

# State of Brownfield 2022

A report by CPRE, the countryside charity

November 2022



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## Executive Summary

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CPRE, the countryside charity has for decades promoted the need to use our plentiful supply of previously developed land, known as brownfield land, for housing developments before any needless destruction of our countryside and green spaces.

This approach makes sense. Brownfield land lays idle, often a blight on communities. While our green lands provide space for nature, climate adaptation as well as benefits for people's health and wellbeing. Harnessing the potential of brownfield land has multiple benefits if we remove the barriers to its development.

This annual update from CPRE highlights the current brownfield land capacity across regions in England and offers recommendations for increased use of our brownfield resource. Our key findings include:

- Brownfield land continues to be perpetually regenerating resource with the current capacity now standing at 1.2 million new homes (up from 1.1 million in 2021 and 1.05 million in 2018). This capacity comes from 23,000 sites on 27,000 hectares. (Compared to 21,500 sites on 26,250 ha in 2021; and 17,650 sites and 28,350 ha in 2018.)

Year	Number of sites	Hectares	Number of housing units
2022	23,002	27,342	1,232,592
2021	21,566	26,256	1,162,969
2020	20,750	24,684	1,061,346
2019	18,277	26,002	1,077,292
2018	17,656	28,349	1,052,124
<b>Difference (2018 – 2022)</b>	<b>30%</b>	<b>-4%</b>	<b>17%</b>

- Brownfield land can be found in high supply in all regions of England, with particular hotspots in the North west (165,919 housing plots), Yorkshire and the Humber (115,052) and the South East (170,941).
- Most brownfield land still does not have a current planning permission. There has been an increase in the proportion of housing units which have planning permission on brownfield land in 2022 (45%) compared with 2021 (44%). But in turn totals are particularly low within regions needing levelling up, specifically the North West (33%), West Midlands (36%) and Yorkshire & The Humber (40%) regions.
- Individual local authorities with the highest brownfield capacity in terms of housing plots include Birmingham and Manchester city councils and three London boroughs.



### CPRE recommends the following to the government:

1. Clear policies in the new National Planning Policy Framework (NPPF), expected in 2023, which prioritise the use of brownfield land over greenfield. This should include:
  - a firm presumption against giving planning permission for additional greenfield sites for development compared to those already in local plans;
  - only allocating greenfield sites in local plans where either (i) sites are primarily affordable homes for local needs; or (ii) where it can be shown that as much use as possible is already being made of brownfield land, and in particular providing more housing in town and city centres. This test already applies in cases where local authorities are considering building large housing developments on currently designated Green Belt land (see p.10 of this report), but CPRE thinks it should apply across the country.
2. The NPPF also needs to change to require that all new developments have diversity of housing tenures and types as outlined by the 2018 Independent Review of Build Out.
3. The New Homes Bonus should be reformed so it is only paid out to support either development of brownfield land and/or additional affordable homes (with affordable homes needing to provide for people on average local incomes or below).
4. The Infrastructure Levy should be set at least double the rate on greenfield land compared to brownfield, in order to reflect the high costs of greenfield development to local communities, although brownfield redevelopment should still make a direct and effective contribution to meeting local affordable housing need.
5. Provide local communities with stronger mechanisms to bring 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 on so that suitable brownfield sites are developed first.

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<sup>1</sup>For more detail on the issue of 'affordable housing' and what CPRE means by the term, see the box 'What is affordable housing?' on p.11 of this report.



## Introduction

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How we use our land is of vital importance. The countryside and green spaces offer people the opportunity to benefit their physical and mental health; provides nature with a home, enriching these spaces with life; and plays a crucial role in storing carbon and the worst impacts of climate change. Contrary to this, CPRE, the countryside charity, has found consistent evidence of unprecedented destruction of these places to build unaffordable, poorly located and carbon intensive housing developments. At the same time, CPRE has also consistently found that swaths of disused and derelict land lays idle despite the opportunity they offer to save our green lands from development.

These spaces are otherwise known as brownfield land and promoting its use for housing developments above the unnecessary use of greenfield sites has been a key focus for CPRE for decades.

Using brownfield land first for development makes sense. It is often located in places which already have existing infrastructure such as public transport, schools and other services. As well as often being less carbon intensive when buildings are re-used such as old factories and offices, saving the carbon output required to make new building materials. Its development also breathes new life into communities whilst also building the homes we need.

CPRE's previous research has previously shown that there is space for at least 1 million homes on suitable brownfield land, much of this in the midlands and north of England as well as the highly pressured south east. It's also been shown that brownfield land as a resource is not finite, that is as brownfield land is used more becomes available. The further benefits of this land were shown when research revealed that housing developments on brownfield sites are often completed more than 6 months more quickly than those on greenfield land.

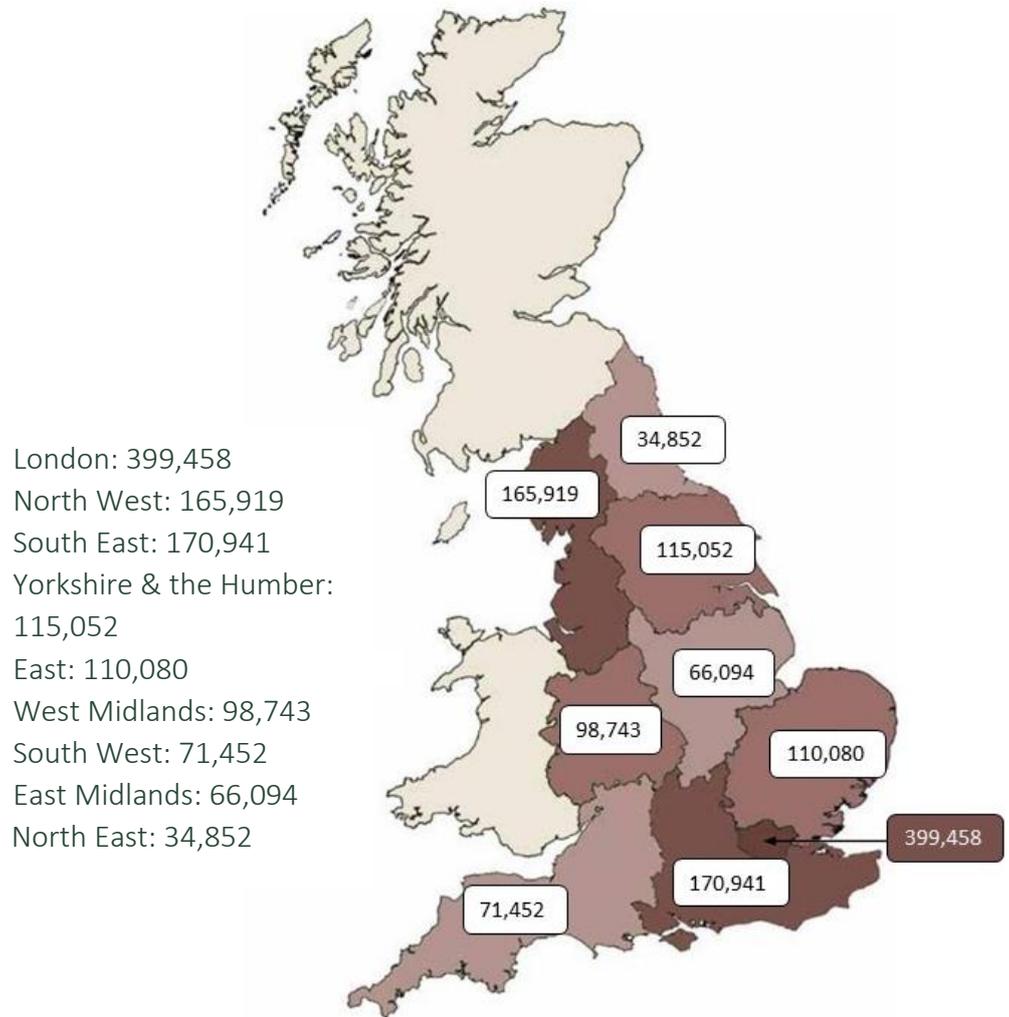
Despite the many positives of using brownfield land for development, the senseless destruction of our countryside continues in the pursuit of developer's profits and is only likely to become worse. Continued deregulation will likely erode many environmental protections and make it even easier to build on our green lands. This will have devastating consequences for our countryside, and climate and nature targets.

This report is the latest report in CPRE's 'State of brownfield' series which looks to quantify the housing capacity of brownfield land across England. We will explore where this brownfield capacity is, how much has already been given planning permission as well as where capacity has grown the most since the last report.

**What is 'brownfield' land?** Simply put, brownfield land refers to any piece of land which has previously been developed but is no longer in use. This could include old office and factory buildings or car parks, for example. In policy terms, brownfield land is defined in the National Planning Policy Framework as land which is or was occupied by a permanent structure. Crucially, these sites provide space to build the homes we need, without damaging precious greenfield land.



Figure 1 – Shows the regional distribution (in terms of plots) of brownfield housing capacity throughout England. Source: CPRE analysis / local authority brownfield land registers





## Analysis

### How much brownfield land?

Analysis of 344 local authority brownfield land registers, 143 of which have been updated since the previous analysis (as of November 2022), revealed the current identified capacity for homes on brownfield land stands at 1,232,592. This is an increase of 6% since 2021, or an additional capacity for ~70,000 homes since the previous analysis. There has also been an increase in the number of sites and hectares of brownfield land recorded on local authority brownfield land registers, both increasing 7% and 4%, respectively, since last year (Table 1). Demonstrating that whilst sites are built out (see previous State of Brownfield reports), new sites continue to come forward, maintaining brownfield capacity at ~1 million homes for several years.

The recent push for greater digitisation of the planning system has led to Department for Levelling Up Housing & Communities (DLUHC) developing an online data platform which brings planning data from local planning authorities into one place. The platform has collected brownfield land registers from local authorities across England using an automated system. The data platform reports that the current brownfield housing capacity is 1,466,214 net dwellings across English local authorities. This result from DLUHC’s own data collection corroborates our findings in this and previous reports, and we look forward to continuing to work with the department to continue the development of the brownfield land dataset.

Table 1 - The total quantity of brownfield sites and hectares, and the total minimum housing unit capacity as recorded on local authority brownfield land registers. Source: CPRE / local authority brownfield land registers

Year	Number of sites	Hectares	Number of housing units
2022	23,002	27,342	1,232,592
2021	21,566	26,256	1,162,969
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<b>Difference (2018 – 2022)</b>	<b>30%</b>	<b>-4%</b>	<b>17%</b>



## How much brownfield land has planning permission?

Of the 1,232,592 housing unit capacity on brownfield sites, we found that 45%, or 555,874, of this capacity currently has planning permission (this includes those with outline permissions and reserved matters). The proportion of brownfield housing capacity having planning permission has benefitted from an increase of 1% since 2021 (Table 2). This may be the first indication of sites beginning to move through the planning process again following the pandemic.

However, momentum in providing planning permissions to brownfield land needs to continue and increase. With the continued pressure being faced by our green spaces evidenced by CPRE (see State of our Green Belts; Beauty still betrayed: the state of our AONBs; and Building on our food security reports) getting brownfield land through the appropriate processes in the planning system in a timely manner is vital.

Table 2 - The minimum number of housing units and the proportion of which that have planning permission on brownfield land between 2018 and 2022. Source: CPRE analysis / local authority brownfield land registers

Year	Number of housing units	Number of housing units with planning permission	Percentage (%)
2022	1,232,592	555,874	45%
2021	1,162,969	506,086	44%
2020	1,061,346	565,564	53%
2019	1,077,292	535,785	50%
2018	1,052,124	613,052	58%

## Where is the most brownfield land currently?

There is a clear regional spread of brownfield land, as can be seen in Figure 1. Particular concentrations of housing capacity are in London (399,458), as well as the South east as a whole (170,941). However, the midlands and northern regions also show great potential with the North West (165,919), Yorkshire and the Humber (115,052) and the West Midlands (98,743) coming out on top for housing capacity.

The proportions of housing units with planning permission is generally widely distributed throughout the country, with the proportion in many regions falling around the national average of 45% (Table 3). However, the North West, West midlands and Yorkshire and the Humber in particular are lagging behind in terms of permission given to brownfield sites (33%, 36% and 40%, respectively).



Table 3 – The minimum number of housing units and the proportion of those which have planning permission by region. Source: CPRE analysis / local authority brownfield land registers

Region	Minimum housing capacity 2022	Proportion of housing units with planning permission (%)
East	110,080	54%
East Midlands	66,094	59%
London	399,458	46%
North East	34,852	46%
North West	165,919	33%
South East	170,941	48%
South West	71,452	56%
West Midlands	98,743	36%
Yorkshire and the Humber	115,052	40%
<b>Total</b>	<b>1,232,592</b>	<b>45%</b>

### What differences are there between local authorities?

In this edition of the State of Brownfield reports, we found that as of November 2022, 143 local planning authorities had updated their brownfield land registers. This is lower than the previous year where we had found 257 had updated their registers. This may be due to the time in which we collected our data and the fact that the majority of authorities tend to update registers towards the end of the year, rather than any reflection on local authorities not carrying out their duty to produce registers.

We looked into which of the 143 updated registers are showing the greatest capacity on brownfield land in 2022.



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The top five local authorities for brownfield land housing capacity in 2022:

1. Southwark Borough Council – 54,550
2. Birmingham City Council – 37,326
3. Wandsworth Borough Council – 36,988
4. Manchester City Council – 36,978
5. Brent Borough Council – 29,149

The below local authorities, out of the updated 143, have had the greatest increase in brownfield land housing capacity since 2021.

Local authorities with the greatest increase in brownfield housing capacity since 2021

1. Brent Borough Council – 16,679
2. Waltham Forest Council – 13,865
3. Wandsworth Borough Council – 7,987
4. York City Council – 6,002
5. Trafford Council – 3,261



## Towards a brownfield first planning policy

In this report, CPRE recommends a brownfield first planning policy. In broad terms this should involve prioritising the development of suitably located urban brownfield sites over greenfield for large scale housing development, both in terms of public investment and in local planning policies to control the sequence of (or 'phase') developing sites allocated for housing in plans.

A similar policy prioritizing town centres has already operated for retail development since the 1990s, and between 1998 and 2011 a brownfield first policy was in force explicitly for housing. Since 2011 policies have been weakened, allowing much more greenfield development to come forward. In a letter to MPs in December 2022, however, Secretary of State Michael Gove pledged to 'launch a review into identifying further measures that would prioritise the use of brownfield land'. The possible introduction of a brownfield first planning policy for new housing has been attacked by some in the planning and development world (see for example a recent [Lichfields brownfield report](#)) on the following grounds:

- Brownfield land does not provide sufficient land to meet identified housing need, as set out in the government's standard method
- Much of the brownfield land capacity is in areas of relatively low housing demand, particularly in the Midlands and north of England
- The kind of housing that will be built on brownfield land is often high density (100 dwellings per hectare or more), which will mean insufficient amounts of family housing are built
- Redeveloping brownfield sites for housing may also lead to losses of land currently or potentially used for employment uses.

In response to the above, CPRE would argue that:

- The current standard method generates figures which are unrealistic, which have never been met in practice, and provide insufficient focus on the need for types of housing needed for those on average incomes or below, particularly social or low-cost housing to own. Also, CPRE is not arguing for a 'brownfield only' approach; greenfield housing will still be needed, particularly in rural villages with an acute shortage of affordable housing
- There is already an effective brownfield first policy that applies when local authorities with areas of designated Green Belt propose to release land from the Green Belt for development. (See paragraph 141 of the 2021 National Planning Policy Framework.) We recommend (see p.11) that a similar policy should apply across the country.

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<sup>2</sup> Letter available at <https://www.liamfox.co.uk/sites/www.liamfox.co.uk/files/2022-12/Letter%20from%20Secretary%20of%20State%20Michael%20Gove%20-%20Planning%20and%20Local%20Control%20in%20England.pdf>



- The government's levelling up agenda means that greater focus is needed on exactly those areas where greater investment in both jobs and affordable housing will help regenerate communities. Although the government has made some welcome changes to infrastructure funding policies such as scrapping the 80/20 rule, other schemes such as the New Homes Bonus still tend to favour (when considering funding allocations against regional shares of the national population) the southern regions over the West Midlands, Yorkshire & The Humber and particularly the North East. Regeneration of brownfield sites often involves cleaning up contaminated land: a 2014 Durham University study called for this to be prioritised in order to help boost public health as well as the environmental attractiveness of an area. There is also plenty of brownfield land available in high demand areas too
- There are plenty of good practice examples of building family homes on urban brownfield sites and at densities of 100 dwellings per hectare or more
- Cutting edge regeneration projects in Germany, such as at Frizz23 in Berlin and Winnenden in Stuttgart, are pioneering new communities that mix employment spaces such as workshops and hi-tech manufacturing alongside high-density new housing. Technological developments such as 3D printing mean that there is less need to segregate manufacturing uses from housing than was the case historically.

**What is affordable housing?** The official definition of 'affordable housing' is found in the NPPF and initially means 'housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers).' However, such housing can encompass housing that complies with one or more of the following definitions: affordable housing for rent; Starter Homes; discounted market sales housing; and other affordable routes to home ownership. In turn affordable housing for rent can include homes that are as much as 80% of average local rents. This limb of the definition has, since its introduction in the 2012 NPPF, caused problems in many communities as average local rents are often well in excess of what people in average local incomes can afford. CPRE believes that clear definitions of what constitutes 'affordable' housing should be included in local plans; and that local authorities should prioritise delivering subsidised housing for those excluded from the market by price. We also support the calls made by:

- Shelter and others for much more social housing to be provided, as this type of housing is often particularly needed by rural workers on low incomes; and
- the Centre for Social Justice, in its December 2022 report, for statutory targets for affordable housing supply, including social and affordable rent; and a new legal definition for 'affordable housing' (to supersede the current NPPF definition) which relates to the income levels of local households.



## Conclusions and recommendations

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This latest report in CPRE's 'State of Brownfield' series has again shown that capacity for housing on brownfield land continues to sit at over one million homes. This figure persists despite evidence in our previous brownfield reports that brownfield land is being developed for housing. It continues to be a renewable resource.

However, we desperately need to increase the rate in which we are using this land for the good of our environment. Every green space which is destroyed is a home for wildlife or an open space for communities, gone.

CPRE recommends the following to the government:

1. Clear policies in the new National Planning Policy Framework (NPPF), expected in 2023, which prioritise the use of brownfield land over greenfield. This should include:

- a firm presumption against giving planning permission for additional greenfield sites for development compared to those already in local plans;
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2. The NPPF also needs to change to require that all new developments have diversity of housing tenures and types as outlined by the 2018 Independent Review of Build Out.

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## Method

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Brownfield land data collection and analyses conducted by CPRE.

The updated brownfield registers were found through searches of local planning authority (LPA) websites between August and November 2022. 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.