

Recycling our land: the state of brownfield 2020

An updated analysis of the potential of brownfield land for new homes

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The
countryside
charity



Executive summary

Brownfield land – land previously built on – that is suitable for housing is a valuable resource because it provides an alternative to losing precious greenfield land to development. In turn, greenfield land can continue to provide many benefits in terms of fair access to green space near to where people live, space for nature and people, and mitigation of the climate emergency.

Understanding how much brownfield land there is in England and how this land is being used is vital to ensuring that this resource meets its full potential. The re-use of brownfield land for residential development has many benefits, including often being close to where people already live and work, with infrastructure such as public transport, schools and shops already in place. Ultimately, brownfield allows for the provision of the homes we need, where we need them. The government has identified capacity for 1.3 million homes on local authority brownfield registers, which is an increase of 19% over the figure of 1.077 million figure we reported in our 2019 research. Of the 1.3 million homes identified, more detailed analysis of brownfield registers by CPRE, the countryside charity has uncovered the following:

- Brownfield registers show that there is enough brownfield land for **1,061,346** housing units over nearly **21,000** sites, covering almost **25,000** hectares.
- There is currently planning permission for **565,564** units, or **53%** of the total brownfield housing capacity.
- There is currently land provision for over **1.5 million** homes using brownfield land and other land with planning permission, providing enough land to meet the government's **300,000** homes a year target for the rest of this parliament.
- Brownfield sites that have begun being developed and have since been omitted from the registers provide an additional housing capacity of **78,000** units. Bringing the total brownfield housing capacity to **1,144,665** units.
- Since the first registers, a total of **7,383** sites have been added and **4,694** sites omitted from the registers. Of these, **2,844** or **61%** could be matched with development projects.
- There have been **2,689** net additions to the registers since their conception, providing an additional **145,206** housing unit capacity.

Recommendations

- The introduction of a stronger 'brownfield first' policy in any new planning system is crucial to ensure that these 1.3 million sites are built out before any development on greenfield land. The retention and improvement of brownfield registers and the development of a national brownfield map will be crucial in continuing to identify and harness this valuable resource.
- Housing investment funding should be reformed to encourage the regeneration of the Midlands and the north of England, allowing for the plentiful brownfield land resource to be effectively harnessed in areas of particular regeneration need.
- Local communities should be provided with sufficient time and stronger mechanisms for bringing brownfield land forward as a source of land supply, such as increased compulsory purchase powers. Local authorities should also have increased control of the order in which development land is built so that suitable brownfield sites are developed first.
- Brownfield sites should be developed to high design standards and with a substantial proportion of genuinely affordable homes to meet local needs, as well as the use of modern methods of construction which allow homes to be built more quickly.



Introduction

Brownfield registers, first introduced in April 2017 following CPRE, the countryside charity's 'Waste of space' campaign, have provided us with the information required to determine how brownfield land is currently being used in England. Many brownfield sites have come forward since the first brownfield register and many have also been removed. But the fate of sites omitted from successive registers has been unknown until now.

There are also questions as to how brownfield registers will sit within the radical changes proposed to local planning by the government's Planning White Paper, published in August 2020. In the accompanying consultation paper 'Changes to the Current Planning System' the government undertook to review the role of brownfield registers. CPRE strongly believes that the registers should be retained, improved and regularly updated. The evidence we present in this report shows that registers are now beginning to fulfil their role in encouraging local authorities to more proactively identify brownfield land capacity, and thereby reduce pressure for the unnecessary development of greenfield sites. However, there is still plenty of scope for local practice to improve and for still more sites to be proactively identified.

This update of the State of Brownfield series builds upon the questions asked in previous reports including what the current housing capacity of brownfield land is and how much of this land has planning permission. It also seeks to explore the fate of sites that have been removed from the registers.

What is the current capacity of brownfield land in England?

The current housing capacity of brownfield land was calculated by identifying those brownfield registers that had been updated since February 2019. The registers were obtained through searches of local planning authority (LPA) websites between January and May 2020. There were 231 updated brownfield registers since the previous report out of a potential 343 LPA registers.¹ Where registers had not been updated, the most up-to-date figures were used. Full details of the methodology used can be viewed in the State of Brownfield 2019 report.²

We found that the current minimum brownfield land housing capacity is 1,061,346 units. This is a decrease of 15,946 (-1.5%) units since the 2019 report. In addition, the area of brownfield land also decreased since 2019 from 26,002 hectares to 24,684 hectares a decrease of 1,318 hectares (-5.2%). However, the number of brownfield sites identified on brownfield registers increased from 18,277 to 20,750, an increase of 2,473 (12.7%) sites (Table 1). Much of this housing capacity is spread throughout England, but there are particular concentrations in London (capacity for 289,988 homes), the north west (168,194) and south east (133,192).

Although the total number of units and hectares of available brownfield land have decreased since the previous report, the number of sites actually increased. This could be due to an increased number of large sites (0.5 hectares or above) being omitted since the previous brownfield registers were released and an increased number of small sites being added. The omission of larger sites may be due to now being under development (see below), and an increased number of smaller sites coming forward. Or it could be the

¹ MHCLG Brownfield Land, available at: <https://digital-land.github.io/dataset/brownfield-land/>

² CPRE, State of Brownfield 2019, available at: <https://www.cpre.org.uk/resources/state-of-brownfield-2019/>



result of more accurate recording of land classified as 'brownfield', excluding any greenfield elements of the site in the register and resulting in smaller sites being brought forward (see below).

How much of this land has planning permission?

Of the minimum brownfield land housing capacity, 565,564 units currently have planning permission (including those with outline permissions and reserved matters) (Table 2). Although the total housing capacity has decreased since 2019, there has been an increase of 29,779 housing units being granted permission, increasing the proportion of brownfield land on the registers with planning permission from 50% to 53%. This may be as a result of the removal of sites that have now been developed. It could also be indicative of the registers being refined to only contain land that is considered as brownfield (see below).

The Local Government Association, in February 2020, found that 1.034 million homes in total had been granted planning permission but not yet built.³ If one subtracts from this figure the planning permissions shown on brownfield registers, this gives a figure of just over 468,000. If one then adds all the sites shown on brownfield registers as suitable for development, this means that brownfield sites and other unbuilt sites with planning permission could provide over 1.5 million new homes – meaning there is already enough available and suitable land⁴ in the planning system to meet the government's 300,000 target for the rest of this parliament. This in turn raises questions as to the need for urgent fundamental reforms to speed up the planning system, as opposed to more carefully considered reforms introduced over a longer time scale, that make use of the strengths of the current system.

How have brownfield registers changed since their introduction?

Precisely 767 brownfield registers have been published since 2016 by the 326 English local planning authorities (LPAs). Where more than one register had been published by an LPA, successive registers were used to identify the sites which had been excluded from later registers. Site references and addresses were used to determine which sites had been omitted from the registers, and ensured that it was identified when a site's reference had changed rather than been removed from the register.

The list of excluded sites was cross-checked with Glenigan's⁵ construction database to establish whether the site may have been excluded from later registers due to it being brought forward for development. Matches with the database were determined using either the planning references, local housing land availability assessment (SHLAA or HELAA) reference or geocode, name and address of the site provided by the LPA.

³ LGA, Housing backlog, available at: <https://local.gov.uk/housing-backlog-more-million-homes-planning-permission-not-yet-built>

⁴ Note that the criteria for including land on a brownfield land register include that development of the site must be achievable within 15 years, as well as being available and suitable. Most, but not all, registers also show whether a site can be developed or 'delivered' within five years in the opinion of a local authority. Not all sites may be considered 'deliverable' within five years, often because local authorities rely on large private housebuilders to build out development sites in most cases, and/or because supporting transport links or decontamination works are needed. CPRE's State of Brownfield 2019 report found that the majority of potential new houses (634,000 in total) on brownfield sites were identified as deliverable within the next five years, with 63% of newly identified sites (with capacity for 79,909 houses) also meeting this definition.

⁵ Glenigan, <https://www.glenigan.com/>



Successive comparison of the registers showed that there have been 7,383 sites added since the earliest registers and 4,694 sites omitted from later version of the registers. This provides a net addition of 2,689 sites added since the first registers (Table 4).

The average minimum dwellings on the most up-to-date registers was 54. Using this figure, the additional 2,689 sites will have provided land suitable for an additional 145,206 homes since the introduction of brownfield registers. This highlights the increasing value of brownfield registers in identifying suitable land for housing, ultimately allowing for the protection of greenfield land.

What has happened to sites that were removed from the registers?

Of the omitted sites, 2,844 could be matched to a project on Glenigan's construction database, 61% of all omitted sites. Regional breakdown of these removed sites can be seen in Table 5.

Small sites of 0.5 hectares or below made up over half (52%) of those omitted from the registers. Of these smaller sites, 1,655 (67%) could be matched against a development activity. Smaller sites may have also been omitted due to falling below the size threshold for inclusion in the registers.

Although large sites contributed the minority of omitted sites, they accounted for 96% of the 6,721 hectares of land on the omitted sites. Of these, 1,166 large sites omitted were matched with development activity, or 66% of the omitted land on sites of 0.5 hectares or more.

Omitted sites were also cross-referenced against the published OS database of greenfield and brownfield land. The analysis found that 10% of omitted sites were designated as greenfield, this rose to 16% for sites of 0.5 hectares or more. These sites may have been excluded from later editions of the registers if local authorities subsequently identified them as greenfield sites. This refining of the registers may be responsible in part for the reduction in housing capacity and hectares of brownfield land seen since the previous CPRE State of Brownfield report.

What is the housing capacity on omitted brownfield land?

Due to many brownfield sites being omitted from registers once they enter a stage of development, the housing capacity of this brownfield land contributes becomes unknown. MHCLG guidance says that if a site no longer needs to be listed, it should remain on the register for historical reasons and not be deleted. Instead, an 'end date' should be provided of when the site was developed or determined to be no longer suitable for development.

Analysis of the omitted sites that became projects, revealed that there was further capacity on this land of 122,823 housing units. Of these, completed sites provided 39,504 residential units (32%), while 27% of units were on sites that are currently under construction and 41% are on sites that have yet to start on site (Table 6).

Using this additional data and that obtained from the brownfield registers, this analysis shows that there is brownfield capacity for 1,144,665 housing units in England, not accounting for completed sites. However, this figure is likely to be higher due to this data only accounting for developments that are 10 or more units.



What is the total minimum housing capacity on brownfield land?

This result shows that we do not have a clear picture of the total brownfield housing capacity within England, and the numbers presented in this report are likely a conservative estimate of its potential capacity. This is in line with the data which is presented by MHCLG,⁶ which predicts that there is space for 1,334,329 potential dwellings on 36,700 hectares of England's brownfield land, significantly more than was found in this analysis.

While the MHCLG figure is obtained through first going through a pipeline process to correct the data supplied by LAs, the difference in figures presented here, demonstrates that brownfield registers are still not being used to their full potential, with data inaccuracies and improper use of the registers being a large barrier to this.

Recommendations

- Today, there is capacity for 1.3 million homes on brownfield land. The introduction of a stronger 'brownfield first' policy in any new planning system is crucial to ensure that these sites are built out before any development on greenfield land. The retention and improvement of brownfield registers and the development of a national brownfield map will be crucial in continuing to identify and harness this valuable resource.
- Housing investment funding should be reformed to encourage the regeneration of the Midlands and the North, allowing for the plentiful brownfield land resource to be effectively harnessed in areas of particular regeneration need.
- Local communities should be provided with sufficient time and stronger mechanisms for bringing brownfield land forward as a source of land supply, such as increased compulsory purchase powers. Local authorities should also have increased control of the order in which development land is built so that suitable brownfield sites are developed first.
- Brownfield sites should be developed to high design standards and with a substantial proportion of genuinely affordable homes to meet local needs, as well as the use of modern methods of construction which allow homes to be built more quickly.

⁶ MHCLG, Brownfield land, available at: <https://digital-land.github.io/dataset/brownfield-land/>



Annex

Table 1. Shows and compares the number of sites, area and minimum housing capacity of brownfield registers published in 2020 and 2019.

	Number of Sites	Area (ha)	Minimum Housing Capacity
Total 2020	20,750	24,684	1,061,346
Total 2019	18,277	26,002	1,077,292
Difference (% change)	2,473 (12.7%)	-1,318 (-5.2%)	-15,946 (-1.5%)

Table 2. Shows and compares the number of sites with planning permission and the resulting housing capacity with permission in 2020 and 2019.

	Sites with Permission	Housing capacity with permission	Percentage of total housing capacity with permission
2020	12,277	565,564	53%
2019	11,488	535,785	50%
Difference (% change)	789 (6.8%)	29,779 (5.6%)	+3%

Table 3. Shows the number of sites, areas and minimum housing capacity and change since 2019 of brownfield land registers by regions of England.

Region	Number of sites (change since 2019)	Area (Ha) (change since 2019)	Minimum housing capacity (change since 2019)
East	1,899 (149)	3,442 (-998)	99,681 (-8,067)
East Midlands	1,268 (60)	2,107 (-39)	54,983 (-7,531)
London	3,253 (256)	2,401 (-241)	289,988 (2,937)
North East	790 (59)	1,409 (167)	35,480 (136)
North West	2,833 (358)	3,312 (20)	168,194 (-15,569)
South East	3,271 (219)	3,885 (7)	133,192 (-11,175)
South West	2,031 (286)	2,014 (269)	69,355 (-1,476)
West Midlands	3,266 (830)	3,312 (-2)	99,880 (-2,986)
Yorkshire and the Humber	2,125 (242)	2,797 (-132)	110,592 (-3,354)
Total	20,750 (2,473)	24,684 (-1,318)	1,061,346 (-15,946)

Table 4. Shows the number of sites included in the first and latest brownfield registers.

	Number of sites
Sites on earliest registers	18,018
Sites on latest registers	20,707
Sites omitted from latest registers	4,694
Sites added since earliest registers	7,383
Net additions	2,689

Table 5. Shows the regional spread of omitted sites and sites matched against development activity.

Region	Total omitted sites	Matched against development
East	452	277
East Midlands	321	227
London	543	433
North East	167	85
North West	776	419
South East	917	532
South West	597	457
West Midlands	492	193
Yorkshire and the Humber	429	221
Total	4,694	2,844

Table 6. Shows the housing capacity of sites that have been omitted from brownfield registers due to development projects beginning.

	Projects	Units
Yet to start on site	695	50,276
Under construction	164	33,043
Completed	693	39,504
Total	1,552	122,823