

# Consultation Response: Strengthening Planning Policy for Brownfield Development (DLUHC)



March 2024

## About

The Heritage Alliance is England's largest coalition of independent heritage interests. We unite more than 200 organisations which together have over 7 million members, volunteers, trustees and staff. The vast majority of England's historic environment is owned, managed and cared for by Heritage Alliance members. The Heritage Alliance's specialist Spatial Planning Advocacy Group has fed into this response.

## General Points

1. The Heritage Alliance is supportive of a planning system which encourages the regeneration and reuse of existing assets. Employing circular economy approaches and extending the lifespan of our buildings retains the historic character of our built environment and reduces the carbon cost of new construction. Developing brownfield land can therefore be a welcome contribution to this goal, however there is a vital distinction between the adaptive reuse of brownfield buildings, and a total demolition and rebuild. The former can regenerate urban centres, recycle fabric and celebrate local character, the latter has a significantly higher carbon cost, wastes materials and destroys the character of a place.<sup>1</sup>
2. Approximately one third of our building stock is over 100 years old, the oldest in Europe. Of these estimated 6 million buildings, only about 400,000 are listed - about 7%.<sup>2</sup> Certain types of historic buildings including industrial and mobile heritage infrastructure (air fields, factories, train stations, mills) are particularly under-represented in protection designations and prone to destruction. Airfields were formerly afforded transport infrastructure protection under PP3 but are considered brownfield under the NPPF, which has led to the planned redevelopment of many important historic

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<sup>1</sup><https://historicengland.org.uk/content/heritage-counts/pub/2019/hc2019-re-use-recycle-to-reduce-carbon/#:~:text=THERE'S%20NO%20PLACE%20LIKE%20OLD%20HOMES,-4&text=While%20the%20threat%20it%20poses,more%20sustainable%20way%20of%20living.>

<sup>2</sup><https://www.gov.uk/government/publications/adapting-historic-homes-for-energy-efficiency-a-review-of-the-barriers/adapting-historic-homes-for-energy-efficiency-a-review-of-the-barriers>

airfields such as Popham in Hampshire. It is important that brownfield planning policy considers the potential loss of unlisted heritage assets in the development of such sites and properly weighs this against other factors.

3. By their nature, brownfield sites, having been previously occupied, are very likely to be of archaeological interest. Even less developed 'brownfield' land, such as solar farms, may contain important archaeological evidence which has not yet been uncovered. Geologists have also highlighted that fringe 'brownfield' sites such as highway verges can contain important earth history sites which are typically unprotected and could be lost through development. It is important that geological and archaeological experts are consulted in the development of 'brownfield' land, which may contain deep sequences of deposits of any period as well as standing structures of archaeological importance. Even heavily disturbed 'brownfield' land may contain significant heritage assets of archaeological or geological interest that must be managed in accordance with the NPPF.
4. Heritage is not a barrier to development, rather the reuse of historic sites is a vital opportunity to deliver homes and community assets nationwide. There are enough vacant mills in the North East alone to provide 55,000 new homes, for instance.<sup>3</sup> New heritage-led regeneration projects in Stoke-on-Trent are also paving the way for brownfield redevelopment which retains and enhances historic structures. Not to seize this opportunity, or to squander it by demolishing historic buildings and replacing them with new buildings, would represent an immense cultural and carbon waste.

**Q1. Do you agree we should change national planning policy to make clear that local planning authorities should give significant weight to the benefits of delivering as many homes as possible [yes/no]? If not, why not?**

No. We are concerned by the phrasing 'as many homes as possible'. This could ruin the current balance of decision making which considers the impacts of development on the local area and the character of the site and its surroundings. It implies that environmental and other valid considerations can be ignored and upsets the careful balancing of a wide range of factors that is at the heart of the NPPF.

**Q2. Do you agree we should change national planning policy to make clear that 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. A flexible approach to internal layouts could damage heritage if it means that internal historic features are at risk in conversion developments. We are also concerned that a flexible interpretation of planning policies could leave Local Planning Authorities more vulnerable to appeals, and thereby impact on case law.

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<sup>3</sup><https://historicengland.org.uk/images-books/publications/engines-of-prosperity-new-uses-old-mills/>

**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?**

To support appropriate development on brownfield land, planning policies should prioritise and incentivise adaptive reuse rather than demolition and new build, which could be achieved through permission in principle. We would also urge avoidance of any further expansion of Permitted Development Rights, which have already been subject to significant expansions in the past 14 years without a review of the effects.

To avoid bringing important but unprotected land into scope, the definition of brownfield should be reviewed to consider whether solar farms, airfields, and sites of geological importance should be excluded. Finally, resourcing and supporting Local Planning Authorities to bring forward the delivery of their Local Plans would enhance brownfield planning policy by ensuring the wider needs of local communities are properly considered in their development.

**Q6. How could national planning policy better support brownfield development on small sites?**

The NPPF could make clear that the design, interest and quality of new development on brownfield land could be enhanced if historically significant (but not necessarily formally designated) buildings and structures, or parts of them, are retained wherever appropriate and integrated into the overall design concept. Evidence suggests that such developments are very popular and they will help achieve the Government's objective of driving up design standards.

For further information, please contact The Heritage Alliance.

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