

Environmental science priorities for brownfield land

Background

Over the past few years, there have been many developments around planning, consenting, and environmental improvement which have created an opportunity for engagement in the future of those systems and processes. In that context, there are specific opportunities to engage with brownfield land as a priority area for environmental science.

This is an area where the environment sector already agrees on many of the priority issues, some of which have been priorities for a long time. Some issues, such as skills, may not be novel concerns but have novel applications with the rise of developments such as digital EIA and new technology. Other issues lack policy consensus where decision makers have not caught up to the consensus among professionals.

Points of engagement

Throughout 2024, there are several key opportunities for engagement, including:

- Relevant consultations, such as the DLUHC consultation on strengthening planning policy for brownfield development
- Ongoing reviews of planning processes, such as the 'rapid review' of the planning system
- Engagement at the local scale following local and regional elections in May 2024
- Engagement at the national scale following the forthcoming general election, which may produce a new government or change the priorities of the existing government
- Activity within the environment sector, including opportunities to collaborate and cross-promote the work of other organisations

To maximise these opportunities, the IES has produced a short set of recommendations for policy makers, as well as key actions for the environment sector to promote best practice.

Objective for brownfield land

To better realise the overwhelming consensus of the sector for the safe use, reuse, and redevelopment of brownfield land in line with sustainable development and the potential to secure multiple benefits for society, the economy, and the environment.

Recommendations for policy makers

Reforms should be purpose-driven and well-reasoned, focusing on the three priority areas of making policy affecting brownfield land coherent, rational, and comprehensive. These recommendations should also be used by the sector to identify where good policy design and delivery can be support.

1. **Coherent:** Align governance and consenting processes with one another, as well as across local and national policy.

- **What we want to achieve:** National frameworks (such as the National Planning Policy Framework and Fourth National Planning Framework) link national objectives to local delivery and coordinate with other policies such as the forthcoming Land Use Framework. The same considerations in national policy are also made at a local level, so all environmental outcomes are explicit considerations in Local Plans, including previously understated considerations, such as soil resources.
 - **Key stakeholders:** DLUHC, Local Planning Authorities, EPIC
 - **Key touchpoints for engagement:** Consultation on brownfield, engagement with local authorities, post-election planning reforms
2. **Rational:** Remove unnecessary permitting limitations and practical barriers to brownfield redevelopment.
- **What we want to achieve:** Consenting processes are consolidated to minimise duplication, actualising NPPF guidance that planning issues should not be unnecessarily revisited through permitting regimes. Agreements are in place between departments and regulators to clarify which process which encompass which actions, avoiding double regulation. Practical actions are facilitated to meet the requirements of waste legislation, such as by including soil in the Circular Economy Regulations as a resource where re-use is encouraged to support safe re-use of soils, and through the expedited development and rollout of the Soil Re-Use and Storage Depot scheme.
 - **Key stakeholders:** DLUHC, DEFRA, Enforcement/Delivery Agencies
 - **Key touchpoints for engagement:** Consultation on brownfield, rapid review of planning systems, post-election planning reforms
3. **Comprehensive:** Account for holistic considerations across projects, such as soil health, climate and biodiversity impacts, and wider sustainability implications.
- **What we want to achieve:** National frameworks set a clear expectation for environmental improvement across projects, considering the full range of social and environmental outcomes and how they interact. Climate, biodiversity, soil health, and sustainable development are all explicit environmental outcomes in impact assessment, which retains a proportional approach to maximising these wherever possible.
 - **Key stakeholders:** DLUHC, DEFRA, DESNZ, professional bodies
 - **Key touchpoints for engagement:** Consultation on brownfield, reform of Environmental Impact Assessment, post-election planning reforms

Actions for the environment sector

The spread of best practice benefits from policy change, but does not require it. As policy develops, the environment sector should focus on its immediate sphere of influence to increase competency and drive implementation. These actions should also be used in policy advocacy to identify key areas to facilitate delivery.

1. **Competency:** Facilitate best practice through wider proliferation of competency standards and focused upskilling on key digital and technical skills.
 - **What we want to achieve:** Ongoing review and updating of key competency standards, such as the National Quality Mark Scheme for Land Contamination Management (NQMS), Specialist in Land Condition (SiLC), and Chartered Environmentalist, as well as their wider promotion and proliferation through industry, professional bodies, and communities of practice. Specific skills gaps around new technologies, data, and digital development should be identified and addressed through training provision.

- **Key stakeholders:** SiLC, CL:AIRE, Society for the Environment, IES Land Condition Community, major consultancies and employers
 - **Key touchpoints for engagement:** Collaborations with professional bodies on brownfield policy, competency framework and skills gap analyses
2. **Implementation:** Drive delivery of widespread best practice through guidance and sufficient resources and support for local authorities and delivery organisations.
- **What we want to achieve:** Guidance is produced and proliferated, particularly on key areas of best practice such as design stage intervention and emerging practice such as digital EIA. The sector collaborates with local authorities and delivery organisations such as the Environment Agency, supporting with guidance and networks such as the Environmental Policy Implementation Community where appropriate. Departments and delivery organisations are encouraged to collaborate to avoid double regulation or uncertainty. The sector scrutinises the delivery of the Planning Skills Delivery Fund to ensure these organisations are sufficiently resourced.
 - **Key stakeholders:** Society for the Environment, EPIC, local authorities, Environment Agency, DLUHC
 - **Key touchpoints for engagement:** Collaborations with professional bodies on brownfield policy, consultation on brownfield, post-election planning reforms