



Link response to Strengthening planning policy for brownfield development consultation

26 March 2024

This briefing is on behalf of nature coalition Wildlife and Countryside Link ([Link](#)).

Covering letter

Brownfield sites range from hard-standing areas of limited biodiversity value through to some nationally important wildlife sites, including sites which support some of the UK's most scarce and threatened species, for example, the Swanscombe Peninsula Site of Special Scientific Interest (SSSI). In addition, brownfield sites can provide the last 'wild green and blue space' in urban areas for local communities, allowing them access to nature and consequently improving the communities' health and wellbeing.

National policy could go further in promoting brownfield first development on suitable brownfield land in order to reduce pressure on greenfield sites, but this must make a distinction between suitable sites for development and brownfield sites of high nature conservation value and access to nature value. Sites should be assessed for their value and potential value for biodiversity and local communities on a case-by-case basis and not based on land classification.

Currently, the National Planning Policy Framework (NPPF) is explicit that 'previously developed' land, treated as synonymous with 'brownfield', should be prioritised for development as long as it is not of 'high environmental value'. However, there is currently no definition of 'high environmental value'. Greater clarity for planners and developers through guidance about what are considered brownfield sites with environmental value for nature and people is needed. This includes guidance in recognising Priority Habitat Open Mosaic Habitat on Previously Developed Land (OMHPDL).

Overall, in our view, the NPPF already gives significant weight to the delivery of housing through the presumption for sustainable development, and these proposed changes shift the balance of the NPPF further away from considering the three pillars of sustainable



development (economic, social, environmental) on brownfield sites in an integrated and holistic way.

Responses to selected consultation questions

Q.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?

No. The National Planning Policy Framework (NPPF) already gives significant weight to the delivery of housing through the presumption for sustainable development, and these proposed changes shift the balance of the NPPF further away from considering the three pillars of sustainable development (economic, social, environmental) on brownfield sites in an integrated and holistic way. Planning policy should also help deliver nature's recovery, access to green space and nature-friendly developments.

Brownfield sites range from hard-standing areas of limited biodiversity value through to some nationally important wildlife sites, including sites which support some of the UK's most scarce and threatened species, for example, the Swanscombe Peninsula SSSI. In addition, brownfield sites can provide the last 'wild green or blue space' in urban areas for local communities, allowing them access to nature and consequently improving the communities' health and wellbeing.

Any national policy changes to further in promote brownfield first development on suitable brownfield land in order to reduce pressure on greenfield sites must make a distinction between suitable sites for development and brownfield sites of high nature conservation value and access to nature value. Sites should be assessed for their value and potential value for biodiversity and local communities on a case-by-case basis and not based on land classification.

Greater clarity for planners and developers through guidance about what are considered brownfield sites with environmental value for nature and people is needed. This includes guidance in recognising Priority Habitat Open Mosaic Habitat on Previously Developed Land (OMHPDL). The OMHPDL in the BNG metric should still apply, so that development that impacts on these habitats will ensure that sufficient BNG provision on or offsite will take place.



Q.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?

No Link response.

Q.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?

No Link response.

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

Brownfield sites range from hard-standing areas of limited biodiversity value through to some nationally important wildlife sites, including sites which support some of the UK's most scarce and threatened species, for example, the Swanscombe Peninsula SSSI. In addition, brownfield sites can provide the last 'wild green or blue space' in urban areas for local communities, allowing them access to nature and consequently improving the communities' health and wellbeing.

Greater clarity for planners and developers through guidance about what are considered brownfield sites with environmental value for nature and people is needed. This includes guidance in recognising Priority Habitat OMHPDL.

Up to date environmental data on brownfield land is needed to help identify at an early stage whether a particular brownfield site is of environmental value. An update of the Open Mosaic Habitat Inventory is essential as many of the areas most under pressure to develop brownfields lack an up-to-date inventory to support wildlife-rich sites being identified at the early opportunity.



Q.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?

The NPPF already gives significant weight to the delivery of housing through the presumption for sustainable development, and these proposed changes shift the balance of the NPPF further away from considering the three pillars of sustainable development (economic, social, environmental) on brownfield sites in an integrated and holistic way. Planning policy should also help deliver nature’s recovery, access to nature, delivery of Natural England Green Infrastructure Standards, ambitious Biodiversity Net Gain (BNG) policies, and nature-friendly development.

Greater clarity for planners and developers through guidance about what are considered brownfield sites with environmental value for nature and people is needed. This includes guidance in recognising Priority Habitat OMHPDL.

Ensuring that high environmental value brownfield sites are not harmed by development will support nature’s recovery, climate mitigation and adaptation, local access to nature, and healthy and sustainable communities. Brownfield habitats often act as surrogate habitat for species dependent on semi-natural habitats which have become fragmented and declined across the wider landscape. These habitat stepping stones can help species move across the landscape in response to a changing climate. They can often support habitat mosaics that provide combinations and variations of habitat that are limited in the wider landscape, which can help species adapt to a changing climate.

Similarly, where there are opportunities to enhance the value of brownfield sites in order to deliver government targets, this should be encouraged. Brownfield sites can provide the space to create green/blue infrastructure in the centre of communities which are needed and often lacking within cities and towns. Integrating the use of nature-based solutions in design can also provide the opportunity to address local issues, such as flooding or urban heat effects, as well as providing space for people to access nature for wellbeing.



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

Again, any policy on brownfield development must ensure that brownfield sites of high environmental value (which may not have any protections or safeguards conferred by other designations) are identified and protected.

Greater clarity for planners and developers through guidance about what are considered brownfield sites with high environmental value for nature and people is needed. This includes guidance in recognising Priority Habitat OMHPDL.

Up to date environmental data on brownfield land is needed to help identify at an early stage whether a particular brownfield site is of high environmental value. An update of the Open Mosaic Habitat Inventory is essential as many of the areas most under pressure to develop brownfields lack an up-to-date inventory to support wildlife-rich sites being identified at the early opportunity.

Q.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 Link response.

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

No Link response.

Q.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 Link response.

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

No Link response.

Q.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 Link response.

Q.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 Link response.

Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 83 organisations to use their joint voice for the protection of the natural world and animals. Wildlife and Countryside Link is a registered charity number 1107460 and a company limited by guarantee registered in England and Wales number 3889519.

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The following organisations support this Link response:

Bat Conservation Trust

Buglife

Bumblebee Conservation Trust

Butterfly Conservation



- CPRE – The countryside charity
- Froglife
- People’s Trust for Endangered Species
- National Biological Recording Forum
- Royal Society for the Protection of Birds
- The Wildlife Trusts
- Wildfowl and Wetlands Trust
- Woodland Trust