



The countryside charity  
Dorset

**Dorset CPRE**

26<sup>th</sup> March 2024

## **Open Consultation – Strengthening Planning Policy for Brownfield Development**

### **Introduction and General Comments**

This response is prepared by the Dorset Branch of the Campaign to Protect Rural England (CPRE). Our mission is to protect and enhance rural towns, villages, and the countryside. Much of our work involves interacting with the local planning system, we actively engage with both Dorset Council and BCP Council. We have focussed our response on the proposals contained within Section 2 – Giving significant weight to the benefits of delivering homes on Brownfield land.

Ensuring that local housing need is met firstly through the re-development of previously developed sites before considering the development of Greenfields is a subject close to our heart. The Port of Poole has a significant number of previously developed sites including the former Poole Power Station. This Brownfield site, allocated in the Local Plan to provide housing and employment land and subject to numerous planning applications for re-development still sits vacant whilst precious land in the Green Belt has been released for development instead to meet Poole's housing need.

As a broad principle we support a Brownfield first, Greenfield last approach to development and strongly believe that wherever possible it is better re-purpose already developed urban land and buildings to meet the country's housing needs than to build on green fields. We therefore welcome the Government's ambition to encourage the development on previously developed/Brownfield sites. However, it is essential that it is recognised that not all previously developed sites are suitable for re-development, some due to their location/other factors make them undesirable for habitation, other sites may have reverted to nature to become locally and nationally important nature reserves, providing invaluable access to greenspace for local communities.

Whilst it is important that development on those Brownfield sites that are suitable is optimised, this should not on any account be at the expense of creating 'beautiful, thoughtfully laid out, developments, that are carbon neutral and most importantly that people want to live in.

In addition to ensuring that local planning policies support re-development of Brownfield sites, we strongly believe more could be done to encourage developers, for example:-

- Through direct financial incentives, where planning consent has been granted Council Tax could be charged on the consented scheme after a period of time had elapsed.
- Charging of Council Tax on consented schemes after a period of time, say 24 months has elapsed to ensure schemes are developed out.
- Easier access to tax incentives for developers for site remediation.

## **Response to Proposed Policy Changes in Section 2 - Giving significant weight to the benefits of delivering homes on Brownfield Land**

Q1. 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?

*No, we do not agree that local planning authorities should give significant weight to the benefits of delivering as many homes as possible. Sites should be developed to best meet the needs of the community as part of an Urban Master Plan.*

Q2. 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, Local Planning Authorities should have the ability to exercise their own judgement as to whether or not a proposed scheme is in the public interest. However, it is essential that development schemes meet current building regulations and that the access to daylight meets the standards set out in BRE 209 (Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice)*

Q3. 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*

Q4. In addition to the challenges outlined in paragraph 13, are there any other planning barriers in relation to developing on brownfield land?

- *Small Brownfield sites (less than 2ha) are often excluded by local authorities when allocating sites for development in the local plan. These sites are too small for volume builders yet as they are not allocated for development are too risky for small/medium sized firms to take on.*

Q5. 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.

- *Greater use of Local Development Orders on Brownfield sites suitable for housing by local planning authorities, would help facilitate their development.*
- *Introduction of a sequential approach to land allocation that prioritises Brownfield land over and above Green Belt/ Greenfield.*