



The countryside charity
Dorset

Dorset CPRE

December 2024

Response to the Planning Reform Working Paper - Brownfield Passport: Making the Most of Urban Land

Introduction and General Comments

This response is prepared by the Dorset Branch of the Campaign to Protect Rural England (CPRE). Much of our work involves interacting with the local planning system, we actively engage with both Dorset Council and BCP Council.

Ensuring that local housing need is met firstly through the re-development of previously developed sites is a subject close to our heart we therefore welcome and support the Government's ambition that development must look to Brownfield first and the proposals set out in this working paper. In our opinion the introduction of Brownfield Passports will make a significant contribution to bringing forward development on Previously Developed Land/Brownfield Sites. To be most successful it is essential that these are 'put together' with inputs from local stakeholders including the local community. We do not support a presumption in favour of brownfield land if it results in building in isolated, unsustainable locations in the countryside. We believe that any Brownfield Passports are therefore kept strictly under the control of the LPA in accordance with the Local Plan.

The Port of Poole has a significant number of previously developed sites including the former Poole Power Station. This 16 hectare site is one of the largest Brownfield sites in the Southwest and has been vacant since the power station was demolished in 1994. There have been numerous planning applications for re-development of the site, none of which have come to fruition. In 2010 excavation works on the site uncovered buried asbestos containing material, resulting in a significant increase in the cost of site remediation, with a knock-on impact on site viability. The site was purchased by BCP Council in 2020, with plans to provide 830 housing units and 761sq m of commercial floorspace, which would make a significant contribution towards meeting BCP's housing needs. However, so far, work on the site has not commenced.

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 (for example Swanscombe Peninsula, Kent) to become locally and nationally important nature reserves, often providing invaluable access to greenspace for local communities, such sites need to be protected from development.

In our experience some Brownfield sites are difficult to re-develop due to factors such as ground contamination, risk of flooding, etc making them unattractive to developers. To achieve the re-development of such sites funding support is required either in the form subsidies/grants or tax incentives for site remediation. Additional strengthening of legislative powers to force current owners to clean up sites would be welcomed.

Response to Questions

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

Yes

- Clear support for developing brownfield sites first could help reduce pressure on greenfield and rural land.
- Brownfield Registers should be kept up to date with full details of legal ownership, occupation, tenancies, site area, access to road network, plot ratio of any existing developed space and most importantly existing use and zoning for alternative use within approved Local Plan.
- The Registers should include clearly defined site exclusions—such as environmental protections, heritage considerations, or land contamination issues—would ensure that unsuitable sites are appropriately safeguarded, reducing ambiguity and disputes.
- Any applications on Green Field should require a sequential test against the Brownfield Register to ensure that Brownfield opportunity is considered first.
- Explicit national-level support would provide local planning authorities with a stronger framework to make consistent decisions, aligning with broader sustainability goals.
- This shift in approach could help streamline planning processes and encourage urban regeneration while preserving natural landscapes.

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

We believe the following caveats should be put in place:

- It is important that those brownfield sites that have reverted to nature and now provide important wildlife habitats are identified and protected from development.
- The potential for Brownfield sites to provide Urban Greenspace should be taken into consideration.
- Some brownfield sites may be contaminated due to previous industrial use. Before development, thorough environmental assessments and remediation efforts must be required to ensure that the land is safe for residential or commercial use.
- Some brownfield sites may be at risk of flooding, especially in urban areas. Developers should be required to conduct flood risk assessments and incorporate appropriate mitigation measures.
- Development should only proceed if there is adequate infrastructure in place to support new residents or businesses, including transport links, public services (e.g., healthcare, education), and utilities (e.g., water, electricity, waste management).
- Careful consideration of the potential impact on local traffic congestion and public transport is necessary to avoid overwhelming existing infrastructure.
- It is essential that communities are consulted on any development proposals, which should be in accordance with the local plan for the area. The development should take into account its impact on the local community,

including affordable housing provision, social cohesion, and access to amenities. Development should not lead to the displacement of existing communities or cause housing market imbalances.

- The development should align with the local economic strategy and contribute to job creation or economic growth. In some cases, developments might need to ensure they fit within broader plans for urban regeneration.
- Brownfield sites may be located near areas of historic or cultural importance. Care should be taken to preserve heritage assets, and development should comply with local conservation policies.
- Brownfield developments should adhere to high sustainability standards, incorporating energy-efficient buildings, low-carbon transport options, and green infrastructure such as parks or biodiversity enhancements.
- Development should be subject to existing planning permissions and regulations, including consultations with the community, environmental assessments, and adherence to local planning policies.

3. How best can urban areas be identified and defined if this approach is pursued?

In our opinion there are many more Brownfield sites capable of re-development than those identified in Brownfield Registers, which are often not kept up to date. For example, both BCP and Dorset Council's most up to date Brownfield Register were published in 2020. We suggest that the following approaches can be used to identify urban areas:

- Establish clear criteria for urban areas.
- Define minimum population density thresholds to identify urban zones.
- Ensure the area has access to essential infrastructure (roads, utilities, public transport).
- Prioritize areas with existing commercial, industrial, or residential use over purely greenfield land.
- Identify areas close to schools, hospitals, and shopping centres to reduce infrastructure development costs.
- Use GIS to map existing brownfield sites and overlay urban boundaries, infrastructure, and population data. GIS can help assess environmental risks, such as flood zones or contamination, to prioritize safer sites.
- Identify specific zones within the urban boundary for brownfield redevelopment to speed up approval.
- Allow mixed residential, commercial, and industrial developments to ensure flexibility for developers.
- Develop fast-track planning policies with specific brownfield pre-approved development plans.
- Implement template-based or modular design frameworks for developments to reduce planning time including modern methods of prefabricated construction.
- Allow for automatic consent in certain predefined conditions, such as compliance with zoning regulations, to avoid lengthy council reviews.

- Simplify public consultation processes for brownfield projects to ensure community input but within shorter timeframes.
- Leverage incentives and partnerships by providing tax breaks and grants and offer incentives to developers for prioritizing brownfield sites over greenfield.
- Encourage collaboration between government agencies and developers to share the costs and risks

4. 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?

No this is not necessary.

- Urban areas suitable for 'densification' are ideally identified and defined in conjunction with local communities but minimum development scale could result in bad planning.
- In terms of Urban Planning and Design Standards developments should be sensitive to the existing townscape urban form and avoid overdevelopment that leads to overcrowding, reduced quality of life, or the loss of essential open spaces.
- Good architectural and urban design standards should be maintained, ensuring that development enhances the urban environment and is in line with local character and sustainability goals.

5. What parameters could be set for both the scale of development and accessibility?

See answer to 4 above

6. 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?

Yes.

- The greater use of design guides will ensure that development taking place on Brownfield sites is well designed, thoughtfully laid out, is carbon neutral, meets the needs of local communities and delivers places that people want to live in.
- For large sites full design briefs should be agreed with key stakeholders

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

See answers to 3 above.

8. How could Local Development Orders be best used with these proposals?

Whilst Local Development Orders can be a useful tool to achieving development of Brownfield sites, it is essential that local communities are consulted prior to Local Development Orders being adopted.

Re-development of the former Winfrith Nuclear site to provide employment space, is being successfully facilitated using a Local Development Order, which was adopted by Purbeck District Council in December 2018. The LDO was prepared with input from

local residents, businesses and other organisations, and was consented unanimously highlighting the importance of community involvement in the process.

9. 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 method of ensuring that consented development on brownfield sites is brought to fruition is much needed. In too many cases planning consent for development schemes on Brownfield sites is granted, enacted through minor works yet not carried through to completion. Whilst Local Planning Authorities do have the ability to use completion notices these however are rarely used because of their limitations.

As mentioned earlier the government can play a further part in unblocking brownfield and promoting economic activity by:

- Helping to decontaminate sites (e.g. power stations) so that they are fit for redevelopment. Either some government support for decontaminating sites (grants/tax incentives) or, on the presumption that the polluter pays, the current owners of such sites could be required to clean them up within a certain period of time.
- Supporting the carbon neutrality of brownfield developments for example by showing a preference for rooftop solar, heat pumps and community heating systems. Also by reducing the number of car parking spaces allocated making more space for new homes and promoting the use of public transport.

10. 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?

No Comment