

## APPENDIX 2

### Previously Developed / Brownfield Land Briefing Note

27 February 2015

1. The National Planning Policy Framework (NPPF) seeks to 'encourage the effective use of land by reuse land that has been previously developed (brownfield land), provided that it is not of high environmental value' (paragraph 17).
2. Under the NPPF, previously developed land is 'land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure'. It however does not include: agricultural or forestry buildings; land developed for minerals/ extraction/ waste disposal, private residential gardens; parks; recreation grounds; allotments; or previously developed land where permanent or fixed structures have blended into the landscape in the process of time.
3. The Council's Development Opportunity Sites List includes a total of 183 sites. The list is inclusive of sites that were listed in the Redbridge Local Plan Preferred Options Report, with additional sites identified via the 2013 Strategic Housing Land Availability Assessment (SHLAA) undertaken on a pan-London basis by the Greater London Authority (GLA), as well as through the Local Plan process itself. The list also includes a number of sites proposed for non-residential uses (either new uses or improvements to existing non-residential uses).
4. The table below provides a breakdown of the 183 sites currently on the Development Opportunity Sites List, having regard to the number and percentage of proposed sites that are previously developed and not previously developed, as well as residential and non-residential sites. For residential sites, an estimated number of dwellings are identified:

Category	Number of Sites (number)	Percentage of Sites (%)	Estimated number of dwellings (number)
Previously Developed Land (All) <sup>1</sup>	163	89	9,848
Sites that are not on Previously Developed Land (All)	20	11	1,672
<b>Total Sites (All uses)</b>	<b>183</b>	<b>100</b>	<b>11,520</b>
Previously Developed Land (Other uses other than housing)	17	11	0
Previously Developed Land (Housing sites including mixed uses)	145	89	9,848
<b>Total sites that are Previously Developed Land</b>	<b>163</b>	<b>100</b>	<b>9,848</b>
The uses other than housing	7	35	0
Housing sites including mixed uses	13	65	1,672
<b>Total Sites Not Previously Developed</b>	<b>20</b>	<b>100</b>	<b>1,672</b>

<sup>1</sup> Car parks have been taken as Previously Developed Land.

Source: London Borough of Redbridge Development Opportunity Sites, Preferred Options Report, January 2013. Amended version, August 2014

5. From the table above, it is evident that:
  - a. Within the total 183 sites (including residential and non-residential), 163 sites or 89% are previously developed land.
  - b. Within the 163 sites that are previously developed land, 145 of these (89%) are for housing / mixed use, with the remaining 17 (11%) for non-residential development.
  - c. Within the 20 sites that are not previously developed land, 13 sites (65%) are for housing / mixed use and 7 sites (35%) are for non-residential.
  - d. The 183 sites are estimated to yield 11,520 dwellings, with 9,848 dwellings (85% of total dwellings) on previously developed land and 1,672 dwellings (15%) on non-previously developed land.
6. The table below provides a summary of the housing sites:

Housing Sites	Number of sites (number)	Percentage (%)	Number of units	Percentage of total units (%)
Total Housing sites	158	86 (of total sites)	11,520	100
Previously Developed Land	145	92 (of housing sites)	9,848	85
Not Previously Developed Land	13	8 (of housing sites)	1,672	15

Source: London Borough of Redbridge Development Opportunity Sites, Preferred Options Report, January 2013. Amended version, August 2014.

7. There are certain sites that are not taken into account in the above statistics that are counted in the Council's London Plan housing target as identified by the SHLAA process. These are sites that have been classified as low probability sites and have a constrained capacity sites with reduced likelihood of coming forward. Collectively these total 1,115 dwellings. Similarly sites that are classified as small sites (or windfall sites) are also not taken into account in the above data, however, would amount to 270 units per year over the 15 year period (totalling 4,050 dwellings); it is envisaged that very few windfall sites would be not previously developed land.
8. Redbridge has one of the most extensive Local Development Frameworks / Local Plans in the country. This includes two site allocations documents and three area action plans (which also allocate sites). In preparing these sites and the draft Redbridge Local Plan 2015-2030, considerable work has been undertaken in identifying housing sites, with the focus being on previously developed land. As a result of this work, Redbridge has almost twice as many formally allocated housing sites than the next highest in London. Whilst additional previously developed sites would always considered for allocation in the emerging Local Plan, it is unlikely that many more that haven't already been identified will come forward.
9. It is relevant to note that the proposed London Plan target for Redbridge (1,123 dwellings per year) is still well short of the overall housing need in the borough, which is estimated to be in excess of 2,000 dwellings per year. Across London, housing supply is 42,000 per year (identified through the GLA SHLAA 2013), whereas housing need is 49,000 per year. This means that there is a shortfall of housing within London, so there is limited scope for Redbridge to meet any shortfall within London. It also demonstrates that the Council's shortfall (circa 45% of total need) is far greater than the pan-London shortfall (circa 15%). Furthermore, boroughs immediately outside of London are heavily constrained by green belt (for example, Epping Forrest District is 94% Green Belt). Consequently, meeting Redbridge's housing need in boroughs outside of London is not a straightforward answer.

