



BROWNFIELD PLANNING PASSPORTS

THE FAST TRACK TO GROWTH

Edited by Chris Worrall and Adam Allnutt



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Foreword

Uma Kumaran, MP for Stratford and Bow

A little over two decades ago, Stratford formed an essential part of London's bid to host the 2012 Olympic and Paralympic games, which included promises to create a lasting legacy of regeneration and opportunities to change the lives of those living in East London.

Today, Stratford is one of the best-connected transport hubs in the country and a thriving centre of innovation, culture, and connectivity – in fact it's just been named the second-best place to visit in the country.

The transformation of urban brownfield sites into the Queen Elizabeth Olympic Park, the largest new green park in any European city, has shown us what is possible when ambition and imagination meets political will.

The 2012 Olympic Games marked a turning point for East London - an often overlooked area that was at the back of the queue for development and investment. The site was transformed into one of the most impressive and sought after regeneration projects in modern Britain.

The speed at which the Olympic Park brownfield regeneration project was developed proves that when local and national government are committed, and planning bureaucracy is streamlined, even large-scale projects can be delivered efficiently and quickly.

The legacy of regeneration in Stratford continues with the multi million pound investment in East Bank by the current Mayor of London, backed up by investment from the Government.

The same urgency must now be applied to tackling the housing crisis to put the country on a fast-track to growth. Yet for all the successes of Stratford's regeneration, we cannot ignore the fact that housing affordability remains a pressing concern. Regeneration cannot come at the cost of

pushing out locals in favour of investors, or cutting concerns for building standards and fire safety. We're still unpicking the cladding scandal as I write this.

Too many new homes built today are out of reach for local people. Soaring mortgage rates and huge deposits have made home ownership an impossible dream for the next generation.

We also need placemaking to be more equal. While Stratford has gained world-class amenities, some pockets of our constituency still feel disconnected from the prosperity seen near Westfield Stratford and East Village.

Investment in infrastructure must go hand-in-hand with policies that ensure genuinely affordable and social homes for those that need them most and put local people first.

That's why I welcome the push to fast-track growth through many of the recommendations set out to develop brownfield planning passports, which will help to expedite development on under-utilised land.

By cutting through red tape and fast-tracking planning for well designed, sustainable, genuinely affordable homes, we can ensure that brownfield regeneration delivers not only much needed market rate homes; but also security and a place to call home for local people.

Stratford exemplifies the transformative possibilities of large-scale brownfield development. It's well past time to apply these lessons across the country, ensuring we build not just faster, but fairer for all.

The time for delay is over. We have the land, the tools, the will and the public mandate. Let's get Britain building. ■

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Brownfield Planning Passports: The Fast Track to Growth

Chris Worrall and Adam Allnutt

The UK's housing crisis demands immediate, transformative action. Brownfield Planning Passports offer a strategic opportunity to fast-track development, streamline regulatory processes, and unlock vast economic potential while ensuring affordability and sustainability. By learning from successful regeneration projects like Stratford, this initiative seeks to remove planning bottlenecks, stimulate private investment, and create well-designed, community-oriented spaces.

Responding to the Government's working paper on Brownfield Passports published last year, the recommendations outlined in this report emphasise how a streamlined, pro-growth planning framework can accelerate much-needed development without sacrificing quality, affordability, or environmental concerns. By cutting through red tape and offering clear, predictable pathways for brownfield redevelopment, Brownfield Planning Passports could be a game-changer in Britain's housing landscape. ■

Key Contributions & Summaries

1. Growth Delivery Zones (Caroline Harper)

Proposes designated zones to prioritise housing and economic growth, leveraging public and private investment to de-risk development.

2. Good Urban Density (Elva Phelan)

Advocates for optimised land use by promoting well-planned density to meet housing needs without urban sprawl.

3. Stacking Benefits (Chris Worrall)

Makes the case for density bonuses as an incentive for developers to balance affordable housing requirements with viable development.

4. Fixing PD (Simon Ricketts)

Addresses inefficiencies in permitted development rights and proposes balanced reforms to ensure quality housing conversion.

5. Devil in the Detail (Elly Hault)

Stresses that financial capacity and scheme viability remain as significant barriers to development, requiring a mix of policy and financial solutions.

6. Brownfield Grand Designs (Cllr Louise Brett)

Demonstrates how brownfield regeneration in London can unlock sustainable, well-integrated housing solutions.

7. Treat Investment As Investment (Andrew White)

Recommends tax reforms to align brownfield investments with other corporate tax treatment, to incentivise a step change in investment.

8. Hold Me Closer, Tiny Windows (Chris Hogwood)

Highlights regulatory inconsistencies that hinder housing quality and livability, advocating for rationalised building standards.

9. Building Hope (Russell Curtis)

Calls for emergency permitted development rights to address homelessness and reduce reliance on temporary accommodation.

10. Planning Simplification (Tom Dobson)

Argues for streamlined planning processes, reducing bureaucratic delays to improve certainty and efficiency.

11. No More Grey Areas (Sean Tofts)

Proposes additional support for small developers to navigate brownfield challenges, including viability assessments and remediation funding.

12. Passport for High Street Renewal (Gary Day)

Emphasises brownfield redevelopment's role in revitalizing town centres, with a focus on housing for older residents.

13. National Model Design Codes (Rob Heasman)

Advocates for national design standards that ensure quality, sustainability, and community cohesion in brownfield developments.

14. Factories for Homes (Emma Cariaga)

Advocates for using modular design to allow for more rapid housebuilding.

Conclusion

The Brownfield Planning Passport initiative provides a structured, proactive framework to accelerate housing development, boost economic growth, and enhance urban sustainability. By integrating tax incentives, planning simplification, and innovative pro-growth planning changes, the UK can unlock its vast brownfield potential and meet ambitious housing targets.

The time for action is now. With the right policies in place, we can turn underutilised urban spaces into thriving, affordable, and well-connected communities.



Growth Delivery Zones

Unlock delivery and growth at scale, by *Caroline Harper*
Director of Planning & Development (Deputy MD), Be First

Growth Delivery Zones would deliver on the Government's growth agenda at scale and starting within this parliamentary term.

These would recognise areas where there is significant housing and economic growth opportunity, and attach specific mechanisms that go beyond planning policy designation.

The London Borough of Barking & Dagenham (LBBD), specifically the proposed South Barking New Town, offers the location in which to pilot this, supported by a pro-growth Council which owns a successful regeneration delivery agency, Be First.

London's supply of new homes has not kept pace with increases in jobs, population and housing demand. In the four years since 2019/20 there had already been an undersupply in excess of 60,000 homes, more than a year of the equivalent supply needed.

Figures around London's affordable housing starts (582 homes) and completions (2,697 homes) for the first half of 2024/25 are stark. While allocated for increasingly higher jobs and homes targets across successive London Plans, actual delivery within the London Riverside Opportunity Area, in which South Barking sits, is low.

The GLA's 2024 AMR notes that London Riverside has met only 3% of its indicative residential capacity. The impact of housing affordability on London's – and the UK's – productivity is well acknowledged.

The Centre for Cities estimates that if London's productivity had performed in line with Brussels, Paris, New York and Stockholm, then this would have added £54bn to the UK economy in 2019 alone, generating around £17bn extra spend for HM Treasury.

If we are to deliver against long recognised regeneration potential- as is the case at London Riverside and South Barking- then more is needed to marry this potential with actual delivery.

Growth Delivery Zones could attach the following:

Deliberate prioritisation and focus of the limited public purse

While the promise of private capital, particularly from the pension funds, is compelling, many of the players want de-risked investment. This is not easy, given that regeneration is typically high risk.

It is on the public sector to create the conditions, confidence and certainty that make development attractive, securing private public partnerships (PPPs) and, over time, alleviating the need for public sector involvement.

This requires a shift in attitude, whereby supporting infrastructure is not only a mechanism for good placemaking but also essential for attractive investment returns. It also speaks to a commitment across several political and economic cycles.

Simplify and reduce planning costs via revised permissions in principles (PiP)

Amend PiPs so that they can be used for major development including where subject to Environmental Impact Assessments, particularly in locations where planning policy is advanced.

Thames Road, within South Barking, has a Supplementary Planning Document and Design Code, which establishes the development envelope but still does not give private capital sufficient planning confidence.

Innovative approaches to public sector funding support

This includes tax reform to drive investment, as proposed by the Berkeley Group, alongside a longer term approach to public funding that works more holistically than site-by-site, and which moves away from being predominantly grant-based. Our work with MHCLG on Thames Road is proposing exactly this. It would be prudent to establish criteria by which a Growth Delivery Zone is designated. This could include:

Proven pro-growth local authority ambition

LBBD established Be First in 2017 and is supporting its evolution in current market conditions to continue delivering against the Council's growth ambitions.

Exemplary statutory planning

Be First's Development Management Planning Team is the number one performing team in the country, as determined by Government metrics.

A supportive, up-to-date planning policy framework

LBBD adopted its Local Plan in Autumn 2024.

Significant regeneration momentum

Major investment programmes are already underway in South Barking, including Barking Riverside, Barking Town Centre and the Thames Freeport.

A Growth Delivery Zone allocation will help knit these together through agglomeration of funding, resource and delivery, in line with good growth principles.



Strong social value impact

While LBBB is on a growth trajectory, it has significant social and economic challenges. Over 62% of households have at least one measure of deprivation, the highest proportion in England and Wales. Positive growth will have profound impacts for aspirational working Londoners.

We are all working in a world which is currently very uncertain. It is quite possible that this uncertainty will increase, at least globally. If we are to deliver at scale and

quickly, then we must regear our focus to specifically target those locations where the delivery wins are big.

South Barking initially offers 48,000 homes combined with employment opportunities from extensive industrial land and a new rail freight terminal at Box Lane. Growth Delivery Zones offer a means of establishing certainty within the uncertainty, to the benefit of PPP. ■



Good Urban Density

To meet today's housing crisis the challenge is to do more with less, by
Elva Phelan - Head of Planning, Berkeley Group

To meet today's housing crisis, the challenge is to do more with less; to fit more homes into less and less available space. Building at good urban density is the best way of meeting the UK's housing need, and will create more liveable, inclusive and sustainable towns and cities.

It would deliver more good green homes, where they are most needed, where we can leverage our existing infrastructure to best effect, and where they will best support economic growth by building close to jobs in dynamic job creating towns and cities.

These developments provide an opportunity to combine affordability with accessibility, making the best use of often unloved urban brownfield land.

Historic Urban Sprawl

It used to be all so simple. For centuries, our towns and cities simply expanded outwards. The Industrial Revolution led to the rapid expansion of places like London, Birmingham and Manchester, driven by speculative development of brick-built terraced housing. In the twentieth century the opening of the Metropolitan Railway and its successors enabled London to expand into the green fields of Middlesex and the Home Counties. This sprawling suburban growth provided the middle classes with access to country living while maintaining city jobs, resulting in the creation of the iconic low density 1930s semi-detached homes. The creation of the greenbelt put a stop to this. Ever since, development has faced the constraint of space. In the post-war period, this led to a proliferation of high-rise developments which in turn fell out of fashion because they failed to meet the needs of communities.

In the decades that followed, the UK has struggled to build the homes it needs, contributing to a growing housing crisis.

Efficient Use of Brownfield Land

With constant outward expansion no longer a solution, to solve this crisis and hit the government's rightly ambitious targets for home building, it is essential that we make the most of the limited land available for housing.

We start from a position where UK cities are less dense than their European counterparts. While grey belt reform will introduce welcome new land into the mix, we will still need to optimise land use within urban areas.

Making the most of this land is not just a necessity, but a huge opportunity to make the most efficient use of land in sustainable locations which in turn helps to limit Green Belt release to only where it is most necessary.

Technological change has rendered formerly critical industrial infrastructure surplus to requirements. Where derelict utilities sites and industrial remnants once stood, mid to high-rise housing could take their place.

These brownfield sites lend themselves to developments built at a good urban density. Derelict sites can become vibrant new urban quarters, reconnecting this land into the surrounding urban fabric, revitalising local economies and breathing new life into areas that were once neglected.

It is estimated that in the 15 years to 2035 up to 2,650 hectares of brownfield land will become available for redevelopment in London alone.

Building at the densities common for traditional low-rise housing of 35 homes per hectare this land would deliver just 92,000 new homes, against London's 15-year requirement of more than 1.3 million.

In contrast, high-rise housing can deliver up to 550 homes per hectare or more, which would deliver 1.5 million new homes on the same land. Building at this density would deliver London's housing requirements on surplus brownfield land with room to spare.

High density housing is not appropriate everywhere of course, and dropping high rise flats in places where they are not appropriate, should not be the aim of planning policy.

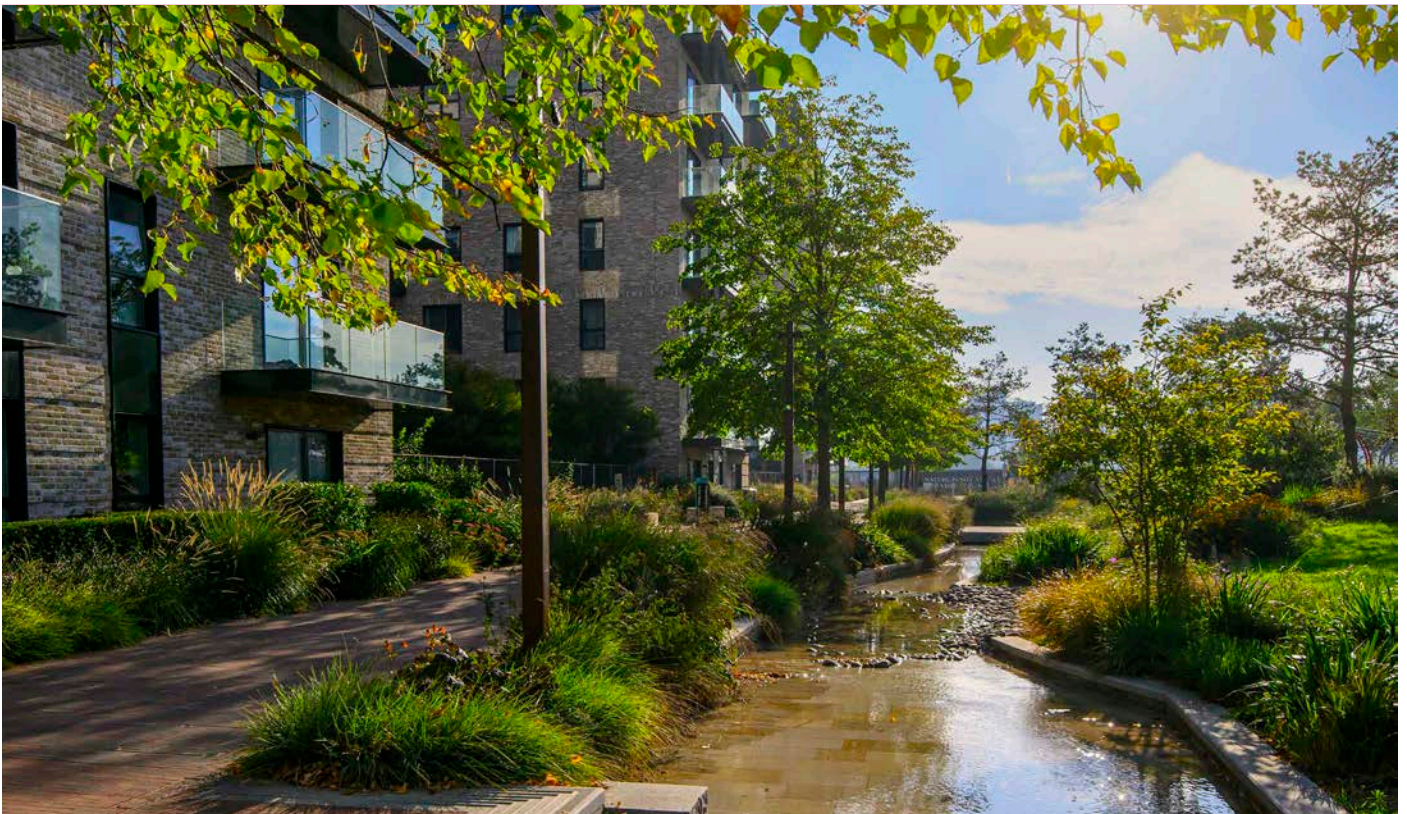
Building at a 'good urban density' however means being willing to build more homes where this is appropriate, with taller and denser developments in city centre locations, close to transport nodes, and gentler density in town centres and in more sensitive locations.

Benefits of Development at Density

Building homes at higher densities can allow sites to unlock a wider range of services for the local community. With more people in walking distance, more shops, gyms and cafes can be sustained in the same area.

With more homes being delivered the scope to deliver affordable housing, and other community benefits like parks, schools or GP surgeries that are financed by new homes increases exponentially.

Building at good urban densities therefore can ease pressure on local services and lead to a richer tapestry of services in the local neighbourhood, rather than more traffic from car dependent urban sprawl. Eliminating this car dependency and leading to more active lifestyles is another key benefit of urban densities in urban cores and around public transport.



The Green Quarter by Berkeley Group: walkable green space, on the former Southall Gas Works site.

Well-designed green homes located near jobs, services and public transport hubs drastically reduce commuting distances, foster active travel, and reduce car dependency.

This shift is essential for reducing the carbon footprint of our housing stock. Indeed, the Committee on Climate Change (CCC), which evaluates the UK's carbon abatement strategies, have identified increasing urban density as a step toward cutting emissions from personal transport.

These benefits need to be better understood because when clearly explained the public, when polled, tend to prefer good development at density. A challenge for the development sector and policymakers is to ensure communities understand the benefit of making the most efficient use of underused urban land.

To unlock the full potential of available urban land and address the UK's housing needs, policymakers must embrace the advantages of good urban density, and be

clearer in setting expectation for good urban densities where this is appropriate, such as within walking distance of town and city centres, and in easy reach of public transport. Taking a positive policy approach to development at density, rather than limiting the potential of brownfield land will make a significant contribution to addressing the housing challenge.

A successful 21st-century city requires careful planning that balances the competing demands of housing, jobs, schools, public services, green space, transport, and the many other factors that contribute to a vibrant and liveable urban environment. Building to a good urban density is a key to building the homes we need in the places we need them. ■



Stacking Benefits

Making the case for density bonuses, by Chris Worrall,
Labour Housing Group, Executive Committee

Despite being politically understandable, British affordable housing policies delivered through developer contribution requirements has created significant viability challenges. In particular when it comes to the construction of new homes on brownfield sites. It is a solution that is congruent with the kind of morality-tale explanation that housing unaffordability is all the fault of greedy developers and heartless landlords.

This makes the pitch of dragooning developers into paying for the solution all the more politically convenient. While this maybe attention grabbing and contentious, the real-world outcomes of affordable housing requirements have been, at best, modest. At worst - paltry.

The Policy Gap: Affordable Housing Requirements

Still with construction costs so high, and viability remaining a challenge, such requirements only suppress housing supply overall, which in turn drives up rents and house prices. The current status quo adds costs imposed to developers when it comes to the delivery of new homes, increasing the price point at which they sell or market for rent. In turn depressing the supply of market rate housing. The impact of which merely overall offsets the small gains made from the handful of affordable homes eventually delivered, creating a gap between policy objectives and financial incentives for development through hampered sales and leasing velocities. The result? Higher prices, greater financing costs, and inevitably fewer affordable and market-rate homes.

At present affordable housing requirements are worsening Britain's housing shortage, even in high demand areas, which is resulting in rents accelerating as a result of schemes no longer stacking up due to a gap between policy outcomes and objectives.

Balancing High Affordable Housing Requirements with Viable Development

Yet at a time of acute viability challenges, in London there is a 50 per cent affordable housing requirement, which is a strategic target forming part of the Mayor's London Plan. In Labour-controlled Wandsworth we have also seen, despite record high construction costs, local policy changes to increase affordable housing requirements to the same level.

The London Plan at least as a threshold level of 35 per cent, which can alleviate the challenges somewhat. This ultimately widens the viability gap of brownfield sites. Overall over-zealous affordable housing policy requirements from councils causes nothing but harm to the governments brownfield first strategy by making schemes cost more, which ultimately either stop development through making schemes unviable, or push exit values up to accommodate the higher costs.

If Labour is to design policy that achieves more than just a token effect on tackling the housing unaffordability

problem it needs to reassess the trade-offs between balancing affordable housing requirements and development viability. Should Labour stand any chance of reaching its target of 1.5 million homes, while also delivering "the biggest boost to affordable housing in a generation", it must recognise without reforming current affordable housing policies to offset the costs of affordable housing it will inevitably create avoidable viability challenges.

After all, developer contributions simply shift the cost of affordable housing subsidy from the government onto new development vis-à-vis the end user. But we make it hard to offset these costs, primarily due to height and massing considerations taking priority.

In turn, local authorities inadvertently opt to aggravate the housing shortage further. An uncomfortable truth we must come to understand.

Brownfield Planning Passport: The Opportunity

Luckily the Labour government has sought to take further action on adapting the planning system to support the development of brownfield land in urban areas through the Planning Reform Working Paper, Brownfield Passport: Making the Most of Urban Land. In proposing options that would make more specific options that would form a default answer of a straightforward "yes". It suggests proposals concerning not just the principle, but the scale and form of development, including Local Development Orders to grant area-wide permissions. All in a way that retains appropriate local oversight.

The paper sets out a range of objectives that include having "clear policies in place to communicate these opportunities, with plans and development proposals informed by the views of local communities". While calls for granting the automatic planning permission on suitable brownfield sites or removing oversight is not being considered, there are options that can help alleviate the effective developer tax that developer contributions induce.

Density Bonuses: Bridging the Policy Objective Gap

Density bonuses have emerged as a pragmatic solution in housing policy when grappling with inclusionary zoning mandates in the United States. Such mandates operate similarly to affordable housing requirements in the UK. In this context, it would allow developers to exceed typical density limits in exchange for delivering on the required affordable housing provision and community benefits. Density bonuses effectively bridge the gap between policy objectives and viability.

How Density Bonuses Work

A density bonus permits developers to build more homes at greater density than normally allowed under existing planning regulations. Provided that they contribute to



a specific public good. Most commonly this would be affordable housing subsidy. For example, if a local plan limits a site to six storeys and offers a 50 per cent density bonus it could construct say nine to enable affordable housing requirements to be met.

The underlying mechanism aligns public and private interests. As developers can offset the financial burden of providing affordable housing by capitalising on the increased profit generated from additional homes. This flexibility is especially valuable in areas where construction costs and land values are high, as the bonus would mitigate the risk of projects becoming economically unviable.

Why Density Bonuses Make Effective Brownfield Passports

Brownfield sites, prioritised in the UK for their underutilisation, pose additional challenges. The costs of remediation, coupled with stringent affordable housing requirements, can render these sites unviable to builders. This is where density bonuses can become crucial.

The Brownfield Planning Passport initiative seeks to streamline redevelopment providing pre-approved

templates for higher density projects on brownfield sites. Coupling these passports with density bonuses creates a win-win scenario: builders gain the financial incentive to tackle challenging sites, while councils ensure the delivery of brownfield sites for regeneration.

Density bonuses also align with the broader goals of minimising greenfield development by making urban areas more liveable and efficient. In maximising the potential of existing infrastructure and minimizing sprawl, they support sustainable growth while addressing the housing shortage.

Conclusion

Density bonuses are not a panacea but would make a critical addition to the policy toolkit. When thoughtfully integrated into frameworks, like the Brownfield Planning Passport initiative, they can offset the economic impacts of affordable housing requirements, stacking together the benefits of making housing projects viable without compromising affordability targets. As the UK continues to navigate its housing crisis, leveraging such incentives can balance the competing demands of affordability, density, and urban renewal. ■



Fixing PD

What went wrong with permitted development and how to fix it,
by Simon Ricketts – Partner, Town Legal

Should the concept of automatic planning permission for the conversion of certain types of commercial buildings to residential use be rejected outright, based on the experience since May 2013 in England of how the permitted development rights system has operated under the General Permitted Development Order (“GPDO”)?

Is it simply wrong to take individual decisions away from the local planning authority?

The Government has its 1.5m homes target. For the last ten years or so a significant proportion of new dwellings have come forward by way of developers securing prior approval under the GPDO process, a relatively light-touch procedure where only specified matters are up for consideration.

In 2023-24 8,825 of England’s 198,610 new dwelling completions were by way of permitted development rights.

Between 2015/16 and 2022/23, 102,830 new homes were delivered by way of permitted development rights, around 6% of new homes.

To this we add the Government’s drive towards brownfield development in urban areas, the extent to which commercial space is surplus to market requirements and the carbon benefits of finding new uses for existing buildings.

But, of course, this does not tell the full story. Much of the resulting accommodation has not been of a decent standard. The Town and Country Planning Association is lobbying for a “Healthy Homes Bill”, describing permitted development rights as creating “slums for the future”.

Is there a middle ground?

Do permitted development rights have a role in delivering homes, in the quantity needed but also to the necessary quality – decent, healthy?

The previous government consulted on further changes to permitted development rights in February 2024. The outcome of that process was never published. We await Labour’s next steps.

What went wrong? After all permitted development rights more generally are not new but previously dealt with usually uncontentious forms of minor development and changes of use which rarely raise issues warranting the submission of a formal application for planning permission and exercise of the local planning authority’s wider and more discretionary decision-making role.

In May 2013 the right was first introduced. initially just for three years, to allow changes from office use to residential use, the twin objectives being to boost housing and to help regeneration by way of putting vacant or under-utilised office space to productive use.

The “prior approval” requirements were minimal, with no minimum space standards, no minimum standards for daylight and no protection in relation to noise, for

instance. As is still the case, local planning authorities could not impose requirements as to affordable housing or require contributions towards for instance education or health facilities. Authorities could make “article 4” directions limiting the areas within which the permitted development right would apply but at risk of these being cancelled or amended by the government (as has frequently happened).

The right was extended to shops and to financial and professional services uses in April 2014 and made permanent in Autumn 2015. Adequacy of daylight was introduced as a prior approval requirement in August 2020 and minimum space standards in April 2021. Initially buildings of any size could be converted to residential.

A 1,500 sq m cap was introduced in September 2020 (at the same time that there was the separate but related de-regulation measure of gathering together most commercial uses within a single use class, the new class E) and then that cap was removed in March 2024.

Similarly, a requirement was also introduced that the building should have been vacant for at least three months before the application was made, only for that also to be removed.

One might conclude from this chopping and changing that from the outset the process has lacked a proper strategic foundation, core objectives and a commitment to ensure that resulting development is not of poorer quality, or having a free ride at the expense of development achieved by way of the traditional planning application route.

Criticisms are well-founded of many, not all, of the outcomes to date, although care is needed: the worst of these resulted from the initial wave of conversions, before additional prior approval safeguards had been introduced.

Also remember that these developments do have to comply with the Building Regulations and with housing legislation. Not every failing is down to the GPDO.

Before we give up on removing unnecessary matters from the planning application process and on this streamlined route for delivering new accommodation on urban brownfield land, perhaps we should examine whether the system can indeed ensure, by way of objective criteria, that:

- Possibly by way of an article 4 direction process following better national guidance and the opportunity for public consultation, development locations are sustainable for their residents, with access to public transport, schools, health and community facilities;
- Schemes should pay their way in terms of affordable housing and other section 106 agreement requirements in the same way as schemes delivered by way of planning application.

If this isn’t a “brownfield passport”, what is? ■



Devil in the Detail

Anything that makes it easier to build affordable homes is a step in the right direction by Elly Hoults - Deputy CEO, Peabody

London is at the epicentre of the housing emergency and urgent support and a long-term plan is needed for things to change.

The new government is making all the right noises, with ambitious plans to scale up the delivery of new social housing where it's most needed, including the brownfield passport consultation. But for this to happen, we need more than just planning reform, we need a package of measures to help rebuild stability and financial capacity.

Of course, any measures to speed up planning and unlock brownfield sites are welcome. And we, like anyone in the sector, are very aware of the transformative benefits developing these sites can bring to local communities.

We're already working on large scale regeneration schemes on brownfield sites across London, including transforming Ford's iconic stamping plant in Dagenham. Working in partnership with the Mayor of London, we're building more than 3,100 new homes, a five-acre public urban park and a series of other green spaces on the East London site. There will also be 4,400 sqm of non-residential spaces for new shops and other community amenities. In the North of the capital, in Islington, we're redeveloping the site of the former Holloway Prison to make way for 985 new homes, 60 percent of which will be affordable. And the scheme will also provide a new public park, pedestrian connections and commercial space.

Elsewhere, we've recently completed 13 new homes in Pembury on land that we've held since 2014 and 12 new homes in Morpeth Road, both in Hackney.

Looking ahead, we have a pipeline of around 5,000 homes with planning permission waiting to be built, the majority of which are on brownfield sites. But for us, the main issues preventing these builds progressing, is financial capacity and scheme viability, particularly in the light of the severe skills shortages and rising costs facing the construction sector.

This year, we'll start only around 10 percent of our historic annual average number of homes, and we're not alone in this decline. Development pipelines across the sector have already fallen off the proverbial cliff, with starts across all the G15 housing associations down 76 percent.

We've yet to see the real impact of these declines because homes started two to three years ago are still being completed, but it's a significant concern when we have hundreds of thousands of families on housing waiting lists and councils spending hundreds of millions of pounds on

temporary accommodation.

As a result, anything that makes it easier for new homes, and particularly affordable ones, to be built is definitely a step in the right direction and the 'presumption in favour' is a helpful start. But in our experience, it's often the detail that's key to a project or scheme being permitted and ultimately viable to deliver.

To be successful, a brownfield development needs to continue or extend the nature of the urban settlement it's adding to. If it proposes a radical or abrupt change in height, use, character or quality, then caveats would apply, and progress would likely be delayed.

Proximity to neighbourhood amenities is also key, making mixed-use developments with things like shops and healthcare facilities particularly attractive. Extensions to existing places where infrastructure and facilities need to be extended rather than established from scratch are also likely to attract more positive responses from planners and be more financially viable.

Thamesmead, a town in South East London where we've already built 600 new homes and have another 4,200 in the pipeline, is a good example of this.

As well as building new affordable homes, we're delivering an extensive refurbishment, repairs and maintenance programme for existing homes, and making substantial improvements to the surrounding parks and green areas and the local community.

Looking ahead, we believe that over the next 30 years, Thamesmead offers the potential for an additional 20,000 new homes, the creation of many new jobs and a new leisure, cultural and commercial offer. By 2050, it could be home for up to 100,000 people.

Like many developments, the delivery of new homes in Thamesmead could be sped up with infrastructure improvements, such as the proposed expansion to the Docklands Light Railway. Building new homes here would also be in line with the government's new towns plans.

So, while measures to speed up planning and unlock brownfield sites are welcome, it's clear that no one single act will solve the housing crisis.

We need a package of measures, including increased private investment, the return of rent convergence, a lighter regulatory burden and at least a 10-year rent settlement to rebuild stability and financial capacity. ■



Brownfield Grand Designs

How London's brownfield sites can help realize the housing dream, by
Cllr Louise Brett – Deputy Leader, London Borough of Ealing

Having a home – a secure, stable, and affordable place to call your own – is a dream shared by so many of us. That is the dream is it not?

It is what property shows like Grand Designs sell to millions of viewers: the idea of building the perfect sanctuary, a space that reflects not just our needs but our aspirations. But for far too many people, that dream feels further away than ever before.

The reality for thousands of families across London, including Ealing, is not Grand Designs, but temporary accommodation, unaffordable rents, and the very real fear of homelessness.

While the dream home of Kevin McCloud's participants might be a self-build in the countryside or a converted barn with floor-to-ceiling glass, for many of our residents, the dream is far simpler. A safe, secure, and affordable place to live.

And that should not be an impossible aspiration. But for too many the possibility of having any kind of home at all feels very far removed.

The Housing Crisis: A National Failure, a Local Emergency

For years, successive governments have talked about solving the housing crisis, yet we continue to see rising homelessness, escalating private rents, and a chronic lack of genuinely affordable homes.

Local authorities like Ealing are at breaking point, struggling to meet the growing demand for social housing while shouldering the soaring costs of temporary accommodation.

The statistics are staggering: in 2023-24, London boroughs spent nearly £1.6bn on homelessness, with £114m per month going towards temporary accommodation. Here in Ealing, we have, on average, 3,000 families in temporary accommodation each month.

But behind every number is a child without a stable home, a family moving from one unsuitable short-term rental to another, never knowing when they'll be forced to pack up again.

I know firsthand how life-changing a secure and affordable home can be. I was lucky enough to grow up in social housing – an affordable home that gave my working class parents security and stability. It gave me the foundation to build my future. A start in life that sadly so many are now missing out on.

That is what every child deserves. No child should grow up homeless. No family should be forced to live in overcrowded, unsafe conditions.

Brownfield Development: Unlocking Housing Potential Without Encroaching Green Spaces

The government has set ambitious housing targets - 1.5 million new homes, planning reforms, and even a review of Green Belt land. But for built-up areas like London, the real opportunity lies in unlocking brownfield land.

There are thousands of underutilised and dormant sites across the capital that could provide the housing we so desperately need. But London's brownfield sites are not just vast, derelict industrial plots like you might see in other regions.

Many are small fragmented pockets of land scattered across neighbourhoods and commercial areas, often left undeveloped due to complex, bureaucratic planning system that favours delay over delivery.

The disjointed nature of these has often hampered large-scale regeneration efforts, leaving developers to navigate a complex planning system and overcome local opposition.

The promise of the brownfield passport proposals aims to cut through these barriers by offering more certainty on planning outcomes. Central to the consultation are measures such as scaling up development, allowing larger and denser projects. In fact, we have a prime example of this type of development on our doorstep in Old Oak Common.

Streamlining permissions by reducing objections to developments that adhere to local planning and design rules, which could incentivise mid-rise and high-rise construction in areas well served by public transport, such as the Elizabeth Line and other Tube stations.

These reforms align with the government's push for a denser, more sustainable urban form, positioning brownfield passports as a tool to optimize the capital's limited space.

Crucially, brownfield development allows us to build more homes while protecting London's precious green spaces. It offers a sustainable solution – maximising land that has already been developed rather than encroaching on parks and open spaces that our communities rely on.



A Fast-Track to Growth that Works for Ealing

Of course, brownfield development won't solve London's housing crisis alone, but it is a crucial piece of the puzzle.

For Ealing, and other borough across the city, it offers a real opportunity to regenerate forgotten areas, make better use of urban land, and deliver the affordable homes that local people desperately need.

Because housing shouldn't be just a dream for people who can afford to feature on *Grand Designs*.

The right to a decent, affordable home should be within reach for every family in Ealing, every young person trying to get on the housing ladder, every child who deserves a stable place to grow up.

That is why I welcome the brownfield planning passport consultation – to bring clarity, certainty, and a locally-led approach to development. With the right policies, we can turn 'the dream' into a real, tangible future for thousands of families – one where they have a safe, secure, and affordable home to call their own. ■



Treat Investment as Investment

How tax reform attached to brownfield passports can turbocharge investment and brownfield housing delivery, by Andrew White – Head of Public Affairs, Berkeley Group

There are many sensible suggestions in this discussion paper and elsewhere on how to remove or overcome the barriers that stand in the way of making the most of urban land, building good green homes where they are most needed, and reinvigorating our towns and cities. While many solutions seek to address the supply of land, planning capacity, skilled workers, or demand, how to unlock the many billions of pounds of investment needed to bring these new homes to life is often overlooked or simply taken as a given.

To the extent investment is discussed, it is usually the cost of purchasing the finished product, not the money needed to get the homes built. This is a mistake since, building an extra 50,000 brownfield homes each year, might require up to £60 billion of new working capital to be invested.

The investment required is so significant because extensive work is often required before a project can even commence. The demolition and remediation of derelict industrial sites, installation of shared infrastructure, building of shared basements or podiums, or simply the scale of tall buildings means it takes longer, and costs more, to go from starting a project to handing over a finished home. Indeed, this is one of the core reasons why development has historically extended further into the countryside, while many brownfield sites sit idle.

Past attempts to solve this challenge have included making increasing calls for grant funding for affordable housing or infrastructure, or for compromises to be made on ambitions for affordable housing.

A better alternative would be to simply treat investment into the delivery of brownfield homes as the investment that it is and allow full expensing of build costs for brownfield housing, bringing it into line with other forms of investment.

Currently the upfront investment needed to deliver brownfield homes is recognised for tax purposes only as homes are sold, which for the most transformative brownfield projects may take many years. Recent reforms to the corporate tax system that sought to increase investment and drive economic growth mean other forms of investment do not face this hurdle.

These reforms allowed for the ‘full expensing’ of investment costs, meaning they are recognised for tax purposes when the money is spent, rather than slowly over time. This reduces tax when firms invest, which is then recouped over the remaining life of the investment. This makes investing cheaper, without making long term demands on the Treasury.

These incentives were not extended to investment into the built environment, despite little economic difference between investment in machinery to be used for 10 years,

and investment into a brownfield project that takes 10 years to build. This is still more surprising when you consider after 10 years, the machinery would be scrapped, but the homes continue to contribute to long-term prosperity for many decades.

The impact of extending this policy could be dramatic. After full expensing of capital equipment was introduced record numbers of industrial robots were installed in British factories, increasing by more than 50% in one year. Repeating this success for investment into building good green homes, in places where they are most needed would have a dramatic and long-lasting effect.

This reform would be tax neutral as it only changes when tax is paid not how much. It is strongly pro-growth and targeted, as it only provides a benefit when money is invested into building new homes. Possibly most significantly however it makes marginal developments more economically viable without needing to provide government grant or give up affordable housing, getting more sites into production without giving up the kinds of homes people want to see.

Such reform is a compelling answer to many of the Government’s challenges. It uses the balance sheet credibility of the UK to drive private investment in support its core priorities: building new homes and increasing economic growth, all whilst not making claims on the long-term fiscal position of the UK or compromising on its wider housing objectives.

- It supports Labour’s growth mission: as every 10,000 new homes directly contributes ~0.2% to GDP, and improves economic network effects long term;
- It supports labour’s housing mission: as increasing investment into brownfield homes is essential to building 1.5 million homes;
- It improves the fiscal credibility of the UK: as every new development that comes forward that would not otherwise, pays significant amounts of tax to the Treasury through Stamp Duty, Residential Property Developer Tax, Building Safety Levy, Corporation Tax, payroll taxes, and others; and
- It fits completely with the Chancellor’s vision: to “strategically use public investment where it can unlock additional private sector investment, create jobs, and provide a return for taxpayers.”

The Government should therefore be bold and turbocharge investment into the new homes and neighbourhoods we all wish to see, attaching tax incentives to brownfield passports, which will accelerate the improvement of lives for decades to come. ■



Hold Me Closer, Tiny Windows

The implications of new regulations and the need for balance,
by Chris Hogwood, Managing Director, Land Securities

Since sweeping to power last year, the Government has taken bold steps to unblock the planning barriers to growth. It seems that barely a week has passed since the election without a new piece of reform – plenty of fun for those of us writing responses to consultations.

It already seems unlikely that we'll be returning to the days of a revolving door for housing ministers. It's easy to forget having political leaders with the confidence to publicly champion the myriad benefits of building stuff felt like a pipe dream some years back.

This Government has put the built environment at the heart of its growth agenda. Our sector has welcomed the policy levers it's pulled so far, and we should continue to do so at every opportunity.

However, those of us in the sector know that planning – while a vitally important part of the picture – is not the only barrier standing in front of development. Far from it.

In recent years, there has been a groundswell of regulation on building. Few have the direct consent of parliament, and many risk undermining our new Government's efforts to drive growth through development.

Individually, each of these regulations appear rational. How could anyone argue against people getting a quiet night's sleep? Preventing people falling from windows? Making our homes more energy efficient? Ensuring an adequate number of toilets in an office building?

Taken together, the web of requirements not only confuses the design process, but it also means we're producing buildings which are less economically sustainable, more environmentally costly, and socially less productive.

Windows have become a comical example of this 'best intentions' approach leading to something we've started to call 'the tiny windows' conundrum.

In 2022, to reduce the chances of falls from windows, guard sill height requirements increased from 800mm to 1100mm for windows more than 60cm above the ground.

Combined with rules on overheating which regulate the ratio between the floor and the window space, serving to effectively ban larger windows, and Building Regulations are leading to the adoption of higher, smaller windows.

I'm not the world's tallest person, but even a loftier individual would struggle to see out of a window raised that high while sitting down in their darker living room.

At this point that I can sense your scepticism. Developer argues for lighter touch regulation. Quelle surprise.

It's right that our sector is held to high standards. Good actors – of which there are many in our sector, several of whom appear in these pages – know what it takes to design well, and why it matters.

That's probably why we've sometimes been told that 200 pages of the London Plan are not intended to apply to businesses like ours.

But the reality is that all of us are caught by regulation aimed at the lowest common denominator. And in addition to the swelling ranks of national regulation, locally set policy is expanding accordingly. And often in ways which run counter to national standards.

Building Regulations Part L demands stringent energy efficiency standards. Let's build warm homes, making them more efficient and cheaper to run. Excellent idea.

But in London, city policy demands a 35% improvement over this. This drives increasing wall thickness, which comes with a cost in cash and carbon. The push for efficiency is resulting in warmer and warmer homes, which often require AC to keep cool.

But there's more. Part O of Building Regulations stipulates that openable windows cannot be considered as part of a designer's plans to manage the temperature within homes (which as already noted, are rising due to efficiency savings), where the homes fall foul of a new regulation on acceptable levels of noise at nighttime.

We estimate that most projects fall foul of this standard if they are within 15 metres of a road that has 10 or more cars on it at night. In short, most sites in urban locations.

These policies are well intentioned. A good night's sleep is important for our health, and energy efficiency keeps pounds in people's pockets. But the lack of consideration for their implementation is troubling.

Taken together, these regulations are leading to more AC plant and pipework, meaning less space for homes and commercial space, squeezing viability. Not to mention the perverse outcome of an energy efficiency standard undermining our net zero goals.

My aim is not to decry any form of regulation or get into a philosophical argument about the balance between a paternal state and oh-so-wise businesses and citizens.

Instead, I encourage Government to finish the job. The much-needed planning reforms are a welcome first step. But officials must now peel back the layers of regulation which – though well intentioned – are stifling development.

In the absence of increased grant funding for infrastructure and affordable housing, these are the policy levers ministers must look to pull to bring about change in this parliament.

As a minimum, Government should pause any further changes to Building Regulations in this parliament. And for our sector, now is the time to propose sensible alternatives in the public interest – or else let the benefits of development be limited by tiny windows. ■



Building Hope

How emergency permitted development rights could help address the financial and human cost of homelessness, by Russell Curtis – Director RCKA

At the end of 2024 London boroughs were spending £4m each and every day on housing families in temporary accommodation—nearly £1.5bn every year.

One in 23 of London's children are growing up homeless, many in substandard converted offices, mouldy privately-rented flats, or overcrowded hotel rooms without private kitchens. Many young adults have spent their entire primary and secondary education living in precarious circumstances, their student rooms now providing the most stable accommodation they can remember.

Aside from the extraordinary financial implications of the worsening housing crisis, the human cost is profound. At a time when public finances are under a greater strain than they have been in generations, scandalous sums of money are cascading into the pockets of private landlords and hoteliers.

Inadequate and unsafe housing leads to poor health outcomes, putting a strain on an already overstretched NHS—but the real tragedy is the lives that are diminished, the opportunities thwarted, and the potential of future generations squandered. The homelessness crisis is a national emergency and a stain on our country. We must take bold steps to confront it.

During the COVID 19 pandemic, the country mobilised to build a series of temporary hospitals at speed. The government adopted emergency measures that allowed the bypassing of conventional planning processes so that health needs could be prioritised.

The public and private sector came together to quickly design, install and operate the so-called Nightingale Hospitals under emergency amendments to the Town & Country Planning Act.

These granted specified healthcare bodies permitted development powers to construct or convert buildings for a range of uses including hospitals, mortuaries and testing units, whilst avoiding the need for expensive, time-consuming planning applications. It was a remarkable response. A similarly ambitious approach is now required to address the housing crisis. The public emergency of substandard temporary accommodation deserves to be treated with the same urgency as the pandemic.

In the end the Nightingale Hospitals were not required—the housing emergency is real and present, and has similarly profound long-term implications.

Permitted development rights should be extended to allow the installation of temporary accommodation on vacant plots of land in appropriate locations, with a time limit of no more than five years before permanent development or its return to a pristine state.

Naturally, safeguards must be included to ensure that the homes are of a sufficient standard: compliance with Building Regulations to ensure thermal comfort, accessibility and safety; and broad compliance with

Nationally Described Space Standards, although perhaps a concession should be made to allow dwellings 85% of the total required area to optimise the use of land.

Homes delivered under this method should have easy access to the public transport network, and so located no more than 800m from a station; also close to local amenities such as high streets and social infrastructure.

To avoid large numbers of people in need being placed in areas already suffering from high levels of deprivation, an impact assessment should be carried out to understand how these temporary homes might affect the wellbeing of existing residents.

These powers could also include an upper limit on the number of bed spaces within a single location: 250 would seem reasonable.

Dimensional parameters should also be established: a similar Class TA Permitted Development Right already allows the Crown to erect certain structures within closed defence sites provided that they are below a height threshold and a sufficient distance from neighbouring homes.

Importantly, the homes should be demountable and capable of being relocated elsewhere with ease. This will ensure that a five-year lifespan is achievable and that the homes are designed and manufactured with appropriate quality and robustness. This would provide a boost to the UK's beleaguered modular manufacturing industry too.

Consideration should also be given to the siting of new accommodation, with the provision of external amenity space and play equipment ensuring that these temporary developments meet the needs of the children and young people who will live there.

There is no reason whatsoever that the quality of these homes should be in any way compromised: there would be little sense in moving families from precarious lodgings to overcrowded and substandard accommodation elsewhere.

There are thousands of hectares of vacant land that could be temporarily repurposed for this use: surface car parks next to suburban train stations, disused golf courses, council estates awaiting regeneration and brownfield land awaiting permanent development which is delayed due to uncertainty over viability or forming part of a later phase of regeneration.

In the case of the homelessness crisis, it is likely that councils will be the ones applying to themselves for permission, but given the nature of the emergency it cannot be allowed that unnecessary interference from external interests can delay or otherwise frustrate the construction of these dwellings. Provided that they meet the pre-determined criteria sketched out above. Limited and specific permitted development rules would help achieve this.



Work already undertaken in this area has demonstrated that it is possible to install temporary homes at between half and two-thirds of the cost of conventional affordable housing, and the relocatable nature of the modules enables the homes to be either repurposed elsewhere as permanent homes or to continue their life providing emergency accommodation for those in need.

Councils across the country have already demonstrated how, with the appropriate supply chain and procurement processes in place, public sector temporary housing can be comfortable, safe and cost-effective.

We should learn from these lessons and apply them at scale. The potential cost savings to the public purse are also vast: the typical payback for a temporary dwelling can be as little as a year.

We owe it to our fellow citizens who are not adequately housed to provide them with a safe and secure home in which to raise their children. Their needs should take precedence over those who already benefit from a place to live. Time-limited permitted development powers could provide a way. ■



Planning Simplification

What measures might be done to support the simplification of planning by
Tom Dobson – Managing Director, Quod

Matthew Pennycook has likened the planning reform challenge to a ‘set menu’ where every item needs to be attended to, with planning reform a necessary course. Without planning permission you can’t build or convert an existing building, and you need more permissions than you want new homes so builders fight for customers rather than people fighting for homes.

On this the Government has moved commendably fast since July with its initial set of reforms, and planning is now rarely out of the news. In fact there is so much going on that people get a lost in the blur of messages to see the bigger picture. Even Donald Trump has been briefed on it in his first post-inauguration call with the PM.

One can define at least four broad areas of reform, ranging from immediate and technical to long term and radical:

- **Fix It:** Re-booting the system with the changes to the National Planning Policy Framework (NPPF) deleting Michael Gove’s 2023 revisions which directly resulted in stalled Plans and tumbling Planning Permissions
- **Simplify It:** Simplify the system, to make plan making and decision making quicker, whilst maintaining essential standards and quality;
- **Integrate It:** in a wider devolution and place-based agenda, increasing strategic planning and integration into, funding and infrastructure delivery and operation;
- **Transform it:** the most ambitious and difficult part of the agenda, having a stronger Government led focus on delivery, including social housing, and new models of investment supported by land value capture and backed by expanded Compulsory Purchase powers.

This is ambitious and goes well beyond a single term of Government. It will be messy as different priorities rub up against one another, and as departmental priorities rub up against public spending constraints. Reform isn’t easy.

‘Simplification’: should be the next stage of reform.

The Government continues to have a ‘brownfield first’ focus, and research shows that it has wide public support. So how can the system encourage this to happen?

Simplification is a key part of the answer. Over the years we have placed more and more burdens and requirements on the planning system. Plans are much longer, the number of documents required has multiplied, as has the obligations placed on development.

The situation was likened to ‘Buckaroo’, in that planning can deliver more and more things, right up to the point it reaches a limit and delivers nothing.

Taking London as an example, there are 550 pages of requirements in London Plan, plus Local Plans ranging from 400 to 700 pages. This is in addition to the NPPF,

blissfully short at 83 pages but backed by Planning Practice Guidance. Beyond this there is London Plan guidance and Supplementary Guidance. Documents that list the documents you need to submit often run to 40 pages.

Some of this policy is essential to make sure we get the right development in the right place, but much is little used and sometimes more about signalling political positions than making land use decisions (the London Plan policy banning fracking for gas in London, despite no shale and no gas springs to mind).

There is also much duplication between levels of government, which can become the subject of extended debate in planning inquiries, and sometimes in court over which has precedence.

The Government has some new tools to address this from the Levelling up and Regeneration Act, including provision for National Development Management Policies (NDMPs), through which the Government can inset uniform policy into local plans across the country. The London Plan review also offers the opportunity to re-think the role of a genuinely ‘strategic’ plan, as can new Spatial Development Strategies outside London.

The focus should be on the need for short plans, with clear rules, which enable rapid decision making, with less need for lawyers planning consultants (like me!).

The Government has already been thinking about this in the form of ‘Brownfield Passports’, setting clear rules “with the default answer to suitable proposals being a straightforward “yes”.

In planning terms this could work by NDMPs being specific about what scale and types of development is allowable in different locations perhaps starting with smaller sites. This, combined with a rule that proposals that meet those requirements should be approved under delegated powers would provide certainty in decision making, particularly for small builders and unlock a lot of untapped capacity.

For larger sites the approach could involve more clarity in site allocations with NDMPs setting out core elements proposals must meet, leaving decision making focussed on important site-specific issues, not the principle of development. These could be considered by smaller, more focussed strategic committees. In some cases site focussed Supplementary Plans may be jointly produced by authorities and applicants.

This is not a ‘Developers Charter’ but focussed reform to make the system work better and provide more certainty to all involved.

The focus needs to be on whether a policy is resulting in a better outcome or simply ticking ‘symbolic’ boxes whilst generating piles of documents read only by the person paid to write them, the person the Authority paid to read them, or lawyers looking for errors.



Government has over the years retreated from directly doing things, through privatisation and spending cuts, but then required, through regulation, others to do them instead. This is one of the reasons for the expansion of planning policy and obligations.

Government is now getting back into a 'doing' role, for example on nutrient neutrality and environmental mitigation through pooling of obligations.

This principle could be extended to other 'public goods' including affordable housing where Local Authorities make better use of the 'value' of the obligations they secure rather than always requiring them on site. This is a long-term agenda but in principle 'doing' may be a better way to achieve the desired outcomes than 'regulating'.

Overall, this is quite boring, long term detailed work, and not an 'heroic' leap to zoning, but a step by step approach can take you further than one heroic leap. ■



No More Grey Areas

How brownfield planning passports need to address the extra baggage to fast-track suitable brownfield development for SMEs by Sean Tofts - Founder, Small Sites Alliance

The UK housing crisis demands bold and innovative solutions. The 2024 consultation on Brownfield Passports is a commendable step towards prioritising urban brownfield redevelopment.

By streamlining planning approval, the policy seeks to rejuvenate neglected urban spaces while addressing the housing shortage.

The Small Sites Alliance (SSA), the UK's only advocacy organisation for small sites, developers, and builders, supports the Brownfield Passport initiative.

However, its success depends on tackling key challenges like planning inconsistencies, high remediation costs, and prohibitive financial barriers that disproportionately impact small developers.

Complementary initiatives like Restore to Build and Room to Grow offer practical, scalable solutions that align with the Passport's goals, creating a pathway for urban regeneration and equitable housing delivery.

Building Consistency: The Core of Brownfield Passports

A key ambition of the Brownfield Passport is to ensure planning certainty by giving suitable sites a default "yes" to development.

However, inconsistent planning decisions across LPAs have historically undermined this goal, creating a "postcode lottery" that delays project delivery and disproportionately affects small developers.

Previous initiatives, such as the Brownfield Register and Permission in Principle (PiP), illustrate these challenges. PiP, in particular, largely duplicated existing outline planning permission and failed to align with the financial models of SME developers.

Despite significant investment, it delivered only a few hundred homes, exposing it as a policy designed more for appearances than practicality. The risk now is that the Brownfield Passport follows a similar trajectory unless policies are grounded in reality.

The failures of policy making are even more pronounced in the case of Biodiversity Net Gain (BNG), which stands as a stark example of how small developers were sidelined. BNG policy formation has been heavily influenced by large landowners and the "big six" developers.

Civil servants under the previous government favoured these interests, overlooking the challenges that smaller sites face.

The resulting policy framework was tailored for large greenfield developments, where delivering net biodiversity gains is simpler and more cost-effective, and failed to account for the complexities of urban brownfield regeneration or small constrained sites.

The introduction of the Small Sites Metric (SSM) was, partially, meant to address these disparities but has proven ineffective. In fact, the SSM often results in higher BNG scoring than the standard metric, increasing costs for small developers instead of alleviating their burden.

Data from the largest ecology consultancy suggests the SSM has been used fewer than 10 times in thousands of assessments they undertook, rendering it practically irrelevant. For small developers working on constrained brownfield sites, the cost of compliance, particularly for offsite biodiversity credits, which are punitive in their nature, can render projects economically unviable.

Furthermore, brownfield sites, despite their industrial appearances, can host intricate ecosystems or be located near watercourses, adding further compliance complexities. These additional hurdles disproportionately affect SME developers, which will exacerbate the decline of this sector.

Without an immediate pause and reassessment of BNG for small sites, these policies will continue to undermine SME developers, whose share of housing delivery has already plummeted from 40% in the 1980s to around 12% today. The Labour government has an opportunity to break from the failures of the past and must ensure that policymaking no longer sidelines smaller stakeholders. Sir Keir Starmer's recent criticisms of inefficiencies in the civil service highlight the need for better leadership in policymaking.

The Brownfield Passport risks becoming rehashed versions of previous failures unless all voices are given due weight in consultation processes and the civil service has competent leadership throughout with genuinely fresh perspectives.

Viability and Remediation: Overcoming Financial Hurdles

The government acknowledges that planning reforms alone cannot address the financial and logistical obstacles of brownfield redevelopment. High remediation costs and uncertainty about site viability often deter small developers.

The SSA proposes practical solutions:

- **Pre-Assessing Viability:** Inspired by Germany, local authorities could conduct upfront environmental and infrastructure evaluations of brownfield sites. These assessments reduce risks, streamline timelines, and could cut delays by 30% (Deloitte, 2022). Such costs would be offset by economic growth from faster project delivery.
- **Shared Remediation Costs:** A government-backed fund could support local authorities in site clean-up, recouping costs through land sales. Homes England could also offer low-interest loans to SMEs, while joint ventures with private partners could further share the burden.

These measures would make brownfield projects economically viable. Without such support, smaller developers remain disadvantaged, lacking both the financial capacity and expertise to address these challenges.

Restore to Build: Unlocking Grey Belt Potential

Restore to Build, introduced by the SSA for the first time in this report, complements the Brownfield Passport by addressing underutilised Grey Belt land and other constrained sites, such as flood-prone or heavily contaminated plots.

This initiative incentivises developers to restore degraded sites in exchange for the right to build on equivalent-sized, better-situated plots. For example, a flood-prone industrial site could become a functional floodplain or green space, enhancing biodiversity and climate resilience. In return, developers gain approval to build housing on more sustainable sites near settlements.

This land swap model ensures previously overlooked sites that would not necessarily have been restored contribute to both environmental improvement and housing delivery, creating a win-win for sustainability and development.

It should be made clear that many of these sites would not necessarily meet the current definition and criteria of the grey belt. Linking restored sites with Nature Recovery Networks amplifies biodiversity gains and strengthens ecological connections. By offsetting remediation costs through land swaps, Restore to Build offers a fiscally responsible solution to longstanding barriers in brownfield regeneration.

Room to Grow: Expanding Opportunities for Small-Scale Development

The Room to Grow initiative aligns with the Brownfield Passport by enabling small-scale infill projects through expanded Permitted Development Rights (PDR). The policy allows detached homes to be converted into semi-detached units without requiring full planning permission, significantly reducing costs and risks for small developers.

Safeguards:

- **Minimum Plot and Garden Sizes:** Preserving outdoor spaces and local character.
- **Parking Requirements:** Preventing strain on local infrastructure.
- **Energy Efficiency Standards:** Ensuring sustainability in all conversions.

By simplifying planning for small-scale developments, Room to Grow accelerates housing delivery while maintaining community integrity. Together with Restore to Build and the Passport, it forms a comprehensive framework for revitalising underused urban land.

Navigating the Route Ahead

The Brownfield Passport, supported by SSA's Restore to Build and Room to Grow, presents an opportunity to address the housing crisis through innovative urban redevelopment. To succeed, the following measures are critical:

- **Exclusions for unsuitable sites:** Sites in flood zones or remote locations could be repurposed for ecological restoration through the Restore to Build model, enhancing biodiversity and climate resilience while enabling housing elsewhere.
- **Amended BNG requirements:** Current BNG metrics unfairly burden small and brownfield sites. Policymakers must pause their application to reassess feasibility and introduce fairer compliance pathways, such as simplified metrics or urban biodiversity credits.
- **Financial instruments:** Funding mechanisms, such as government-backed remediation funds or SME loans, must empower small developers to tackle complex projects.

Incorporating these changes into national policy will unlock the Passport's full potential, driving meaningful progress in urban regeneration and housing delivery.

The SSA urges the government to address these challenges comprehensively. By doing so, policymakers can ensure sustainable growth, equitable housing solutions, and a revitalisation of small developers' vital role in tackling the housing crisis. ■



Passport for High Street Renewal

How a bold new Brownfield Passport can put the right homes in the right places by Gary Day – Land, Design and Planning Director, Churchill Living

A new brownfield passport which actively incentivises the re-use of sites which are already developed has the potential to do three things which have so far eluded planning policy in the UK:

1. Deliver lasting regeneration in town centres and urban commercial areas,
2. Stimulate economic growth on High Streets and in local economies, and
3. Put people once again within easy reach of shops, services and amenities without having to rely on car use.

What's more if it's done well, with scale and design that compliments or enhances the existing built environment it can visually lift the entire streetscape.

One such example of this is Churchill Living's redevelopment of a derelict former bus station site just off the High Street in Salisbury. What was roughly 2.5 acres of under-utilised brownfield land became home to 47 apartments specifically designed for older people.

What had previously been a visual eyesore was replaced with a modestly sized and carefully designed 3 storey building which lifted the townscape through architecture that complimented neighbouring buildings.

Externally the dilapidated concrete and tarmac slab which dominated the site was replaced with biodiversity-rich, landscaped gardens which were a significant environmental and aesthetic improvement.

The sensitive re-use of that brownfield site in the town centre to provide sorely needed specialist housing for older people, with a mix of self-contained apartments, extensive communal facilities and staff accommodation, offers the following social and economic benefits:

- The creation of 47 new homes that enable older people to live safely, socially and independently offering health and social care savings of more than £200,000 each year.
- The regeneration of a derelict brownfield site in the town centre.
- The release of larger, second-hand properties back onto the market in the local area as people downsize.
- Increased High Street expenditure of roughly £360,000 per year from older people using the shops and services with which they are co-located.
- A marked reduction in car reliance and greater uptake of active travel or public transport solutions.

All of these were achieved without having to encroach on the Green Belt, and in a way that positively enhanced the local area – economically and environmentally.

In addition, the redevelopment is giving people most likely to benefit from town-centre living - namely older people who are less inclined to drive but very much want to remain an active part of the local community - an opportunity to live in a high quality, well-designed, and future-proofed new home that better meets their changing needs.

This avoids older people having to move into large, remote communities where they may feel isolated and lose the intergenerational engagement that comes with frequenting the shops, cafes and public spaces populated by people of all ages.

It also leads to larger, second-hand properties, often located in the suburbs near schools and parks, being vacated for growing families to move into as they try to move up the housing ladder, and in turn opportunities are unlocked further down the chain for first-time buyers.

Using small-scale brownfield sites in or near town centres to provide specialist housing for older people generates far greater socio-economic benefits than any other type of housing on that site and it is difficult to contemplate a form of development that is more sustainable than this.

As well as being the most efficient use of these sites, independent polling shows it is popular with local communities, with over 50% of local people expressing support for housing for older people compared to less than half for comparable mainstream apartments.

Despite this, new developments like Sarum Lodge located on town-centre, brownfield sites and offering extensive support services and social benefits are still fiendishly difficult to deliver.

Too often planning consents have to be secured via appeal, in large part because proposed developments are unjustifiably perceived to be contrary to planning policy.

The new Brownfield Passport should address this by providing a greater balance in the interpretation and application of local planning policy, and proper consideration of the planning merits of these types of development – thereby, avoiding the unnecessary costs and delays of “planning by appeal”.

In doing so the Passport will help deliver a new housing mix that serves both our ageing population and younger generations by creating opportunities for them to upsize to existing, family-sized homes.



Churchill Living's Sarum Lodge – a new retirement community, located on a previously derelict, town centre, brownfield site in Salisbury - before and after.

To achieve this the Brownfield Passport needs the following three measures:

A planning presumption in favour of specialist housing for older people on brownfield sites.

Brownfield sites of this sort have invariably been home to former commercial properties so there is nearly always an “in principle” planning objection because the site will be designated in the Development Plan or Neighbourhood Plan for its existing commercial land use, or the Plan will seek to preserve existing “employment generating uses” or “community uses” use such as hotels, pubs, etc.

An exemption from affordable housing obligations and CIL charges for specialist housing for older people.

“Non-residential” developers competing for the same site do not face affordable housing obligations and often employment-generating uses, community facilities, care homes etc, will be exempted from CIL by the local authority or offered a reduced CIL charge.

Consequently, retirement housing operators frequently lose good sites in urban areas to small supermarkets, car dealerships, fast-food outlets and even self-storage companies.

Brownfield sites are also more difficult to develop – land contamination, previous structures, archaeology, Conservation Area status, adjacent Listed Buildings, existing covenants etc. all increase risk, complexity and costs making sites significantly more expensive to regenerate.

An obligation for local planning authorities to ensure adequate provision of town centre brownfield sites for older people's housing.

UK planning authorities, unlike others in Europe, rarely allocate suitable sites in Development Plans for older people's housing. Hence, such scarcely become available for residential redevelopment, and when they do it is generally ad hoc “windfall” sites, rather than a coherent and reliable allocation of sites for such beneficial re-use.

A Government-appointed Older Person's Housing Taskforce recently published its report into the chronic undersupply of retirement housing in the UK. It stated: “While the National Planning Policy Guidance (NPPG) was updated in 2019 to explain the critical need for Older Person's Housing, that change has failed to reverse the trend of a declining number of planning approvals for Older Person's Housing. Local authorities need to be given the right levers to reverse this chronic under supply to meet growing future demand.”

The Brownfield Passport is just such a lever, if its design properly reflects the specific needs of specialist housing for older people.

In doing so it would help deliver a proper long-term housing strategy that equips the UK with the right mix of housing to meet its ageing population's needs, and crucially housing located in the right places to improve people's quality of life, deliver economic growth and improve our environment. ■



National Model Design Codes

Government must unlock large-scale sites like Earls Court, by Rob Heasman, CEO, Earls Court Development Company

In late 2019, the Earls Court Development Company (ECDC) acquired the stalled former Earls Court Exhibition Centre site from its previous owners. Central London's largest cleared development site, ECDC has spent the past few years focused on taking a fresh approach, reimagining the future of Earls Court with a forward-thinking, resilient masterplan.

Such large-scale, city defining projects have a transformational impact that goes beyond the red line boundary of the site and for generations to come. Earls Court will be a place to discover wonder. 4,000 homes, 12,000 jobs, three new cultural venues and 20 acres of public and open space, with over 1,000 new trees being planted, we will create a blueprint for future city living.

With a focus on sustainability, we will become a hub for climate and clean innovation, helping to harness this rapidly growing industry, from small start-ups to multinational companies that will work and collaborate to meet head-on the climate emergency.

In seeking to address the housing crisis, 'brownfield first' is the right approach. With a range of measures announced since coming to power, from a revised National Planning Policy Framework (NPPF) to the New Homes Accelerator and Brownfield Passports, all designed to streamline our planning system and speed up the delivery of large schemes, Government has made a strong start. There is a clear recognition that large, ready-to-go, brownfield sites like Earls Court will be key drivers of housing delivery if they are to get close to hitting the ambitious target of 1.5m new homes by the end of this parliament. Indeed, Earls Court ticks all the boxes for the exact type of development the Government wants and needs to come forward.

We are a unique development, but one that comes with challenges common across other large-scale schemes. The planning system isn't designed for developments like ours, making it a very lengthy and resource-intensive process that could undoubtedly be simplified through planning reform.

We submitted our planning application in summer 2024 after four years of engagement and thousands of conversations with residents and stakeholders, including a process which gives a platform to those frequently excluded. All of which demonstrated significant support. Yet the risk of the process being derailed by a vocal minority looms ever large – the planning process must be democratic, but this requires a real effort to ensure genuine representation and not a default position where

those who shout the loudest are heard. This is not unique to Earls Court, and this situation is the reality for all developments, large and small – future residents and beneficiaries of development rarely have the opportunity to get involved in localised planning debates.

From the outset we have sought to deliver public benefit, recognising what can be done with a large brownfield site awaiting development. From the BBC Earth Experience to The Greatest Showman Circus Spectacular to The Lost Estate to our Padel Social Club or the range of local businesses and charities we support onsite. Earls Court is rapidly becoming a destination once more; over 2,000 people per day work in the buildings in and around the site and almost 750,000 people have visited an event on-site since 2021. This brings significant benefits to the local community as these activities brought nearly £13m in Gross Value Added and £25.7m in local spend in 2022-23, helping reinvigorate a local economy which has struggled since the closure of the Exhibition Centres. This represents a vast improvement on having a large patch of land left empty for years and shows what the area can be.

Planning reform must allow schemes like ours to progress at pace to unlock the housing delivery and economic growth the Government desires. Giving a Brownfield Passport to large-scale transformational schemes, meaning a default "yes" to proposals, would not only streamline the process, saving time and resources but unlock thousands more homes across the country. Concerns over preserving the integrity of design and masterplanning as schemes progress over many years can be addressed through the National Model Design Code process, as we have shown with our extensive work in this area at Earls Court.

However, planning is only part of the issue. Much of the debate actually centres around funding. Many large-scale brownfield developments have huge infrastructure burdens or remediation requirements which need to be addressed before any vertical building can be built. All of these come with an upfront cost, which makes delivery challenging.

The role and importance of Government in underpinning the delivery of complex schemes through infrastructure funding, under-written loans, finance guarantees or other public sector tools, should not be underestimated. Such collaboration between the public and private sectors sends a strong signal that the Government is serious about the growth agenda, giving confidence to the investor market and building momentum. Effective loan-based arrangements can deliver long-term value for money



to the public sector both as a return on investment and through the economic growth generated by the development itself.

While there is no silver bullet, especially in the context of the rapidly evolving social, economic and digital environment, we need long-term solutions to meet these challenges if the Government wishes to accelerate housing delivery to the levels it wants to see. By using all

of the tools at its disposal, across planning, funding and regulation, large sites such as Earls Court will be able to accelerate plans and get construction on brownfield sites underway far quicker than at present.

This is a shared endeavour, and we stand ready to play our part to ensure that this new piece of city is brought to life as swiftly as possible to help tackle the housing crisis. ■



Factories for Homes

A vision for rapid housebuilding in the UK, by Emma Cariaga,
Chief Operating Officer of British Land

A Labour government, committed to a new generation of housebuilding, is an exciting prospect for every Briton trying to get onto, or move up, the housing ladder. However, this bold ambition must be met by practical, deliverable reform.

There are multiple hurdles to overcome to achieve the goal of 1.5 million new homes in this Parliament, and, in the longer-term, deliver a generation of new towns. Achieving these aims requires navigating an environment of rising costs, regulatory change and higher interest rates, which are challenging viability, as well as capacity, skills and recruitment issues in an already strained construction sector.

The gap in construction capacity requires urgent attention. The UK Trade Skills Index estimates that the construction industry will need over 900,000 new recruits over the next decade.¹ Rising costs facing the industry present a real threat to delivery: construction costs for all new work increased by 30% between 2020 and 2024, according to the Office for National Statistics.²

The government's ambition of delivering 1.5 million new homes faces significant challenges if we were to construct them by traditional means. Innovation and modernisation are essential if we are to achieve this target and drive productivity growth in the sector.

There could be a solution to these issues: the scaling of modular construction.

Modular construction, one of a range of solutions commonly referred to as Modern Methods of Construction (MMC), can enable rapid housebuilding that can in turn support the delivery of new towns - if the government backs it.

The process of modular construction involves building the components required for new homes in factories, with local workers assembling and installing these components on-site. It is fast, efficient, reduces waste, and these factories can scale up with demand. Modular construction can also save time and money; requiring less labour and skills that can be more easily picked up by the existing workforce.

Historically, Britain's relationship with modular construction - and industrialising housebuilding in general - has been rocky. Whilst this form of delivery has gained some traction, it still lags well behind more traditional construction methods. In 2022, modular homes represented only a small percentage of new homes - 3,300 in total or one in sixty³ - and there have been high profile failures of modular construction facilities in the last two years.

To date, there has been insufficient scale, confidence and appetite for standardisation in the housing market, to drive efficiencies, cost savings and investment in modular housebuilding. This could be addressed through policymaking and regulation to line-up supply and demand, enable standardisation through planning and design coding, and provide assurance on safety and quality, to the market and insurers, through better regulation.

Whilst government has shown some positive intent - Homes England's partners must deliver 25% of their affordable programmes using MMC - this only constitutes a small percentage of new homes and, in many instances, the construction methods adopted are not creating new long-term capacity.

This could change. New towns present a significant opportunity to deploy modular solutions on a greater scale. Utilising modular construction for new towns would enable homes to be delivered at pace, while creating local employment opportunities and, crucially, creating a stable order book for factory-built homes.

There are precedents for modular construction in other sectors and jurisdictions. It has been deployed to build prisons, hospitals, military accommodation and schools at pace.⁴ The Welsh Government has just announced its own pattern book for social housing using timber framed MMC⁵ and, in Australia, the New South Wales government is reforming planning to leverage modular solutions.^{6,7} In the private sector, Ten Degrees and Enclave in Croydon are examples of high-rise modular projects that have delivered hundreds of build to rent, co-living and affordable homes.

However, this mode of development needs market-making interventions and a confidence boost if it is to become more widespread and viable for housing delivery at a national scale. That backing could be provided with government support and a reliable order book.

When done well, modular construction has multiple efficiencies versus traditional methods, which can support the government's aim to accelerate delivery: less time spent on site, more predictable fixed costs, greater energy efficiency and quality assurance. Milton Keynes was developed at a time of significantly lower materials and labour costs. However, the environment now means that a town of this scale would be near impossible to deliver without greater innovation and capacity building in the construction sector.

Modular factories could be deployed rapidly, close to and serving new towns, with on-site assembly. Distributing these facilities across the country would also provide opportunities for local workforces and create new



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pathways into construction for local school leavers and graduates. So, they would deliver on two ambitions: delivering new homes and Get Britain Working, creating local employment and skills development opportunities.

If the government is to achieve its ambition for housing delivery, it is time to be creative, to build capacity and secure a vision for rapid housebuilding in the UK. New towns, with high quality, factory-built homes, delivered at

pace by an emergent and less strained workforce, could accelerate housing delivery and revitalise the dream of home ownership. What we need now is for policymakers to show their support, through joined up policy and regulation, to enable modular construction to realise its full potential. ■

1. [UK Trade Skills Index 2023](#)
2. [ONS – Construction Output Prices Indices](#)
3. [Guardian UK, April 2023](#)
4. [Wates.co.uk](#)
5. [Cymru.gov](#)
6. [Gov.au](#)
7. [Built Off Site](#)







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