agree [yes/no]?

If not, why not?

No comment.

13. Do you think the current threshold of 150 residential units for referral of a planning application of potential strategic importance to the Mayor of London is the right level [yes/no]?

No comment.

14. If no, what would you set as the new threshold? [300/500/750/1000/other] Please explain your answer.

15. We continue to keep the impacts of these proposals under review and would be grateful for your comments on any potential impacts that might arise under the Public Sector Equality Duty as a result of the proposals in this document.
No comment.