

Cambridge City Council

Record of Executive Decision

Response to Government Consultation: Strengthening planning policy for brownfield development

Decision of: Executive Councillor for Planning, Building Control and Infrastructure

Reference: 24/URGENCY/P&T/03

Date of decision: 19/03/24

Date Published on website: 27/06/03

Decision Type: Non-Key

Matter for Decision:

- a. To agree to submit the response to the open consultation on strengthening planning policy for brownfield development as set out in Appendix 1 which can be viewed at the link below:
[Appendix 1 :Response to Government Consultation: Strengthening planning policy for brownfield development - Cambridge Council](#)
- b. To agree delegated authority is given to the Joint Director for Planning and Economic Development to agree any minor amendments to the response in order to finalise the joint response.

Why the Decision had to be made (and any alternative options):

To provide feedback on the consultation reflecting issues relevant to Greater Cambridge.

An alternative option would be to not respond to the consultation. However, if no response is made by Cambridge City and South Cambridgeshire District Councils, DLUHC would not be made aware of the Councils' views on the proposed changes to national planning policy.

The Executive Councillor's decision: That the Executive Councillor for Planning, Building Control and Infrastructure agrees:

- a. to submit the response to the open consultation on strengthening planning policy for brownfield development as set out in Appendix 1.
[Appendix 1 :Response to Government Consultation: Strengthening planning policy for brownfield development - Cambridge Council](#)
- b. that delegated authority is given to the Joint Director for Planning and Economic Development to agree any minor amendments to the response in order to finalise the joint response.

Reason for the decision: To provide feedback on the consultation reflecting issues relevant to Greater Cambridge.

Scrutiny Consideration: The Chair and Spokesperson of Planning and Transport Scrutiny Committee were consulted prior to the action being authorised.

Report: BFL Consultation 2024 is attached as Appendix 1

[Appendix 1 :Response to Government Consultation: Strengthening planning policy for brownfield development - Cambridge Council](#)

Conflict of interest: None.

Comments: The following comments were received from Cllr Porrer, Liberal Democrats, Opposition Spokes:

I'd note that the importance of having active frontages at ground floor levels (ie shop fronts and not just flats) is so important to place making and designing out crime and making things feel safer for residents. I wonder if officers and the Exec Cllr might consider adding this in.

I also wanted to ask if officers and the Exec Cllr might consider adding a little more under the last question about the equalities impact. As is already mentioned in some responses, the likely outcome of lower quality/small/cheaper housing being clustered on brownfields sites with few or no amenities nearby is definitely going to impact on the quality of life for residents in lower income brackets who would be more likely to live there, and there is clear evidence that these lower income brackets are often disproportionately represented by residents with protected characteristics as you note. This would lead to a much more divided city (or county) and is the opposite of what we currently aim to do in terms of peppercotting different housing types and tenures across developments and limiting numbers of affordable flats to a maximum per block and which we have been very successful in achieving across many recent brownfield developments with a mix of larger and smaller homes, but all meeting space standards.

I appreciate that this is already alluded to in various parts of the response, but as the Equalities audit is something that the government needs to have regard to, I think it might be useful to reiterate these points here too.

Councillor Tong, Green Party Opposition Spokes, made the following comments:

Although I broadly agree with the points being made, here, particularly the arguments made in relation to how we need to do all that we can to protect the quality of our housing and ensure that amenities for local residents are made available, I do think this response puts too much of an emphasis on the importance of expanding Cambridge's STEM industries - the focus should be on the provision of facilities for local people.

I also think that if we're going to discuss heritage assets, our response should go into a bit more detail about our stance on them. Personally, I put the value of views of heritage assets from specific places lower than the value of residents having the

opportunity to enjoy looking around a heritage asset on-site, something that facilities need to be provided to allow for.

Officers addressed the comments with both Councillors

Briefing Paper

The Department for Levelling Up, Housing, and Communities (DLUHC) is seeking views on how it might strengthen national planning policy to support brownfield development. It also seeks views on reviewing the threshold for referral of applications to the Mayor of London. The 3 consultation proposals are:

- Changes to national planning policy to give significant weight to the benefits of delivering as many homes as possible and to take a flexible approach in applying planning policies or guidance relating to the internal layout of development.
- Changes to the way the Housing Delivery Test operates in the 20 towns and cities subject to the uplift in the standard method. This would introduce an additional presumption in favour of sustainable development on brownfield land where the Housing Delivery Test score falls below 95%.
- Reviewing the threshold for referral of applications to the Mayor of London.

Consultation closes on **26 March 2024** and further information can be viewed on the DLUHC webpage for the consultation: [Strengthening planning policy for brownfield development - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/strengthening-planning-policy-for-brownfield-development)

Feedback is requested via submission of written responses to the answered questions included within the document. The councils' response is set out in Appendix 1. Given that the proposal relating to the threshold for referral of applications to the Mayor of London does not relate to Greater Cambridge, no response is proposed to the questions related to this.

Within the councils' response, many of the key responses relate to the:

- change to national planning policy to make clear local planning authorities should give significant weight to the benefits of delivering as many homes as possible
- change to national planning policy to make clear local planning authorities should take a flexible approach in applying planning policies or guidance relating to the internal layout of development.
- other planning barriers in relation to developing on brownfield land
- how national planning policy better support development on brownfield land
- how national planning policy better support brownfield development on small sites

The Councils response states that although we are supportive of development of brownfield sites, which reflects the existing NPPF, we express multiple concerns that strengthening planning policy around such areas through the options proposed will lower the quality of homes and lead to 'quantity over quality' on brownfield sites. All options proposed reduce standards of development and placemaking. This would lead to the erosion of development quality, sustainability, affordability, energy efficiency, and homes with sufficient space for families / working at home, for the provision of quantity. It also states that through the Local Plan as a comprehensive strategy, rather than piecemeal change, is the appropriate approach to allocating the best and most appropriate sites for residential uses, and this includes the re-use of brownfield sites.

Note that the response is proposed to be joint by Cambridge City Council and South Cambridgeshire District Council, subject to each council's individual decision sign of process.