

From: CPRE Hertfordshire
Sent: 24 May 2019 13:16
To: PlanningPolicy
Cc: Tim Hagyard
Subject: Stevenage BC - Community Infrastructure Levy - draft charging schedule

Dear Stevenage Policy Team

I am hoping these comments on the proposed CIL charging can still be considered although I acknowledge we have missed your deadline of Friday 17th May .

The NPPF para 56 sets out a reminder of the CIL Regulations that obligations including CIL charging regimes should be

- a) necessary to make the development acceptable in planning terms;
- b) directly related to the development; and
- c) fairly and reasonably related in scale and kind to the development.

CPRE Herts would wish to reiterate the priorities of CPRE nationally to promote a '*Brownfield First*' approach to development . Moreover we consider that CIL charging rates should reflect the lower build costs of greenfield land and higher infrastructure service costs of lower density more car dependent greenfield development than built up sites within the urban area. This is reflected in national policy. However, a well targeted CIL rate can then help to promote brownfield development including development of sites within the Stevenage Town Centre and existing built up area in accordance with the NPPF.

CPRE Hertfordshire makes the following key points

1. A lower CIL rate should be applied for brownfield than for greenfield land development generally. This is logical as it reflects the additional costs of brownfield development and encourages developers to look at brownfield sites first rather than greenfield land such as north and west of Stevenage.
2. Given the greater complications and costs of development in the town centre and the lower infrastructure costs per head, due to locational advantages that central areas are easily serviced, then a lower rate for the town centre should be applied
3. Mobility infrastructure i.e. roads/highways/access and public transport or walking / cycling will all be significantly higher for greenfield sites than for compact central and higher density more central locations. So logically the CIL rates to apply in the central area would be reduced and higher for peripheral areas
4. The town centre area is drawn very tightly. A further inner central area zone in proximity could be defined to still reflect the lower service costs and to promote regeneration in areas outside but still close to the town centre.
5. For 'market housing' a lower CIL levy is proposed in Stevenage Central (£40 per sqm) relative to sites everywhere elsewhere (£100 per sqm) . However a similar distinction is not made for sheltered housing or extra care housing although it would be expected to see a lower CIL rate in the town centre. This could discourage valuable elderly persons accommodation being provided in more accessible central locations.

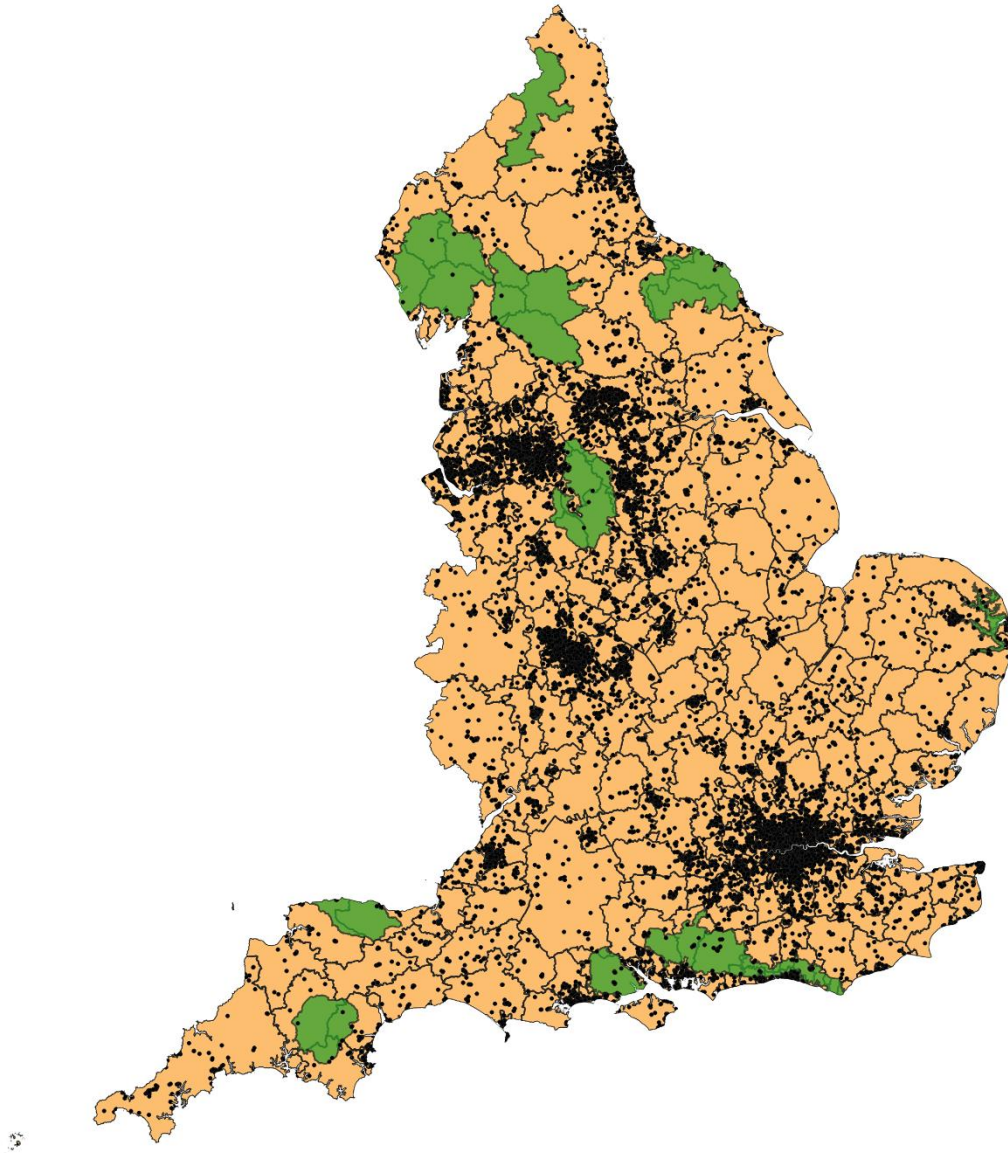
Yours sincerely,

Tim Hagyard
Planning Manager
CPRE – Hertfordshire

Attached : CPRE Report State of Brownfield 2019

State of Brownfield 2019

An updated analysis on the potential of brownfield land for housing



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March 2019

State of Brownfield 2019

In order to provide enough housing in England for everyone who needs it, we must be creative within our finite land. By making use of suitable brownfield sites, the homes we need can be built in the places we need them, while our beautiful countryside is allowed to thrive. Brownfield sites are also often close to where people already work and live, with infrastructure such as public transport, schools and shops already in place.

CPRE has long campaigned for brownfield development to be brought to the top of the planning agenda. We urged the government to introduce regulations that make it compulsory for local planning authorities to publish a list of suitable brownfield sites, and estimates of their capacity for housing. These regulations came into force in April 2017,¹ and we were finally able to definitively analyse the number of identified suitable brownfield sites for housing across the whole of England. In *State of Brownfield 2018*,² we found our previous estimates were accurate: suitable brownfield sites identified by local planning authorities have capacity for more than one million homes - and yet we know this is a minimum given there are smaller sites that are not recorded.

This report keeps our understanding of this capacity up-to-date and measures progress towards achieving the government's aim of 'making full and efficient use of brownfield land'.³ We are using updated registers provided by local planning authorities to assess how brownfield capacity has changed since last year. All the sites on the registers have been assessed by local planning authorities as being 'suitable' for housing development, having had regard to their environmental, amenity and heritage value.

Key findings

- Every local planning authority now has a brownfield register recording brownfield land considered to be suitable for housing led development (Section 3.1).
- Brownfield registers continue to show enough suitable brownfield land is available for more than 1 million homes across over 18,000 sites and over 26,000 hectares (Section 3.2).
- More suitable brownfield land has come forward over the last 12 months, with one in seven homes on up to date brownfield registers being on sites identified in the last 12 months (Section 3.3). This shows that brownfield is a perpetually regenerating resource, with the potential to provide a steady pipeline of development opportunities.
- The majority of brownfield sites are available to build on now as 59% of the total identified housing is identified as deliverable within the next five years, with 63% of newly identified sites also meeting this definition (Section 3.4).
- Capacity for more than half a million homes has yet to obtain planning permission, so whilst developers should get on with building the homes they already have planning permission for, more needs to be done to ensure these sites get planning permission, and are developed before greenfield sites (Section 3.5).

- The average density assumptions on brownfield registers have increased from 33 to 41 dwellings per hectare (Section 3.2 and 3.7.3). While the increase is welcome, 41 dwellings per hectare is still quite low as an average. The reasons for the increase are unclear and merit further investigation.
- Not all opportunities for redeveloping suitable brownfield land are recorded on brownfield registers, for example small sites and those exemplified by CPRE London's work in Enfield (Section 3.7).
- Where councils are failing to identify all possible opportunities and even in areas with a lot of suitable brownfield capacity, countryside remains at risk unnecessarily (Section 3.9). This shows the importance of implementing a genuine brownfield first approach to development.

1. Introduction

Brownfield registers provide a list of sites that have been assessed by local planning authorities (LPAs) as being suitable for housing led development having had regard to their environmental, amenity and heritage value. LPAs are required to review their brownfield registers at least once a year. Updated registers should remove sites that are no longer suitable, and identify new sites that meet the criteria. This research examines updated brownfield registers, now published by 338 local planning authorities in England.

In February 2018, we published our first report on the state of brownfield availability,⁴ which confirmed our previous work that showed there is sufficient suitable brownfield land currently available for more than 1 million homes. Our report demonstrated that as well as brownfield sites providing space for the homes we need, this capacity is where people want to live.

It is important that suitable brownfield land is used more efficiently, preventing the unnecessary loss of our countryside and green spaces, whilst providing more homes closer to where people work, go to school and spend their leisure time.

Since last year's report:

- **The updated National Planning Policy Framework (NPPF),⁵ the government's 'planning rulebook', was published in July (and updated again in February).** It states that substantial weight must now be given to the value of reusing brownfield land, but still stops short of requiring that suitable brownfield land is prioritised for development over greenfield sites.
- **Homes England's strategic plan was published in October,⁶** within which the government agency agreed with CPRE's previous analysis which showed there is capacity for 1 million homes on brownfield land.
- **The National Housing Federation have created a brownfield map** to make it easier to locate available brownfield sites in England.⁷
- **Local CPRE groups, CPRE London and CPRE Lancashire are developing and using toolkits** to help local campaigners and community groups identify suitable brownfield sites for development.^{8 9}

2. Methodology

The updated brownfield registers were found through searches of local planning authority (LPA) websites between 14 January and 14 February 2019. Part 1 of the registers lists all developable brownfield sites assessed as being suitable for redevelopment for new homes and provides information on area, estimated minimum housing capacity, ownership, planning status and whether sites are deliverable in the next five years.

When determining whether or not a site is suitable for redevelopment local planning authorities have to consider the environment, heritage and amenity value of the brownfield site. This should mean that brownfield land that is important for biodiversity or is a local playground, for example, should not be recorded on the register unless that value is not affected by redevelopment.

The information on these registers is provided by local planning authorities and based on their assessments, including of whether or not a site is suitable for housing. This is a local assessment made by professionals in LPAs, but the accuracy of the data and suitability of sites for development has not been verified by CPRE.

At the time of data collection, out of the 338 LPAs, two did not have an accessible register through their website and their most recent register was obtained via email. The most up to date brownfield registers were transferred into a single spreadsheet for analysis. Five local authorities had published their registers as a PDF; these were converted into spreadsheet formats to include in the analysis. Whilst every effort was made to prevent errors through the use of data validation and checking, it proved a challenge to ensure the data was in a consistent format for analysis and small errors may be present in the national register created (see box below). CPRE will continue to check the accuracy of the data and will be happy to receive any concerns about data accuracy sent to planning@cpre.org.uk.

A note on specific challenges arising from the collection and collation of brownfield registers:

- Websites: it was often difficult to find the brownfield registers through an online search engine or the LPA website. There were a number of occasions where a large number of clicks were required to reach the download. In a few cases, links were broken - or even led to another LPA's register. And while LPAs are required to log their registers through data.gov.uk, many have not.
- Updated registers: it was often unclear when the register had last been updated with information on LPA website. In some cases, the title of the register and dates within the register itself contradicted each other.
- Open registers: five LPAs had only published their register in a PDF format, which is difficult to use.
- Use of template: despite being provided with a template spreadsheet many councils moved the columns around, adding in a step to match up the correct data when compiling a single database.

- Inputting information: despite the provision of data standards, many LPAs did not follow the requirements. This included:
 - A wide range of coordinate reference systems
 - Numerical data, such as the area and housing capacity figures being put in as text, or with text included.
- Accuracy of data: in a number of cases the accuracy of the data was questionable, for example location references that ended up in the ocean, area information that was a copy of one of the coordinates, or a minimum housing capacity estimate that is the same for all sites despite a wide range of area of site.
- Missing data: in a few cases not all of the key information was complete, for example, missing housing capacity information.

3. Analysis

This report focuses on the national picture, but associated data tables are available in the annex and on the CPRE website for regional breakdowns of key analyses.

3.1. How many registers?

The Brownfield Register Regulations require LPAs to review their registers every 12 months. Table 1 shows that every LPA has a brownfield register and almost three quarters of LPAs have reviewed their register in the past 12 months since CPRE published *State of Brownfield 2018*. This is an improvement from past year, where 95% of LPAs had a published register. The fact that full coverage has been achieved illustrates the importance of national government showing leadership and the value of providing guidance including a template spreadsheet to support the implementation of policy.

Table 1: Status of brownfield registers as of 14 February 2019 according to the register and/or LPA website (Total number of LPAs = 338)

Status	Number of LPAs	Percentage of LPAs (Figures may not sum to 100% due to rounding)
'Up-to-date' brownfield register published (since February 2018)	251	74%
Published after the publication of the Brownfield Land Register Regulations and included in <i>State of Brownfield 2018</i> (April 2017-January 2018)	83	25%
Published before the Brownfield Land Register Regulations (June 2016-March 2017) and not refreshed since	4	1%

3.2. How much brownfield?

The 338 published brownfield registers identify more than 18,200 brownfield sites covering more than 26,000 hectares that have been assessed by LPAs as suitable for housing development. The registers show that LPAs have identified sufficient suitable brownfield sites to provide a minimum capacity of more than 1 million homes.

3.3. Changes since 2018 report

Table 2 shows that the number of brownfield sites identified has increased by 3.5% since the 2018 report, and the identified housing capacity has also increased by 2.4%. This supports previous work that has suggested brownfield land is continually coming forward for redevelopment - it is a renewable resource.

Table 2: The number, area and minimum housing capacity estimates of sites recorded on LPA brownfield register in 2018 and 2019 including a breakdown for new brownfield sites added in the past 12 months

	Number of sites	Area (Ha)	Minimum housing capacity
Total 2019	18,277	26,002	1,077,292
Total 2018	17,656	28,349	1,052,124
Difference (number)	621	-2,347	25,168
Difference (%)	3.5	-8.3	2.4
New sites added since February 2018	2,634	2,894	126,099*

*The total housing capacity of registers that have been reviewed in the past 12 months is 822,926 homes. This figure has been used in assessing the proportion of homes that are newly identified.

However, the total area of sites has decreased by over 8%. It is unclear at this stage why this is the case, but could be a result of more accurate recording of land classified as 'brownfield' to ensure that any greenfield elements are not included in the register. It could also be that some larger sites have been removed from the register.

As well as looking at the net change in estimated housing capacity, the number of newly identified sites can be calculated using the date the site was first added on to the register. This shows that over 2,600 suitable brownfield sites have been added since February 2018 with space for over 126,000 homes out of a total housing capacity of these registers of 822,926 homes. This means that of those registers that have been reviewed in the past 12 months almost one in seven homes have been identified in the past year alone.

As the number and capacity of sites added since February 2018 is far greater than the net change, it is also apparent that brownfield sites have been removed from the register. Information on brownfield sites that have been removed from the register is not recorded, except by a very small number of LPAs, and could be because they have been completed and are no longer part of the pipeline of sites, or some other factor that has created uncertainty about whether the site meets the criteria for inclusion in the register (for example, whether sites are available and suitable for redevelopment, or achievable within the 15-year timeframe brownfield registers cover).

In order for brownfield registers to fulfil their potential in identifying a pipeline of sites and helping overcome obstacles to redeveloping suitable brownfield sites, it is important that this information is recorded alongside the annual register.

3.4. Deliverability

Local planning authorities must record whether they consider a site is deliverable, which means according to the regulations that there is ‘a reasonable prospect that residential development will take place on the land within 5 years beginning with the entry date’.¹⁰ Recent changes in the definition of ‘deliverable’ in the NPPF 2018 (revised again in 2019) might set a higher bar for recording sites on brownfield registers as deliverable. The NPPF now explicitly states that sites recorded on brownfield registers ‘should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years’: there is therefore a conflict between the regulations and the NPPF regarding the definition of ‘deliverable’ that needs resolution. Further work would help to ascertain the impact this difference in definition is having on LPAs ability to record sites as deliverable.

This is important because LPAs need to illustrate that they have identified enough land to build the required number of homes in the next five years (a five-year land supply).

An increased number of LPAs have recorded at least some of their sites as deliverable, with 303 LPAs, up from 288 in 2018.

Across all 338 brownfield registers the majority (59%) of the housing capacity is on sites identified as deliverable - a proportion that has not significantly changed since the 2018 report (see Table 3). This shows that many homes can be built on suitable brownfield land now.

The increase in the number of LPAs recording such data and the increase in the overall number of homes assessed as deliverable suggests that LPAs find the registers a useful tool in establishing a five-year land supply.

Nearly two-thirds (63%) of the newly identified housing capacity, for those LPAs that have recorded deliverable data, are deliverable now (Table 3). The new sites that are likely to be coming forward may be those for which there is strong landowner and developer interest already as a result of a traditional call for sites, which was found to be the case in CPRE’s 2017 report *Unlocking Potential*.¹¹

Table 3: the estimated minimum housing capacity on sites recorded as deliverable

Deliverability	Minimum housing capacity deliverable	Percentage of total minimum housing capacity
Total 2019	634,750	59%
Total 2018	619,392	59%
Added since Feb 2018 with data	79,909	63%

Development is already under way on some sites on the brownfield registers. However, the analysis shows that this has little bearing on the overall conclusions of this report. Some LPAs have recorded whether a site is under construction, either in the notes column or in additional columns added to the register. In total, these sites represent just 2% of the overall minimum housing capacity, with 361 sites with a minimum capacity of 22,000 homes clearly identified as being under construction or completed. A further 11 sites across two LPAs, Wolverhampton and Maidstone, with a minimum capacity of over 500 homes on the register are recorded as being completed in the planning status column.

However, it is often unclear from the register whether any completed homes on sites under construction are included within the minimum housing capacity data. Some have recorded the status of sites under construction and this varies from the start of an access road to the site, to partial completion of dwellings. The recording of this information is highly inconsistent across local planning authorities and could result in the overall outstanding figure of the number of homes that can be delivered on brownfield being either over- or under-estimated. In order to more accurately estimate the minimum potential of brownfield land for future development and understand better how brownfield land comes forward as part of a pipeline, this information should be more clearly recorded in brownfield registers and government data standards should be updated to reflect this.

3.5. Permission

One of the drivers behind the introduction of brownfield registers was to enable the government to measure progress towards their goal for 90% of suitable brownfield sites to have planning permission by 2020, announced in 2014. Table 4 below shows that LPAs are a long way off meeting this target, with just half of the housing capacity on sites that have been granted planning permission (in full or outline, or are noted as having been completed), meaning that sites with a capacity for more than half a million homes are yet to be granted planning permission.

The decrease in the number and proportion of brownfield sites with planning permission may be a result of a number of sites having been completed since the 2018 report: there are 147,000 homes recorded as having planning permission in 2018 that are no longer recorded on the registers. An understanding of what happens to sites that are removed from brownfield registers is needed to realise the potential of registers in managing how brownfield land comes forward and is developed. It also suggests that there is a long way to go in realising the benefit of brownfield registers in helping to speed up the identification and permissioning of housing development on brownfield sites.

A higher proportion of newly added sites have already been granted planning permission, compared with the brownfield registers as a whole. This is perhaps a result of the approach to developing brownfield registers, and a reliance on developers to submit sites to the register, as noted in Section 3.4.

Table 4 also shows that, even for sites that are recorded as deliverable, the government's goal is not being met, with more than a third of homes on identified sites yet to be granted planning permission. It is important that deliverable, suitable brownfield sites are prioritised by developers and local authorities for redevelopment over greenfield sites.

Table 4: The number of homes on sites that have been granted outline or full planning permission

	Housing capacity with planning permission	Percentage of total housing capacity with planning permission (totals as a reminder)
2019	535,785	50% (1,077,292)
2019 new sites	69,795	55% (126,099)
2019 deliverable sites	413,587	65% (634,750)
2018	613,052	58% (1,052,124)

Brownfield registers were introduced alongside permission in principle (PiP), a new route to planning permission that is similar to an outline consent. Further approval is required before development can go ahead. LPAs can use Part 2 of the brownfield register to record sites that have permission in principle following a public consultation. As of February 2019, 10 councils had sites on or proposed for Part 2 of their brownfield register, across 58 sites with capacity for 1,590 homes. That so few LPAs have explored the use of Part 2, demonstrates that understanding and proactive use of PiP is still in its early days. For comparison, 69,000 of the newly recorded homes on brownfield registers have full or outline planning permission and this calls into question the real need for PiP as an additional route to consent as it suggests that obtaining planning permission is not a barrier to development. *Unlocking Potential* also highlighted a reticence of LPAs to use PiP due to the additional workload required and potential reduction in planning fees.¹²

There is inconsistency in how the planning status of sites with PiP is recorded and whether the site has planning permission. This means there will be some overlap with the figures in Table 4.

3.6. Ownership

As noted in *State of Brownfield 2018*,¹³ publicly owned land provides an opportunity for the greatest gains in terms of delivery of affordable homes.

More than 2,100 brownfield sites with a total capacity of almost 145,000 homes are owned by public authorities such as the local or county council, Highways England or the Ministry of Defence. This is 13% of overall capacity.

However, just 26% of the identified housing capacity on brownfield land in public ownership has planning permission (Table 5). This illustrates a missed opportunity to deliver homes that local people can afford to live in.

Table 5: The housing capacity of land in public ownership

	Total	With Planning permission	% with planning permission
Housing capacity on brownfield land in public ownership	144,819	37,545	26

3.7. Finding more land and building more homes on suitable brownfield land

3.7.1 Missed opportunities

Previous CPRE publications, including *Unlocking Potential*,^[1] have shown that brownfield registers may miss certain types of brownfield land. This is a result of the restrictive definition of ‘previously developed land’ in the NPPF, and small sites being overlooked. We welcome changes within the NPPF 2018 (updated in February 2019) that begin to recognise the different types of brownfield land; however, it is clear in the below case study from Enfield, that many of these sites are missing from brownfield registers. See Section 4.9 for a discussion of why LPAs missing sites from brownfield registers is placing our countryside at risk.

Case study: Enfield

The requirement in the regulations that land should be ‘available for residential development’ and the definition of that term in article 4(2) may result in missed opportunities to make better use of existing developed sites. For example, supermarkets and their car parks could be converted to provide homes whilst maintaining existing uses. This is illustrated further by CPRE London research in the London Borough of Enfield.¹⁴ The research found space for 37,000 homes on a wide range of types of brownfield land, including through the appropriate intensification of existing sites. This is compared to just 2,170 homes identified on Enfield’s most recently published register in December 2017.

The reasons for such a significant difference between CPRE London’s research and Enfield’s register may relate to the impact of the criteria that sites need to meet to be recorded on brownfield registers. For example, if land is currently in use, but there is potential to make more efficient use of brownfield land within the site such as the use of airspace, it may not be considered to be available for development.

3.7.2 Small sites

It makes sense to use small brownfield sites in urban centres as these sites have the necessary infrastructure and are in areas where people want to live. In *Unlocking Potential* evidence suggested that small sites were likely to be missing from brownfield registers due to lack of resources to identify and assess these sites.¹⁵

Three assessments were made using three different definitions of a small site, the details of which are in Table 6.

Table 6: Small sites on brownfield registers

	Number of sites	Area (ha)	Minimum housing capacity	% of total housing capacity	% with planning permission
Fewer than 10 homes (comparison to last year)	6,960	1,900	38,152	3.5	73
Less than 1 hectare (10% target in NPPF across all land)	14,322	3,893	350,808	32.6	55
Less than 0.25 ha and 5 homes (threshold in brownfield regulations)	1,120	72	1,791	0.2	78

The 2019 results show a similar proportion (3.5%) of the housing capacity on identified small sites of fewer than 10 homes (the threshold used in the 2018 report) showing that these sites remain largely unrecorded.

Since the 2018 report, the government has encouraged LPAs to allocate 10% of their housing numbers on sites that are no larger than one hectare (NPPF 2018, paragraph 68a). The data from brownfield registers suggests that such a target is unambitious for many LPAs with almost a third of sites meeting this criterion. A hectare is actually quite a large area - a square of 100 metres on each side - easily enough for 30 family houses with gardens. In urban areas, such sites could accommodate upwards of 100 homes, whereas in rural areas it is hard to find sites of even a quarter of a hectare, but there are plenty of smaller ones.

A total 105 LPAs have recorded 1,120 sites on their brownfield registers that are smaller than the minimum requirements in the regulations (fewer than five homes and less than 0.25 hectares). These sites have a capacity for 1,791 homes. Almost 80% of these sites have planning permission.

The inclusion of such sites should be more strongly encouraged to incentivise bringing forward the smallest of suitable brownfield sites, which are often immediately available and deliverable as a result of not being subject to complex ownership.

3.7.3 Density

As has already been noted (see Section 3.3), more sites and housing capacity have been identified on brownfield registers when compared to last year. However, the overall area of those sites has decreased. This indicates that the average minimum density assumptions that councils have made on brownfield registers has increased from 33 homes per hectare to just over 41 homes per hectare, with the range from 24 in the east of England to 109 homes per hectare in London.

An overall average density of 41 homes per hectare is an improvement, but is still a very low average that is only just higher than the average density of new developments already being achieved,¹⁶ and, as Section 3.7.4 suggests, could easily be exceeded. More research is needed to understand how councils are arriving at density assumptions, particularly in the case of mixed-use developments, and how they might be more ambitious.

3.7.4 Maximum figures

A total of 154 LPAs include an estimated maximum housing capacity for some of their sites (which is only mandatory for sites that have permission in principle). These maximum figures are 13% higher than the minimum figures for these sites (Table 7). These maximum figures suggest a 13% increase should be obtainable leading to an estimated total housing capacity of 1,217,000 homes with an average density of 47 homes per hectare. In some areas higher densities should yield even more homes than this.

Table 7: Minimum and maximum housing estimates for sites where a maximum figure was recorded

Minimum estimate	Maximum estimate	Difference	Extrapolated housing capacity across England if the 13% increase occurred across all sites
339,320	383,979	44,659 (13% increase)	1,217,340

3.8 Countryside at risk

The government aims to build the ‘right homes in the right places’.¹⁷ However, if LPAs do not record the full range of suitable brownfield sites and deliver appropriately high density developments on these sites, and can’t do more to get the right sites built out, then opportunities to deliver this ambition may be missed. This results in valued green spaces and the countryside being placed at risk.

The brownfield registers also provide evidence that there is a lot of suitable and available brownfield land where people want to live. However, even where councils have identified a significant amount of suitable brownfield land, greenfield sites remain at risk.

As has been illustrated across CPRE’s work, including *State of the Green Belt 2018*,¹⁸ and work by local campaign groups, valued greenfield sites are under constant threat across the country.

In Gateshead, for example, the leader of the council, Martin Gannon, has said: ‘You can’t move in the centre of Gateshead for brownfield sites but housebuilders aren’t interested in building homes in central Gateshead because they can’t sell them for £350,000.’¹⁹ At the same time, *State of the Green Belt 2018*²⁰ showed that land for 6,000 homes was released from Gateshead’s Green Belt in 2015. To counter this, some local planning authorities are taking matters into their own hands. Lewis Young, a councillor on Middlesborough Council, says: ‘We are seeing great progress on some brownfield sites, but understand that these sites are not attractive to private developers. That is why Middlesbrough Council is launching a Housing Delivery Vehicle, which will allow us to control the delivery of some of these sites, and build homes for the needs of people, not profit.’

Sir Oliver Letwin’s Review of Build Out also proposes giving new powers to local planning authorities to get faster build out on allocated sites, whether brownfield or greenfield, through being able to insist on a wider mix of housing types than is currently seen, as well as compulsory purchase and controls over site development.²¹ At the time of writing the government had yet to respond to Letwin’s recommendations, but CPRE believes that the recommendations will particularly help the delivery of new homes on suitable brownfield land.

The Housing Delivery Test is an annual measurement comparing the number of homes that have been delivered against the number of homes required, in line with government methodology. According to the Test results published February 2019 by MHCLG,²² 87 councils will be required to include a buffer in the five-year land supply calculations because fewer homes have been delivered over the past three years than have been required according to the government’s approach. A more sustainable alternative to allocating more land for development might be to increase density assumptions on existing greenfield and brownfield

sites, and put effort into facilitating the delivery of brownfield sites currently not identified as ‘deliverable’.

Case study: A planning application

The recent planning application for 500 homes near Ashkam Bog provides an example of a valued wildlife site in York’s Green Belt being placed at risk from development despite there being a number of suitable brownfield sites available for development. The council has identified space for almost 6,000 homes on suitable brownfield land, all of which are recorded as being deliverable in five years and yet over 50% of the housing capacity is yet to be granted planning permission. CPRE North Yorkshire responded, calling for the application to be rejected.

Case study: A strategic framework

CPRE Lancashire has been lobbying for the Greater Manchester Spatial Framework to consider brownfield land first. As a result, the proportion of the housing requirement proposed in the urban area has increased from around 55-60% to 87% on brownfield sites. This means that almost 2,500 hectares of Green Belt land did not feature in the latest draft framework. Significant amounts of Green Belt land remain proposed for housing development as well as other types of development including industrial and warehousing. We believe that the Greater Manchester Combined Authority needs to go still further to prioritise the reuse of suitable brownfield land for all types of development. CPRE Lancashire is working closely with local communities to evaluate brownfield registers and submit further suitable brownfield sites for consideration.

Of course, there is some brownfield land in countryside locations, including in the Green Belt, and these can and should be developed if they are suitable sites in an accessible location. Just 49 sites with capacity for 1,773 homes are recorded as being within the Green Belt. Recording on this between local councils may be inconsistent as there is no requirement to record this information.

Case study: Good brownfield development

In 2018, CPRE Gloucestershire awarded the King’s Lodge Development, in Forest of Dean district council, a Rural Excellence Prize. Funding from the Homes and Communities Agency (now Homes England) was used to help relocate a business to a more suitable location. This unlocked the potential of the site, which is now the site of 92 homes, including 32 for affordable rent and five for shared ownership. CPRE Gloucestershire praised the development as ‘contemporary in its visual appearance, and with a well-chosen palate of external materials has achieved a distinct character and sense of place. The properties are also highly energy efficient as they are built to the Code for Sustainable Homes Level Four.’²³ Level 4 is well above the standards set in building regulations.

4. Conclusion and recommendations

The redevelopment of suitable brownfield sites can clearly go a long way in delivering the homes the country needs in places people want to live.

But it is clear that more needs to be done to ensure that brownfield registers deliver on their potential to proactively encourage the bringing forward of brownfield sites, making the deliverable, and delivering new homes on suitable brownfield land. It can be frustrating for LPAs and communities alike when they see valued green spaces targeted by developers whilst suitable brownfield sites remain idle.

In order to address this, and other issues arising in the report CPRE recommends:

That national government:

- Introduces a **genuine brownfield first policy**, that ensure suitable brownfield land is prioritised for redevelopment over greenfield land in local and strategic plans and in planning decisions. This includes ensuring that paragraph 123c in the revised NPPF is interpreted to enable decision-makers to refuse applications that do not represent an efficient use of land, and not just where there is a shortage of housing land.
- Prioritises the redevelopment of suitable brownfield land in its **funding decisions to unlock stalled sites** to increase the number of sites recorded on brownfield registers as developable and bring them forward for development.
- Implements the recommendations of the Letwin Review of Build Out,²⁴ particularly on giving **LPAs new powers of compulsory purchase and to control the development of sites**. This would provide LPAs with more scope to prioritise brownfield development.
- Support LPAs to follow the data standards more rigorously and publish an aggregated national brownfield register to support communities and developers in identifying which sites are on the brownfield register and **help identify any gaps**.
- Continue to evolve the Brownfield Registers Regulations so that **registers act as a true pipeline**, identify all brownfield sites and record their suitability for uses other than housing as well as recording their ongoing development status and the contribution they have made towards meeting development needs after completion.

Local government:

- Use the registers to promote suitable sites and attract investment to bring them forward for development. For example, Middlesbrough has launched a Housing Delivery Vehicle to redevelop brownfield sites that are not attractive to private developers.
- Work with the CPRE network and local communities who are often keen to see new development on local eyesores to identify and bring forward suitable brownfield land for redevelopment.

We will continue to monitor brownfield registers, including delving into the detail of some of the changes observed, to better understand the potential of suitable brownfield sites to deliver the right homes in the right places.

Annex: Regional breakdown of key statistics in brownfield registers analysis

Region	Number of LPAs	Number with a register published in the last 12 months	Total number of sites	Total area (hectares)	Total minimum housing capacity	Newly added minimum housing capacity	Total housing capacity of reviewed registers
Section reference	Section 3.1	Section 3.1	Section 3.2	Section 3.2	Section 3.2	Section 3.3	Section 3.3
East	48	35	1,750	4,440	107,748	17,012	85,539
East Midlands	42	33	1,208	2,146	62,514	2,512	52,047
London	35	20	2,997	2,642	287,051	43,616	178,806
North East	12	7	731	1,242	35,344	6,925	27,917
North West	40	26	2,475	3,292	152,625	10,058	104,354
South East	69	58	3,052	3,878	144,367	16,223	124,338
South West	39	29	1,745	2,120	70,831	8,588	59,286
West Midlands	31	25	2,436	3,314	102,866	3,951	82,350
Yorkshire and The Humber	22	18	1,883	2,929	113,946	17,214	108,289
Grand Total	338	251	18,277	26,002	1,077,292	126,099	822,926

Annex continued:

Region	Minimum housing capacity of deliverable sites	Housing capacity of newly added deliverable sites	Minimum number of homes on sites with planning permission	Minimum housing capacity of small sites, fewer than 10 homes	Minimum housing capacity of small sites, less than 0.25 ha and fewer than 5 homes	Minimum housing capacity of small sites, less than 1ha	Average density
Section reference	Section 3.4	Section 3.4	Section 3.5	Section 3.7.2	Section 3.7.2	Section 3.7.2	Section 3.7.3
East	78,285	14,399	49,985	3,447	144	26,736	24
East Midlands	35,824	1,249	35,600	2,087	55	19,033	29
London	170,185	20,362	166,727	7,391	608	87,988	109
North East	16,814	4,196	11,623	1,585	85	10,950	28
North West	63,554	4,940	64,846	4,446	172	49,557	46
South East	85,333	8,902	63,452	6,674	89	56,164	37
South West	52,698	8,187	34,387	4,573	133	25,332	33
West Midlands	58,251	3,481	57,910	4,423	414	34,317	31
Yorkshire and The Humber	73,806	14,293	51,256	3,526	91	40,731	39
Grand Total	634,750	80,009	535,785	38,152	1,791	350,808	41

¹ The Town and Country Planning (Brownfield Land Register) Regulations 2017. 2017. <http://www.legislation.gov.uk/ukxi/2017/403/contents/made> [Accessed 14/3/2019]

² CPRE. State of Brownfield. 2018. <https://www.cpre.org.uk/resources/housing-and-planning/housing/item/4769-state-of-brownfield-2018> [Accessed 14/3/2019]

³ Malthouse, K. Brownfield Sites. 2019. <https://hansard.parliament.uk/commons/2019-03-04/debates/BE6F5010-7C96-452A-BF14-D3A9A2E0D334/BrownfieldSites> [Accessed 14/3/2019]

⁴ CPRE. State of Brownfield. 2018. <https://www.cpre.org.uk/resources/housing-and-planning/housing/item/4769-state-of-brownfield-2018> [Accessed 14/3/2019]

⁵ MHCLG. National Planning Policy Framework. 2019. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf [Accessed 14/3/2019]

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- ⁶ Homes England. Strategic Plan 2018/19-2022/23. 2018. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752686/Homes_England_Strategic_Plan_AW_REV_150dpi_REV.pdf [Accessed 14/3/2019]
- ⁷ NHF. Housing sites mapped: England's most comprehensive brownfield land map. 2018. <https://www.housing.org.uk/resource-library/browse/housing-sites-mapped-englands-most-comprehensive-brownfield-land-tool/> [Accessed 14/3/2019]
- ⁸ CPRE Lancashire. CPRE Lancashire Brownfield Land Register Toolkit. 2018. <http://www.cprelancashire.org.uk/resources/housing-and-planning/item/2483-cpre-lancashire-brownfield-land-register-toolkit> [Accessed 14/3/2019]
- ⁹ CPRE London. Space to Build in Enfield. 2019. <http://www.cprelondon.org.uk/projects/item/2427-space-to-build-in-enfield> [Accessed 14/3/2019]
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- ¹¹ HTA. Unlocking Potential: Best Practice for Previously Developed Land. CPRE, 2017. <https://www.cpre.org.uk/resources/housing-and-planning/housing/item/4726-unlocking-potential-best-practice-for-brownfield-land-registers> [Accessed 14/3/2019]
- ¹² HTA. Unlocking Potential: Best Practice for Previously Developed Land. CPRE, 2017. <https://www.cpre.org.uk/resources/housing-and-planning/housing/item/4726-unlocking-potential-best-practice-for-brownfield-land-registers> [Accessed 14/3/2019]
- ¹³ CPRE. State of Brownfield. 2018. <https://www.cpre.org.uk/resources/housing-and-planning/housing/item/4769-state-of-brownfield-2018> [Accessed 14/3/2019]
- ¹⁴ HTA. Unlocking Potential: Best Practice for Previously Developed Land. CPRE, 2017. <https://www.cpre.org.uk/resources/housing-and-planning/housing/item/4726-unlocking-potential-best-practice-for-brownfield-land-registers> [Accessed 14/3/2019]
- ¹⁵ CPRE London. Space to Build in Enfield. 2019. <http://www.cprelondon.org.uk/projects/item/2427-space-to-build-in-enfield> [Accessed 14/3/2019]
- ¹⁶ HTA. Unlocking Potential: Best Practice for Previously Developed Land. CPRE, 2017. <https://www.cpre.org.uk/resources/housing-and-planning/housing/item/4726-unlocking-potential-best-practice-for-brownfield-land-registers> Accessed [14/3/2019]
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