

# The NPPF:

## Fact Not Fiction - Brownfield First



Home Builders Federation Briefing

07 October 2011

The National Trust and others are asking the Government to introduce a brownfield first policy.

**1) The National Planning Policy Framework already offers greater protection of land of environmental value than a brownfield first policy.**

The NPPF clearly states that local plans should allocate “land with the least environmental or amenity value.” This directly addresses protecting the environment while building the homes that the country needs; as stated a brownfield first policy would fail to do so.

**2) A national brownfield first policy would be anti localism, taking power away from local people and preventing sustainable planning by communities in their areas.**

The National Planning Policy Framework puts power in the hands of local people and their elected representatives. The NPPF provides more flexibility for local authorities and communities to plan their areas in line with local needs, circumstances and preferences.

**3) The concept of “brownfield first” is flawed.** It makes no distinction between derelict, contaminated land and regenerated, bio-diverse recreational land. It would also have unintended consequences.

It was the previous target of at least 60% of homes being built on previously developed – brownfield - land that led to “garden grabbing” as local authorities felt that they could not resist development proposals on “brownfield gardens” since these had to be developed first – before any greenfield release.

An overt emphasis on brownfield development has given rise to the problems of ‘town cramming’ where what were previously relatively spacious areas, developed at a lower densities, have tended to be over-developed. It is usually poorer communities that have born the brunt of such intensification policies.

The definition of previously developed land has been altered already (June 2010) as a result of the concern this created and to allow local authorities to better prioritise the types of land to be built on in their areas. A “brownfield first” policy now would risk a loss of land with environmental value.

**4) A brownfield first policy fails to take into account the cost of development on some types of previously developed land e.g. contaminated sites and would reduce housing land supply.**

Local authorities should be able to bring forward brownfield sites or to encourage their re-use through their development plans where construction on such sites is deliverable. Some brownfield land however simply has too much cost associated with decontamination, demolition etc to make it economically viable to construct the homes and businesses needed in an area. Authorities will therefore need to be able to consider wider options for meeting their needs.

A brownfield first policy would mean that in areas with these issues local plans could not meet housing need or create economic growth – two key aspects, alongside environmental protection – of sustainable development. Related to this, the process of establishing whether all possible brownfield sites of any type were deliverable and suitable for development would create significant delay and complexity – contrary to the Government's objective.

**A brownfield first policy would remove power from the hands of local people, worsen our housing crisis, prevent economic growth and could see unsuitable development as a result.**

## About HBF

The Home Builders Federation (HBF) is the representative body of the home building industry in England and Wales. The HBF's member firms account for some 80% of all new homes built in England and Wales in any one year, and include companies of all sizes, ranging from multi-national, household names through regionally based businesses to small local companies.

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