

Making the most of the brownfield urban regeneration opportunity

We welcome the Government's mission to unlock the growth, homes and jobs our country needs.

We advocate an urban brownfield-first approach to development. We recognise, however, that brownfield alone will not meet the UK's housing needs. That's why we also support a targeted approach to green belt release.

To reduce housing's impact on our green spaces, and to deliver homes and jobs where they are most needed, we must ensure brownfield urban regeneration is delivering to its full potential. We believe this can be secured through five key changes to the NPPF and aspects of planning policy.

Define and focus on brownfield urban regeneration

- The definition of 'brownfield urban regeneration' sites in [our discussion paper](#) stimulated policy from the previous Government which is yet to be enacted. These policies would've created opportunities to maximise housing delivery in the 20 urban uplift areas.
- These reforms should be progressed and expanded to include commercial development to promote economic growth, and applied to wider urban areas, rather than restricted to the Conservative-designated uplift areas only.
- The previous Government also explored creating investment incentives to promote the remediation of brownfield sites. These incentives would use the balance sheet credibility of the UK to drive investment into all brownfield projects, particularly those being progressed by smaller developers. These should be seriously considered.

Embrace density in the right areas

- The revised NPPF should explicitly encourage denser development on brownfield urban regeneration sites, which is our best route to more growth, more homes and more jobs.
- Our research shows that through thoughtful design, development focused on brownfield urban regeneration sites in 16 UK cities can deliver at least 1.3 million new homes by 2035, provide employment land for over 1 million jobs and generate £185 billion in GVA.
- The more we do in these locations, the more homes and jobs we'll create where they are most needed, and in turn we'll reduce pressure on valuable greenfield land.
- To improve viability of these schemes and maximise the benefits to local people from development in their communities, the Community Infrastructure Levy should be replaced on all large sites with new infrastructure, community benefits, and affordable homes being delivered directly through negotiated S106 agreements.

Encourage proportionate decision-making

- Professionalise the planning system through consistent training of planning committees.
- Create thresholds to define what type of application is managed through delegated powers, and which should be determined at either the local or strategic level.
- These thresholds should reflect the Deputy Prime Minister and Chancellor's request that any investment opportunity with important planning considerations is brought to their attention.
- Enhance community participation by requiring developers to submit consultation method statements at pre-application stage.

Resource the system effectively

- The recruiting of 300 new planning officers is welcome. To maximise their impact, they should be targeted at big schemes which are moving slowly through the planning system because of a lack of capacity.
- The Government should seek to provide longer term sustainable funding for local authorities to support their role as shapers of successful places.

Reduce complexity and duplication

- The new draft should clearly define what should be in each planning policy tier (local, regional, and national) to avoid duplication.
- National Development Management Policies (NDMPs) should be created to end duplication of building regulations and other planning policy legislation. On issues like building safety and carbon management, Written Ministerial Statements have proved ineffective at preventing this, leading to complexity, cost and delay. Reform to the NPPF and NDMPs is key.