

To: brownfieldpassport@communities.gov.uk or

<https://consult.communities.gov.uk/planning/brownfield-passport/>

Could national policy be clearer if it were explicit that development on brownfield land within urban settlements is acceptable unless certain exclusions apply?	<p>The definition of what could be identified as brownfield land is not explicit enough. The definition should also recognise that non-urban areas have land that can be identified as brownfield.</p> <p>Brownfield sites should only be identified once an assessment of the viability of the land not being able to contribute to biodiversity and greening has been completed.</p> <p>An impartial person or the planning inspectorate should judge that land can be declared as brownfield.</p>
What caveats should accompany any general expectation that development on brownfield land within urban settlements is acceptable?	<p>A full, independent environmental impact assessment must be completed prior to the declaration of brownfield land and this should be funded, but not arranged, by the landowner, similar to planning application fee.</p> <p>Parish Councils could arrange independent assessments paid for by the landowner.</p> <p>Parish Council Neighbourhood Plans must be referenced and considered at this stage.</p> <p>Air quality management should also be considered for any commercial development.</p> <p>Public transport provision must be considered for any (housing/commercial) development and provision of amenities (schools, doctors, etc.) prior to housing development.</p>
How best can urban areas be identified and defined if this approach is pursued?	Local communities can identify areas through consideration of Neighbourhood Plans.
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?	Local policy needs to also play a role as local councils and communities know what extra capacity the area can manage.
What parameters could be set for both the scale of development and accessibility?	We support mixed tenure housing for developments in line with local needs i.e. low-cost housing.
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?	Neighbourhood Plan design guidance/codes should be considered for housing developments. However, commercial developments will also wish to build on brownfield sites for which design codes may not be applicable.

	Areas should be specified for housing developments only.
What sort of areas would be most suited to this approach, and at what geographic scale could such guidance and codes be used?	Guidance within Neighbourhood Plans and land protected by the 1938 Green Belt Act need to be properly recognised.
How could Local Development Orders be best used with these proposals?	Local Development Orders identified in Neighbourhood Plans for the provision of housing or protection of shopping facilities must be prioritised.
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?	The planning system must recognise that every planning application and location is different – one size does not fit all. Development plans must demonstrate that notice has been taken of Neighbourhood Plans.
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?	In parished areas, sites within proximity to motorway/railway networks must be limited to development of industrial parks. The redevelopment of industrialised canal/riversides must be limited to housing development. In semi-rural, non-industrial areas, housing provision must be prioritised before industrial provision.