



Campaign to Protect  
Rural England  
Standing up for your countryside

# FROM WASTED SPACE TO LIVING SPACES

## The availability of brownfield land for housing development in England

University of the West of England, for the Campaign to Protect Rural England

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The former Eastern Quarry in Ebbsfleet – due to be transformed into Ebbsfleet Garden City

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# Foreword

## by Richard Rogers



**T**he central message of the Urban Task Force Report, *Towards an Urban Renaissance*, was that we cannot consider housing in isolation from the future of our towns and cities. Many positive policy responses followed the publication of our report 15 years ago: two of the most important were a commitment to use previously-developed land to accommodate growth in our towns and cities, and the establishment of a National Land Use Database (NLUD) to assess and monitor the capacity of these sites.

Though political parties still pay lip service to the concept of 'brownfield first', the figures are falling – from 80 per cent of new housing on brownfield sites in 2008 to 68 per cent in 2011. And politicians of all stripes have been talking about new towns and garden cities, threatening a return to the mistakes of the past; 'new town blues' in lifeless dormitories, hollowing out of our towns and cities, and unnecessary encroachment on green field sites. In comparison, retrofitting existing cities is both socially effective and energy efficient.

As this timely report shows, there is no urgent need to sprawl onto greenfield sites. We still have capacity for more than one million homes on brownfield sites, and some estimates suggest that total capacity could be 1.5 million homes – as high

as it was in 2009, when the last full survey was published. In many places new sites have emerged as fast as previously identified sites are developed. And that is before we even start looking at the scope to retrofit and intensify existing developments. There is certainly sufficient land and inefficient buildings to see us through many years of house building to come.

There is some uncertainty about the precise figures, as Government has only published raw and incomplete NLUD data for 2011 and 2012, and did not commission a survey of brownfield land at all in 2013. Given the importance of this issue to our towns, cities and countryside, it seems bizarre that we are not collecting accurate data to support decision making.

In the meantime, as this report indicates, there is nothing to suggest that our supply of brownfield sites is running low. We should focus on better planning and funding systems to build new towns – but in our towns and cities, not on inaccessible and unsustainable green field sites.

A handwritten signature in black ink, appearing to read 'Richard Rogers', written in a cursive, flowing style.

**Richard Rogers**

# Executive summary

## From Wasted Space to Living Spaces

### Key findings

- Research shows that councils have identified capacity for at least 1 million new homes on brownfield land
- Sites with existing planning permission can accommodate more than 405,000 homes
- A further 550,000 homes can be located on suitable vacant or derelict land, including at least 146,000 in London
- Data also shows that new brownfield sites replace ones that have already been redeveloped

Everyone knows that England has a housing crisis. But bedevilling the debate on how to solve it is the fact that no one has been sure how much brownfield land is available and suitable for housing development. This means that greenfield land, including valuable agricultural land and treasured landscapes, is vulnerable to developers who say there are no alternative sites.

Brownfield, or 'previously developed land', offers the opportunity for redevelopment and regeneration in areas with existing infrastructure, access to local amenities and proximity to existing communities. The Campaign to Protect Rural England (CPRE) supports a 'brownfield first' policy, which prioritises brownfield sites for development over greenfield.

But ever since the requirement was removed for local councils to report annually on land available for development, estimates have varied wildly as to the amount of brownfield land available. Figures provided on the housing capacity of brownfield land from the Department for Communities and Local Government, for instance, have ranged from 200,000 to 1.5 million.

To achieve greater clarity on the potential of brownfield land, the Campaign to Protect Rural England commissioned University of the West of England (UWE) researchers to calculate a more accurate figure for housing capacity on suitable brownfield land and specify how such land might be brought forward for development. To explore this further, the report considers the economic and policy drivers for brownfield development and how they can bring sites back into use, and analyses a number of local authority approaches to identifying land and engaging with local communities.

Researchers compiled data submitted by local authorities since 2010 to the National Land Use Database of Previously

Developed Land (NLUD-PDL). These data are fully analysed in this report for the first time.

From the submissions of local authorities the data show that brownfield land in England can accommodate a minimum of **976,000 homes**. Actual brownfield capacity is likely to be much greater than that.

The figure identifies brownfield sites with existing planning permission as well as derelict and vacant land, but does not include sites with the potential for development or land that will shortly become brownfield. The 2014 Further Alterations to the London Plan, for example, states that brownfield 'opportunity areas' – which include land still in use and land yet to be designated as brownfield – could accommodate 300,000 new homes.

This report's comprehensive calculation of **976,000 homes** is therefore the absolute minimum capacity of brownfield land in England. This amount alone would provide a four-year supply of homes if no other land is used and no new brownfield sites become available.

### Viability of development

Looking more specifically at the viability of development on these sites, the report finds that there is enough brownfield land with either outline or detailed planning permission for just over 405,000 homes. The availability of these sites with the prospect of building in the short-term is actually greatest in the areas of greatest demand for new housing – such as London.

The report also shows that there is the capacity for 550,000 homes on suitable vacant and derelict land. Almost half of these homes (44 per cent) would be located in the south east, east of England or London. London itself could provide 146,000 homes on brownfield land.

The research also confirms that the amount of brownfield land is far from finite; it is, in reality, a renewable resource. Planning data from the 82 local authorities that responded with figures for 2011 and 2012 show that 1,658 hectares of land were redeveloped and removed from the database between 2010 and 2012, while 1,725 were added. That therefore shows a modest increase of 67 hectares of total brownfield land during that period, but also a turnover of more than 10 per cent of the overall amount of PDL in both years (17 per cent in 2010/11; and 11 per cent in 2011/12).

### Barriers to brownfield development

Through its close study of seven local planning authorities, this report catalogues the various strategic approaches to brownfield identification and development, and the barriers that hamper progress.

While some authorities have made progress in accessing government resources and collaborating with Local Enterprise Partnerships, others have found it difficult to utilise central government incentives or overcome the complexity of certain sites. Strategic Housing Land Availability Assessments (SHLAAs), meanwhile, are thought to be useful documents, but are generally comprised of sites identified by developers and landowners rather than local authorities themselves. SHLAAs are also inconsistent in information and format between local authorities, which means that they cannot be used to gain a national picture of the availability of brownfield land for housing.

Local authorities are aware that the National Planning Policy Framework (NPPF) does not prioritise brownfield development, thereby further opening the door to Green Belt and greenfield development. Although three of the case study authorities (Durham, Bristol, and Cheshire West and Chester) had developed 'local brownfield strategies' under the Homes and Communities Agency's initiative to encourage brownfield identification, there is little evidence that this initiative is having a long-term impact nationally.

Other barriers for brownfield development include the cost of site remediation and local infrastructure provision; the difficulties for small- and medium-sized builders trying to enter the market; the availability of cheaper greenfield sites; and the lack of accurate data on brownfield land and its ownership.

On the important issue of biodiversity, the report makes reference to forthcoming research from Natural England and Defra on the wildlife value of brownfield sites. Early indications of this research suggest that just eight per cent of all brownfield land is currently seen as an important habitat for beetles and other creatures. While illustrating the importance of protecting such 'open mosaic habitats', this figure leaves a considerable amount of brownfield suitable for development.

## Our way forward

With the capacity identified by councils for at least 1 million homes, including more than 400,000 with planning permission, brownfield development has the potential to provide the high quality and affordable housing that is needed to tackle the housing crisis.

To turn potential into reality, this report includes the following recommendations:

- Reintroduce a clear and consistent 'brownfield first' approach in national planning policy
- Bring back an effective strategic tier of sub-regional or county level planning
- Ensure that strong strategic and local plans are encouraged, implemented and updated across the country
- Give the Homes and Communities Agency (HCA) greater powers and resources to redevelop large and difficult sites
- Develop a proactive approach to identifying brownfield land, with increased focus on regenerating large sites with multiple owners
- Reintroduce mandatory reporting to the National Land Use Database (NLUD) and make its data more accessible
- Provide assistance to smaller builders by identifying smaller sites and offering incentives for development such as the increased use of local development orders (LDOs)



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# PART 1

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## Introduction





# PART 1

## Introduction

### 1.1 Context: Brownfield Development in England in 2014

- 1.1.1 The Campaign to Protect Rural England (CPRE) has long sought to encourage government and local planning authorities<sup>1</sup> to maximise development on suitable Previously Developed Land (PDL), or brownfield sites.<sup>2</sup> Such sites are a valuable asset for urban regeneration and sustainable development strategies, and their re-use helps to protect the countryside. CPRE's position has had some resonance with planning policies and urban initiatives over the last 20 years or so, as they have generally favoured a containment and regeneration agenda: or a 'brownfield first' approach.
- 1.1.2 In England, the proportion of housing being built on PDL, compared with greenfield sites, rose steadily from 55% in 1989 to a peak of 81% in 2008. However, this dropped to 68% in 2011 (the last date for which there is data, see Figure 1; DCLG, 2013a).<sup>3</sup> This means that the proportion of housing development on greenfield sites has risen by approximately 13% between 2008 and 2011. Indications are that this trend has continued, as many brownfield developments have 'stalled', and there has been a recent trend for planning applications for large housing developments in the countryside to be approved, many by central government, on appeal (CPRE, 2014a).
- 1.1.3 The number of homes being built annually is at a historic low, however. It dropped from around 171,000 in 2007-8 to 112,000 in 2013-14 (Figure 2). These figures have to be compared with post-war completions of 200,000 to 300,000 per year in the late 1960s and 1970s, declining throughout the 80s and 90s. At<sup>4</sup> 107,870 completed homes, 2010-11 saw the lowest level of house building in the post-war period, reflecting the depth of the recession England was experiencing. Against this backdrop, households are forming at a rate of 221,000 per year (DCLG, 2013b): about double the pace at which homes are being built.
- 1.1.4 Yet England actually has a growing surplus, in absolute terms, of homes over households (Holmans, 2013).
- In 2011, there were 874,000 more homes than households (22,102,000 households and 22,976,000 homes, Holmans, 2013; DCLG, 2014a). This household figure includes vacant homes and second homes, and does not take account of regional differences in demand and affordability.
- 1.1.5 England is now experiencing a severe housing crisis, characterised by housing shortages in some areas (particularly London, the South East and East of England), and lack of affordability (about a third of housing demand is for homes below market prices and rents) (Holmans, 2013).
- 1.1.6 Since coming to power in 2010, the Coalition Government has responded to the crisis by trying to stimulate the housing market. The mechanisms it is using are in line with its ideological drive to free up markets wherever possible. Hence, it has brought in a tranche of changes to policy and funding to try to kick-start development. In doing so, it has moved away from a strong and clear 'brownfield first' message. This may be partly because it sees an over-emphasis on brownfield development as having stifled housing supply in the recent past.
- 1.1.7 In 2012, the Government introduced the National Planning Policy Framework (NPPF) (DCLG, 2012), a simplification of the much more comprehensive set of planning policy guidance notes that it replaced. Within the NPPF, Government still expressly favours 'sustainable development', but the interpretation of this is now less clear in terms of a preference for brownfields over greenfields at the local level, and is also linked to the viability of a site. This has clouded clarity over housing location decisions, and partly explains the recent rise in the proportion of greenfield developments.
- 1.1.8 In addition, as part of the Government's drive for localism, it has removed regional housing targets, and a national brownfield target, and replaced them with more local discretion on housing numbers and locations. It has also removed the requirement for local planning authorities to report annually on the

<sup>1</sup> The term 'local planning authorities' is used throughout the report when responsibility for planning and development functions are being referred to. The term 'local authority' is used when wider local authority functions are discussed (i.e. those not solely confined to planning departments): e.g. economic development and general funding mechanisms for local government.

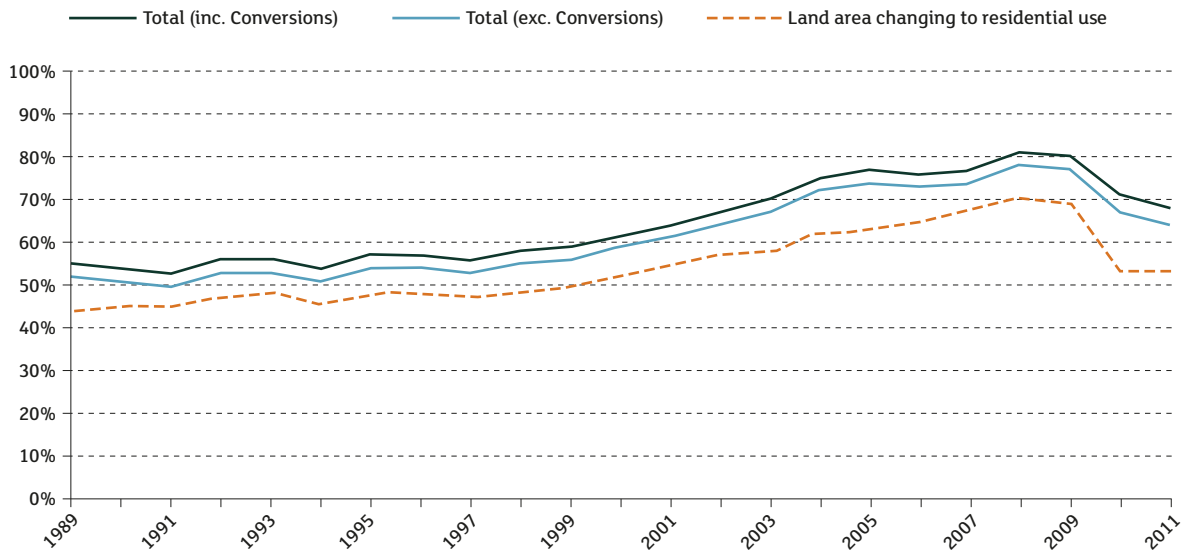
<sup>2</sup> See 'Key definitions' on p.9 for further consideration of the terms 'brownfield' and 'previously developed'.

<sup>3</sup> Figure is for 2011, the last date for which data are available. Although this period covers a change in the precise definition of brownfield sites (from 2010 gardens were excluded), the decline is still significant. This figure includes conversions.

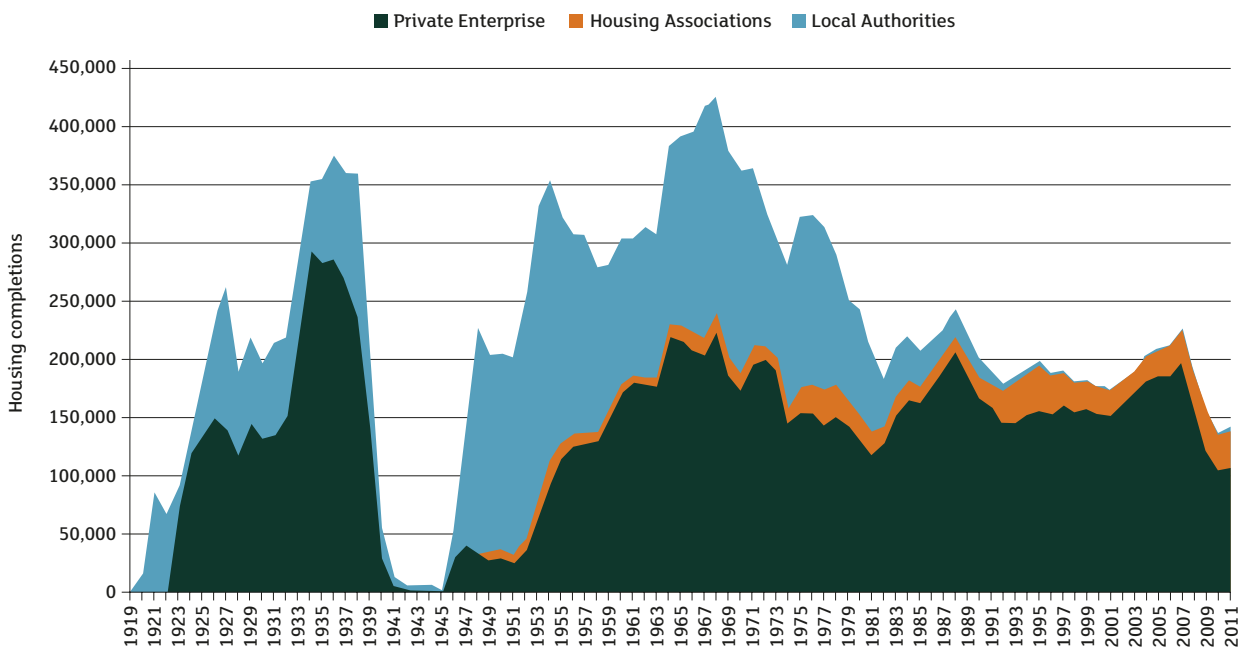
<sup>4</sup> 'Data in pre-war period was calculated differently than today and so needs to be viewed with caution. Data on private house building in England and Wales between 1919/20 to 1922/23 is unavailable, as is in Scotland between 1919/20 and 1923/24. The data up to 1944/45 also doesn't include private houses of rateable value exceeding £78, houses built for Government Departments, war-destroyed houses or temporary houses.' RTPI, 2013, p.4.



**Figure 1. Proportion of new buildings on Previously Developed Land, and Previously Developed Land changing to a residential use 1989-2011 (Source DCLG, 2013a)**



**Figure 2. Housing completions in the UK, by sector, 1919-2011 (Source: RTPI, 2013 reproduced from British Historical Statistics, Cambridge 1988 (1919-1948), DCLG (1949-2011) (note this figure is for the whole of the UK)**





Brownfield sites suitable for housing are constantly becoming available

land used for development (to the National Land Use Database, NLUD, 2014), so there is no longer a national dataset on land use with which to monitor changes. Government is, however, encouraging local communities, developers, land owners and local authorities to proactively identify and bring forward sites for development through Local Plans and neighbourhood planning processes.

- 1.1.9 Government still has an ambition to build on brownfield, and argues, on some occasions, that there is enough PDL for almost 1.5 million homes in England (see HCA 2014, the 2010 NLUD-PDL summary headline report), and at other times only enough for 200,000 (the latter may be based on the amount of land classed as 'derelict' in England). It has developed some specific measures to promote development on this land, including £400 million to fund Housing Zones in London, and £200 million for 10 Zones outside London, primarily (although not wholly) on brownfield sites (DCLG, 2014b). However, a key problem is that the amount of available land is disputed by many in the development and planning sectors.
- 1.1.10 So, in 2014, there is a complex picture of development in England. There are signs that the proportion of

development in the countryside is growing (conversely, the percentage of new build on PDL is declining), but no national dataset since 2010 to quantify this. There is also a range of new policy and funding mechanisms to stimulate the housing market, with site prioritisation focused on local discretion, but little understanding or evidence of the effects of these policies. There is also great pressure to deliver, quickly, high volumes of market housing, with little consideration of local needs or the quality of that development (see Parts 3 and 4 of this report).

## 1.2 Purpose of this report

- 1.2.1 Given this context, the purpose of this report is to provide a contemporary analysis of brownfield land availability in England, and of the local policies designed to identify brownfield sites and bring them forward for development. The study provides up-to-date evidence of PDL, in lieu of the NLUD dataset, as the basis for an informed debate about the location of housing in England. The purpose is to understand how much urban brownfield land is available for housing, where it is, and what is working, or not working, to bring it forward for development.



### 1.2.2 Specifically the report:

- Sets out how much brownfield land in England is available for housing, and the nature of this land;
- Determines recent trends in brownfield development;
- Identifies the key drivers of, and barriers to, brownfield development;
- Reviews current policies and mechanisms to encourage brownfield development, focusing on how brownfields can be brought forward for housing at the local level; and
- Provides recommendations for Government, local authorities, community groups and developers about how to enable brownfield development.

#### Key definitions

The key focus of the report is **brownfield** sites in **England**. The terms '**brownfield**' and '**PDL**' are often used interchangeably, but have slightly different meanings (CPRE, 2014b). PDL is formally defined as:

'Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes:

- Land that is or has been occupied by agricultural or forestry buildings
- Land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures
- Land in built-up areas such as private residential gardens, parks, recreation grounds and allotments
- Land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time' (DCLG, 2012, p.61).

This definition does not exclude land or buildings that are 'in use' (see CPRE, 2014b). This is important because sites can be identified for redevelopment in planning terms when they are still being used. This has caused some confusion with the data, as such sites can be included in NLUD, but many have argued they should not feature in housing capacity discussions. Hence, some data on 'in use' sites are presented in this report, but are excluded from calculations of land currently available for housing (see Part 2).

The term 'brownfield' is used more broadly in England, and internationally, than PDL, to mean the alternative to 'greenfield' (CABERNET, 2006) and can include land affected by development such as quarries, but which is not within the planning definition of previously developed land. Brownfield and greenfield are commonly used in planning practice and policy. Both terms, 'brownfield' and 'PDL', are used in this report in line with DCLG's definition above, and with the 'in use' caveat.

### 1.3 Types of PDL

1.3.1 The NLUD figures show that the stock of PDL in England is dynamic. Even in times of unprecedented development on PDL, new sites were becoming available continuously. In fact, replenishment exceeded supply between 2001 and 2009. For this reason, it is critical to continue to develop our understanding of the land that England has, and of how to bring brownfield sites forward to contribute to the beneficial evolution of towns and cities. In previous analyses of brownfield developments, sites have also been categorised according to how 'developable' they are, and according to what is required to make them 'viable'. Three broad categories are useful (and the report covers all three types of site):

- **Hardcore sites:** these sites are difficult to develop, usually because of site conditions and/or poor market conditions (low demand). They were classified by English Partnerships as sites that have been undeveloped for nine years or more.
- **Stalled sites:** these sites are identified for development, and have planning permission and other planning agreements in place (i.e. are 'shovel ready'), but are not being actively developed at present.
- **Sites under development:** these sites are actively being developed but are not yet figuring in housing completions data.

1.3.2 The report also concentrates predominantly on the use of brownfield sites for **housing in urban areas**. Housing is the largest single use of developed land in England, but any discussion of housing land needs to include considerations of infrastructure and other services to support housing, and the amount of land they require. Hence this report takes this into consideration.

1.3.3 It is also important to be clear that not all brownfield sites are in urban areas, and not all urban brownfields are suitable for housing. Excluding London, some have estimated that almost a fifth of brownfield sites are outside of built-up areas (NLP, 2014, using NLUD 2010 data). These sites are often formally industrial land, old airfields and so on, which may or may not be appropriate for redevelopment. Some brownfields will not be appropriate for development because of site conditions that cannot be overcome, such as poor location, or because they are earmarked for uses other than housing. Other sites may be valued for different end uses, for example they may have strategic or local importance as part of green infrastructure, be valued for their biodiversity or climate adaptation functions, or have cultural significance. This is also factored in to the analysis.

## 1.4 Methodology

1.4.1 The report is developed from three strands of research:

- A survey of all local planning authorities in England, requesting their NLUD data for 2011, 2012 and 2013 (the same data that would previously have been returned for the NLUD). Eighty two per cent of local planning authorities replied and 34% supplied full data sets (Appendix A), hence we have used the most up-to-date data available for each local authority (2010, 2011 or 2012).
- A critical review of policies and other mechanisms to encourage brownfield development. This comprised an analysis of literature and policy documents, and an Expert Symposium with 16 participants drawn from a range of sectors involved in brownfield development (Appendix B).
- Case studies of seven local planning authorities' approaches to brownfield development. These comprised reviews of brownfield strategies and interviews with planning policy teams (see Appendix C for more detail on case study methods).

1.4.2 The report is in five sections:

### **Part 1: Introduction**

Sets out the context for brownfield development in England in 2014, and the purpose of the report.

### **Part 2: Brownfield land available for housing**

Provides a picture of the total amount of brownfield land in England in 2014, and the amount suitable for housing. It determines patterns in housing

development in the recent past (focusing on changes since 2010), looking at the types of site being developed, their location, and housing densities on them. It provides a picture of the potential for more brownfield development for housing.

### **Part 3: Drivers and barriers for brownfield development**

Sets out current drivers and barriers to development, in terms of: market conditions; policy, regulatory and fiscal conditions; and site conditions.

### **Part 4: Brownfield development at the local level: How are local planning authorities approaching PDL?**

Sets out the policy context for the identification and delivery of brownfields at the local level. It provides seven case studies showing how local planning authorities are dealing with brownfields strategically and practically.

### **Part 5: Recommendations for enabling brownfield development**

Draws on the evidence presented in the report to provide recommendations for different stakeholders in brownfield development: Central Government; local planning authorities; local communities; and developers.



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## PART 2

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# Brownfield land available for housing





# PART 2

## Brownfield land available for housing

This part of the report presents data on how much brownfield land has been identified as suitable and available for development in England. First, however, it is useful to set out briefly where the drive for brownfield development has come from, and why the data are so urgently required.

### 2.1 A brief history of brownfield development

2.1.1 The Government has, until very recently, prioritised the development of urban brownfield sites over greenfield for housing and other uses. Policies were pursued to achieve a range of benefits:

- to provide sustainable spatial development patterns: i.e. to recycle previously developed land, reduce sprawl, and protect valuable greenfield land;
- to support high quality urban regeneration, and maximise the benefit from previous investments in urban infrastructure;
- to provide a critical mass of people in towns and cities, and stem the tide of counter-urbanisation, to ensure viable and vibrant local neighbourhoods, economies and services (Dixon and Adams, 2008; Williams, 2012).

2.1.2 There was recognition that brownfield sites could be a problem in their own right, blighting neighbourhoods, contributing to urban decline and holding back wider regeneration initiatives. But the corollary was that they could be considerable assets, often in central areas, for flagship mixed developments and much needed housing.

2.1.3 For these reasons, brownfields received targeted political and technical attention (CABERNET, 2006). Specific policies were introduced to: release land for development sequentially (so brownfield sites were approved for development before greenfield); regenerate derelict parts of towns and cities; and to increase housing densities.

2.1.4 In addition, the target was set for at least 60% of all housing to be developed on previously developed land, which was rapidly exceeded in some regions (Williams and Ganser, 2007). These policies were supported by a range of public financing incentives and partnership arrangements to assist with development. English Partnerships, now absorbed into the Homes and Communities Agency (HCA), was the main agency targeted with providing expertise and allocating public funding to bring sites forward.

2.1.5 In terms of shifting the balance between greenfield and brownfield development, and contributing to urban regeneration and re-population, these policies were largely successful (Williams, 2012). As noted above, the proportion of housing on brownfield sites rose to a high of 81% in 2008, and average densities rose from 25 to 43 dwellings per hectare (dph) between 1989 and 2011 (and from 29 to 53 dph on previously developed sites in the same period) (DCLG, 2013c).

2.1.6 There is some debate about the relative influence of policies, compared with other trends that may have favoured an 'urban renaissance' (such as in-migration and global investment flowing into some cities, especially London). It is generally accepted, however, that they steered development into urban areas, and contributed significantly to regeneration in some cities (Williams, 2014; Champion 2014). There have been a number of award winning and popular schemes in large cities such as Leeds, Liverpool, London and Manchester.

2.1.7 However, the pro-brownfield policy successes are only part of the picture. Although proportions of 'urban' housing grew, there was still substantial housing development in the countryside: even when 81% of new housing was on PDL, that still left 19% of housing being developed on greenfield sites. In the 2000s there was a marked trend for numerous small scale developments in the countryside, which cumulatively changed the character of some rural areas (Bibby, 2009). And much of what was built on larger greenfield sites, including urban extensions, was poorly designed, single use, and had limited accessibility due to location and inadequate public transport (RTPI, 2013; RIBA, 2014).

2.1.8 Throughout this period, Government brought in new ways of keeping track of development patterns, partly to monitor progress against its policies, and partly to support strategic planning. Hence, since the late 1990s, all sectors involved in PDL have had a relatively accurate picture of the location of housing development in England. Data collated in the National Land Use Database (NLUD) provided this. NLUD was used by Government to estimate the stock and supply of previously developed land. It contains individual site information (location, size, current and previous use etc.) on each site in any given local authority. Data were published on an annual basis, generally as headline figures, until 2010. The number of local planning authorities providing data reached a peak at 97% in 2010, but this figure has declined



substantially since 2011 when reporting ceased to be mandatory. Unfortunately, the NLUD is no longer publically available, but some local planning authorities are still providing data to the Homes and Communities Agency (HCA) on a voluntary basis.

## 2.2 The approach taken to quantifying the amount of brownfield land available for housing

2.2.1 For the purposes of this report, it was necessary to try to gain as full a picture of PDL as possible, to find out what has happened since 2010 when NLUD ceased to be mandatory. Hence, every local planning authority in England was surveyed requesting their NLUD data from 2011, 2012 and 2013. Overall, 82% of local planning authorities responded in some form, but many indicated that they had not provided data to the HCA since 2010.

2.2.2 Despite this, 34% of local planning authorities provided NLUD data for 2011 and 2012 although this was not necessarily the same local planning authorities for both years. Very few local planning authorities provided data for 2013 (9%), so these data are not presented in this report. There are regional differences ranging from around 20% of local planning authorities in the North East to 45% in the North West (Appendix D). An attempt was made to use data in Strategic Housing Land Availability Assessments (SHLAAs, see also Section 4.1 and the case studies in Section 5 below) for the local planning authorities with no 2011 or 2012 data. However, this was not possible as the data presented in these documents are not compatible with NLUD. In particular, SHLAAs do not report information using the same categories of land type, planning status and often do not report whether a site is PDL. Although they replaced the urban capacity figures they are very inconsistent between local planning authorities in terms of presentation, style and format so cannot be used to gain a national picture of the availability of land for housing in England. A further problem with the use of SHLAA data is that they have been compiled based on the sites that developers have brought forward for development so do not present the complete picture of PDL available in an area.

2.2.3 The data from 2010, 2011 and 2012 have been used to construct an updated NLUD for local authorities in England. In line with previous versions of NLUD the most up-to-date data have been used for each local planning authority. This means that for more than



half of the local planning authorities it was necessary to use the 2010 data as no 2011 and/or 2012 data were available.

2.2.4 The NLUD provides five categories, or land types, of PDL:

- A: Previously developed land now vacant;
- B: Vacant buildings;
- C: Derelict land and buildings;
- D: Previously developed land or buildings currently in use and allocated in local plan or with planning permission;
- E: Land currently in use with known redevelopment potential but no planning allocation or permission.

2.2.5 Previous Government summaries have included all five types of land in their headline figures; for example, this is how the total housing capacity of 1.5 million homes on brownfield reported in both 2009 and 2010 was calculated. There is likely to be a significant amount of land that could fall into category E, just as there had been in previous years (see Section 2.5 below). However, in this report category E data has been removed for two reasons.

2.2.6 First, it was felt, and reinforced at the Expert Symposium, that this category is inherently unreliable in terms of providing a realistic assessment of brownfield land stock as sites are ‘in use’ often with no short- to medium- term aspirations for development. Although the guidance for reporting this land type states that sites *‘are likely to be disposed of by their owners for redevelopment or conversion in the next five years’* (HCA, 2009) the general site information in NLUD suggests that for many sites this is not likely to be the case. For example, although the NLUD indicated that some category E sites had been identified in the SHLAA, others had significant constraints including multiple ownership, owners that are unwilling to redevelop, a need to relocate existing businesses, possible contamination and issues with location (e.g. Green Belt, poor access, within the flood zone, noise), others also stated previous planning permission has lapsed. Indeed the guidance acknowledges that the *‘recognition of potential sites for redevelopment will depend to some degree on local knowledge and judgement. The objective here is to identify major potential redevelopment sites before they reach the planning permission stage. It is not envisaged that extensive surveys will be carried out to develop a comprehensive and site-specific assessment of land and buildings falling in this category’* (HCA, 2009).

2.2.7 Second, the raw data for this category is, understandably, removed from the public-facing database making it impossible to carry out a complete analysis. Some local planning authorities did provide these data but others did not, so the dataset for 2011 and 2012 would not have consistent information across local planning authorities (i.e. some would have A to E, others would only have A to D).

2.2.8 The NLUD also requires the local planning authority to make a judgement on whether a site is suitable for housing (‘yes’, ‘no’ or ‘don’t know’), the estimated housing capacity and the estimated density. It also contains information on the planning status of the site (‘none’, ‘with draft allocation in the Local Plan’, ‘allocated in the Local Plan’, ‘outline planning permission’, ‘detailed planning permission’ and ‘planning permission subject to further legal agreement’).

2.2.9 Government summaries have adjusted the site-specific data in the NLUD for ‘completeness’. This is an estimate provided by local authorities as to how complete their NLUD return is as a percentage of the total PDL, by land type. However, not all local planning authorities provided their completeness estimates, so in the interest of providing as accurate and consistent dataset as possible this report only uses the site-specific data from NLUD (a full explanation can be found in Appendix E).

**Table 1. The amount of publicly identified PDL by land type in England in 2010, 2011 and 2012**

Year	A: Previously developed land now vacant	B: Vacant buildings	C: Derelict land and buildings	D: Previously developed land or buildings currently in use and allocated in local plan or with planning permission	Total A-D
2009 <sup>a</sup>	13,570 ha	4,090 ha	15,730 ha	17,270 ha	50,660 ha
2010 <sup>a</sup>	16,100 ha	4,940 ha	16,900 ha	18,620 ha	56,560 ha
2010 <sup>b</sup>	13,908 ha	3,656 ha	13,088 ha	16,899 ha	47,551 ha
2011 <sup>b</sup>	13,013 ha	3,534 ha	12,120 ha	17,655 ha	46,322 ha
2012 <sup>b</sup>	12,990 ha	3,467 ha	12,612 ha	16,055 ha	45,124 ha

<sup>a</sup> These figures include the ‘completeness assessments’ from the local planning authorities hence the larger difference in area between 2009 (HCA, 2009) and 2010 (HCA, 2010);  
<sup>b</sup> These figures use the raw NLUD data only so do not include the ‘completeness assessments’.

2.2.10 Presenting the figures based on these data from NLUD provides some certainty over the status of the site and its suitability for housing. This has resulted in area and housing capacity figures that are lower than those previously reported, but these have been compared with raw 2010 data, where necessary, to allow a ‘between-year’ comparison. A comparison of the raw 2010 data with the published headline figures suggests that the completeness estimate for England is around 80%. This means that the use of raw data is likely to have resulted in a somewhat conservative estimate of the true availability of brownfield land. In addition, the headline figures published from the 2009 data have been included for comparison with the previous CPRE report ‘Building in a Small Island’ (Green Balance, 2011).

2.2.11 Here, the total amount of brownfield land available is presented, summarised by land type, suitability for housing and planning status. An assessment is included of changes over time, particularly examining the differences between ‘hardcore’, ‘stalled’ and ‘churn’ sites. Finally, the estimated housing capacity in NLUD is used to provide the total housing capacity on brownfield land in England.

**2.3 How much brownfield land is there?**

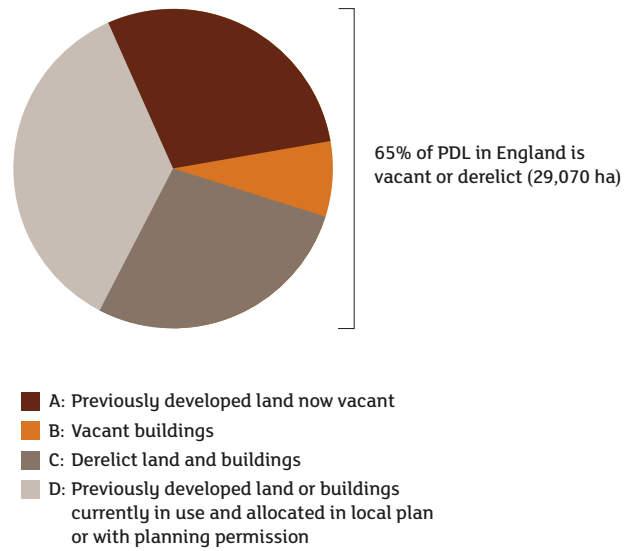
2.3.1 In 2012, there were approximately 45,120 ha of publicly identified PDL in England (Table 1), this includes all vacant land and buildings, derelict land and buildings and those in use but allocated in the Local Plan or with planning permission. Of these, around 29,070 ha or 65% were vacant or derelict land and buildings (land types A to C; Figure 3), equating to an area twice the size of Bristol. Government figures, which include the completeness assessments, estimated an area of 37,940 ha in 2010.

2.3.2 There was a 2.5% reduction in the amount of publicly identified PDL between 2010 and 2011 and a further 2.5% reduction between 2011 and 2012 (Table 1). The proportion of PDL in the different land types, except for derelict land and buildings, has remained relatively stable over this time period.

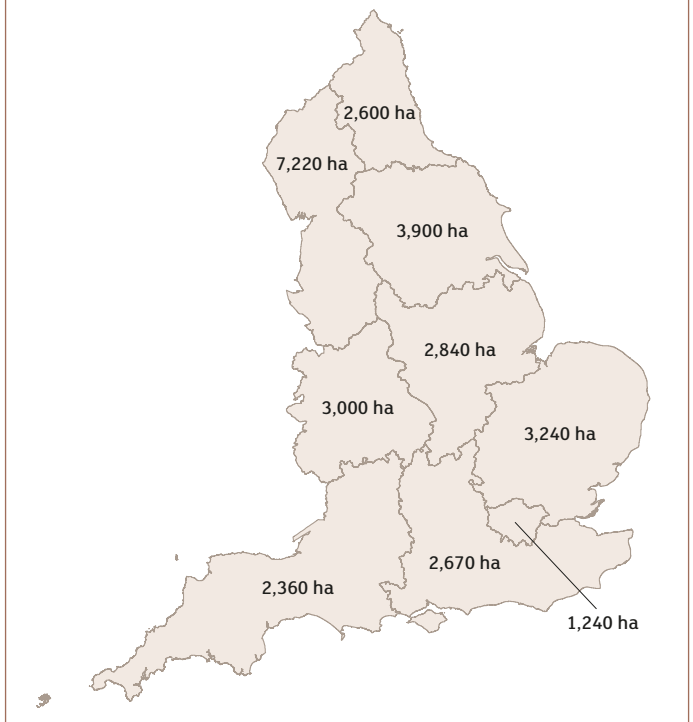
2.3.3 However, there are large regional differences in the amount of vacant and derelict PDL; ranging from 1,240 ha in London to 7,220 ha in the North West (Figure 4; Appendix F; Appendix G).

2.3.4 Looking at the size of sites (Appendix H) it is clear that the vast majority of brownfield sites in 2012 were less than 1 ha in size (71%), with 22% in the

**Figure 3. Proportion of PDL in land types A to D in England in 2012**



**Figure 4. Total area of vacant and derelict PDL in 2012 by English region. Contains public sector information licensed under the Open Government Licence v3.0**



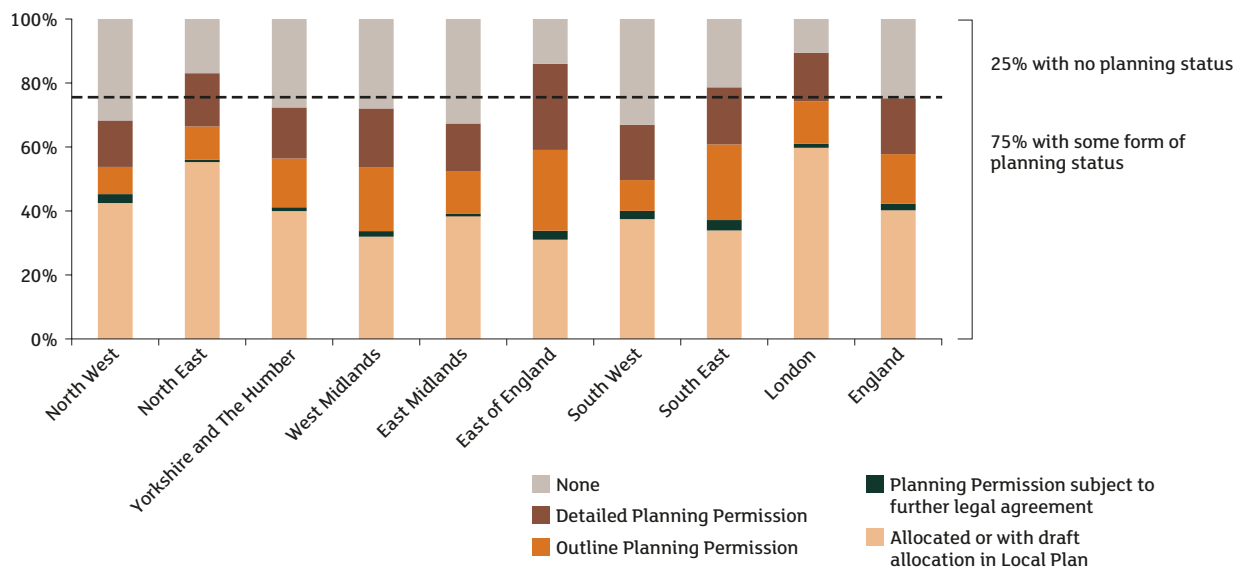


**Table 2. The amount of PDL by planning status in England in 2010, 2011 and 2012**

Year	Allocated or with draft allocation in Local Plan	Outline Planning Permission	Detailed Planning Permission	Planning Permission subject to further legal agreement	Total with planning status	No planning status	Total <sup>1</sup>
2010	19,866 ha	8,169 ha	7,508 ha	966 ha	36,509 ha	11,024 ha	47,533 ha
2011	18,748 ha	7,591 ha	7,173 ha	999 ha	34,511 ha	10,761 ha	45,272 ha
2012	18,121 ha	6,980 ha	7,869 ha	930 ha	33,900 ha	11,164 ha	45,064 ha

<sup>1</sup> Total values vary slightly from those presented in Table 1 due to omissions in NLUD, for example where local planning authorities did not report a land type for some sites (e.g. Medway Council did not provide the planning status for any of its sites in 2011).

**Figure 5. Proportion of PDL with different levels of planning status in England in 2012**



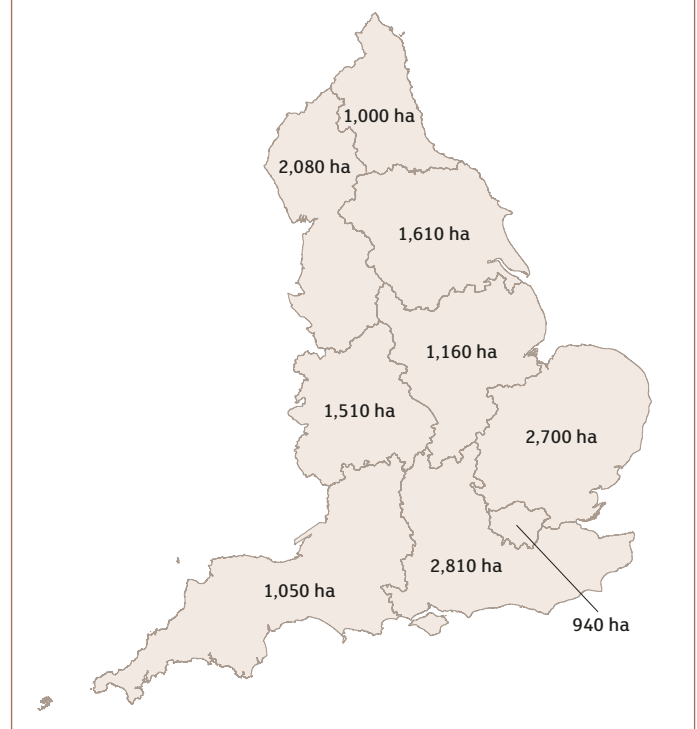
1-5-ha range, 6% in the 5-20 ha range with only 1% (317 sites) being greater than 20 ha. But also, interestingly, the number of very large (20 ha or greater) sites has stayed more constant (317 in 2012, down from 340 in 2010), than the number of very small (below 1 ha) sites (15,152 in 2012, down from 17,207 in 2010 – a drop of more than 10%). This in turn raises the issues of (i) the extent to which a number of very large brownfield sites are particularly difficult to develop, and also that (ii) local authorities may no longer be identifying the

very small brownfield sites to the same degree as in the past, bearing out concerns raised by Professor Anne Power in 2013 (Power, 2013).

2.3.5 Clearly, not all PDL in NLUD is developable in the short- to medium- term. The planning status of the sites was therefore used to provide an assessment of the amount immediately available for development (Table 2). This estimated that 18,100 ha (40%) were allocated or had draft allocation in the Local Plan and a further 14,850 ha (33%) had either outline or detailed planning permission in 2012 (Figure 5).

- 2.3.6 The proportion of PDL in the different categories of planning status stayed relatively stable between 2010 and 2012 suggesting that either sites are stalled, or that there is sufficient churn to maintain the supply, or a combination of these two factors.
- 2.3.7 An analysis of the 82 local planning authorities that provided NLUD data for both 2011 and 2012 suggests that there is still a considerable 'churn' of sites, with new brownfield land coming forward as existing sites are redeveloped. Across England, in these local planning authorities, 2,653 ha of PDL were removed from NLUD and 2,591 ha were added between 2010 and 2011, representing a change of around 18% of the total PDL in these authorities and an overall decrease of just 62 ha (Appendix I). However, between 2011 and 2012 1,949 ha of PDL were removed from NLUD and 1,501 ha were added, representing a change of 14% and 10% of the total PDL, respectively, and an overall decrease of 449 ha.
- 2.3.8 Again, there was considerable regional variation in the planning status of PDL across England ranging from 940 ha with planning permission in London to 2,810 ha in the South East (Figure 6; Appendix J). Similarly, the area of 'churn' sites varied between regions; between 2010 and 2011 two thirds of regions experienced an increase in the area of PDL, ranging from a decrease of 209 ha in the North West to an increase of 80 ha in the East Midlands. However, between 2011 and 2012 only two regions showed an increased area of PDL (London and the South West), here the area of sites ranged from a decrease of 868 ha in the South East to an increase of 85 ha in the South West (Appendix I). See section 2.4 below for a further analysis of 'churn' in relation to sites classed as suitable for housing.
- 2.3.9 There has been considerable speculation concerning the nature of brownfield stock and supply. One particular area is centred on 'hardcore' sites, defined as having been on the NLUD for at least nine years. These sites are often thought to comprise a significant proportion of PDL in England, which due to various site characteristics make them very difficult or unattractive to develop. The data from NLUD in 2012 suggests that of the 45,120 ha of the total PDL, an estimated 17,740 ha (5,114 sites) were classified as 'hardcore' (Appendix J). This results in an estimated 27,380 ha of non-hardcore sites in 2012. As with the total PDL, there was considerable regional variation in the area and number of hardcore sites; ranging from only 9 ha across 6 sites in London to 4,169 ha across 1,027 sites in the North West.

**Figure 6. Total area of PDL with outline or detailed planning permission in 2012 by English region. Contains public sector information licensed under the Open Government Licence v3.0**



- 2.3.10 A comparison between the 2010 and 2012 NLUD for those local planning authorities providing data in 2012 suggested that the number of hardcore sites has increased since 2010. In the 2010 NLUD there were 12,710 ha across 3,873 sites. This is unsurprising given the slowdown in the construction sector during this period. If these sites have remained on NLUD due to the recession they may be 'stalled' (see definition given in Section 1.4 above) as opposed to truly hardcore. Indeed, 4,460 ha had some form of planning permission in 2012; 25% of all hardcore PDL suggesting that they are developable.

## 2.4 How much brownfield land is suitable for housing?

- 2.4.1 Brownfield land may be suited to a number of end uses and its physical location or site characteristics may make it more suitable for one type of use over another. Local planning authorities provide an indication in the NLUD as to whether a site is suitable for housing either as a solely residential development

or as part of a mixed use scheme. An analysis of this information in NLUD from 2012 suggests that of the 45,120 ha of brownfield land 22,680 ha were judged to be suitable for housing, equating to an area larger than the Liverpool Urban Area<sup>5</sup> (Table 3).

- 2.4.2 Although the total amount of PDL decreased between 2010 and 2012, the proportion suitable for housing has increased from 48% to 52% (Table 3; Figure 7).<sup>6</sup>
- 2.4.3 In contrast to the overall amount of brownfield land, the amount of land suitable for housing did not vary as much between the regions (Figure 8; Appendix M;

Appendix N), ranging from 1,600 ha in The East Midlands to 3,800 ha in the South East.

- 2.4.4 Table 4 and Figure 9 set out the PDL that was judged by local planning authorities to be suitable for housing. There were 12,740 ha of vacant or derelict PDL in 2012, broadly comparable with 12,800 ha in 2010. Again, there are regional differences in the amount of vacant and derelict PDL suitable for housing; ranging from 830 ha in the South West to 2,540 ha in the North West (Appendix O).

**Table 3. The amount of publicly identified PDL suitable for housing in England in 2010, 2011 and 2012**

Year	Suitable	Not suitable	Don't know	Total
2009 <sup>a</sup>	24,640 ha	26,020 ha		50,660 ha
2010	22,781 ha	20,934 ha	3,836 ha	47,551 ha
2011	22,156 ha	20,070 ha	4,096 ha	46,322 ha
2012	22,681 ha	19,043 ha	3,401 ha	45,124 ha

<sup>a</sup> These figures include the 'completeness assessments' from the local planning authorities hence the larger difference in area between 2009 and 2010, they also only present the area that is suitable for housing, therefore the 'not suitable' value will include both those deemed not suitable and those where the local planning authority do not know.

**Table 4. The amount of publicly identified PDL suitable for housing in England by land type in 2010, 2011 and 2012**

Year	A: Previously developed land now vacant	B: Vacant buildings	C: Derelict land and buildings	D: Previously developed land or buildings currently in use and allocated in local plan or with planning permission	Total A-D
2009 <sup>a</sup>	5,960 ha	2,230 ha	5,990 ha	10,460 ha	24,640 ha
2010	6,241 ha	2,027 ha	4,534 ha	9,979 ha	22,781 ha
2011	5,784 ha	1,960 ha	4,401 ha	10,011 ha	22,156 ha
2012	6,378 ha	1,921 ha	4,445 ha	9,937 ha	22,681 ha

<sup>a</sup> These figures include the 'completeness assessments' from the local planning authorities hence the larger difference in area between 2009 and 2010.

<sup>5</sup> The Liverpool Urban Area includes Bootle, Crosby, Haydock, Huyton-with-Roby, Litherland, Liverpool, Prescot, St. Helens and Rainford.

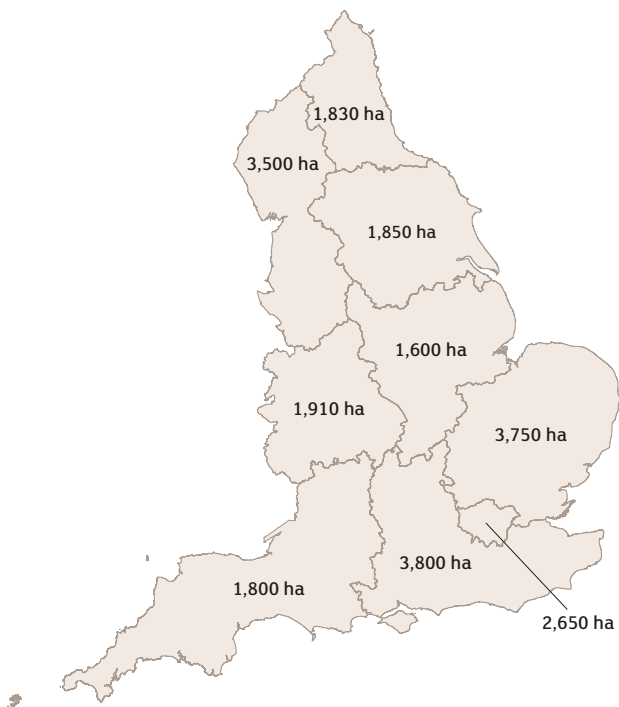
<sup>6</sup> Given that it is now easier to convert some commercial premises into housing and the government is increasingly challenging local planning authorities on their judgements on suitability it is unlikely that this proportion will decline.



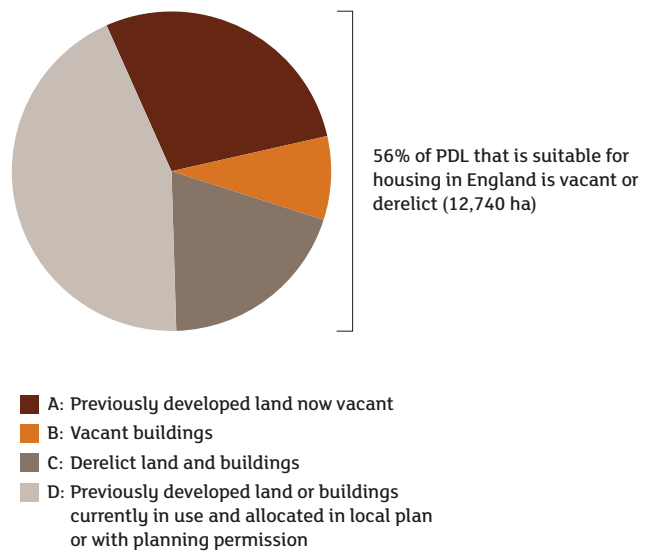
**Figure 7. Proportion of publicly identified PDL suitable for use as housing in England in 2012**



**Figure 8. Total area of PDL suitable for housing in 2012 by English region. Contains public sector information licensed under the Open Government Licence v3.0**



**Figure 9. Proportion of publicly identified PDL in land types A to D that is suitable for housing in England in 2012**



2.4.5 Table 5 sets out the ‘planning status’ of brownfield land that is suitable for housing. The NLUD data shows that in 2012 there were 10,020 ha with outline or detailed planning permission, representing an increase from 9,840 ha in 2010. In addition, there were a further 8,460 ha allocated or with draft allocation in the Local Plan. In total 85% of PDL that was judged to be suitable for housing had some form of planning status (Figure 10).

2.4.6 Despite the relatively similar total amounts of brownfield land that were suitable for housing across the regions there was considerable variation in the amount with planning permission (Figure 10; Figure 11). The least amount of brownfield land with planning permission was 600 ha in the East Midlands and the greatest was 2,260 ha in the East of England (Figure 11; Appendix P; Appendix Q).

2.4.7 There were an estimated 6,280 ha of hardcore sites in 2012 that were suitable for housing (Appendix R) representing around 35% of the total amount of hardcore brownfield land. This results in an estimated 23,350 ha of non-hardcore sites suitable for housing, 12,630 ha of which are on vacant or derelict PDL.

2.4.8 The continued ‘churn’ (or continual replenishment) of PDL suitable for housing can be observed in the 82 local planning authorities that provided data for both 2011 and 2012. There was a decrease in the area of publicly identified PDL that was suitable for housing in these areas of 73 ha between 2010 and 2011 with 1,052 ha being removed from NLUD and 979 ha being added, representing a change of around 17% of the total PDL. However, in contrast to the change in area of overall PDL (see page 15 above), the area suitable for housing increased by 140 ha

**Table 5. The amount of PDL suitable for housing in England by planning status in 2010, 2011 and 2012**

Year	Allocated or with draft allocation in Local Plan	Outline Planning Permission	Detailed Planning Permission	Planning Permission subject to further legal agreement	Total with planning status	No planning status	Total <sup>1</sup>
2010	8,918 ha	5,356 ha	4,479 ha	798 ha	19,551 ha	3,230 ha	22,781 ha
2011	8,380 ha	5,215 ha	4,302 ha	837 ha	18,734 ha	3,394 ha	22,128 ha
2012	8,459 ha	5,077 ha	4,938 ha	782 ha	19,256 ha	3,392 ha	22,668 ha

<sup>1</sup> Total values vary slightly from those presented in earlier tables due to omissions in NLUD, for example where local planning authorities did not report a land type for some sites.

**Figure 10. Proportion of PDL that is suitable for housing by planning status in England in 2012**



in 2011/12, with 606 ha being removed from NLUD and 746 ha being added, representing a change of 11% and 13% respectively (Appendix S).

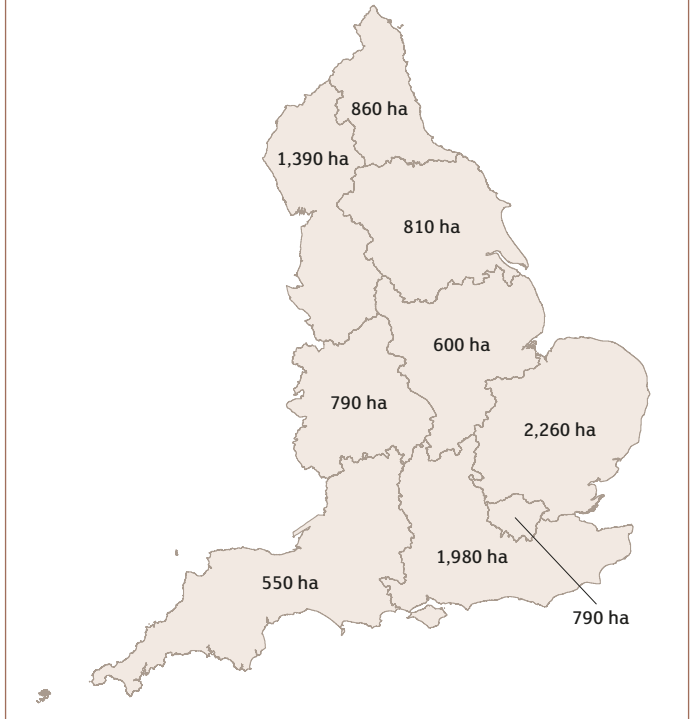
### 2.5 How many homes could brownfield land provide?

2.5.1 The preceding sections estimate the amount of publicly identified brownfield land in England and, more specifically how much is suitable for housing and what the position of these sites is in the planning system. However, it is essential to relate the amount of land to the housing capacity on these sites. The housing capacity given for each site from NLUD data was used to calculate the potential number of homes that could be delivered on brownfield sites.

2.5.2 The 2012 NLUD data show that across all publicly identified PDL there was an estimated housing capacity of 975,991 homes (Table 6), equating to just over four years' supply assuming the household formation rate of 221,000 households per year (DCLG, 2013b). This figure contrasts with the Government's published figure of 1,485,210 from 2010 which includes land type E and the completeness assessments which we have omitted for the reasons presented earlier (see Section 2.2 above). This value is a conservative estimate of the true picture. **The 2010 NLUD data**, without the inclusion of land type E and completeness assessments, put the housing capacity at **1,005,730** (Table 6; Figure 12) suggesting that these two factors combined resulted in 32% of the estimated housing capacity (13% from the inclusion of land type E). The figure of 975,991 homes could therefore be **around 30% greater** if land type E and the completeness assessments were included. The NLUD data also provides information on the proposed use of PDL sites. In 2012 'employment' was the proposed use on 11,300 ha of PDL and 'retail' was the proposed use on 439 ha of sites (Appendix T).

2.5.3 Both values include land type D (i.e. PDL currently in use that is allocated in the Local Plan or has planning permission). Looking specifically at vacant and derelict PDL (i.e. land types A to C) there is capacity for 550,610 homes on PDL. Government figures, from 2010, previously estimated a capacity of 673,130 homes on these sites which includes the adjustment for completeness which we have also omitted (see Appendix E). The figures shown in Table 6 suggest that **the housing capacity on all types of brownfield land has decreased by 29,737 ha since 2010, or by less than 3% overall.**

**Figure 11. Total area of publicly identified PDL suitable for housing with outline or detailed planning permission in 2012 by English region. Contains public sector information licensed under the Open Government Licence v3.0**



**Figure 12. Housing capacity on publicly identified PDL in England in 2012**





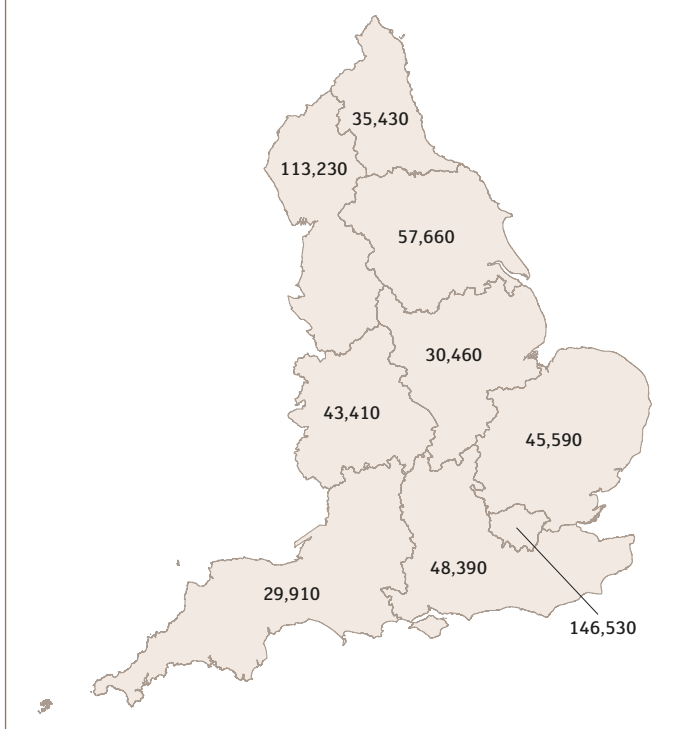
**Table 6. Housing capacity on publicly identified PDL in England by land type in 2010, 2011 and 2012 based on the site-specific housing capacity from NLUD**

Year	A: Previously developed land now vacant	B: Vacant buildings	C: Derelict land and buildings	D: Previously developed land or buildings currently in use and allocated in local plan or with planning permission	Total A-D
2009 <sup>a</sup>	331,820	125,040	203,350	521,050	1,181,260
2010	301,913	102,918	166,905	433,993	1,005,729
2011	286,798	96,414	161,946	428,628	973,786
2012	300,386	93,318	156,902	425,385	975,991

<sup>a</sup> These figures include the 'completeness assessments' from the local planning authorities hence the larger difference in area between 2009 and 2010.

2.5.4 The average housing density assumption underlying these figures varies substantially across England. Average density in London was 140 dwellings per ha compared with an average across the remaining regions of 35 dwellings per ha. This means that the estimated housing capacity on vacant and derelict PDL varied substantially across the regions, ranging from 29,910 homes in the South West to 146,530 homes in London. Combining the data for the regions where housing demand is the highest, namely London, East of England and the South East, suggests that these regions account for around 44% of all available housing capacity (Figure 13; Appendix U). Again, the NLUD is likely to provide a conservative picture of the amount of brownfield land available. In London, the 2014 Further Alterations to the London Plan (FALP) states that brownfield 'opportunity areas' in the capital could provide 300,000 new homes alongside 568,000 jobs (paragraphs 2.58-2.60) – double the amount on land publicly identified for NLUD. This discrepancy could be due to a number of factors including the identification of additional PDL sites from those in the 2012 NLUD, particularly given that not all London Boroughs responded to the request for data or the inclusion of 'category E' sites that were omitted from this analysis. They may also be based on higher housing density. The Case Studies in section 4.5 look in more detail at one such 'opportunity area', in Barnet.

**Figure 13. Total housing capacity on vacant and derelict PDL in 2012 by English region. Contains public sector information licensed under the Open Government Licence v3.0**



- 2.5.5 The case of London gives a good illustration of why there still needs to be an understanding of the availability of ‘category E’ brownfield land, as mentioned earlier in this section.
- 2.5.6 An analysis of housing capacity on sites with outline or detailed planning permission suggests that there is capacity for 406,170 homes in England (Table 7). In addition, capacity for a further 367,900 homes existed on sites allocated or with draft allocation in the Local Plan (Figure 14). Again, this represents a decrease in capacity since 2010 of 9,940 homes.
- 2.5.7 Again, there are large regional differences; the least capacity on sites with planning permission existed in the South West at 20,860 homes and the largest in London at 106,320 (Figure 15; Appendix V).

Taken together, London, East of England and the South East had planning permission for 195,660 homes on PDL sites.

- 2.5.8 Looking specifically at the estimated housing capacity on hardcore sites in 2012 this was estimated at 191,970 homes (Appendix S), of which 66,550 have planning permission suggesting that these sites may be making a substantial contribution to the overall housing capacity on PDL.
- 2.5.9 As stated earlier, not all brownfield land will be suitable for housing and consideration should also be given to brownfield sites that are valuable for nature conservation. There is increasing recognition that brownfields can provide a valuable contribution to nature conservation in England. Some habitats on

**Table 7. Housing capacity on publicly identified PDL in England by planning status in 2010, 2011 and 2012 based on the site-specific housing capacity from NLUD**

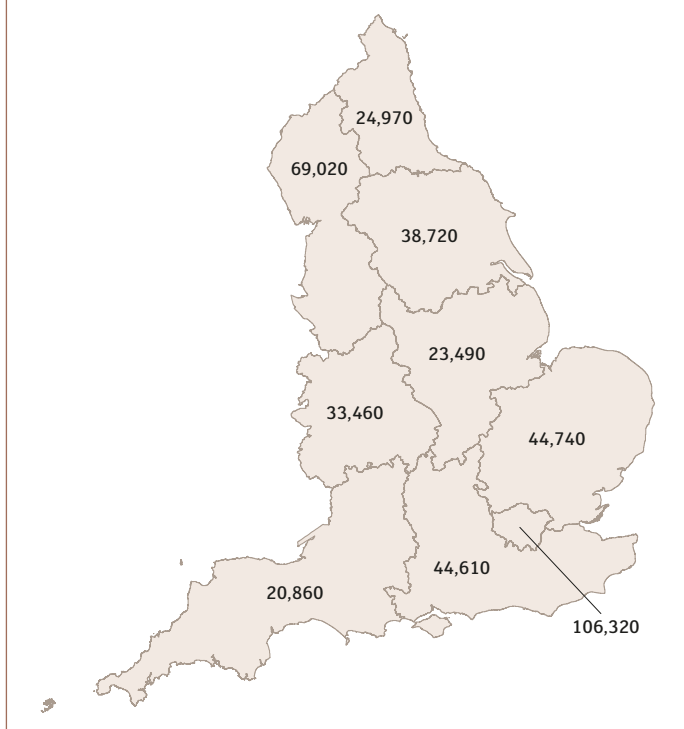
Year	Allocated or with draft allocation in Local Plan	Outline Planning Permission	Detailed Planning Permission	Planning Permission subject to further legal agreement	Total with planning status	No planning status	Total <sup>1</sup>
2010	388,439	179,319	236,792	36,012	843,562	165,166	1,005,728
2011	377,435	171,677	224,849	31,990	805,951	165,494	971,445
2012	367,901	170,555	235,619	31,400	805,475	163,041	968,516

<sup>1</sup> Total values vary slightly from those presented in earlier tables due to omissions in NLUD, for example where local planning authorities did not report a land type for some sites.

**Figure 14. Proportion of housing capacity on PDL by planning status in England in 2012**



**Figure 15. Total housing capacity on PDL with outline or detailed planning permission in 2012 by English region. Contains public sector information licensed under the Open Government Licence v3.0**



brownfield sites are now considered a ‘priority habitat’ in the national Biodiversity Action Plan; these are known as Open Mosaic Habitats (OMH) on Previously Developed Land. Work is currently underway, funded by Natural England and Defra, to assess the extent of brownfield land that supports OMH using a combination of data analysis, aerial photography and habitat surveys. This work is due to be completed in late 2014. Early indications suggest that around 8% of brownfield land would meet the criteria for OMH (Habitat Surveys, 2014). However, it is not clear how this figure relates to sites in the NLUD as OMH is also likely to include brownfields that do not meet the criteria for inclusion in NLUD and may not be suitable for housing or considered developable due to site constraints.

## 2.6 Summary

- 2.6.1 The amount of brownfield land in England appears to have remained fairly static between 2010 and 2012. This is perhaps unsurprising given the slowdown in the development sector during this period. However, previous reports have suggested that the availability of brownfield land and resulting housing capacity has remained relatively stable or even increased (e.g. Green Balance, 2011) due to the constant churn of brownfield sites. It does appear that recent changes in government policy have slightly increased the proportion of land judged to be suitable for housing but this has not yet had an impact on estimates of housing capacity which have declined at a national level over this time frame.
- 2.6.2 The data show enough brownfield land in England has been publicly identified to accommodate almost 1 million homes. This equates to a four year supply if homes were not provided on any other sites, no new brownfield sites became available and that projections of household formation are a reliable means of assessing housing need. In the short-term there is enough land available with either outline or detailed planning permission for over 400,000 homes; almost two years’ supply. These figures also indicate that, although there are large regional variations across England, the availability of brownfield sites in the short-term is greatest in the areas of greatest demand for new housing – namely London, East of England and the South East. These regions account for around 44% of all available housing capacity.
- 2.6.3 The review has also highlighted a number of shortcomings with the data collection for NLUD, in particular on land with the potential for redevelopment but still currently in another use (‘category E’ land). The example of London may suggest that the potential of such land, while not possible to accurately measure through NLUD, is significant. In addition, the current SHLAA process for identifying land suitable for housing does not provide sufficiently robust or consistent data on brownfield potential. Part 3 considers the economic and planning context for brownfield development. Part 4 looks in more detail at attempts to get improved local intelligence, looking at a number of local case studies of local brownfield strategies, including three local planning authorities (Durham, Bristol, and Cheshire West and Chester) assisted in the past by HCA to produce ‘local brownfield strategies’ to inform their local development frameworks.



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## PART 3

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# Drivers and barriers for brownfield development





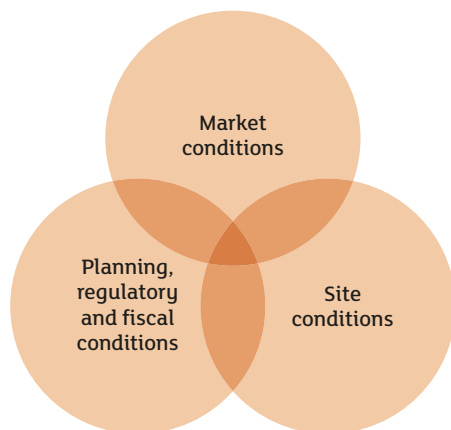
# PART 3

## Drivers and barriers for brownfield development

### 3.1 Introduction

- 3.1.1 For brownfield sites to be developed, three inter-related 'conditions' have to be right: market conditions; planning, regulatory and fiscal conditions; and site conditions.
- 3.1.2 The ways that these three conditions interact leads to variable development rates for different types of site, in different parts of the country (Figure 16). Hence, where the new housing market is strong, sites can be viable even with some site remediation and infrastructure costs factored in. However, where markets are weaker, sites may only be viable if the public sector invests to improve site conditions, or reduces requirements from developers. There is often considerable debate about how 'viability' is calculated: specifically about the profit margins required, and the levels of public subsidy (see CPRE, 2014b; Monk et al., 2013), but unless agreement can be reached by all stakeholders involved, sites will not be developed.

**Figure 16. Conditions affecting brownfield development**



### 3.2 Market drivers and barriers

- 3.2.1 **Developers are seeking to make a profit on housing on brownfield sites**, so, in general, green-lighting development comes down to simple supply and demand. If the perceived value of a development (including profit) is less than anticipated costs for that site, the site will remain vacant or under-used for the foreseeable future. This will only change if there is some means of creating a surplus of value

over costs. Clearly, planning and regulatory mechanisms, including 'market enhancement' schemes can affect where the line is drawn in terms of 'viability', but ultimately developers are seeking to return as healthy a profit as is possible. In buoyant times PDL 'stalls' less frequently, and there is a quick turnover in viable sites. Hardcore sites may still need some public sector intervention.

- 3.2.2 Currently, **the PDL market in England is very uneven**, as the data in Part 2 showed. In much of London and the Greater South East brownfield sites are being developed continually, and there is also a lot of land with planning permission ('under development'). Generally in the two Midlands regions, Yorkshire and the Humber and the two Northern regions the market is weaker, and there is a lot of land available, including hardcore sites. Yet, within regions, cities and towns, markets vary, leading to a range of 'hardcore', 'stalled', and 'under development' sites in most places.
- 3.2.3 There is no doubt that **the recession hit PDL recycling rates**. The funding available for hardcore sites reduced, as public finances were squeezed, and a large number of previously viable sites stalled. Volatility in the market, lack of access to funds, and increased risk caused land owners and developers to postpone or abandon development plans.
- 3.2.4 In addition, following the introduction of the NPPF a perceived 'window of opportunity' was created for developers to gain permission on more greenfield sites, due to a lack of adopted Local Plans in some areas, and lack of clarity over housing allocations in others (CPRE, 2014a). The **increased availability of greenfield sites** has affected the viability of brownfield developments in some local authorities, but not in others (CPRE, 2009).
- 3.2.5 In some cases, **developers are also holding on to brownfield sites in anticipation of higher profits in the future**, or of changing planning designations, or because they want to keep completion figures at a rate they judge to give optimum returns (Adams and Leishman, 2008; Monk et al., 2013). Land bought at the height of the market, before the recession, is often not viable to develop now, or would garner smaller profits than hoped for. In other cases, **companies with large land portfolios are phasing developments over long time periods** to maximise profits and reduce their exposure to risk (*op cit*). This said, developers incur costs in holding on to land too, so **quick and profitable disposal of sites remains a driver for them**.

3.2.6 Government's response to the 'market failure' to provide enough housing has been largely to free up planning requirements and to introduce a number of policies and regulations that act, to varying degrees, as '**market enhancement mechanisms**' (see below). These mechanisms are trying to move the 'viability' line for developers by reducing the costs, or simplifying the processes, around their contribution to 'public goods' such as infrastructure, open space, social housing and so on. Yet, planners have a responsibility to ensure developments are of a high quality, are safe, and well served by amenities (see below). Other market enhancement mechanisms seek to increase demand (e.g. from first time buyers), directly reduce anticipated costs, or both. In many of the incentive schemes, local authorities are required to share or modify the costs/and or risks, or enhance the market values likely to be achieved.

### 3.3 Planning and regulatory drivers and barriers

3.3.1 Planning and regulatory systems, including the use of taxes and other fiscal incentives, create the environment in which development does or does not take place. Greenfield sites are usually easier and cheaper to build on, so when the planning system is 'open' to approving development on greenfield sites, they will be favoured. Conversely, if greenfield development is constrained by planning regulations, or if brownfields are made more attractive, due to incentives or reduced costs, then developers may target brownfields. On the whole, the past 50 years has shown house builders prioritising greenfield sites, but developing on brownfield, and adapting to different housing types (e.g. flats) as the planning regime has shifted.

3.3.2 The **removal of Regional Spatial Strategies** now means that, outside London, there is almost no regional or strategic planning for housing land. The Localism Act introduced a '**duty to cooperate**' on local planning authorities, on strategic issues, which can include housing land supply, and Green Belt protection, to encourage cross-authority co-operation. However, this is not happening effectively across England at the current time. The potential for joint plans is not being maximised, and this is hindering land being identified for housing. A recent international review found that England was the only one of the 24 countries reviewed that had no strategic layer of planning between central and local government (Monk *et al.*, 2013).

3.3.3 **Many local planning authorities are maintaining policies that seek sustainable development patterns, and protect the countryside**, but explicitly prioritising brownfield, even at a strategic level is becoming harder to do as Government resists a 'sequential' approach to allocating and developing brownfield land before greenfield (CPRE, 2014a and Part 4, below). In fact, only 27% of local planning authorities outside London have set local targets for the re-use of brownfield land (*op cit*). The NPPF makes clear that identified sites have to be 'viable' and 'deliverable'. These terms are debated, but tend to favour market housing by large developers on greenfield sites (*op cit*).

3.3.4 Currently, these mechanisms do not seem to be bringing forward a sufficient amount of new housing (HoC, 2014), and certainly not more brownfield development: more greenfield land is allocated now, than under the Regional Planning system (CPRE, 2014a). In addition, there is a lack of adopted Local Plans in many places. Just over half of all local planning authorities have Local Plans in place, and only two thirds will have by May 2015.

3.3.5 Local planning authorities also have fewer resources than before to undertake strategic brownfield development, and often lack the skills and staff capacity to take on a proactive role. In the past, English Partnerships and subsequently the HCA played a significant role in providing expertise, long term capacity to target sites and assemble land, and resources to directly prepare sites for development, or negotiate risk-sharing partnerships. In theory, local authorities can take on a similar role at the local level; in practice, they often lack the resources and expertise to be able to do this.

3.3.6 Within this broader planning context, however, the Government is increasingly keen to stimulate development. There are **a number of policies and mechanisms to increase delivery** (not all specifically on brownfield sites) as follows:

- **Community Infrastructure Levy (CIL) and Section 106.** Local planning authorities are able to capture some of the increase in land value generated by granting planning permission, by negotiating contributions from developers for public goods. The Community Infrastructure Levy (CIL) was introduced in 2010 to help streamline the negotiation and delivery of infrastructure, social housing and other amenities, and to overcome



some of the problems of Section 106 Agreements. CIL can be used to fund things like roads, flood defences, schools, hospitals, park and landscaping. Section 106 Agreements were criticised as lacking transparency and being complex and time consuming. CIL is applied at a more consistent rate, and should simplify project delivery.

However, any contributions paid by developers will affect profits, and in some cases can risk the viability of a project. In many instances developers and planners come to an impasse over such contributions, and in others developers can seek renegotiation once a project has started. Some local planning authorities (e.g. Birmingham and Wandsworth) and central Government (through other new schemes, such as LDOs, see below) are drawing back on CIL and Section 106 requirements, or have set lower rates of CIL in identified regeneration areas, in order to kick start development.

The risk in doing this is that the necessary infrastructure and other public benefits are not delivered, and the housing developments are poorer quality. Indications are that CIL works best in small settlements where its benefits are clear for the local community, but is less effective at streamlining the system for more complex PDL.

- **LDOs (Local Development Orders) and permitted development rights.** The Government is promoting the increased use of LDOs (a locally-led instrument, originally introduced in 2004) specifically in order to support brownfield development. Previously, they have been used mainly to deliver commercial projects. LDOs remove the need for planning applications to be made for specific types of development, and allow far more freedom for developers. They are also, in most cases, to be exempt from CIL or Section 106 agreements, although planners can still impose conditions on proposals. Government has introduced a LDO incentive fund to support new LDOs on large brownfield sites. Permitted development rights have a similar effect; both remove the need to apply for full planning permission for development, but PDRs are centrally imposed and apply across the country. They are being increasingly used for conversions between built uses, such as offices to residential, with further rights for the conversions of warehousing being proposed. Conversions taking place under PDRs are also exempt from CIL or Section 106 agreements, an issue which has caused particular controversy in London where a

considerable increase in land value has arisen from office to residential conversions.

- **CPO (Compulsory Purchase Orders).** CPOs can be used by local planning authorities to purchase land where development is desired, particularly on strategically important sites (DCLG, 2010). Because much land is held by organisations not intent on providing housing on it, local planning authorities can use CPOs to buy land, at a set price (which includes a level of compensation), to improve the supply of housing land. However, as with other mechanisms, CPOs are not widely used by local planning authorities, as they often do not have the resources to be proactive, and the CPO process can be lengthy and costly.
- **LEPs (Local Enterprise Partnerships).** LEPs are partnerships between local authorities and businesses. They work in collaboration to decide priorities for investment in buildings and infrastructure. So far, 39 LEPs have been established in England, with more coming on stream. LEPs have the scope to lever in money to their localities (e.g. through the Government's 'Growing Places Fund', launched in 2011, with £500 million available to enable the development of local funds to address infrastructure constraints and deliver homes and jobs). Currently, the major focus of LEPs has been on local economies, some via funding for Enterprise Zones. As the 'Growing Places Fund' is specifically designed to kick-start stalled developments, some LEPs have targeted brownfield sites, and some have included housing delivery in their schemes. However, most of our case study areas did not specifically mention LEP involvement in terms of partnerships for brownfield regeneration (see Section 4.5 below) which may suggest that there is more scope for them to become more involved.
- **New Homes Bonus.** This is a grant paid by central government to local authorities for increasing the number of new homes. It is based on the amount of extra council tax revenue raised for new-build homes, conversions and empty homes being brought back into use. There are also extra payments for providing affordable housing. The total budget for the scheme is £2.2 billion between 2011 and 2015 (funded from existing local authority grants). The idea is that local authorities can decide how to spend this increased revenue, and that these decisions will be taken in consultation with communities (DCLG, 2014c). This gives local authorities an incentive to be more proactive and positive about new homes.

There are concerns that local authorities in the South and South East have gained considerably from the New Homes Bonus in comparison with their Northern counterparts. The Public Accounts Committee questioned if the scheme was actually delivering more homes, and found that ‘So far the areas which have gained most money tend to be the areas where housing need is lowest. The areas that have lost most tend to be those where needs are greatest.’ (Public Accounts Committee, 2013)

- **Housing Zones.** In 2014 the Government announced plans for 30 Housing Zones (outside of London – London is already pushing forward with the scheme). Local authorities have to apply in partnership with private developers to central Government to participate (DCLG, 2014b). Thirty zones will be created with the capacity to develop, through a combination of long term investment funding, planning simplification (e.g. LDOs), local authority leadership, and brokerage support from central Government. Central Government is offering recoverable investment funding on these sites, and local authorities will have access to cheaper borrowing. It is probably too early to tell if these schemes will be successful. The Greater London Authority’s role in the scheme in London may help to address the lack of capacity within individual planning authorities to carry out strategic redevelopment using tools such as CPOs (see above); there are questions as to whether similar resources will be available outside London. Like ‘stand alone’ LDOs there is significant concern over the quality, sustainability and liveability of developments that may be delivered under these deregulated conditions.

3.3.7 Alongside these incentives, a number of policy and regulatory barriers also still exist to brownfield development. Generally, there is much **uncertainty within the English planning system, and the costs of obtaining permission and undertaking negotiations for development can be high.** Existing planning and regulatory designations on a site can add to uncertainty and risk, making it harder to bring forward for development. This is especially true of large complex sites, where such designations affect parts of the plot.

3.3.8 There are also often **mismatches in developers’ and planners’ objectives for sites.** For example, planners and community groups are keen to deliver a mix of uses on large sites to ensure long-term, liveable and

sustainable developments. However, developers often argue that this renders sites unviable. Another area of contention is over employment sites. Many developers are keen to see planners reallocate employment land, but planners are often keen to protect it for future employment use. There are also often disputes over types of housing required in planning (e.g. family housing versus flats) and the densities required by planning compared with developers’ preferences. These tensions are perhaps inevitable in a system where developers are prioritising profitability and planners have few effective mechanisms to achieve the full range of ‘public goods’ on a site.

3.3.9 But perhaps one of the most significant barriers to brownfield development is one that applies to all development generally – a distinct lack of incentives in the English system for local authorities to be proactive. In contrast to many other countries, English local authorities have few mechanisms (other than CIL, Section 106 or the New Homes Bonus) to retain and reinvest the added value of new developments. This lack of ‘local benefit’ partly explains the negative public reaction to almost all new development proposals in England.

### 3.4 Site condition drivers and barriers

3.4.1 Some sites, particularly hardcore sites, are **difficult to develop because of their physical characteristics.** They may have poor conditions, such as ground instability, e.g. from mining, poor drainage, difficult topography or levelling issues. Many ex-industrial sites may also be contaminated, contain derelict buildings and other structures, or pose a risk to health. Some sites **lack any infrastructure**, for example, for water, drainage, power, communications, or access (Bury Council, Brownfield Land Strategy, 2010). Such sites may never be viable for housing because the costs of getting them ‘shovel ready’ are too high. For most urban PDL, however, this can be remedied by investment in transport and other infrastructure to provide adequate connectivity. Such infrastructure investment can be used as a driver for development, making sites viable for the private market.

3.4.2 A further complication, and additional barrier, is that urban brownfield sites are often owned by multiple individuals, companies, trusts and so on, or are under restrictive covenants of some type. In these cases, assembling land to bring forward for development can be complex and time consuming involving

negotiations with numerous stakeholders. In many cases this can take a decade or more, and involve thousands of separate negotiations. As stated above, most local planning authorities have little expertise or

capacity for this type of activity. This is another area which the Government’s Housing Zones initiative may help to address (see Section 3.3 above).

**Table 8. A summary of drivers and barriers for brownfield development**

Drivers	Barriers
Market conditions	
<ul style="list-style-type: none"> <li>● <b>Site viability:</b> high value/low costs = acceptable profit margins</li> <li>● <b>Strong housing market</b> (in some places/regions)</li> <li>● <b>Revenue flows:</b> developers want quick turnover (on some sites)</li> <li>● <b>Costs/risk borne or shared across agencies</b> (see mechanisms for doing this below)</li> <li>● <b>Targeted funding</b> (e.g. Growing Places Fund, New Homes Bonus)</li> </ul>	<ul style="list-style-type: none"> <li>● <b>Site not viable:</b> low value/high costs = unacceptable profit</li> <li>● <b>Expected higher profit for site in the future</b></li> <li>● <b>Cost of site preparation</b></li> <li>● <b>Cost of infrastructure provision</b></li> <li>● <b>Cost of contributions</b> (Section 106/Community Infrastructure Levy)</li> <li>● <b>Unavailability and/or high cost of finance</b></li> <li>● <b>Smaller developers/self builders etc. priced out of land market,</b> or unable to gain finance</li> <li>● <b>Available cheaper/alternative greenfield sites</b> (in some places)</li> </ul>
Planning, regulatory and conditions	
<ul style="list-style-type: none"> <li>● <b>Brownfield first/sequential approach</b> (in some places)</li> <li>● <b>Lack of alternative greenfield</b> (because of policy or location)</li> <li>● <b>Good supply of viable sites allocated for housing</b></li> <li>● <b>Available expertise and assistance in land assembly</b> (e.g. from local authorities or Homes and Communities Agency, HCA)</li> <li>● <b>Public investment</b> in land remediation, site preparation and infrastructure provision (see targeted funding, above)</li> <li>● <b>No (or uncomplicated) existing planning/regulatory designations</b> on a site: e.g. listed buildings, ancient monuments</li> <li>● <b>Streamlined planning processes</b> (Local Development Orders (LDOs), Permitted Development Rights, Housing Zones)</li> <li>● <b>Local partnership working</b> (e.g. Local Economic Partnerships)</li> <li>● <b>Tax relief</b> (e.g. Land Remediation Relief, applies to contaminated land and land derelict since 1998)</li> </ul>	<ul style="list-style-type: none"> <li>● <b>Available alternative greenfield sites, allocated for housing</b></li> <li>● <b>Not enough brownfield land identified/allocated</b></li> <li>● <b>Potential brownfield sites allocated for other uses</b> (e.g. employment, mixed use)</li> <li>● <b>Lack of information/data</b> on available sites</li> <li>● <b>Limited incentives</b> for local planning authorities to be proactive in land assembly/preparation/development (insufficient measures to capture value for local benefit)</li> <li>● <b>Limited resources</b> and expertise for local planning authorities to be proactive in land assembly/preparation/development</li> <li>● <b>Anti-development attitudes</b> from third parties</li> </ul>
Site conditions	
<ul style="list-style-type: none"> <li>● <b>Good location:</b> accessible/well connected</li> <li>● <b>Straightforward site</b> (e.g. not contaminated, and ‘shovel ready’)</li> </ul>	<ul style="list-style-type: none"> <li>● <b>Poor site conditions</b> (e.g. ground works, drainage, topography)</li> <li>● <b>Contamination</b></li> <li>● <b>Lack of infrastructure</b></li> <li>● <b>Poor (undesirable) location</b></li> <li>● <b>Owned by organisations/individuals not seeking to develop for housing</b></li> <li>● <b>Complex ownership</b></li> </ul>



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## PART 4

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**Brownfield development at the local level: how are local planning authorities performing?**



# PART 4

## Brownfield development at the local level: How are local planning authorities performing?

The previous part of the report set out the drivers and barriers to PDL in England. This part looks specifically at how local planning authorities are approaching brownfield development in the current policy and regulatory climate. It sets out the specific planning context in which local planning authorities are expected to identify and bring forward PDL, and then gives an insight into what is happening ‘on the ground’ through case studies of seven local planning authorities.

### 4.1 The national-to-local planning context: identifying and allocating land for housing

- 4.1.1 As stated above, incentives to promote the use of urban brownfield sites at the local level are now set within the context of the Localism Act 2011 and the NPPF (DCLG, 2012) which have changed the national system for producing planning policy documents. Local planning authorities are now required to produce a Local Plan that includes strategic policies, core strategy, land allocations, development management policies and proposals maps.
- 4.1.2 These documents must be backed up by a strong expert and local evidence base on local growth and housing requirements. This includes forecasts on economic growth and housing demand as well as the identification of land for development, produced through a statutory consultation process. The evidence base includes, for instance, the SHLAA, the Employment and Economic Land Assessment, a sustainability appraisal and other technical studies. As part of their preparations many local planning authorities have developed specific approaches to brownfield development that make best use of their PDL.
- 4.1.3 Some of the functions and strategic planning effectiveness lost at regional level have been replaced by the ‘duty to cooperate’, which was introduced to ensure that local planning authorities take responsibility for strategic planning decisions in partnership with other local planning authorities or public bodies in the preparation of the evidence base and their local plans. Serious questions as to the effectiveness of this duty have been raised across the planning and development sector.
- 4.1.4 In the process of setting their own housing targets and other developments, local planning authorities will continue to identify key sites in their Local Plan, further sites being identified through Site Allocations and Detailed Policies. This gives local planning authorities the opportunity to ‘encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value’ (NPPF, DCLG, 2012). However, local planning authorities have been put under pressure to not prevent development by requiring brownfield land to be developed before greenfield. They need to offer strong evidence (e.g. through the SHLAA or other supporting, and up-to-date, data), that they have an adequate supply of housing land at any time. As the case studies of Cheshire West and Chester and Crawley in section 4.5 below show, some local planning authorities are choosing not to make an allowance for small brownfield ‘windfall’ sites that come forward unexpectedly during the plan period, even when SHLAAs are indicating that such small sites are likely to come forward at a steady rate. This reinforces the concern that many small brownfield sites may go unidentified (Power, 2013).
- 4.1.5 Part 2 highlighted a number of shortcomings with the data collection for NLUD, in particular on land with the potential for redevelopment but still currently in another use (‘Category E’ land). The example of London shows that the potential of such land, while not possible to accurately measure through NLUD, is significant. In addition, Part 1 also showed that the current SHLAA process for identifying land suitable for housing does not provide sufficiently robust or consistent data on brownfield potential. It was partly for these reasons that the HCA spearheaded an initiative in the late 2000s to encourage more rigorous and fine-grained local approaches to identifying brownfield land, through ‘local brownfield strategies’. This section looks in more detail at attempts to get a more fine grained approach, looking at a number of local case studies of local brownfield strategies, including three local planning authorities (Durham, Bristol, and Cheshire West and Chester) assisted in the past by HCA to produce ‘local brownfield strategies’ to inform their local development frameworks.
- 4.1.6 One of the foremost purposes of the Local Plan is to show that it supports the delivery of housing targets, regardless of the type of land being redeveloped. This message has been reinforced by the Planning Inspectorate, for example in reviewing the Nottingham core strategy, when it stated: ‘*The NPPF does not specify a hierarchical approach giving priority to brownfield sites. Given the reality that some brownfield land will take time and extra finance to clear and make suitable for development, a priority system could cause unnecessary delay to meeting the pressing housing needs.*’ (The Planning





Eastmoor school site in Leeds

Inspectorate, 2014a). There have, however, been recent signs that the Inspectorate may be changing its approach. For example, the Inspector's Report into the Leeds Core Strategy (Planning Inspectorate, 2014b) agreed, albeit with some modifications, to the draft Policy H1 which set out both a local brownfield target and a sequential release of sites, prioritising development in identified regeneration areas.

- 4.1.7 In addition, the NPPF requires an additional buffer of 5% housing supply to be identified and where there has been persistent under-delivery this must be increased to 20%. Local planning authorities can take small brownfield and windfall sites into consideration in identifying land for housing over the whole local plan period, and Local Plans can be approved even where they do not identify land for housing growth in years 11-15 (this is the period which has proved most challenging for local planning authorities).

## 4.2 Protecting the Green Belt and greenfield sites

- 4.2.1 The reuse of brownfield sites by local planning authorities can be prioritised indirectly through the protection of the Green Belt within Local Plans. The NPPF states that 'The fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.' (NPPF, DCLG, 2012, para 79). The Green Belt also serves *'to assist in urban regeneration, by encouraging the*

*recycling of derelict and other urban land.'* (op cit, para 80). The NPPF is less clear, however, about the protection of greenfield land outside the Green Belt and nationally designated areas.

- 4.2.2 While the NPPF now enables limited infilling or redevelopment of PDL in the Green Belt, the development of undeveloped Green Belt land is still regarded as 'inappropriate'. Another opportunity for local planning authorities to protect urban greenfield land is given in the 2010 revised definition of PDL that removed private residential gardens from the earlier definition.

## 4.3 Neighbourhood Planning

- 4.3.1 The Localism Act has reinforced collaborative planning, introducing Neighbourhood Plans to give local communities new bottom-up powers to shape future development, in particular giving them a say where homes and shops should go. Neighbourhood Plans have to conform to national policies and the Local Plan. Hence, Neighbourhood Plans should not prevent new developments. In theory, however, Neighbourhood Plans can give communities an opportunity to unlock brownfield sites, thereby supporting strategies for regeneration, provision of local services, housing on vacant sites, preserving local greenfields and open land, or simply tackling brownfield 'eyesores'. Based on the experience of the case study areas set out in section 4.5, it does not yet appear to be the case that this potential is being realised, with the possible exception of Winsford in Cheshire.

## 4.4 Monitoring development

- 4.4.1 Local authorities' Annual Monitoring Reports have been abolished with the NPPF and with them the requirement to report on core output indicators. Formerly, the level of residential completions on PDL had been such a core indicator, due to the now abolished national 60% target for housing completions on brownfield land. Local planning authorities now need to produce an Authority Monitoring Report<sup>7</sup> annually to provide evidence on how they are performing against their key policy priorities. This is a move away from a consistent set of national indicators, to a system of reporting on local priorities. Hence the aforementioned decline of the NLUD.

<sup>7</sup> Some local planning authorities still refer to their returns as 'Annual Monitoring Reports' so this report uses AMR to describe both.

## 4.5 Case studies

4.5.1 The NPPF has been in existence since March 2012 and is a critical influence on local planning authorities. In addition, local planning authorities may or may not be using the special incentives and drivers to stimulate development outlined in Part 3. This section aims to consider the degree to which local planning authorities are applying the fine grained, rigorous approach to brownfield development within this context.

4.5.2 The next section sets out the findings of a review of seven local authorities' approaches to brownfield development, identifying the opportunities and

challenges they have encountered in identifying and bringing forward PDL. The case study authorities, and their key geographical, demographic and land use characteristics are set out in Table 9. Figures for permanent dwellings started and completed (by tenure) in 2012-2013 and 2013-2014 in the case study authorities are set out in Table 10 and Table 11.

4.5.3 The accounts provided in this section are based on the case study interviews with local authority officers. The views given within them are those of the officers rather than of CPRE or UWE. The methodology for the case studies is set out in Appendix C.

**Table 9. Case study characteristics**

Local authority, region	Rural Urban (ONS, 2011)	Population (2011)	Population projected 2026 (unless stated)	Green Belt characteristics	Housing target over plan period	% Residential completion on PDL	Ratio of median house price to median earnings 2013
London Borough of Barnet, London	Major urban	356,400	384,000	37% Green Belt and metropolitan open land	22,550 (2021) 33,500 (2026)	100% (2008-09)	10.88
Bristol City Council, South West	Large urban	421,300	519,800	5.5% but most Green Belt lies within neighbouring authorities	Minimum 26,000 but envisaging 30,600 (2006-26)	95% (2000-10)	6.24
Cheshire West and Chester Borough Council, North West	Significant rural	329,000	364,600 (2031)	Covers 42% of borough	22,000 (2010-30)	81% (2012-13)	6.40
Crawley Borough Council, South East	Other urban	108,971 (2013)	111,900	Little land falling outside built area	4,950 (2015-30)	76.6% (2006-12)	6.22
Durham County Council, North East	Rural – 50	506,000 (2009)	501,600	5.33%	30,000 (2011-30)	N/A	4.38
South Cambridgeshire District Council, East of England	Rural – 80	146,800	176,500	25%	19,000 (2011-31)	21% (2013)	7.97
Worcester City Council, West Midlands	Other urban	90,500	101,400 (2021)	7.2%	9,400 (2013-2030)	82% (2009-10)	6.61



**Table 10. Permanent dwellings started and completed, by tenure and local authority, 2012/13 (Source: DCLG, 2014d)**

Lower and Single Tier Authority Data	Dwellings started				Dwellings completed			
	Private Enterprise	Housing Association	Local Authority	All	Private Enterprise	Housing Association	Local Authority	All
(England)	81,980	19,930	1,610	103,520	84,550	22,060	1,360	107,970
Barnet	400	450	0	850	1,200	520	0	1,720
Bristol, City of	–	–	–	–	620	240	70	930
Cheshire West and Chester	120	0	0	120	170	10	0	180
Crawley	40	70	0	110	40	10	0	50
County Durham	400	50	0	450	360	70	0	430
South Cambridgeshire	510	90	0	600	490	160	0	650
Worcester	120	50	0	170	240	120	0	360

**Table 11. Permanent dwellings started and completed, by tenure and local authority, 2013/14 (Source: DCLG, 2014d)**

Lower and Single Tier Authority Data	Dwellings started				Dwellings completed			
	Private Enterprise	Housing Association	Local Authority	All	Private Enterprise	Housing Association	Local Authority	All
(England)	106,820	24,990	2,130	133,940	89,700	21,770	900	112,370
Barnet	850	480	0	1,330	1,120	370	0	1,490
Bristol, City of					770	100	10	880
Cheshire West and Chester	530	0	0	530	180	0	0	180
Crawley	70	50	0	120	60	70	0	130
County Durham	–	–	–	–	–	–	–	–
South Cambridgeshire	500	140	0	640	500	100	0	600
Worcester	160	40	0	200	150	70	0	220

# London Borough of Barnet

## 4.6 Case study: London Borough of Barnet

### Context

- 4.6.1 With a population of 356,400 (2011) projected to rise to 384,000 by 2026 the London Borough of Barnet (LBB) is the most populous borough in London. LBB is part of the North London housing sub-region that informs the London Plan through Strategic Housing Market Assessments. The 2050 London Infrastructure Plan set LBB the challenge of meeting the fourth highest housing figure in London: 22,550 new homes by 2021 and 33,500 by 2026 (targets to be revised in 2015/16).
- 4.6.2 Barnet had the 4th highest level of net housing completions in London in 2012/13 and the ratio of median house price to median earnings (10.88 in 2013) is well above the English average of 6.71, demonstrating the high demand for housing in the area and the resulting impact on lower paid workers.
- 4.6.3 In response to the 2008 economic downturn, LBB started to address its housing investment model to rely less on public investment in housing. Its 2010-2025 housing strategy refers to joint venture vehicles, special purpose or local asset backed vehicles and working with institutional investors to develop new and high quality private rented housing (LBB, 2010a).

### Key features of brownfield strategy

- 4.6.4 Following on from its 2004 core strategy's 'Three Strands' approach of protection, enhancement and growth, in 2010, LBB adopted a new emphasis of 'Protect, Enhance and Consolidate planned and pipeline Growth' (PECG).
- 4.6.5 The priority for LBB's development strategy is to address its housing needs through the use of PDL and the protection of the Green Belt supports this strategy. As part of identifying further development locations for its Local Plan, Barnet's site allocation document will be informed by a call for sites in the next few months. Exploitation of PDL will be maximised through a range of policy mechanisms including promoting mixed use development of PDL in the major growth areas, encouraging proposals that make best use of PDL to reduce pressure on Green Belt sites, planning higher density in PDL in four priority town centres in the western part of the borough and in other identified locations that are accessible by public transport. In 2008/09 100% of new homes in Barnet were built on PDL (but since 2011, Barnet stopped using this indicator in its AMR).
- 4.6.6 Given its high housing targets, LBB has developed a strategy that identifies large sites, hence the borough does not rely on windfall sites as most housing is planned and is part of large regeneration schemes that are already identified. As a result, LBB does not anticipate using LDOs. LBB planners also do not feel they have the expertise to use them.
- 4.6.7 One key area of regeneration with higher housing density in LBB is Colindale. In 2010, LBB adopted the Colindale Area Action plan, providing a framework for the redevelopment of the Colindale area, an Opportunity Area identified in the London Plan for a minimum delivery target of 10,000 homes and 500 jobs. The local authority has made use of central Government funds to speed up the regeneration of major housing estates. In Colindale, this means bringing forward the demolition of the 1970s central concourse block in Grahame Park, by three years, and building new homes with higher density and commercial space. Colindale will make the largest contribution to LBB's 2025 housing targets.
- 4.6.8 Other key strategic regeneration areas include Mill Hill East, with the creation of Millbrook Park (a scheme of 2,170 new homes) and Brent Cross-Cricklewood, a mixed use, metropolitan town centre with substantial residential, commercial and retail uses. Other strategic developments include the priority estates of Dollis Valley, Grahame Park, Granville Road, Stonegrove and Spur Road, and West Hendon, with targets to deliver the 'Decent Homes' standard, offer a broader range and variety of accommodation, and integrate the estates into their surrounding areas.
- 4.6.9 In terms of delivery, LBB has added nearly 10,500 new dwellings to the housing stock since 2004 (16% houses and 84% new flats). New build accounts for 76% of new homes and conversions for 17%. So far only 4% of new homes have been created through change of use, but this is likely to increase with the relaxation of the Use Classes Order in May 2013 allowing more offices to be converted for residential uses.
- 4.6.10 Green Belt policy in Barnet is part of the strategy to maximise brownfield reuse. The Green Belt and Metropolitan Open Land account for nearly 37% of the Borough's land area, and are seen within a broader sustainable spatial framework in which urban sprawl must be contained and green infrastructure used to reconnect natural and built environments. An example is the importance given to strategic



Metropolitan Green Belt near Barnet

walking routes to improve access to open space. In a challenging environment, there has been no loss of Green Belt or Metropolitan Open Land in Barnet in 2012-13. In addition, the pre NPPF inclusion of gardens in the PDL definition was seen to be controversial, and their removal from the definition seems to have resulted in fewer applications coming forward for housing in gardens.

- 4.6.11 Altogether, continued protection of Green Belt and Metropolitan Open Land is part of LBB's agenda for 'place shaping' and delivery of a substantial number of new homes by 2029. The 2012-13 AMR identified, in detail, the five year (2014-2019) supply of deliverable land for housing and illustrated clearly the reuse of a variety of PDL across Barnet for its extensive housing development plans. To deliver housing development on brownfield land requires key local partnership activities. As the 2012-13 AMR states: *'The five year supply reflects local knowledge of housing delivery including discussions with regeneration partners and developers'* (LBB, 2013) (see below).

#### **Community engagement and partnerships**

- 4.6.12 The various stages of local plan making offered an opportunity for organisations and individuals to suggest land or buildings within Barnet for development or for change of uses, but such opportunities apply both to greenfield and brownfield sites. The major

housing schemes in the borough are already in regeneration areas that will be subject to statutory consultation. Key partners for planners are 'town teams' made up of local businesses, residents and other town centre interests, as well as developers (for instance North Finchley Town Team, Cricklewood Town Team, Chipping Barnet – Spire development framework).

- 4.6.13 The most recent search for regeneration partners was launched in July 2014 to develop one of London's largest brownfield development opportunities, the Brent Cross Cricklewood South site, which has a capacity for 7,500 new homes. The whole regeneration area has the potential to support up to 20,000 jobs in 450,000 m<sup>2</sup> of commercial space. Outside regeneration areas, the impact on infrastructure limits the interest and enthusiasm of residents in identifying more brownfield sites. Meanwhile Neighbourhood Planning is an emergent process in Barnet. The Council had received expression of interest in Neighbourhood Plans in Mill Hill, West Finchley and Childs Hill.

# Bristol City Council

## 4.7 Case study: Bristol City Council

### Context

- 4.7.1 Bristol is one of the eight core cities in England and the largest city in the South West, with a population of 421,300 projected to grow to 519,800 by 2026. Most of the Green Belt surrounding Bristol lies within the neighbouring local authorities. The 5.5% of Green Belt within Bristol's boundaries covers small areas on the east, south east and south west boundaries.
- 4.7.2 Bristol's economy has performed well in the past fifteen years with Gross Value Added per head above the national average. The city centre is the largest employment area in the sub-region. With a thriving economy, sufficient identified sites and an expectation of windfall sites, Bristol City Council (BCC) is relatively confident it can deliver 30,600 homes by 2026, helping to improve affordability in the city.

### Key features of brownfield strategy

- 4.7.3 The vision within the Local Development Framework's 2011 core strategy, reasserted in the Local Plan, is to create balanced urban communities that are accessible and offer facilities and services. Given the city's scarce land resources, development is prioritised on the many available brownfield sites.
- 4.7.4 Residential completions on PDL exceeded 95% between 2006 and 2013. In addition, the level of identified sites and the contribution from small windfall sites (4,200 houses estimated from windfall) give reasonable prospects that 30,600 homes can be delivered within the built-up area primarily from PDL and some redundant open space. Between 2006 and 2013, 277 dwellings were completed on 4 major greenfield sites with a capacity for 50 or more dwellings, including 101 dwellings at the former Hewlett Packard site at Romney Avenue, Lockleaze.
- 4.7.5 A LDO has been used once in the past within an Enterprise Zone, but BCC has no plans to use LDOs for housing in the short term. From a policy perspective, one planner commented that *'the NPPF has not had much impact one way or another on BCC's approach to brownfield development. Sites that come forward are PDL: residential completions are high'*.
- 4.7.6 One area where the impact of NPPF has been felt, however, is the removal of private residential gardens from the definition of brownfield. This change has resulted in a lower number of housing completions on PDL since 2010/11 compared with previous years.
- 4.7.7 To encourage the effective use of land, BCC's planning policy encourages relatively high densities, depending mainly on the level of accessibility to employment opportunities, services and other facilities. BCC's modelling suggests that most areas of the city have good accessibility to these uses by public transport, walking and cycling, and it seeks a minimum indicative net density of 50 dwellings per hectare. Lower density development can occur only where it is essential to safeguard the special interest and character of the area. Since 2006, the average net density achieved on large PDL sites has been 210.9 dwellings per hectare (compared to 63 dph on greenfield sites). In addition, BCC works towards a mix of uses (local services, facilities and centres) to enable thriving communities.
- 4.7.8 An example of BCC working towards promoting the delivery of a mix of uses across new developments, while securing Bristol City Centre's housing needs, is the Finzels Reach site. Planning policy on mixed development in Bristol City centre highlighted the need to incorporate housing in order to meet housing need in the context of limited PDL supply. In 2012, the 'Get Britain Building Fund' also shortlisted the stalled Finzels Reach housing project for a loan.
- 4.7.9 Wapping Wharf is another example of site that stalled because of a lack of loan finance. The site benefited from £12 million from the Government's 'Get Britain Building' fund. Up to 200 homes should be built by 2015 with the overall project aimed at delivering 625 homes, a hotel and retail and office space.
- 4.7.10 Yet current pressures on housing require a contingency plan. Some areas of redundant open land will be brought forward for essential development. Green Belt use is considered by the Council to be a credible long-term option for expansion. It is very much part of the Council's housing strategy, in particular if monitoring of housing need and demand, and economic growth, show that planned provision will not be delivered at the levels expected, or if land is required to accommodate more homes. Evidence to the core strategy showed, however, that only a small proportion of the Green Belt land in southwest and southeast Bristol will have any practical potential for development (i.e. it can only accommodate 1200 homes).
- 4.7.11 Furthermore, the Green Belt plays a strategic role in containing the outward expansion of Bristol, providing a green setting for the city and focusing attention





Developing the Finzels Reach site in Bristol City Centre

upon the regeneration of PDL in the urban area. Planners also recognise the role of the city's green infrastructure, notably in food production and community assets.

- 4.7.12 In addition, an urban space policy sets out the approach to protect urban spaces in the inner city. Land has been allocated for employment, industrial and warehouse uses, and currently there are no such allocations on greenfield land.

#### **Community engagement and partnerships**

- 4.7.13 Consultation and partnerships at strategic and development management levels abound in Bristol, albeit not exclusively on brownfield sites. The adopted site allocation involved individuals, organisations and parties with an interest in developing land, and who provided local knowledge and expertise, and discussed alternatives.

- 4.7.14 In 2010, a consultation exercise saw more than 5,000 responses including an estimated 2,400 visitors to 18 drop-in events. This led to potential options for 119 sites in 14 neighbourhoods. But while brownfields can be suggested for development, planners highlight this is very different to them actually being developed.

- 4.7.15 Many potentially developable housing sites in Bristol have been identified in the SHLAA, in consultation with other local planning authorities, West of England

Housing Market Partnership (Bath and North East Somerset, Bristol, North Somerset and South Gloucestershire Councils), the Local Enterprise Partnership (West of England Partnership), and stakeholders including from the development industry. The West of England Strategic Housing Market Assessment (WESHMA) is part of the evidence base used by the four unitary authorities to address the supply of housing in the West of England. The West of England Economic Partnership (WEEP) has a vested interest in promoting the West Country construction sector, which it identifies as key to the sub-regional economy, but accepts that the sector is challenged by stalled sites currently. WEEP has invested in work to focus funding bids, and redesign schemes. It has also investigated s106 renegotiations in the past to enable work to begin and contribute to local planning authorities' efforts to deliver mixed use developments.

- 4.7.16 Five designated Neighbourhood Forums are at the preparation stage of their Neighbourhood Plan, but no generalisation can be made on whether communities are eager to bring forward PDL or not.

- 4.7.17 In the future BCC intends to review its property assets, exploring possibilities to maximise their value. It could consider disposal of land to deliver these objectives with the HCA bringing expertise on 'hardcore' sites.

# Cheshire West and Chester

## 4.8 Case study: Cheshire West and Chester

### Context

- 4.8.1 With over 329,000 inhabitants, the Borough of Cheshire West and Chester (CWBC) lies between Manchester and Liverpool, relying economically partly on these two urban centres. The area includes urban centres, Chester, a key centre for employment, retail, education and tourism, Ellesmere Port and Northwich, and large rural settlements mainly adjoining the North Cheshire Green Belt (which covers 42% of CWBC).
- 4.8.2 A third of the CWBC's residents live in the rural area that runs from Neston in the north, which borders Wirral, to the boundary with Shropshire in the south. The network of settlements that provide rural residents with services and facilities might define the character of the borough but some rural settlements are effectively dormitories dependent on larger towns for employment opportunities. Pockets of deprivation are concentrated in Ellesmere Port, Chester, Winsford and Northwich. Although agriculture employs few people, it makes a very significant contribution to the character of the borough, habitats and the environment.
- 4.8.3 The key long term economic issue is an ageing population and a decline in the working age population.

### Key features of brownfield strategy

- 4.8.4 The Cheshire West and Chester Local Plan 2030 is currently at the main modifications stage subject to sustainability appraisal and full public consultation following Planning Inspectorate review. Overall, the Council aims to strike a balance between the overall strategy to concentrate most new development in the borough's urban areas, and allowing the managed growth of rural towns and key settlements. The borough's PDL strategy is framed to support both sustainable development and to protect its Green Belt.
- 4.8.5 PDL is mainly identified and managed by what it sees as 'good urban policies'. Sustainable development for instance is supported through a range of principles that enable the best use of PDL. This includes locating the majority of development within, and on the edge of, the main urban areas and key service centres (i.e. city of Chester and towns of Ellesmere Port, Northwich and Winsford), to maximise the use of existing infrastructure, and provide for mixed-use developments.
- 4.8.6 The 2013 AMR showed that a total of 4,803 properties were vacant in 2013 in Cheshire West and Chester, of which 2,133 were vacant for 6 months or longer.
- The Council does not rely on windfall sites for its strategy nor on LDOs. One planner commented that *'...windfall sites are not guaranteed anyway, we try to work without them. As for LDOs they might be useful, but are probably more useful for Neighbourhood Plans than for us. If we get our Part 2 site allocations right, then there should not be a need for LDOs, so they have not been looked at'*.
- 4.8.7 In CWBC, biodiversity might be an obstacle to reusing PDL sites for housing. Improvement of biodiversity can be, for instance, the result of soft end-use reclamation projects. Between 2008 and 2011, the REVIVE project funded by the North West Development Agency in collaboration with CWBC transformed an 8.6ha disused railway line into 'Mickle Trafford Greenway' to provide attractive pedestrian, cycle or horse access to Chester. REVIVE worked to reclaim other brownfield sites in the area, including former landfill sites and a former glue factory, and turned them into meadows, footpaths, cycleways and safe public open spaces.
- 4.8.8 In terms of Green Belt planning, the Council would prefer not to release the Green Belt surrounding Ellesmere Port, because it has PDL available with planning permission within the town. Indeed the level of housing completions on PDL was 81% in 2012/2013 compared with 75% in 2011/2012. However, the Council feels that the NPPF does not allow it to make PDL a priority anymore. The planning inspector recently reviewed the Local Plan and required the Council to 'water down' its brownfield policy. One planner commented *'In theory, the NPPF has limited what we used to do. We cannot write the PDL policy as strongly as we used to do.'*
- 4.8.9 However, it remains that the Council needs to deliver 22,000 new homes between 2010 and 2030. This will require, in the current view of the Council, exceptional and targeted Green Belt release.
- 4.8.10 The Council is committed to maintaining the general extent and character of the North Cheshire Green Belt and Cheshire countryside by minimising the loss of greenfield land and high grade agricultural land, in particular protecting the strategic gap between Chester and Ellesmere Port as well as the character of Chester and the surrounding villages. Across the borough some large developments have been identified as Major Developed Sites in the Green Belt. However, as mentioned above, while the Local Plan aims to maximise the use of brownfield land, with over

60% of new housing anticipated to be delivered on PDL, some release of greenfield sites will be required, especially within rural areas. Furthermore, planners are mindful that the NPPF considers the redevelopment of PDL within the Green Belt as appropriate where there is no significant impact on openness. It is compounded by the facts that the SHLAA itself also identified a declining supply of brownfield sites and that the Strategic Housing Market Assessment highlighted the significant need for affordable and family housing in the city. In 2012/13, 170 affordable dwellings were delivered compared to an annual requirement of 1,296 for CWBC. The changing student accommodation offer in Chester has also reduced the supply of sites available for general housing, although it is accepted the student accommodation does contribute to meeting wider housing needs.

#### Community engagement and partnerships

4.8.11 The Council is committed to local decision making and engages with stakeholders and communities to shape and manage development through feedback on the Local Plan. In this process, people have identified new sites.

4.8.12 To support the delivery of housing, the Planning Delivery Team tries to build good working partnership with developers, liaising with them to understand the problems they face in the current market conditions and why developments are stalling. A recurrent issue in the AMR is site viability, and CWBC is looking into how to address this, particularly in relation to deferred planning obligations.

4.8.13 In addition, development that meets local needs can be brought forward through Neighbourhood Plans and other mechanisms. There are currently in the order of 20 communities within the borough that are preparing Neighbourhood Plans and another ten communities considering preparing one. So far one Neighbourhood Plan has been adopted (or 'made', Tattenhall).

4.8.14 It is still difficult to evaluate whether local residents or stakeholders will bring forward PDL. Winsford Town Council actively pursued opportunities to support the development of PDL but as the area has a fairly low proportion of available brownfield sites, the Winsford neighbourhood plan has also allocated greenfield sites. In the past the process was '*...mainly landlords putting forward their own sites rather than local people putting other people's sites on the (SHLAA) list*'. But there is now '*enthusiasm from local people to redevelop sites because they are eyesores*'.



4.8.15 The Council supports neighbourhood groups, but resources are limited and the level of contacts varies from one group to another. Usually Parish or Town councils lead with local residents involved. Awareness around brownfield sites is assisted by semi-independent regeneration teams working with the Council. As one planner commented, '*they talk to businesses and landowners, and do profile-raising about brownfield sites*'.



# Crawley Borough Council

## 4.9 Case study: Crawley Borough Council

### Context

4.9.1 Crawley borough (108,971 inhabitants in 2013) in West Sussex lies between London and the South Coast. Its administrative boundaries are drawn tightly around the town itself, with very little land falling outside of the built up area. Gatwick Airport is located within the borough to the north of the town, with the land between the town and the airport heavily constrained by noise and, potentially, by the future development of the airport. Regeneration priorities include redeveloping and revitalising the Town Centre and the Manor Royal Business District.

4.9.2 Crawley Borough Council's (CBC's) Local Plan 2015-2030 is currently at consultation stage and makes provision for the development of a minimum of 4,950 net dwellings in the borough between 2015 and 2030. There are few brownfield sites in Crawley. It is part of the Northern West Sussex Housing Market area, alongside Mid Sussex and Horsham District Councils that identify housing demand in the sub-region. Various assessments in the SHLAA and other housing market assessments since 2009 show that the town of Crawley itself is part of a strong and focused primary housing market (evidenced in market price, sales and rental data) centred on the M23/A23 corridor. A recent housing market analysis highlights the effects of London's population growth and unmet housing needs spilling over into Northern West Sussex (Chilmark Consulting, 2014).

### Key features of brownfield strategy

4.9.3 The current Core Strategy sets a target of 60% of new homes to be built on PDL from 2006 to 2018. This target will be superseded by the Local Plan which identifies a range of sites for housing but with no PDL target. However, several spatial policies, including sustainable development, housing, and town centre policies, actively promote the use of PDL within the Local Plan.

4.9.4 The regeneration of PDL is secured through positively considering proposals for housing on brownfield land, and working to overcome constraints wherever possible. The plan ensures that houses will be built in locations that respect the town's unique development and design principles and preserve the most valued of the town's environmental features. Amongst other design priorities encouraged to create a good living and working environment are mixed-use development, supporting Crawley's role as a vital sub-regional centre, facilities for new and existing residents, and links

between different areas of the town centre.

Altogether, this compact city approach promotes high density within the boundary of the built up area while avoiding over-development or unacceptable impacts on the planned character of existing neighbourhoods.

4.9.5 In 2012/13 the average density for all completed developments was 48.1dph while the current Core Strategy aims to ensure the efficient use of land and requires residential development to be a minimum of 30dph. The majority of the new completed dwellings are in highly sustainable locations.

4.9.6 The focus on a sustainable development approach, combined with the key priority for CBC to demonstrate the soundness of its Local Plan, and to show it can deliver its housing target, has led to its 'supply-led' approach to housing land. This means that all reasonable opportunities for development are considered, not only on PDL. Town centre living is supported, but some areas of open space may need to be developed for housing.

4.9.7 Between 2012 and 2013, 74.1% of new and converted dwellings were built on PDL (a reduction from 2008-2012 figures of between 82.4% and 86.9%). In addition, 93% of employment floor space (from mixed use, general industry, storage and distribution) was on PDL between April 2012 and March 2013. Unfortunately within the current economic context, housing delivery stalled in 2012/13 with the Council anticipating a similar situation in 2013/14 and recovery in the following years, as the North East Sector development (Forge Wood) is anticipated to start on greenfield land. The Council also anticipates a need to bring forward additional sites. The supply of affordable housing does not meet total demand, but the Council is relying on development on both greenfield and brownfield land at Kilnwood Vale to contribute to this shortfall, as well as working with social landlords and developing its own schemes to bring forward new housing.

4.9.8 A successful brownfield approach for development in Crawley will require some flexibility in the Council's discussions with developers.

4.9.9 Viability testing showed that all greenfield sites are viable for landowners and developers across the entire plan period, while the delivery of a small number of brownfield sites may require landowners to be realistic about value reductions to take account of greater development costs. The Council may need to marginally reduce affordable housing aspirations to encourage





Greenfield land at Kilnwood Vale

development in the short term. Crawley Borough Council does not rely on windfall sites, although they have consistently become available historically. The SHLAA has anticipated that a total of 645 dwellings (at a rate of 43 dwellings per annum) will come forward through windfall sites in the plan period.

#### **Community engagement and partnerships**

4.9.10 The overall policy is that local communities will be directly involved in planning how the town grows in order to achieve the best outcome for all concerned; particularly where difficult choices have to be made. Neighbourhood groups will continue to feature in the development of the town, recognising the important role they play in helping shape and develop communities. A number of stakeholders are also involved in a 'Town Centre Working Group'.

4.9.11 To identify sites across the borough, the Council initially undertook the SHLAA internally, in liaison with its Northern West Sussex Housing Market partners, i.e. the neighbouring authorities of Horsham and Mid Sussex District Councils. To inform housing studies and test the assessment findings, consultation was sought from a broad range of stakeholders including national agencies, house builders and the Home Builders Federation, estate agents and planning consultancies, local community groups as well as major land owners within the borough.

4.9.12 In its latest consultation exercise, respondents challenged the council to be more creative in how it identifies land for development, for instance using empty office blocks in and around the town centre, looking outside the boundary of the town, or making better use of brownfield sites. Through consultation people clearly articulated how much open green space means to them; not just from an environmental perspective but also for the impact it has on their health and wellbeing, and its contribution to the town's character.

# Durham County Council

## 4.10 Case study: Durham County Council

### Context

4.10.1 Durham County Council (DCC) is the largest local authority in the North East Region, home to around 510,800 people (2010). The economic history of the county has generated a spatially fragmented area of around 250 settlements spread across a large geographical area from the North Pennines to the North Sea Coast. The County includes villages, 12 main towns, and the Durham City World Heritage Site, an important population, employment, tourist and university centre. The County also has much fertile farmland, remote moorlands and pastoral dales. Durham's housing is characterised by accessible and desirable residential areas as well as some of the most deprived communities in the country. Durham County Council (DCC) aims to create 23,000 new jobs in the County by 2030, and to prioritise new development in the 12 main towns.

### Key features of brownfield strategy

4.10.2 The County Council's rationale is to build on Durham City's strength so that it can play an important economic role both in County Durham and the region. As part of its strategy, the Council plans to build 30,000 homes (2011-2030). It has a focus on sustainable development that would indicate a preference for PDL, but this is weighed against the Council's approach to biodiversity and Green Belt. The Council has stopped reporting on PDL development in its AMRs.

4.10.3 Policymakers in DCC strongly value the fact that brownfield sites can support an extremely rich diversity of wildflowers and animals, and contribute to the priority habitat Open Mosaic Habitats on Previously Developed Land. Hence PDL development will be subject to its contribution to biodiversity, potentially putting pressure its viability. PDL will be prioritised provided that the site is not of high environmental value. But if a site is developed, any significant biodiversity or geological interest will need to be retained, or incorporated into the development.

4.10.4 DCC also applies the Green Belt policy more flexibly for PDL in the Green Belt. While the construction of new buildings is regarded as inappropriate and will not be permitted, the policy leaves the door open to limited infilling or redevelopment of existing major developed sites within the limits of NPPF (i.e. when openness of the Green Belt is not compromised). The argument put forward is that the purpose of the

Green Belt is not to prejudice existing uses that bring jobs and prosperity, and that environmental improvements will result from the redevelopment of these sites.

4.10.5 Importantly, DCC is also confident that following an assessment of PDL within Durham City and the County, suitable sites have been allocated wherever possible as part of the Local Plan. The evidence base for the Local Plan identified a lack of deliverable and viable PDL to meet housing requirements. And while DCC's SHLAA does not include 'small sites' of under 0.4 ha in gross area, historic rates suggests that the amount of housing delivered on these small sites will be insufficient to meet the under supply, even if it is accepted that a number of these small sites will come forward, e.g. through windfall opportunities. Hence in the Council's view '*an absence of suitable, deliverable brownfield sites within Durham City necessitates the use of Green Belt land and demonstrates exceptional circumstances*'. (DCC, 2014).

4.10.6 Altogether the major drivers of the Green Belt review, and greenfield development, are held by the Council to be: the 'economic' element of sustainable development; the importance of fulfilling Durham City's potential as a regional economic asset for the benefit of the whole County; the delivery of the Strategic Employment Allocation; and the delivery of housing.

### Community engagement and partnerships

4.10.7 Community engagement and partnerships linked to brownfield take place within the statutory consultation framework for the Local Plan, including in the consultation exercises on the revision of the Green Belt surrounding Durham City.

4.10.8 At a strategic level, some people have voiced their concerns over the need to build new houses on the Green Belt. CPRE, for example, questioned the economic forecast that informed the 2030 housing targets, and argued that housing requirements should be based on an assessment including the functional city-regions of both Tyne and Wear and Teesside. A councillor also stated that '*the Green Belt is part of our wonderful heritage and environment, and the County Council should not renege on this legal and permanent protection against urban sprawl*', further arguing that the Council should focus on brownfield sites instead.



- 4.10.9 The City of Durham Trust also criticised the fact that the search for strategic housing sites was confined to an arbitrary 5km radius, inevitably meaning that Green Belt sites would be included, rather than assessing the broader travel to work area.
- 4.10.10 Fifteen neighbourhood areas have been agreed by the County Council with a further application pending, but as it is still early days in the process, no Neighbourhood Plan has yet been submitted.



# South Cambridgeshire District Council

## 4.11 Case study: South Cambridgeshire District Council

### Context

4.11.1 Fast growing South Cambridgeshire is a largely rural district that surrounds the city of Cambridge and comprises over 100 villages, none currently larger than 8,000 inhabitants. The district is surrounded by market towns just beyond its borders and, together with them and Cambridge, it forms the Cambridge Sub-Region. Around 25% of the district is designated as Green Belt. The district has significant areas of high quality agricultural land, mineral resources (e.g. sand and gravel aggregates) that require protection, and a limited supply of PDL available for development. Some brownfield sites may come forward, but result in the loss of employment sites and commercial properties. Old council housing is also being redeveloped for new housing. The district is in one of the driest areas in the country and planners are conscious that any proposed development must protect the district's land and water resources while making an efficient use of the land. Its economy relies on the clusters of high technology research and development in the Cambridge Sub-Region.

4.11.2 At strategic level, South Cambridgeshire Council is partner with Cambridge City Council, Cambridgeshire County Council, The University of Cambridge and the Greater Cambridge Greater Peterborough Enterprise Partnership in the strategic City Deal that aims to invest £500 million of public funding to support infrastructure and housing growth, as business leaders had identified a lack of housing and transport as a barrier to economic growth. The partners are also seeking another £500million from local sources.

### Key features of brownfield strategy

4.11.3 The core strategy and submitted 2031 Local Plan stipulate making efficient use of land, including through the reuse of PDL: it is a central element in the approach to delivering sustainable development. This means that between 1999 and 2016 at least 37% of new dwellings should either be located on PDL or utilise existing buildings. This target was rolled forward from the 2003 Structure Plan which was set lower than the then regional and national target of 60%, reflecting the rural nature of the district and the location of the planned growth sites.

4.11.4 Housing completions on PDL for the last monitoring year recorded 21% of dwellings completed on PDL due to delays in delivery of major brownfield

developments, including Northstowe and Cambridge East. At the same time, greenfield sites have been completed at Cambourne, Orchard Park, Girton, Papworth Everard, Longstanton, Comberton and Steeple Morden. Northstowe, Cambridge East and Cambourne form part of the housing and business growth areas identified to be financially supported through the Greater Cambridge City Deal that will eventually bring £500million of public funds to the area.

4.11.5 The 2031 Local Plan identified the need for 19,000 new homes between 2011 and 2031, limiting housing allocations in villages and focusing on opportunities in the more sustainable settlements. They have been identified taking account of a range of factors and opportunities provided by individual sites, such as avoiding the best and most versatile agricultural land, reusing PDL, and good access to services, facilities and jobs.

4.11.6 However, in view of a lack of PDL, implementation of the guidance in the NPPF that limits the reuse of PDL when it is of high environmental value seems to make little difference to any efforts by the Council to maximise reuse and the removal of 60% target for residential PDL completion has not affected South Cambridgeshire at all, as the district was in no position to meet that target.

4.11.7 While the reality is that housing development has required large amounts of greenfield allocation and will carry on doing so, the district still applied a series of policies to at least maximise the sustainability of its development, including rigorous development frameworks ensuring that the countryside is protected from gradual encroachment on the edges of villages and defining where policies for the built-up areas of settlements and for the countryside should apply. In addition, density has been used as a key measure of efficient use of land. The overall trend in South Cambridgeshire has been increasing densities, particularly in urban developments.

4.11.8 In the countryside, development is also restricted to uses that can re-use existing buildings and sites and support the rural economy. In these cases, easy access to services and the availability of public transport also inform decision making. Protection of the Green Belt is also reiterated, subject to NPPF limitations. Altogether, as one planner commented *'planners would favour development of greenfield sites over brownfield if they were closer to services and facilities, and we had brownfield sites in the*



Greenfield site at Cambourne

*middle of nowhere: this would serve sustainable development better.* As far as mechanisms such as LDOs are concerned, planners do not use them, and do not plan to in the future.

- 4.11.9 In addition to supporting funding for large development schemes through the City Deal, DCLG announced at the end of September 2014 that South Cambridgeshire District Council will receive £50,000 under the 'Right to Build' scheme that supports custom and self builders start off their housing projects. This means that the Council will have to bring forward at least 100 suitable serviced plots of land for sale at market value.

#### **Community engagement and partnerships**

- 4.11.10 The Council undertook a Call for Sites in June-July 2011, offering an opportunity for anyone to help identify land they would like to be considered for housing development. Sites had to be located within or adjoining the development framework of a Rural Centre, Minor Rural Centre or Group Village, or had to be a strategic scale of development (e.g. an urban extension to Cambridge or a new settlement). Various consultations on the Local Plan also brought forward additional sites, but they are both greenfield and brownfield. Compliance with policies and allocations in the Local Plan will be continuously monitored throughout the plan period. If allocations

are not being achieved, the Council will, amongst other measures, develop mechanisms to bring forward development on PDL.

- 4.11.11 The City Deal is planned to support the delivery of 33,000 planned homes and enable the delivery of an extra 1,000 new homes, to help improve the supply of affordable homes. As we saw above, the scheme has supported greenfield development. At part of the City Deal, the partners are exploring a new model for housing investment, a joint venture company that could potentially draw in land holdings from Cambridgeshire County Council and the other Councils, and external investment, including possibly from the University of Cambridge, in order to deliver more affordable housing (Deputy Prime Minister's Office, 2014).
- 4.11.12 Neighbourhood Planning has recently started with parish council groups, but none have gone as far as developing a Neighbourhood Plan yet.

# Worcester City Council – South Worcestershire

## 4.12 Case study: Worcester City Council – South Worcestershire

### Context

4.12.1 Worcester is a compact town and the principal urban area within Worcestershire, with a population of 98,700 (2011). Historically, Worcester was a manufacturing centre and it retains a stock of older industrial and commercial premises. Much of its PDL is contaminated, reflecting its engineering past. More modern commercial property is located mainly on the northern edge of the city. Worcester has a dynamic local economy, knowledge based industry, connectivity and communications, and a university. Worcester is a dominant employment shopping and tourist centre in South Worcestershire, contributing to the prosperity of the sub-region and able to attract and retain employers. Worcester residents have higher than average earnings, but Worcester salaries are lower than the national average. The contradiction implied by these facts is the result of some residents commuting long distances, principally to Birmingham and the M42 Corridor and other centres for higher-paid jobs.

### Key features of brownfield strategy

4.12.2 At strategic planning level, Worcester City Council (WCC) collaborates with the rural districts of Malvern Hills and Wychavon on cross-boundary strategic planning matters in the South Worcestershire Development Plan (SWDP), that aims to ensure that spatial development has a positive impact on the very high quality environment of South Worcestershire, including the upland areas of the Cotswolds and Malvern Hills Areas of Outstanding Natural Beauty as well as the valleys of the Avon, Severn and Teme.

4.12.3 The SWDP made provision for approximately 9,800 dwellings in Worcester City following the Inspector's request to increase housing requirement figures within the SWDP. This figure has been derived from the SHLAA and is based on migration projections, the limited brownfield capacity of the city and wider area, and the fact that jobs and appropriate infrastructure will also need to be provided to support such housing growth. Evidence demonstrates that the city itself can accommodate 5,600 dwellings. Capacity for a further 3,900 dwellings will therefore need to be found on sites outside of, but adjacent to, the city boundary to meet the wider Worcester need.

4.12.4 The SWDP allocates larger 'strategic' sites across South Worcestershire, providing sustainable

development policies and assessing all other potential development sites whether they are for housing, employment, or other purposes. The SWDP offers a development strategy and settlement hierarchy that ensures that economic development can be shared by all districts by prioritising the redevelopment, including mixed uses, of brownfield land within urban areas prior to the release of greenfield land. The local evidence base informed the choice of a 50% target for reuse of brownfield land for housing. The target is realistic, as the brownfield land identified as available for development is not sufficient to meet the housing provision requirement to 2030, and a proportion of new development will need to be on greenfield land.

4.12.5 Following the Inspector's request to increase housing allocations, Worcester City along with its two partner authorities within South Worcestershire made a call for new potential sites for housing developments in the summer of 2014. As a result, the call for sites brought forward a significant amount of additional brownfield land for development in Worcester: potentially, 240 new dwellings were identified on the Crown Packaging Site at Perry Wood and 100 on land at Lowesmoor Wharf. These new housing sites along with others are now at consultation stage. This aids the regeneration of the city and town centres, and the places where both housing needs and accessibility to lower-cost public services are greatest. However, this may not be sufficient to meet demand.

4.12.6 The South Worcestershire 2010 AMR demonstrated that in 2009-2010, 82% of new and converted homes were built on PDL. This position may change in future years as currently available brownfield sites become built out, and if fewer come forward. This will increase the pressure on greenfield sites to meet local housing, employment and service needs, including the main allocated urban extensions. One respondent commented that there are '*a significant number of PDL sites in the SWDP (currently at examination) but these are currently in an active employment or other use.*'

4.12.7 A number of policy tools are available for South Worcestershire planners to ensure that development will make the most effective and sustainable use of land. These include residential density standards, encouraging changes of use of long term empty non-residential properties, and the settlement hierarchy. In the SWDP, settlements are categorised as part of a hierarchy based on the services and





West Midlands Green Belt near Droitwich Spa

facilities available to that settlement. This ranges from 'category 1 settlements' (towns and villages with a good range of services and facilities, as well as some access to public transport), where development will be promoted, to 'category 4' (settlements that have few facilities and services, and are felt to be unsustainable locations for any growth), where development will be resisted.

4.12.8 The SWDP also seeks to maintain the openness of the Green Belt and 'significant gaps'. The West Midlands Green Belt has been an effective planning tool in ensuring that the main settlements, in particular Droitwich Spa and Worcester, remain physically separate and distinctive. Locally, the Worcestershire Green Belt can be narrow, and for Worcester planners, it is particularly important to ensure that the land remains open, as otherwise its ability to function as Green Belt would be compromised.

#### **Community engagement and partnerships**

4.12.9 The SWDP is supportive of development proposals that are promoted through Neighbourhood Planning mechanisms, where these proposals do not compromise the delivery of strategic plan objectives. The SWDP will give due consideration to housing proposals that are intended to meet the clearly identified needs of a neighbouring planning authority and that are set out in an adopted Local Plan.

4.12.10 At a strategic level Worcester City Council is part of the Worcestershire LEP alongside Worcestershire County Council, Wyre Forest District Council, Malvern Hills District Council, Wychavon District, Redditch Borough Council, Bromsgrove District Council, and Further and Higher Education providers. The Worcestershire LEP has secured £47m from the Government's Local Growth Fund from 2016 onwards, one of the priorities is enabling housing sites and allowing 1000 new homes to be built by 2021. Under the scheme, the Homes and Communities Agency will work with the LEP and the Worcestershire Strategic Housing Officers Group to assist with the development of a strategic housing investment plan (Cabinet Office, 2014).

## 4.13 Conclusions

- 4.13.1 The case studies have shown a range of different approaches to brownfield development by local planning authorities, both in their strategic approach to identifying sites, and in how they attempt to bring them forward for development. Although three local planning authorities had developed 'local brownfield strategies' as part of the Homes and Communities Agency's 2008/9 initiative to encourage greater local identification of brownfield land there is little evidence that this initiative is having a continued impact with these generally being subsumed into other strategies.
- 4.13.2 Some local planning authorities are working in local partnership arrangements (formalised LEPs, as in Worcestershire, or other public/private/community groupings) to identify and bring forward sites. Some are managing to access central Government resources to bring development forward (e.g. Bristol CC through the 'Get Britain Building' Fund, Cambridge through its 'City Deal', and Worcester through the 'Local Growth Fund'), although these funding streams are not limited to brownfield sites alone. It seems that some of the local planning authorities have been proactive, in terms of strategic partnerships and collaborations with neighbouring local planning authorities, and are benefiting from Government funding aimed at boosting the construction industry and housing provision. However, what is quite striking, is how divorced many of the local planning authorities seem to be from some of the more recent incentives or Government initiatives to bring sites forward (e.g. the lack of appetite by some for LDOs). Many of the local planning authorities commented on the complexity and resource intensity of schemes as a barrier to their consideration. Most of the local planning authorities are at the early stages of Neighbourhood Planning, and had mixed opinions on whether this was a good way to bring PDL forward.
- 4.13.3 Overall, the local authorities are seeking to prioritise development on PDL within built up areas, and factoring in elements like size of existing settlements and accessibility. They are using policies such as settlement hierarchies to identify and prioritise PDL. The local planning authorities are mindful of the NPPF, but their interpretations of it vary markedly. Some are being more protective of the Green Belt and taking a proactive attitude to redeveloping large areas of brownfield land in opportunity areas, while also encouraging small windfall sites to come forward. Others are taking a different stance, and considering greenfield development in an overall 'portfolio' of options while placing less emphasis on identifying small or windfall sites. All the authorities are mindful of the priority that the Government is attaching to housing delivery, and some are concerned that an overtly 'brownfield first' policy will not be permitted. Many see some form of greenfield development as inevitable if they are to meet longer term housing targets.



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# PART 5

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# Recommendations





# PART 5

## Conclusions and recommendations for enabling brownfield sites to be developed

5.1.1 This report looked at data submitted by local authorities since 2010 to the National Land Use Database of Previously Developed Land (NLUD-PDL). This data, which is analysed in this report for the first time, shows that the availability of brownfield land publicly identified as vacant, derelict or with planning permission has remained fairly static since the last Government analytical report in 2010, with enough for 975,000 new homes. The key issues to emerge are that, first, both central Government and local authorities have given the identification of sites and collection of data reduced priority in recent years. Second, a number of issues are highlighted with NLUD data, particularly regarding the identification of land which is currently in use, and so this data has not been considered in this report.

5.1.2 The report follows up the first point by considering further the wider economic and policy drivers for brownfield development, and how these might be used to assist bringing brownfield sites back into use. The analysis shows that local authorities will need to take on an increasing role, particularly in partnership with other local authorities, in strategic planning, and in site masterplanning and assembly. Alongside this there is a role for Government in providing a repository of expertise (in the HCA) and a more simplified national funding programme to consolidate the current range of initiatives.

5.1.3 On the second point, the report has analysed the robustness of a number of local authorities' approaches to identifying brownfield land and engaging with local communities. Of these authorities, Barnet and Bristol (authorities who benefited from a strong strategic direction including from Green Belt policy) appear to be the most advanced in identifying brownfield opportunities. They also both benefited from a relatively favourable land market. Other authorities, such as Cheshire West and Chester and Durham (which both also benefited from HCA support for brownfield strategies in the past) have had less strategic direction, policy emphasis or market certainty, and are consequently putting greater emphasis on releasing greenfield or Green Belt sites.

5.1.4 The report concludes that there is still a sufficient supply of brownfield land, and a clear public interest in redeveloping it, to justify a renewed strengthening of planning policy to prioritise the redevelopment of brownfield sites. But alongside planning policy it is no less crucial that local planning authorities have greater capacity than now to assemble and

masterplan sites, so that development is both good quality and carried out in a timely fashion. It is important to remember that in England there is already a vast amount of expertise in successful PDL delivery. We have had two decades of considerable quantitative and qualitative success, and there is huge value in building on what is already acknowledged internationally as good practice. This is the context from which the recommendations are developed. They are aimed at central Government, local planning authorities, local communities, and developers.

### 5.2 Recommendations for central and local Government, developers and local communities

#### 5.2.1 **Reintroduce a clear and consistent 'brownfield first' approach in national planning policy.**

The drive to deliver more homes is understandable given England's current housing crisis. However, this should not be at the expense of quality place making for the future. There is land identified and available for almost a million homes on brownfield sites in England, and time should be allowed to plan and design new homes in suitable locations and to a good standard, rather than focus merely on delivering housing within 5 years (as the NPPF currently appears to suggest). Brownfield sites should still be prioritised. Current policy messages are confused and inconsistent: attempting to remove barriers to housing growth, but also retaining Green Belt and greenfield protection statements. When tested, the housing growth agenda often wins out. Central Government should be consistent about its priorities, and reinforce them throughout different tiers of policy so local planning authorities, developers, landowners and communities know what development will and will not be permitted.

#### 5.2.2 **Bring back an effective strategic tier of sub-regional or county level planning.**

For so many issues (housing, infrastructure, economic development, environmental protection and resource management) a sub-national level of planning is required. This may be best done at the scale of city region or county rather than region. The Government and local authorities, working co-operatively and/or in combination, should introduce city regional or county level planning, to provide all sectors with more resources and certainty. The recent (November 2014) agreement between the Government and relevant local authorities to institute such a process in Greater Manchester is welcome. A strategic focus should lead, as in London, to a consistent approach across a city region in identifying

brownfield land, and in focusing investment on areas of opportunity where major new development can be best linked to good public transport and other infrastructure.

- 5.2.3 **Ensure that strong Strategic or Local Plans are encouraged, implemented and updated across the country.** A clear practical challenge at the present time is that approximately half the country is not covered by an adopted Local Plan. Without strong local spatial policies, local planning authorities can lose control of how and what they develop. The past few years have seen major developments on greenfield sites approved, against the wishes of local planning authorities. It is difficult to prioritise development on brownfield sites in these circumstances. Policies should make a clear **relationship between brownfield development and greenfield or Green Belt protection in Local Plans**. This helps to strengthen arguments in favour of reusing brownfield sites, by setting this within a comprehensive/holistic framework that supports sustainable development. A 'brownfield-first' strategy is a means to limit sprawl, and retain valued open land. The local evidence base (covering issues such as the economy, transport, public health) must reinforce arguments that the Green Belt and green spaces have a range of valuable functions: such as supporting health and wellbeing outcomes, climate change resilience, maintaining an attractive environment, and attracting tourists and skilled labour, as well as more obvious environmental benefits.
- 5.2.4 **Give the Homes and Communities Agency (HCA) greater powers and resources to develop large and difficult sites.** This would provide a central resource for local authorities outside London of hands-on intelligence, know-how and long term assistance in developing large and hardcore sites. The Government has already tasked the HCA to take a more direct role in speeding up development on land owned by public bodies. This is welcomed.
- 5.2.5 **Develop a proactive approach to identifying brownfield land, with increased focus on regenerating large sites with multiple owners.** LDOs are a key mechanism by which central Government expects brownfield sites to come forward (aiming to have them in place on 90% of PDL). The main value of an LDO is likely to be in allowing the local authority more of a direct role in masterplanning. This is because (i) most brownfield land already has made some progress through the

planning system (see Section 2.5), and (ii) there is currently little awareness of, or appetite for, LDOs by local planning authorities, as the findings from the case studies and Expert Symposium suggest. Many involved in the planning and brownfield development sectors have serious concerns that if they are implemented without proper planning they will lead to the 'slums of the future' (TCPA, 2014). Alongside this, more innovative local financing systems are needed to underpin development and retain local benefits. Where possible, local authorities should seek to develop in-house expertise, and draw on outside assistance to identify and bring forward sites. It may be that Local Enterprise Partnerships (LEPs) or newly emerging 'combined authorities' can fulfil some tasks of site identification and assembly. LEPs and the Growing Places Fund are already providing some good practice, but could be used to target brownfield development and housing delivery more explicitly.

- 5.2.6 **Reintroduce mandatory reporting to the National Land Use Database (NLUD).** England greatly needs to have an accurate record of its stock of previously developed land. The current absence of this is highly detrimental to any attempts at strategic or local planning, and allows misunderstandings regarding the availability of brownfield land to perpetuate in Government, and in the sector more widely. This hampers informed discussions about where homes could or should be provided. The Government should identify NLUD as a key element of the local evidence base in Planning Practice Guidance, and call on local planning authorities to report to NLUD on an annual basis. NLUD should be refined to make it fit for purpose, and to iron out the problems inherent in its classifications of PDL (see Part 2).
- 5.2.7 **Make NLUD data publicly available and in a more accessible form.** This would allow local planning authorities, Neighbourhood Planning groups and other interested parties to identify and prioritise sites in their area. This could be for long term development but also for temporary uses such as pop-up shops or green spaces that may enhance an area.
- 5.2.8 **Provide assistance to smaller builders by identifying smaller sites and offering incentives for development.** The report has highlighted the potential contribution to housing numbers from small sites, and potentially therefore from Small and Medium Sized Enterprises (SMEs) and self-build. Local planning authorities can help, through a range of mechanisms (e.g. SHLAA, Local Plan, Neighbourhood Planning,

and masterplanning), to identify small sites and assist smaller developers through the planning process.

- 5.2.9 **Provide more direct funding for difficult ‘hardcore’ sites.** Many sites simply need funding to bring them to a developable state. Although there is a range of mechanisms to kick-start housing development, many in the sector, particularly smaller builders, find the current range of loans, levies, pay-back schemes and tax reliefs either irrelevant for the scale they work at, or too complex, risky and time-consuming.
- 5.2.10 **Encourage local communities to identify brownfield sites.** Local planning authorities have a key role in supporting communities to become active in the planning of their neighbourhoods, including by identifying and planning for brownfield sites. Local planning authorities should make consistent and publicly available returns to the National Land Use Database (see other recommendations above).
- 5.2.11 **There should be more creativity in specifying the desired end use of PDL.** Many local planning authorities are, for historic reasons, not keen on releasing PDL for housing if it is identified for employment. Similarly, many want to retain mixed use developments on many sites. In some instances these designations may be out of date, or make sites unfeasible. In such circumstances, local planning authorities should take a fresh look at designations, while remaining mindful of their overall local strategies. Similarly, they may also have to be more flexible in applying conditions, or in amending existing planning consents, to stimulate development once permission has been granted.



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# Supplementary information





# Glossary of terms

**AMR**

Authority Monitoring Report, formerly Annual Monitoring Report.

**BCC**

Bristol City Council.

**Brownfield**

Land that previously had, or currently has, buildings or structures on it, and which is not 'greenfield'. The term can have a distinct meaning from 'previously developed land' (see below), but the two terms are currently treated as synonymous in national planning policy.

**Category E land**

Previously developed land (see below) which has buildings currently in use.

**CBC**

Crawley Borough Council.

**CIL**

Community Infrastructure Levy.

**CPO**

Compulsory Purchase Order.

**CWBC**

Cheshire West and Chester Borough Council.

**DCC**

Durham County Council.

**DCLG**

Department for Communities and Local Government, the central Government department responsible for planning, housing and regeneration policy in 2014.

**English Partnerships**

The former national regeneration agency for England, which became part of the Homes and Communities Agency in 2008.

**FALP**

Further Alterations to the London Plan.

**Green Belt**

An area of land designated with strong controls over new development in order to prevent urban sprawl and encourage urban regeneration, along with other purposes set out in the National Planning Policy Framework. Green Belt land covers 12.4% of England.

**Greenfield**

Land either in use for agriculture or forestry or otherwise not within the definition of previously developed land.

**Hardcore sites**

Sites that have appeared on the National Land Use Database for nine years or more, indicating that it is particularly difficult to develop.

**HCA**

Homes and Communities Agency, formed in 2008 as a result of the merger of English Partnerships with the Housing Corporation. The HCA is responsible for the National Land Use Database (NLUD).

**Housing density**

The amount of separate houses or dwellings on a given plot of land, usually expressed in dwellings per hectare.

**Housing Zone**

An initiative launched by central Government and the Greater London Authority in August 2014 to increase housing supply on areas of brownfield land designated by local authorities and selected by Government following competition.

**LBB**

London Borough of Barnet.

**LDO**

Local Development Order.

**LEP**

Local Enterprise Partnership.

**Local brownfield strategy**

An initiative by a local authority, and supported by the HCA in the late 2000s. According to the HCA website at the time of writing, 80 authorities have produced such a strategy, achieving the outcome of 'improved intelligence on the availability and deliverability of brownfield sites, how to address the obstacles to their development, and help prioritise and target future interventions.'

**Local Plan**

A legal document produced by a local planning authority which forms the basis for allocating sites for new housing and industrial development, and provides policies to form the basis for deciding planning applications.

**Localism Act**

Passed in 2011, the Act revoked Regional Spatial Strategies and introduced Neighbourhood Plans.

**LPA**

Local planning authority, usually a district, borough or unitary council, with legal responsibility for producing a Local Plan or deciding planning applications in its area.

**Neighbourhood Plan**

A document which has the legal force of a Local Plan, but only in relation to the given parish or neighbourhood area or areas designated. It is produced by a parish council or neighbourhood forum.

**New Homes Bonus**

A Government scheme, introduced in February 2011, aimed at encouraging local authorities to grant planning permissions for the building of new houses in return for additional revenue.

**NLUD and NLUD-PDL**

The National Land Use Database, owned by the HCA, aims to provide national and regional trends in previously developed land (PDL), and is compiled from information on individual sites supplied by local authorities across England.

**NPPF**

National Planning Policy Framework, the Government's statement of national planning policy, published in March 2012.

**Open Mosaic Habitats on Previously Developed Land**

A type of wildlife habitat defined as a priority in the UK Biodiversity Action Plan, which provides a detailed scientific definition.

**PDL**

Previously developed land. The term is defined in detail in the glossary of the NPPF, which uses the term synonymously with 'brownfield', although distinct definitions of 'brownfield' are used by others.

**PDRs**

Permitted development rights. Where these exist in regulations, they remove the need to apply for planning permission.

**RSS**

Regional Spatial Strategy.

**SHLAA**

Strategic Housing Land Availability Assessment.

**SWDP**

South Worcestershire Development Plan.



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# List of appendices

Appendix A Local planning authorities that responded to the request for NLUD data.

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**Appendices can be accessed online by searching for From Wasted Space to Living Spaces at [www.cpre.org.uk/resources](http://www.cpre.org.uk/resources)**

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- promoting appropriate brownfield development
- promoting examples of sustainable urban and rural development and good practice
- influencing the approach of the Government towards the countryside and planning

