

## Housing capacity on suitable brownfield land

New brownfield registers show significant increases in number and housing capacity of suitable brownfield sites in England

CPRE, October 2016

### Summary

The Campaign to Protect Rural England (CPRE) has analysed the Government's [brownfield registers pilot scheme](#).

Comparing the findings of 53 of the registers against council submissions to the National Land Use Database in 2010, 2011 and 2012 - the last time councils submitted data on local available sites - CPRE found:

- a 50% increase in the number of brownfield sites identified as suitable for development, with a significant increase in the number of small sites
- a significant increase in the proportion of sites with planning permission (from 41% to 62%)
- a minimum increase of 11% in the estimated number of houses that could be built on brownfield land
- significant increases in brownfield in the South East and East of England - with capacity for 75,000 homes in just 14 local authorities
- a general ability to meet five-year housing land supply targets almost solely through brownfield sites.

The minimum number of homes that can be built on these brownfield sites, according to the registers, is **272,763**.

Employing a variety of conservative methodologies (see below), CPRE estimates that this figure translates to a **minimum of 1.1 million homes** on suitable sites across England. More ambitious methodologies put the figure much higher, towards 1.4 million. This

suggests that the Government has previously severely underestimated brownfield capacity.

In 2014 the Government argued that there was space for [200,000 homes](#) on brownfield land across England. In November of that year CPRE published the [From wasted space to living spaces](#) report, which found that at least 1 million homes could be provided on suitable brownfield land in England. The Department for Communities and Local Government described this estimate as ‘wildly over optimistic’ in its [Housing & Planning Bill Impact Assessment](#) of October 2015 (page 70). The document claimed that ‘only a fraction will be suitable for housing’, which appeared to disregard the fact that the estimate was based only on sites councils considered ‘suitable for housing’.

CPRE believes that brownfield registers are urgently needed across the country to provide a comprehensive picture of England’s brownfield capacity. Clear guidance will also be needed to ensure that local planning authorities carry out a detailed investigation of brownfield land and to ensure that the registers only contain those sites which are suitable for housing.

More widely, CPRE is calling for national policies that prioritise brownfield development over greenfield, and support the delivery of new homes on suitable brownfield sites. One important policy adjustment would be to refuse permission for greenfield sites where these would make competing demands on the development of suitable alternative brownfield land.

[Research previously carried out by CPRE](#) highlights the merits of such an approach, showing that brownfield sites are developed half a year faster on average than greenfield sites.

## **Background**

The Housing and Planning Act, which received Royal Assent in May 2016, requires local authorities to adopt a brownfield register in order to enable housebuilders to identify suitable sites, quickly speeding up the construction of new homes. 73 local authorities were chosen to pilot the development of brownfield registers in spring 2016, and as of August 2016 53 of these local authorities had made their pilot brownfield registers (pBFR) available.

CPRE analysis compared the data in the 53 pBFRs with the same authorities’ information from the National Land Use Database (NLUD) in 2010, 2011 and 2012 - the last time councils submitted data.

## **Findings**

### The registers

The analysis shows that there is an increasing amount of brownfield land available for development.

- The number of brownfield sites identified as suitable for housing development has increased by 50% (from 3074 to 4631 sites).
- There has been a notable increase in the number of identified small sites and an increase in the proportion of brownfield sites with planning permission. In the pilot brownfield registers almost 25,000 homes could be built on sites smaller than 0.25Ha, and 605 sites could support fewer than five homes.
- There has been a minimum increase of 11% in the estimated number of houses that could be built on brownfield land, from 245,498 homes to 272,763 homes across the 53 local authorities. The maximum recorded increase is up to 290,992 homes, representing an 18.5% increase from NLUD.
- The total area of brownfield identified has increased from 7,304 hectares to 12,408 hectares (a 69% increase).
- Based on the most current local plan documents, the amount of land available for housing development identified through the pilot brownfield registers is 4.89 years' supply across the 45 local authorities that have draft or adopted housing land supply figures. 18 of the local authorities have a brownfield land supply that exceeds the five-year housing land supply requirement set by Government.
- The proportion of brownfield sites with some form of planning permission has increased from 41% to 62%. Almost two-thirds of the homes, with information, have not been started.
- The local authorities in the South East and the East of England are two of the biggest winners, with more than 75,000 homes identified in 14 local authorities across these two regions - a significant increase from NLUD. In these areas, where there has been most of the growth and where there is huge pressure to release areas of Green Belt for housing, there is untapped potential for development on brownfield sites that could in some cases meet identified local need.

### National implications

Different methods were used to find a national projection for brownfield housing capacity based on the pilot brownfield registers.

- The first method extrapolated the most recent NLUD data (2010-2012) that was used in CPRE's 2014 *From wasted space* report, using three different averages: an increase of 11% in housing capacity across the pilot registers; and the median and mean average increase in housing capacity across the 53 local authorities.

This produced estimates ranging from 1.08 million to 1.14 million.

- The second method was based on the Office for National Statistics (ONS) rural/urban classification of local authorities. It calculated the average (mean)

housing capacity per local authority across each of the six classes and applied this to the local authorities in each class.

Adding the London Land Commission's estimate of a minimum of 130,000 homes across London, this method provided a minimum estimate of 1.39 million homes.

This method does less to mitigate the impact of potential outliers that could have identified significantly more housing capacity than other methods. However, it does not mean the estimate is unduly biased or an exaggerated over-estimate. The outliers are not the direct result of the selection process for the pilot scheme, and reflect differences in brownfield capacity across England. The local authorities chosen to participate in the pilot scheme for having the most brownfield do not significantly differ in housing capacity to those local authorities selected through the competitive bid process.

## Recommendations

CPRE welcomes the pilot brownfield registers, which suggest that there is more brownfield land available for housing development than previously thought - in particular in the South East and the East of England, the regions with the greatest pressures for housing. More needs to be done to get these houses built.

CPRE calls on local authorities to:

- Be more proactive in identifying small brownfield sites. Town and parish councils, neighbourhood planning bodies and local amenity societies are well-placed to help with the identification of suitable small brownfield sites.
- Ensure that only *suitable* brownfield sites are recorded on these registers: sites with an unsustainable location or high environmental or heritage value may be unsuitable for development. An annex of rejected sites would enable this process to be transparent.

CPRE calls on the Government to:

- Amend the NPPF to prioritise the use of suitable brownfield sites in urban areas over greenfield, particularly in areas where there are both brownfield sites and competing greenfield sites in the same housing market area. Local councils and the Government should refuse permission for greenfield sites where there are alternative brownfield sites suitable for development.
- Make brownfield sites the first priority for site planning and any public funding to bring forward new housing.
- Push for more housing completions as well as permissions. A commitment for the proportion of sites on which development should have commenced would be a major step forward in addition to the commitment to having planning permission on 90% of suitable sites by 2020.

- Guide local authorities to identify all suitable sites, including the smallest sites, in final policies, and provide support to small house builders and self- and custom-builders through targeted funding mechanisms that overcome the initial high costs of brownfield development.
- Recognise that registers show a pipeline of potential regeneration opportunities that could be realised with the right policy and financial interventions. Brownfield registers should not be seen merely as a snapshot of sites that are suitable and available for housing development at one moment in time.

### **Sources of data**

The most recent submissions to the National Land Use Database (2010-2012) for each local authority with a published pBFR were used for the analysis. This data included sites that were considered suitable for housing and those sites that had not been proposed for alternative uses (for example, sites with planning permission for employment or allocated as open space).

The local authorities obtained the information for their pilot brownfield registers from a range of sources. The majority of the local authorities followed guidance provided by the Department for Communities and Local Government, which ran the pilot, obtaining information on sites from documents used as part of their local plan development. However, some local authorities used a broader range of sources, including sites with extant planning permission, a review of council owned sites, sites that are being marketed for development and a public call for sites.

Up to date annual housing requirement figures were obtained through adopted and emerging local plans, where these figures were available.

Note: As current brownfield registers are part of a pilot scheme, a more rigorous search and test of each site within the register has not been undertaken. More sites are likely to be identified as councils carry out a call for sites and widen the sources of information used, while other sites may no longer be deemed 'suitable' for housing due to environmental value or the site being in an unsustainable location.

### **Regional variations**

There is wide variation across the country in terms of approach, but it is clear that in every region of England brownfield land can make a significant contribution to meeting housing supply requirements. The pilot brownfield registers exclude Greater London: the London Land Commission published its own brownfield register of publicly owned sites in January 2016.

The average regional housing supply in the pilot brownfield registers ranges from 2.76 years in the North West to 9.45 years in the East of England. This highlights the need for a more strategic approach to development.

East Midlands: Despite a decrease in identified housing capacity, brownfield sites could still contribute to four years' land supply in the East Midlands with more than 16,500 homes identified in the brownfield registers across the five local authorities.

East of England: This region has a land supply of over nine years, with an increase in supply of over 40% in housing capacity. When this is combined with the increase seen in the South East of England, it suggests that brownfield sites are continuing to come forward in the regions with the greatest housing pressure.

North East: The six participating local authorities in the North East have an estimated housing capacity of 20,015 homes despite a drop of 44% in estimated housing capacity. Northumberland bucked the overall trend in the North East local authorities by having an increase of 30% of estimated housing capacity.

North West: 12 local authorities participated in the North West and have an estimated housing capacity of 58,800 homes on brownfield sites despite an overall drop in identified brownfield land suitable for housing. Many of the local authorities experienced a decline in estimated housing capacity. Over the past 10 years Manchester has had a [\*blitz on the city's brownfield eyesores\*](#), which may have led to a higher than average proportion of sites with permission in the NLUD.

South East: The pilot brownfield registers identified space for 33,000 homes in the South East. This suggests that brownfield sites are continuing to come forward in the regions with the greatest housing pressure, and where there is significant pressure to release Green Belt land. In Cherwell and Oxford City the five-year housing supply could be met fully by brownfield development. However, in Dover, just over 18 months of land supply could be provided on brownfield sites. A number of the brownfield sites identified in the Waverley register are not suitable for development due to their high landscape value.

South West: The South West has one of the lower provisions of land supply, at three years. However, there is still capacity for over 30,000 homes in the region, 10% greater than that identified in NLUD.

West Midlands: The two West Midlands local authorities show a dramatic increase in housing capacity through the pBFRs, with 2.5 times the capacity of NLUD. Over 17,000 homes were identified across the two local authorities: this could meet almost nine years of the current annual housing requirement. A reduction in the identified housing capacity in Dudley is due to the local authority only recording sites that already have planning permission.

Yorkshire and Humber: This region has one of the highest estimated housing capacities on brownfield sites with over 53,000 homes. This is likely a result of three of the four authorities included in the analysis being chosen to participate in the study for having a high amount of brownfield. There was an increase of over 80% in the identified housing capacity in the region, providing a land supply of over 7 years at the current housing requirement.

## Regional breakdowns

Region (number of LAs)	Number of sites	Area (hectares)	Minimum estimate of housing capacity	Years' supply
East Midlands (5)	337	497	16,581	3.98
East of England (4)	253	4,716	41,932	9.45
North East (6)	342	545	20,015	2.49 (5*)
North West (12)	1,290	2,007	58,800	2.76 (10*)
South East (10)	590	1,742	33,916	3.58 (4*)
South West (10)	736	1,008	30,525	3.08
West Midlands (2)	268	498	17,190	8.97
Yorkshire and Humber (4)	815	1,397	53,804	7.68
<b>Total</b>	<b>4,631</b>	<b>12,408</b>	<b>272,763</b>	

\* Up-to-date local authority housing requirements are not available for all 53 local authorities. This is the case in the North East, North West and South East of England. The number in brackets in the 'Years' supply' column denotes the number of local authorities for which housing supply figures were available.

Region*	NLUD Housing Capacity	pBFR Housing Capacity	Change	% Change in housing capacity
East Midlands (5)	18,198	16,581	-1,617	-9
East of England (4)	29,420	41,932	12,512	42
North East (6)	35,494	20,015	-15,479	-44
North West (12)	79,462	58,800	-20,662	-26
South East (10)	18,712	33,916	15,204	81
South West (10)	27,633	30,525	2,892	10
West Midlands (2)	6,617	17,190	10,573	160
Yorkshire and Humber (4)	29,962	53,804	23,842	80
<b>Total</b>	<b>245,498</b>	<b>272,763</b>	<b>27,265</b>	

\*Excluding London: In January 2016, the London Land Commission published London's first brownfield register of publicly owned sites. This identified 40,000 sites for 130,000 homes in the capital.

## Individual local authority data

Council	Region	Pilot brownfield registers			NLUD housing capacity	Change in capacity	% change	Year supply
		Number of sites	Total area	Housing capacity				
Bath and North East Somerset	South West	55	141	4932	4803	129	3	6.85
Blackpool	North West	90	49	2347	617	1730	280	8.38
Bolton	North West	67	119	4502	2463	2039	83	6.49
Bristol City	South West	248	88	9295	6495	2800	43	7.04
Broxtowe	East Midlands	40	182	3121	2462	659	27	8.63
Bury	North West	79	92	2060	2448	-388	-16	
Cherwell	South East	38	803	5968	1622	4346	268	5.23
County Durham	North East	33	109	3075	8691	-5616	-65	
Dover	South East	42	142	2775	1208	1567	130	1.61
Dudley	West Midlands	19	31	1085	2665	-1580	-59	3.72
East Devon	South West	20	7	183	97	86	89	0.19
Gateshead	North East	57	101	3741	5344	-1603	-30	7.19
Gedling	East Midlands	46	71	1868	1472	396	27	4.38
Hart	South East	39	207	3542	1224	2318	189	
Huntingdonshire	East of England	29	943	11369	6028	5341	89	8.12
Kingston upon Hull	Yorkshire and the Humber	78	104	5615	3145	2470	79	7.39
Leeds	Yorkshire and the Humber	342	790	30026	15457	14569	94	6.86
Manchester	North West	161	148	3851	25204	-21353	-85	1.16
Medway	South East	42	25	1167	3136	-1969	-63	
Mid Devon	South West	35	28	438	524	-86	-16	1.22
Milton Keynes	South East	50	57	2082	1099	983	89	
Newcastle upon Tyne	North East	64	85	6882	8791	-1909	-22	1.35
North Somerset	South West	47	37	1119	5794	-4675	-81	1.07
Northampton	East Midlands	25	61	2979	2340	639	27	1.87
Northumberland	North East	149	189	4725	3600	1125	31	3.89
Nottingham	East Midlands	207	102	6852	9439	-2587	-27	6.79



<b>Oldham</b>	North West	139	54	1472	3078	-1606	-52	4.25
<b>Oxford</b>	South East	64	98	2784	1744	1040	60	6.96
<b>Pendle</b>	North West	39	29	847	1639	-792	-48	2.84
<b>Peterborough</b>	East of England	44	1655	5763	10042	-4279	-43	3.13
<b>Rochdale</b>	North West	65	88	3079	4720	-1641	-35	7.70
<b>Rossendale</b>	East of England	20	10	332	2286	-1954	-85	1.34
<b>Runnymede</b>	South East	55	55	1436	618	818	132	
<b>Rushcliffe</b>	East Midlands	19	81	1761	2485	-724	-29	2.28
<b>Salford</b>	North West	292	243	25667	28102	-2435	-9	
<b>Sandwell</b>	West Midlands	249	467	16105	3952	12153	308	12.29
<b>Selby</b>	Yorkshire and the Humber	44	1655	3344	1254	2090	167	7.43
<b>Sheffield</b>	Yorkshire and the Humber	366	364	14819	10106	4713	47	10.40
<b>South Cambridgeshire</b>	East of England	160	2108	24468	11064	13404	121	25.76
<b>South Gloucestershire</b>	South West	69	314	6850	6849	1	0	3.38
<b>South Tyneside</b>	North East	24	30	816	1233	-417	-34	2.47
<b>Stockport</b>	North West	86	174	1838	1564	274	18	4.08
<b>Stroud</b>	South West	103	232	2605	605	2000	331	3.43
<b>Sunderland</b>	North East	15	31	776	7835	-7059	-90	1.03
<b>Swindon</b>	South West	73	103	2971	909	2062	227	1.83
<b>Tameside</b>	North West	124	70	2340	3311	-971	-29	3.62
<b>Teignbridge</b>	South West	19	23	549	792	-243	-31	0.88
<b>Thurrock</b>	South East	200	252	12537	7094	5443	77	
<b>Torbay</b>	South West	66	35	1583	765	818	107	3.20
<b>Trafford</b>	North West	78	651	3435	1529	1906	125	0.90
<b>Waverley</b>	South East	36	67	902	917	-15	-2	1.74
<b>West Oxfordshire</b>	South East	24	46	723	50	673	1346	2.36
<b>Wigan</b>	North West	68	290	7362	4787	2575	54	7.36