



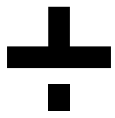
DATA AND THE PLANNING SYSTEM:

**WHERE WE
ARE, WHERE
WE NEED
TO BE AND
HOW TO
GET THERE**

**Public-Private
Partnership Report**

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uandiplc.com



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WE NEED TO REINVIGORATE PLACES THAT HAVE BEEN LEFT BEHIND.

That was true before the COVID-19 pandemic, but it is even more true today.

Across the country, town and city centres are crying out for ways to help them return to being economically productive and successful places.

Whether you call it levelling-up or building back better, as a regeneration specialist U+I feel duty-bound to respond to this challenge.

And we believe that we have the blueprint to help the UK bounce back from COVID-19; a blueprint that is based on partnership working with the public sector. And on the careful and creative use of previously developed or brownfield land.

But while we are keen to play our part in this recovery, we are prevented from doing so.

We can't contribute in the way that we want because the data on which the planning system is increasingly supposed to be built on, is unreliable.

The secret to reinvigorating those places which have been left behind lies in the use of brownfield land. But despite various attempts to capture this opportunity, nobody can say with any degree of certainty how much of this land is available for development.

Last year, we commissioned an independent investigation into Brownfield Land Registers (which, across two separate parts, records the availability of both public and private brownfield land across the country).

Speaking to local authority planning departments, local government umbrella organisations and special interest groups, we discovered three key findings:

- 1) Data is inconsistent, inaccurate and ill-maintained;**
- 2) The benefits of robust data are poorly understood. Accurate records are regarded as a chore rather than a means to incentivise development;**
- 3) And local authorities lack the resources to fulfil the data requirements.**

This combination has created a serious gap in understanding about the amount of brownfield land available for redevelopment and the use to which it can be put. The impact of this knowledge gap is clear: the scale of opportunity is massively underestimated.

In our chosen study area alone (Greater London, Greater Manchester, Cambridge, Oxford, Birmingham and East Berkshire), we found that 348,000 new dwellings could be built on previously developed land, amounting to nearly 29% of the overall expected housing need arising in these areas by 2030.

Of these, an estimated 125,000 dwellings could be developed on land that is either in public or mixed public/private ownership. Even under very conservative density assumptions, this translates to just over 10% of expected future housing needs in urban areas.

And it would do more than just deliver new homes. It would create jobs. Reinvigorate unproductive places. Provide the spaces that bring happiness to communities.

While the potential is significant, we also know that these figures are likely to underestimate the opportunity by a considerable margin because accurate data is simply unavailable.

But this is a problem that can be solved. Working with government, local authorities and specialists in the field, we can enhance the quality, availability and accessibility of data. That will release more land for development, bring places back into sustained economic activity, accelerate housebuilding across the country, improve people's lives and generate revenue for the taxpayer.

With the Planning White Paper undergoing consultation, and a focus on good data, we have an opportunity to modernise the planning system. Creating one which supports local authorities and provides them with the resources and expertise to make the data work for them and for their communities.

The opportunity is there to change lives, create stronger communities and level-up our country.

To that end, we call for:



A new 'digital task force' and a full investigation into how best to achieve a data-led planning system



Funding which allows every planning department to employ a 'data specialist' dedicated to land availability data



Increased collaboration with umbrella organisations so that we can standardise data reporting and develop appropriate training materials



A specific minister in the Ministry for Housing, Communities & Local Government to be made responsible for delivering this data-driven approach to planning that the country so badly needs.

We discuss our findings in more detail below.

WHERE ARE WE NOW?

In today's world, access to information is broader and deeper than ever before. Knowledge, more widely spread, is changing lives and improving livelihoods across the world and right here, in the UK.

But the property industry is lagging behind. We lack the data we need, data that could prove transformative to our country's prosperity, productivity and wellbeing.

Access to accurate, timely and credible data would highlight the availability of land, its capacity for development and its potential contribution to society. Right now, that information does not exist. The data that our industry uses to assess land availability is poor. It is often out-of-date, it is imprecise, it is unreliable. That makes it harder to know where we can build and the difference we can make.

HOW DO WE KNOW THIS?

Before the COVID-19 pandemic, U+I commissioned an independent investigation into Brownfield Land Registers (BLRs), the only current system of reporting brownfield land availability across the country.

We reviewed current literature to better understand these registers, their history and context. Organisations such as the CPRE (formerly the Campaign to Protect Rural England) had already uncovered a litany of issues around BLRs but we believe that we are the first developer to undertake an in-depth analysis of the current system.

Between January and March 2020, we retained a specialist research team to provide an in-depth assessment of BLRs. Our researchers examined existing data and interviewed key figures involved in the BLR system. Through a series of telephone and face-to-face meetings we engaged with:



Senior officers in local authority planning departments;



Local government umbrella organisations, including the Local Government Association (LGA);



Other interested parties, such as the CPRE and the National Housing Federation.

In each case, we asked a series of questions to try to understand more about the BLR system – where it is failing, why it is failing and what might be done to make it better. Our findings highlight the scale of the problem today, but they also hint at the potential for change tomorrow.

THE U+i STUDY

Our chosen study area covered Greater London, Greater Manchester, Cambridge, Oxford, Birmingham and East Berkshire. In these areas alone, our quantitative assessment of available brownfield land data showed that almost 348,000 new homes could be built on previously developed land, amounting to nearly 29% of the overall expected housing need arising in these areas by 2030.

Of these, an estimated 125,000 dwellings could be developed on land that is either in public or mixed public/private ownership. Even under very conservative density assumptions, this translates to just over 10% of expected future housing needs.

But these figures underestimate the opportunity by a considerable margin. Why? Because accurate data is simply unavailable.

1. DATA IS INCONSISTENT

Our research highlighted errors and inconsistencies on many levels.



Timely reporting

Many councils have not updated BLRs for several years; some have not adjusted their registers to include previously developed land, and, at the time of researching, Wolverhampton City Council and the London Borough of Sutton had not submitted a register at all.



Ownership

There are multiple inconsistencies around ownership. Some councils only submitted information on council-owned sites; others assigned ownership incorrectly. Where land did not correspond with ownership, we were forced to make estimations based on land availability in comparable neighbouring boroughs or districts.

**Site suitability**

Many councils are unclear about which sites to upload onto their BLR. According to Government regulations, any site suitable for housing-led development larger than 0.25 hectares should be entered onto the register. But we identified several examples where sites had been submitted even though they were manifestly unsuitable. Some were still in active use. Some were inappropriate for residential use. Some were actively excluded from development because they had been classified as Key Industrial and Business Areas or greenbelt land.

**Divergent reporting**

Local councils complete their registers in different ways, so collated data lacks any semblance of uniformity. Many councils complete a standalone BLR audit but some view the BLR process as a subset of other reporting requirements, such as the Local Plan process or the Strategic Housing Land Availability Assessment (SHLAA).

**Divergent definitions**

There is widespread confusion around terminology. At a very basic level, councils differ in their definition of 'brownfield' or 'vacant' land, so they use arbitrary assessments to assign sites to the register. The National Planning Policy Framework's definition of brownfield land covers all land attached to a building or former building (unless the natural geography makes it unsuitable). The definition notes, however, that all of this land is not necessarily suitable for subsequent development. This presents continuous definitional challenges for councils and their BLRs.

OLDHAM COUNCIL, FOR EXAMPLE, POINTED OUT THAT BROWNFIELD SITES WITH GREEN VERGES WERE EXCLUDED FROM THE BLR, AS THEY ARE CONSIDERED GREENFIELD IN PART. AS A RESULT, MANY SUITABLE SITES, INCLUDING FORMER SCHOOL GROUNDS WITH PLAYING FIELDS, ARE EXCLUDED FROM BLRS, DISTORTING THE TRUE QUANTUM OF DEVELOPABLE LAND IN ANY GIVEN AREA.

**In short**

The Government's stated intention is to leverage the power of data in the planning process. All right-thinking developers would applaud this. But the data needs to be robust. And our research highlights that:

✦ Current data is inaccurate, inconsistent and unreliable.

✦ Terminology, presentation and site information diverge extensively from council to council.

2. THE BENEFITS OF DATA ARE MISUNDERSTOOD

Our research unveiled communication issues across the local authority sector.



No perceived benefits

The Government's White Paper puts data at the centre of planning reform. There is a clear recognition that the more we know, the more we can do. But local authorities, overworked and under-resourced, are often insufficiently briefed about the importance of robust data and the benefits that it can bring. As a result, many see timely reporting as a bureaucratic obligation or tick-box exercise.

ONE OFFICER FROM LAMBETH COUNCIL SAID SIMPLY:

“THE BLR IS A PROCESS THAT YOU HAVE TO GO THROUGH AND IF DEVELOPERS ARE USING IT, THEN FINE. IT’S ANOTHER MONITORING REQUIREMENT WITH LOTS OF SIMILAR INFORMATION TO WHAT WE WOULD HAVE IN ANOTHER REQUIREMENT.”



No clear purpose

BLRs were conceived as a way to encourage and facilitate the delivery of new homes. But this does not seem to have been communicated to local authorities. Few councils appreciated that BLRs were primarily designed to bring together local authorities and developers so they could work in partnership and create more housing. Waltham Forest Council, for example, said that the BLR had been briefed as a data collection exercise rather than a policy initiative. This points to a fundamental misunderstanding of the rationale behind BLRs and the benefits that can arise from robust data management.



Poor follow-through from developers

Most council planning officers said they had received few or no calls from developers about sites registered on their BLR. Watford Council noted only one call. Others revealed that they had received no correspondence at all from developers.



In short

BLRs should be seen as a simple and efficient way for local authorities to highlight sites suitable for redevelopment, and therefore attract interest from developers. But the system is not working. Our research indicates that:

✦ **Many local authorities have not been briefed on the purpose or value of BLRs so they fail to see why they should invest resources in maintaining them.**

✦ **Councils have to be shown that reporting and publicising robust data breeds results.**

3. DATA MANAGEMENT NEEDS RESOURCE

Our research revealed widespread capacity concerns:



Councils are overstretched

Local authorities are under pressure. Budgets have been progressively squeezed over the past decade and cuts have been introduced across departments. Coronavirus has exacerbated an already difficult situation. The pandemic has engendered fear and distress within communities and widespread uncertainty among businesses. As a result, demands on councils have increased, even as their budgets are under strain.



Insufficient resources to manage data

Collating, maintaining and disseminating data can be both costly and time-consuming. And local authorities are already unable to fulfil these tasks. Three years after BLRs were introduced, land data is neither more accurate nor more accessible than it was before. Looking ahead, the Government White Paper is expected to impose further demands on officers to gather and report accurate planning data. With budgets and services under strain, councils simply do not have sufficient resources to do what is being asked of them.



Skill shortages

Effective data gathering is no easy task. It requires experience and expertise. Yet many local councils lack the skills to upload data effectively and use it to best advantage. One Senior Planning Officer echoed the views of many when he stressed that resourcing was a serious issue. "We've already thrown the baby out with the bathwater in order to make cuts because of austerity," he said.



Poor communication

Data has little value if no one knows it exists. Yet, BLR data is rarely publicised widely enough to drive an increase in housing development. While some local authorities recognise the need to disseminate information more widely, they lack the resources to do so. As a result, developers and other interested parties find it hard to access useful data and even harder to act on it.

AS ONE INTERVIEWEE POINTED OUT:

"IT'S A GOOD IDEA THAT COUNCILS IDENTIFY BROWNFIELD LAND, BUT UNLESS THEY'RE GOING TO PUT RESOURCES INTO PUSHING IT AND MAKING INFORMATION ABOUT THE SITES AVAILABLE, IT WILL JUST BE A SPREADSHEET."



In short

It is plain that local authorities will be unable to maximise the potential of data without guidance and support. Our research highlighted that:

✦ **Councils are hard-pressed to collect data, disinclined to maintain it and confused about its value**

✦ **They need more planning capacity if data is to play a genuine and meaningful role in housing delivery.**

SOLVING THE ISSUE

The UK does not suffer from a lack of brownfield land. But it does suffer from an imperfect understanding of that land.

Misinformation, misunderstanding and mismanagement mean that local authorities do not have an accurate record of the land at their disposal or its capacity for development.

The consequences of this information gap cannot be overestimated. Better knowledge about land availability and more effective dissemination of that information could and should facilitate action. And action is what this country needs. Strong partnerships between the public and private sector. Smart ideas about regeneration. Delivery of hundreds of thousands of homes every year across the UK.

Open, accessible, credible and accurate data can create the right environment for such action, pointing the way to opportunities and alleviating this country's housing crisis. But data needs to be managed. It needs time, it needs resource, it needs understanding. And that means we need to invest in it. Simply put, local authorities cannot be expected to supply the data we all need without adequate support and guidance.

To that end, we propose four steps that could prove truly transformative.

- ✦ **First, we advocate the introduction of a 'digital task force', whose members would be drawn from local government, development firms and PropTech, a nascent sector that is already using digital tools to drive innovation across the built environment. This task force would work together to assess how best we can create a data-led planning system, which will deliver genuine change across the development industry.**

- ✦ **Second, we call for more funding so that every planning department can employ a dedicated 'data specialist'. This individual would be tasked with collating, maintaining and distributing land availability data to ensure that every council is properly equipped for the digital future and can truly benefit from the social and economic impact that data can bring.**
- ✦ **Third, we recommend that data reporting should be standardised across the UK. Developers, central government and umbrella organisations such as the LGA should work together to create a uniform approach to data. They should also develop training materials so that local authorities have the skills they need for the digital world.**
- ✦ **Fourth, we believe that a minister within the Ministry for Housing, Communities & Local Government should take specific responsibility for data-driven planning. Giving a named minister oversight of this area will highlight the central role that data should play in the planning system and ensure better results in the future than we have experienced in the past.**

These four steps will require time, energy and funds. But they will deliver results – results that can transform our outmoded planning system once and for all, ensuring that the public and private sectors work in true partnership to deliver the jobs, homes and economic re-growth that our country desperately needs.

CONCLUSION

Changes to the UK's planning system are long overdue. Government knows it, local authorities know it, developers know it – and communities feel it. They feel it because the homes they need are not being built, prices are increasingly out of reach and quality of life is compromised.

At the same time, councils face greater pressure than ever before. Finances are stretched, resources are stretched, work is piling up.

Robust, reliable and accessible data could provide at least some of the answers to these problems. But it isn't there. Three years after Brownfield Land Registers were introduced, our research highlights that local authorities still do not know exactly what land they have or its capacity for development.

That is not their fault. They lack resources and the transformative power of accurate data has not been communicated to them. But transformative it could be.

At U+I, we have long been calling for reforms of our planning system. As a specialist in regeneration, we have spent decades working with local authorities, national Government and other public sector bodies.

We have already delivered results – in February 2020 we secured unanimous support from the Council for the first phase of our Mayfield Manchester scheme, which will deliver Manchester's first public park in 100 years and make Mayfield one of the UK's defining urban developments this decade. Mayfield will be delivered by the Mayfield Partnership, a public private joint venture partnership between LCR, Manchester City Council, Transport for Greater Manchester and U+I. This shovel ready project was awarded a £23 million investment from the Government's Getting Building Fund, and work has now started on site.

And, looking ahead, we are working on schemes that will deliver more than c£10.8 billion GDV from our pipeline across the London region, Manchester and Dublin.

But we need to do more. We want to do more. And we can do more. With a reformed, effective and data-driven planning system, we and our fellow developers can work with the public sector to rebuild our economy, meet the UK's housing needs and create new, thriving communities.

Our research was limited to a few urban areas so we cannot say for certain that other planning authorities face similar challenges. However, in-depth interviews combined with widespread anecdotal evidence suggest that the issues we discuss in this report are common across the UK.

Now, there is a huge opportunity to deliver change, an opportunity that will create real social impact and deliver tangible and substantial benefits to central and local government.

**THE SOLUTION IS THERE FOR THE TAKING.
THE STEPS WE ADVOCATE ARE ACHIEVABLE;
THE TECHNOLOGY IS THERE, AND THE HUMAN
RESOURCES ARE AVAILABLE. NOW IS THE
TIME TO BE BOLD AND DELIVER LASTING,
POSITIVE CHANGE, FOR THE COUNTRY, ITS
PEOPLE AND ITS ECONOMY.**

YOU WILL KNOW US BY THE PLACES WE CREATE

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