

# Practical Issues for the Planning Authority

By Diana Kershaw, B.Sc., M.Phil., Dip.Man., MRTPI and  
Kate Hoare, M.A. (Cantab.), M.Sc., MRTPI

## Introduction

National discussion of the scale of demand for housing and the debate as to where and how it should be met, has once again brought into the public spotlight issues that are within the domain of the planning authority. How to accommodate another 4.4 million households by 2016, despite little presumed increase in the population, when the environmental impact of physical change and the relationship between urban and rural Britain both have a high public profile, has focused minds such that there can be no one in the relevant professions who has not worked on some aspect of this issue.

The planning authority is inevitably at the sharp end of the debate, with the responsibility to interpret the new national agenda, to identify sufficient housing sites to meet the projected local requirement, whilst ensuring that it contributes to the national target of 60 per cent in 10 years on “brownfield” land and, in a sequential approach, looks first to urban areas to achieve this. It also has to balance the sometimes conflicting needs of local communities, financial viability, the need for other land uses, transport requirements and so forth.

This paper focuses on the concerns and practicalities with which the planning authority has to deal in:

- achieving a common understanding and usage of the terms used in the current debate;
- identifying the opportunities for an appropriate level of housing of all kinds in the changing national policy context;
- interpreting the urban area emphasis and the sequential approach.

In the light of Bristol’s experience, it looks at the extent to which urban planning authorities can contribute to meeting the targets, the issues which influence their doing so, including the breadth of the housing agenda, and implications for other agencies if genuine progress is to be made.

## Definitions

### *Brownfield/greenfield*

Although it might appear pedantic, to avoid ambiguity it is important to establish a common understanding of the terms used, and in particular “brown” or “green” field sites, and their relationship to “urban” and “rural areas”. Despite the clarity of the February White Paper, “Planning for the Communities of the Future”<sup>1</sup> in referring to “previously developed land and also to buildings, with reference to conversions and changes of use, both within and outside urban areas”, and its also promising a later paper, yet to be published, on, *inter alia*, definitions, there is still a burgeoning industry among the relevant professions in the (murky brown) field of definition.

To some, “brownfield” seems to conjure up a picture of vacant, contaminated, ex-industrial land. But housing construction on these sites alone will only be a proportion of the progress towards the target on previously used sites as a whole. Much is agreed about definition, but the scope for differences around the margins will lead to confusion especially at a time when having a common monitoring framework

<sup>1</sup> DETR, White Paper (1998).

for local authorities across the country is becoming more important. Thus, when “brownfield” is used in this paper it is in the context of both sites and buildings, whether currently vacant or not.

#### *Urban/brownfield*

A further problem is the apparent confusion between “urban” and “brownfield”, common parlance, and especially when used by speakers with a non-urban perspective. Various Government White or Green Papers<sup>2</sup> over the last three years have quite rightly distinguished between urban “brown” or urban “green”, and likewise between rural of those ilks. It matters. If urban “greenfield” land is not separately identified, pressure will fall on those parks, playing fields, nature reserves and so forth, which are an integral and valuable part of all towns and cities. It is worth remembering that the target is *not* 60 per cent in urban areas in 10 years, but *60 per cent on previously developed land and buildings*.

To be meaningful and effective, achieving this target needs a good understanding both of the potential of urban areas to accommodate housing on previously used sites, and also of the equally pressing need to accommodate other uses. The importance of a clear and common understanding of these terms will become more obvious when statistical information is requested for national monitoring and comparison purposes.

### **The urban contest**

#### *Geographical significance*

The 60 per cent target is an average national figure. It is not necessarily meaningful at the *individual local authority level*. Some existing built-up urban areas will already be exceeding it by some way. Previously used land is already a very significant source of housing, and much has already been recycled. More rural areas and smaller towns may consider that it is unattainable in conjunction with the total housing requirement. As the leader of Rushcliffe Borough Council, immediately south of Nottingham, pointed out in a letter to *The Times* on August 7,<sup>3</sup> his area is expected to experience a 20 per cent increase in population (although presumably this should be households), by 2011, but there is only one brownfield site. Without knowing the numbers involved an image of one very tall tower block springs to mind which is, of course, nonsense.

This example highlights the issues. First, local authority areas must be seen in their geographical context. Where cities, conurbations or large urban areas are administered by a number of contiguous local authorities, it is possible for all or any one of them to take a parochial view, which does not see an urban area as a whole, in housing provision as in other matters.

To make progress towards a national goal, adjoining authorities may need to work more closely together at a site-specific level to identify the opportunities within their joint urban area. This can comprise the city centre, its suburban centres, smaller towns and settlements, and previously used sites with sustainable development potential in rural areas, which together can meet the target overall in terms of numbers and proportion of previously used sites consistent with sequential development. This will also involve jointly developing support mechanisms and policies to bring such sites forward in an appropriate sequence and requires more detailed work over areas usually subject to the more general approach of structure planning.

<sup>2</sup> *op. cit.* DoE, “Our Future Homes”, Housing White Paper (1995); DoE, “Household Growth: where shall we live?” Green Paper (1996).

<sup>3</sup> G. Buckley, *The Times*, August 7, 1998.

Were such an approach feasible, urban green spaces should be better protected and the potential for overall housing development raised. It would also enable more strategic decisions about the release of greenfield sites, where necessary.

#### *The urban hierarchy*

Better performance in terms of numbers on previously developed sites is not a matter for the centres of cities alone. It is certainly true that higher density urban living is associated with the regeneration of city centres, where good design solutions which reflect the close grain and mixed uses of the existing fabric are being sought and successfully implemented, often after overcoming considerable funding and land assembly challenges. But, if this is part of the solution to stemming the “urban exodus”, which is seen as cascading down the urban hierarchy by the Council for the Preservation of Rural England,<sup>4</sup> it needs to be extended to other central places within that hierarchy as well.

Thus suburban centres and their surroundings within cities and smaller towns and settlements need similar creative thinking, in terms of design and accessibility. Indeed, the smaller the settlement, the greater the innovative potential in maximising opportunities for redevelopment for the required quantity and mix of well-designed housing, to retain a heterogeneous community and to maintain viability as successful centres with a meaningful sense of place. There is a challenge here for smaller towns. Of nine winners of this year’s Housing Design Awards, only two were in small settlements.

Finally, there are also, of course, previously developed sites within rural areas, some of which may also merit consideration for housing uses, where location and other sustainability constraints allow.

Given limited resources of land, against a national housing target, local authorities at *all* levels in the settlement hierarchy therefore need to be imaginative in realising a vision of lively, attractive and exciting places to live, and to share this vision with others. This includes architects and house builders sometimes more used to building to a well-worn suburban template, investors and landowners of more difficult sites, and communities sensitive to new development.

#### **The sequential approach**

One of the main issues for the planning authority in the housing debate as in other matters, is how to meet society’s land use needs in an environmentally friendly way. However, practically speaking of course, this is not simply a matter of implementing development on sites of its choice. As housing providers, local authorities are constrained in the resources available for house building, in their choice of sites and in the need for housing renewal. Even if working together as described above, their control as enablers is indirect, in that it only promotes or restricts locational decisions, the genesis of which is influenced by external considerations. These include the current market conditions, land ownership, the ease and cost of development amongst others. For as long as “greenfield” sites remain easier and cheaper to develop, it will be difficult to reach the required levels of construction to meet regional housing needs and at the same time to achieve the 60 per cent target. Local Plan and Government policy, including changes to PPG 3<sup>5</sup> in respect of the need to demonstrate a five-year land supply, may restrict “greenfield” development, but they will not necessarily bring forward sufficient “brownfield” sites first.

Without positive support, the effect of focusing on “brownfield” land first could be to limit total housing supply, distort land values and raise house prices further beyond the means of the poorest.

<sup>4</sup> “Urban Exodus”, A Report for CPRE (February 1998).

<sup>5</sup> DoE, Planning Policy Guidance Note 3, “Housing” (1992).

Planning authorities will need to be able more easily to call on partners and funding from both private and public sector to deal with this, together with other mechanisms to assist with land assembly problems, such as simpler compulsory purchase powers. The results of studies of land assembly currently underway by the Royal Town Planning Institute and others are awaited with interest.

### **Identifying housing opportunities**

#### *The statutory planning framework*

The primary instrument remains the development plan within the context of national guidance, regional and structure planning.

As PPG 12, "Development Plans and Regional Planning Guidance" states in its introduction:

"Planning decisions (whether by local authorities or by the Secretary of State) on proposals to build on land, or change its use, must be considered against objective criteria. The statutory development plan provides the basis for this consideration, and decisions must also take account of other material considerations, including central Government's national and regional guidance and material representations from interested parties. The development plan, therefore, provides an essential framework for decisions and should convey a clear understanding of the weight to be given to different aspects of the public interest in the use of land and common expectations about the likely broad patterns of development."

Much has been said about the inadequacies/delays and other drawbacks to this system, and, as stated earlier, it may result in a fragmented approach to planning of larger urban areas. It does however have the merit of resulting in a clear exposition of site specific land use allocation and policies which will influence decisions on particular proposals.

In an ideal world, by virtue of extensive consultation, and adoption by elected councillors, the development plan ought to represent a consensus on balance of land uses to meet not only local housing, but also employment, leisure, infrastructure requirements and other needs, within a framework of environmental quality.

The process is influenced both by DETR household projections, as converted into numbers of dwellings, and also by a realistic assessment of the capacity of local and structure plan areas to accommodate new building and redevelopment, although in the light of the recent decision in respect of West Sussex County Council, it would appear that the former remains the main determinant.

#### *Urban capacity studies*

Whilst the Development Plan process already involves local assessment of the opportunities for a range of land uses, the current national imperatives have led to questions being asked about whether there is sufficient land either locally or nationally to meet the targets, and where it might be. In response, a number of "urban capacity" studies have been carried out or are underway, using various different methodologies, both "in-house" by Local Authorities, and on their behalf by consultants. They have been conducted or proposed at regional, county and local levels. Some are site specific, others try to categorise "typical urban areas" and derive formulae to estimate the additional housing capacity that each could yield. It is not clear yet whether together they will give a realistic picture of national capacity, or if so, whether its distribution matches regional or sub-regional housing demand.

### *National Land Use Database*

The development of a National Land Use Database, as proposed in the February White Paper,<sup>6</sup> could provide the basic information needed to assess all land use decisions more consistently, but only Phase 1, now described as the “National Assessment of Previously Developed Land Available for Housing” looks likely to come forward this year. As well as collecting data about unused or vacant sites and buildings looks likely to ask for information about: “sites likely to be disposed of by their owners and redeveloped in the next five years”. It thus appears to require local authorities to conduct comprehensive and apparently very detailed site studies which would also provide another list of sites, in addition to the Local Plan schedule, but without considering their value for non-housing uses. This is both an onerous burden on local authorities and, if published, could put at risk sites already identified for housing in Local Plans, which may also meet the sequential test/previous use criteria. Yet the Urban Task Force sees Phase 1 as the way to provide comprehensive, consistent and definitive information on previously developed land which may be available for development.<sup>7</sup>

### *Infrastructure issues*

To be successful, housing initiatives and policy also need to be closely related to good social and other infrastructure. To put the headline emphasis on housing, as in the current national debate, may generate a useful demand for other services in areas of decline, in smaller towns and depopulated city centres for example. In other, already densely developed areas, it may put unwelcome pressure on, for example, school and social services provision. Even without a significant increase in population, a shift in its *distribution* may generate new pressures. Where larger housing sites are planned local authorities will have to consider how the incremental or new services that may be required can be provided. This is more difficult in close-grained urban areas where development is incremental, but the cumulative effect may be significant.

The indirect impact of incremental change is difficult to quantify, but the cumulative impact could be accommodated by developer contribution on all sites. However these may be the very sites most costly to redevelop, yielding comparatively low returns, and any form of proposed levy be the straw that breaks the back of feasibility.

### **Bristol case study**

This paper is dealing with practicalities, and perhaps the best way to explore them further is with a case study.

### *Regional background*

The South West region is not especially well-endowed with previously used sites in urban areas. A less urbanised region than some further north and east, it does not have the extensive legacies of redundant urban primary industry to a comparable degree, or large areas of vacant housing. Many of the region’s “brownfields” are rural including the sites of Cornwall’s mining industry, or rural defence and aircraft activities.

<sup>6</sup> DoE, Planning Policy Guidance Note 12, “Development Plans and Regional Planning” (1992).

<sup>7</sup> Urban Task Force Prospectus, July 1998.

However it is under pressure to provide more housing than can be accommodated on such sites in urban areas, and is aware that its neighbour, the South East, is hard pressed to accommodate its housing requirements, and may export some of them.

#### *Sub-regional context*

Within the South West region, Bristol is the largest urban area. In 1991 the population of Greater Bristol was just over half a million. Bristol City Council lies within this area, but excludes old and new suburbs respectively of Kingswood to the east, and the more recent urban fringe developments of Patchway, Filton and Bradley Stoke to the north. It is almost entirely urban in character.

Greater Bristol is not managed by one local authority. The City Council administers the urban core, the southern and north-western suburbs, but to the east and north the rest of the urban area lies within South Gloucestershire. This unitary authority also includes a substantial part of the rural hinterland of Greater Bristol, so that the city is not planned for as an organic whole at Local Plan level. Whilst joint arrangements are in place for Structure Planning for the area that comprises the former County of Avon, it is still early days to judge their effectiveness. In such circumstances the need to compromise to achieve consensus means that key issues are often avoided, leading to ad hoc rather than planned outcomes. As a result, there is in the order of 40 years' worth of employment land identified, a legacy of historic commitments, just beyond the city Council boundary, whilst the Structure Plan area and the city itself are struggling to find space to accommodate a 15-year housing requirement.

#### *The Structure Plan*<sup>8</sup>

The long-term, Structure Plan aim for 2011 for the former Avon County includes 7,900 net new dwellings for Bristol. If current trends could continue, this is almost within reach. However, it assumes that as yet unidentified (windfall) sites continue coming forward at a consistent rate, which within the confines of the urban area, and given the need for other uses, is optimistic.

This Structure Plan calculation is based on 1993/1994 national household projections. Later projections suggest the figure should be higher. Much new city centre housing is already taking place at high densities, so that increasing the density further there may have little to offer by way of solution.

The implication is that higher densities will need to diffuse out from city and district centres, both into the city's suburbs and urban fringe, but more significantly, into the rural towns beyond, as suggested earlier. Within the wider Structure Plan area there is now a willingness to undertake a wider, sub-regional study of capacity. The sequential approach is only meaningful at this level, in the context of the city region's needs.

#### *Opportunities within the city*

What then of Bristol's "brownfield" sites? The city developed from a medieval core around a bridge over the River Avon, and port facilities grew up along both the Avon and the Frome. This tight knit urban area spread along the river towards the coast and up the hills as Georgian and later Victorian merchants sought larger houses in fresher surroundings. With the construction of the coastal

<sup>8</sup> Deposit Joint Replacement Structure Plan, Bath and North East Somerset, Bristol, North Somerset, South Gloucestershire, 1998.

Avonmouth docks beyond the original city limits at the end of the nineteenth century, the future of the medieval port became one of eventual decline.

A later and more precipitate change was effected by the Luftwaffe in the city's shopping centre and other parts of the city. Subsequent post-war rebuilding of both the commercial area and new roads to serve it left a partially redeveloped city centre.

Meanwhile the city continued to grow outwards, perhaps most dramatically in the 1920s and 1930s, partly at a lower density, but also subsuming existing centres, some of which were older than Bristol and already functioning as fairly densely developed town or village centres. Development along some of the main radial routes was at particularly high density in association with commercial development.

As the city grew, sometimes engulfing and sometimes merely surrounding green spaces, its administrative boundaries moved with it until the late 1960s. Thereafter growth has taken place beyond the boundary, as well as consolidation and changes of use within it.

Over time more green space has been built on, and individual buildings have been replaced, converted or left vacant, but the brownfields of the headlines are limited.

As in all cities, its urban fabric also includes significant green open spaces, without which the quality of city life would be much diminished. Most, but not all of Bristol's schools have some playing fields within their curtilage, or within reach. Some of the city's most sophisticated urban architecture incorporates small communal gardens, or Georgian squares. There are parks associated with nineteenth century benefactors and now an integral part of the communities within which they lie, and larger historic landscapes, estates, allotments and areas of common land owned by the City Council and others, which are valuable aesthetic, recreational and wildlife resources. These are not "brown" fields. On the other hand there are other spaces that are not currently built on, but which may have less intrinsic value, as well as some under occupied sites and buildings which in the normal cycle of delapidation, economic and technological change will need redevelopment. These last constitute the city's "brownfield" resource.

#### *"Brownfield" sites*

There are now four main areas of any scale, one of which, as part of the Avonmouth area of chemical and port-related industries is unsuitable for major new housing development. Of two in the city centre, Harbourside is that part of the medieval dock area not already redeveloped for housing and commercial uses, and is now identified for housing amongst a range of other city centre use. The other, Temple Quay, under the aegis of English Partnerships is being developed for predominantly commercial activity, perhaps with some housing development. A fourth, a very large redundant factory site in south Bristol, has a retail consent at present. Other opportunities arise as windfalls, although their contribution is not infinite and will decline over time. The remainder are smaller infill sites, or the conversion of existing buildings, which yield a small annual contribution to the housing stock.

#### *Development on previously developed sites*

Government Office for the South West figures indicate that in 1992, of all changes to residential use, 47 per cent was on land previously developed for urban uses. The comparable figure for the South West region was 36 per cent, and for the former county of Avon, 31 per cent.

In practice, in Bristol, we have been building housing almost entirely on previously developed sites for many years. For the last couple of years, for example, over 85 per cent of new housing completions have

fallen into this category at a time when three major greenfield sites (ex-playing fields), allowed an appeal, were also under construction. See Table 1.

**Table 1: Bristol City Council—Numbers of new dwellings completed in 1997–1998, current major commitments and Local Plan allocations to 2001, all by previous use<sup>9</sup>**

Completions and allocations	Previously Used Sites & Buildings	Greenfield Sites	Mixed Use Sites	Total Number
Completions 1997–1998	670	103	0	773
Permissions at April 1998	2,227	184	12	2,423
Allocations at April 1998	2,098	361	10	2,469

As this greenfield source is built out almost all future building will be on previously developed sites.

Most of this development has been redevelopment of redundant sites and buildings, as Table 1 indicates. During the 1980s a large part of the medieval dock area was developed for housing at moderately high densities. This was the precursor to the current harbourside initiative mentioned earlier, which, under the leadership of the City Council as one of a number of large landowners and investors working in partnership is a major regeneration scheme expected to include up to a further 800 city centre homes. This will complete the reuse of this docklands site for the foreseeable future.

A planning application for the first residential phase has generated an enthusiastic response from prospective purchasers/occupiers who clearly perceive high density (98 dwellings/ha), as desirable, and there is a consensus among Bristol property agents that the demand for such property, particularly for rent by an increasing number of “transient professionals”, is insatiable.

#### *Local policy framework and initiatives*

As in previous years therefore, Bristol is actively encouraging imaginative responses to the challenges posed by such sites. These require not only excellent design so that new development adds to the quality of the urban environment, but also responds to the historical and environmental context in an interesting way. The Local Plan Policy B2 states, *inter alia*: “Development should have regard to the local context . . .”, rather than imposing rigid standards in respect of density, design and open space across the city.<sup>10</sup> This should enable individual proposals, especially in the city and district centres, to reflect the closer knit development form associated with such locations, enhancing their vitality and supporting sustainable transport provision. For city housing is about more than living in recycled sites and buildings. It involves a wider approach to the quality of urban life as a whole, not always on the scale of the “urban village”, but including good design and environmental quality, energy efficiency in buildings, good accessibility that reduces dependence on the private car and also security.

Bristol has published a city centre housing design guide, “Living in the City”,<sup>11</sup> which illustrates and promotes these ideas, and in its city centre strategy<sup>12</sup> is also promoting the urban core for residential development, emphasising the particular character of different quarters and fostering local solutions. It

<sup>9</sup> Residential Land Surveys, Planning Transport and Development Services, Bristol City Council, 1997–1998.

<sup>10</sup> Bristol Local Plan, adopted December 1997.

<sup>11</sup> City Centre Housing Design Guide, Bristol City Council Housing Services (1998).

<sup>12</sup> Sections 1–3, Bristol City Council (1998).

will not be easy, as the most attractive opportunities are taken up first, leaving a harder core of more difficult sites.

Recent analysis has however indicated a modest upturn in the city centre housing completion rate, with a number of innovative schemes already bearing fruit. Some of these have arisen through the initiative and persistence of the Council's Planning and Housing Directorates.

*The wider residential agenda*

But the situation is not that simple. In a major city, new house building does not always increase the housing stock, and not all residential development figures in the local or national accounting systems.

*Housing renewal*

Bristol's total annual housing completions, including changes of use over the five years to 1997 have averaged about 700. If, however, the loss from demolitions is considered, an average net figure for the last five years would be a more modest 530 as illustrated in Table 2 below.

**Table 2: Bristol City Council—net residential change 1991–1997 (excluding reclaiming vacant dwellings) (total for each year is “new build + change of use + conversion – demolition”)<sup>13</sup>**

	New Build	Change of Use	Conversions	Demolitions	Total Net Gain
Total Numbers	3,130	193	197	871	2,649
Average 1991–1997	626	39	39	174	530

The majority of demolitions are unfit local authority housing stock, and a substantial proportion of new dwellings in the public sector therefore, including Housing Associations, are replacements rather than accommodation for a net increase in households. Nevertheless it is an invaluable part of the local authority's role as an enabler of housing provision, and takes its share of the construction industry's local capacity. It will remain so for some time, as it is currently estimated that 14 per cent of Bristol homes in both the private and public sectors are unfit.

Renewal also involves refurbishment and adapting to changing household distribution and needs. For example in Bristol this has required conversions of local authority stock to increase the proportions of smaller units and flats on the Southmead estate in the north, whilst amalgamating flats to form larger maisonettes and houses further south in Hartcliffe. In Lawrence Weston in the north-west of the city there is refurbishment to bring properties up to modern standards of comfort and energy efficiency.

*“Affordable” housing*

Adequate housing provision involves ensuring that a range of housing is accessible to all in need. Private sector completions have steadily risen over the last three years and are now running at about three-quarters of total annual completions. However they have yielded very little “affordable” housing.

Meanwhile, a quarter of city council households are in receipt of Council Tax benefit, indicative of a substantial need for affordable housing, and a housing needs model for the city currently being updated suggests that just under half of new households can afford to buy a home on the open market.

Thus while total house building is slowly increasing again, the proportion of new dwellings available to

<sup>13</sup> Residential Land Surveys, Planning, Transport and Development Services, Bristol City Council (1991–1997).

those in housing need is decreasing. In Bristol this effect has been partly cushioned by the use of council owned sites by Housing Associations, but this is also a diminishing resource. There is thus tension between meeting total housing need in the broadest sense and using more expensive “brownfield” sites.

#### *Other residential development*

This includes student accommodation and other institutional uses, such as hostels for the homeless, who drift towards the city centre, and residential care homes. All these are competing for sites with proposals which more obviously contribute to meeting the requirement for new households, as well as those needed for other urban uses.

There has been no suggestion that these other categories be included in the figures that count either towards total housing need or towards the 60 per cent target. In Bristol, with two universities and several other educational institutions, not all of which lie within the city boundary, student accommodation represents a substantial proportion of the area’s housing stock in the broadest sense. As *Property News* reported in August<sup>14</sup>: “Nearly 900 students will be starting term in smart newly converted city centre residences, with 1,000 more programmed in the next two years.” In general therefore, the city is to a certain extent, providing a residential “service” for a geographically wider community, which sees advantages in city living, but which in so doing is limiting Bristol’s capacity to provide for its own projected household increase.

#### **Conclusion**

The housing debate is not black and white. It includes various shades of colour. Some of the main areas of the planning authority’s concern, as illustrated in part by the Bristol case are:

- It’s not entirely new—much has already been achieved in our major cities, but the smaller towns and rural settlements need to be involved too.
- Housing provision cannot be seen in isolation from other land use and transport needs. A balanced and comprehensive approach is required.
- Housing provision is also a broader issue than merely building the new homes of the headlines.
- The sequential approach needs a meaningful strategic framework, often involving contiguous groupings of local authorities, in which to operate.
- Achievement of both overall housing targets and the proposed “brown”/“green” breakdown may not be compatible.
- Financial intervention and new mechanisms for implementation will be needed to unlock many brownfield opportunities, together with a market eagerness for them, and imagination in dealing with progressively more difficult ones.
- But given all these, the urban “brownfield” resource is not infinite. New greenfield sites will also be required.

<sup>14</sup> *Property News*, South West and South Wales (August 1998).