

WEST MIDLANDS COMBINED AUTHORITY

The Black Country Plan: Assessment of the Potential for Additional Brownfield Land Development Capacity

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Chilmark Consulting Ltd

Bath: Cambridge House, Henry Street, Bath BA1 1BT **Wiltshire:**
Albany House, High Street, Hindon, Wiltshire SP3 6DP

| T: 0330 223 1510 | info@chilmarkconsulting.co.uk
www.chilmarkconsulting.co.uk

CONTENTS

1. INTRODUCTION	1
Overview	1
Context	1
Purpose and Scope	3
Overall Data Sources, Assumptions and Limitations	4
Report Structure	5
2. HOUSING DEVELOPMENT ASSUMPTIONS	6
Introduction	6
The Black Country Plan - Housing Context	6
Housing Densities for Brownfield Land	9
Housing Development Non-Implementation Rates	15
Windfall Sites Housing	18
3. EXISTING BROWNFIELD LAND HOUSING SITES AND SUPPLY	23
Introduction	23
Methodology	23
Selected Sites	24
Not Selected Sites	24
Not Assessed Sites	25
Sites Carried Forward	25

4. POTENTIAL ADDITIONAL SOURCES OF BROWNFIELD LAND HOUSING SUPPLY	27
Introduction	27
Strategic Centres	28
Town / District and Local Centres (Tier Two and Three Centres)	39
Core Regeneration Areas and Public Transport Nodes	44
Employment Sites	46
Brownfield Land at the Edge of Urban Areas	52
5. UNLOCKING BARRIERS TO BROWNFIELD LAND HOUSING DEVELOPMENT	56
Introduction	56
The Role of Local Authorities and Public Agencies	56
Types and Nature of Barriers to Unlocking Brownfield Land	57
Approaches to Unlocking Brownfield and Latent Land for Housing	61
6. CONCLUSIONS AND RECOMMENDATIONS	73
Introduction	73
Housing Needs and Supply Context	73
Housing Development Assumptions	74
Existing Brownfield Land Housing Sites	76
Potential Additional Brownfield Land Housing Capacity	77
Unlocking Barriers	79
Recommendations and Next Steps	81

Executive Summary

Introduction

Chilmark Consulting Ltd (CCL) working with Understanding Data Ltd (UDL) were instructed by the West Midlands Combined Authority (WMCA) in September 2021 for the preparation of an objective 'Assessment of the Potential for Additional Brownfield Land / Development Capacity' (hereafter the 'Brownfield Land Study').

The four constituent Black Country Authorities (BCA) are Dudley, Sandwell, Walsall, and City of Wolverhampton. The authorities have shared a joint, cross boundary planning approach for many years.

The Regulation 18 Draft Black County Plan (the BCP) was published for a period of public consultation from August to October 2021. The Plan forms an initial stage in the preparation of a new joint strategic plan that will, upon adoption, supersede the existing Black Country Core Strategy adopted in 2011 as well as elements of a number of 'Tier 2' local development plans in each of the four local authority areas.

Scope

The aims and objectives of the Study were to prepare an independent and objective assessment of the brownfield land capacity for housing in the Black Country Plan area.

This involved an assessment of the suitability for new housing development of previously developed land including commercial employment sites and vacant and under-used land across the Black Country area.

It requires a re-assessment of the evidence base to demonstrate the extent to which:

- additional brownfield land and buildings can be identified to augment the supply in the Plan;
- the densities proposed in the plan are appropriate and / or could be increased in specific locations or types of location e.g. Strategic Centres, town centres, strategic growth corridors;
- assumptions on discount rates are reasonable given past trends and future assumptions regarding viability and deliverability;
- additional development could be accommodated in the Strategic

Centres and Tier 2 Town / District and Tier 3 local centres.

support 7,720 new dwellings (16% of total identified supply).

Housing Needs and Supply

The overall level of Local Housing Need within the Black Country Plan is identified as 76,076 new dwellings in the period 2020 – 2039 using the PPG's Standard Methodology.

The BCP concludes (Policy CSP1) that the Black Country can accommodate 47,837 dwellings (some 63% of the total housing need) using both brownfield and greenfield (including Green Belt) land allocations. This leaves a significant identified shortfall of some 28,239 dwellings to be accommodated elsewhere outside of the Black Country area (37% of the total housing need).

Of the total new housing supply, the release of occupied employment land for housing is anticipated to provide 3,091 dwellings (6% of total identified supply in the Black Country area); windfall developments account for some 8,463 dwellings (18% of planned supply); additional indicative capacity in the four Strategic Centres should provide an additional 1,300 dwellings (3% of identified supply); 'Other sites' are expected to generate 6,921 dwellings; and Green Belt release is to

Housing Development Assumptions

Densities

The BCP (Policy HOU2) proposes a range of housing development density assumptions (minimum densities of 40, 45 or 100 dwellings per hectare depending on the location and level of accessibility) that are increased from the levels established in the existing BCCS.

It is our conclusion that the density assumptions are reasonable to ensure a mix of dwelling types and sizes are delivered as well as reflecting the importance of making the most effective use of available land and sites.

Non-Implementation Rates

Non-Implementation Rates (ranging from 5% to 15% of potential capacity on sites) have been applied to different sources of housing land supply to take account of the potential non-implementation or lapse of planning permissions.

It is our view and conclusion that it is appropriate to include Non-Implementation Rates in the BCP (continuing the approach previously

taken in the BCCS and as widely found in other English Local Plan housing trajectories) as this helps support a realistic, flexible, housing delivery trajectory in accordance with the NPPF at paragraph 74.

We consider that the proposed 15% Non-Implementation Rate applied to employment land to be developed for housing could be further evaluated for the Regulation 19 BCP.

Windfalls

Windfall housing sites are expected to deliver 7,651 new dwellings (representing some 10% of the total Black Country housing need) on sites across the Black Country.

Our review concludes that the approach taken to the identification of windfall housing contributions to supply accords with the NPPF and the relevant sections of the Planning Practice Guidance as it relates to specific historic and evident delivery trends in the four Black Country authority areas.

We also conclude that analysis undertaken for Wolverhampton City Centre with respect to establishing an indicative windfall allowance for the conversion of upper floors in the City Centre to residential use is an important and useful consideration of the potential arising from structural

changes to town centre retailing and commercial use. We understand that the BCAs are investigating how structural changes can contribute to housing figures for the Regulation 19 BCP and in the future Urban Capacity Review update.

Existing Brownfield Land Housing Sites

We have reviewed all of the BCP's 'Selected' sites proposed for allocation for residential development and our conclusion is that the Selected sites are appropriate for residential development.

We reviewed a total of 373 sites that were assessed but 'Not Selected' as appropriate for residential development allocation through the BCP. Each site was investigated with respect to other plan allocations, known constraints and available information using GIS data layers to understand both the relationship with the surrounding area and with other sites.

We found that the Black Country local authorities were correct to identify these sites as 'Not Selected'.

For each individual local authority, each "Not Assessed" site was individually reviewed. Of the 158 sites examined, we agreed with the respective Black

Country local authority's decision to not make a further assessment.

'Carried Forward' housing sites are those sites already allocated and identified in the BCCS or other Tier 2 plan as appropriate for residential development that have not yet been developed. We reviewed 207 such sites and found it appropriate to carry them forward into the BCP, although if they are not delivered for housing by 2024 it would be consistent with Policy HOU2 to ensure that the new net minimum density standards were applied.

Potential Additional Brownfield Land Housing Capacity

We investigated the situation and potential arising from other sources of potential brownfield land housing supply that might yield additional new dwellings. A wide range of different locations and types of brownfield land were considered.

Strategic Centres

The four Strategic Centres are identified as key drivers for growth and locations which offer opportunities for change and repurposing.

Given the key importance of the four Strategic Centres for the BCP

Development Strategy, we consider the true housing capacity of the Strategic Centres is not currently reflected in the emerging Regulation 18 BCP and further work is being undertaken by the BCAs.

In recognition, we have reviewed the potential for additional supply in one of the Strategic Centres as an illustration of the sources of capacity to which further studies should be focussed, West Bromwich, and identified significant potential to deliver additional housing capacity, including through mixed-use development, with an indicative unadjusted (i.e. no discount for a Non Implementation Rate) supply of 1,010 units (figure rounded) over existing identified capacity for the centre.

We consider opportunities associated with the repurposing of existing vacant and under-utilised commercial floorspace, especially retail, alongside the potential offered by alternative use of lower quality employment sites and a proactive approach towards mixed-use development could help to drive new capacity for residential uses across the Strategic Centres.

Tier 2 Town and District Centres

We have undertaken a high-level review of Willenhall District Centre as

an example illustration of the possible additional potential in the Tier Two Town and District Centres.

We found a potential capacity for additional housing and identified an indicative unadjusted, cautious, capacity for 250 dwellings (figure rounded) in Willenhall. This has primarily focused on the potential of lower quality employment land sites, including those located in proximity to the committed new railway station together with repurposing of vacant/and or under-utilised sites and buildings, including scope offered by low occupancy public car parks.

We conclude that there may be opportunities within the 17 Tier Two centres which can and should be explored in further detail to inform the Regulation 19 BCP.

Tier 3 Local Centres

From our review and analysis of 29 of the 113 Tier Three Local Centres (we focused on those Centres that had a designated area covering >1 hectare in size) we found no additional supply arising from sites of >0.5 Ha that would usually be of sufficient size to specifically allocate in a Local Plan.

Employment Sites

We have suggested an alternative, more proactive delivery approach to that taken in the Regulation 18 BCP where residential and employment use could be suitable, prioritising residential development potential. We consider that some existing employment sites could, over the BCP plan period, make contributions to the delivery of housing as either residential or mixed use developments, replacing largely lower quality occupied EMP3 and EMP4 sites. Our view is that the Regulation 19 BCP should take a more proactive stance to view EMP4 sites as contributing to the overall supply.

The indicative yield from this exercise is between 1,130 and 1,530 dwellings, subject to suitable non implementation discounting. The upper end of the range represents an additional density uplift where sites are not in Strategic Centres or Tier 2 Centres, but are within 400m of a bus station or rail or main metro station.

Brownfield Land at the Urban Edge

Our review of potential brownfield sites and land at the edge of the existing urban area (i.e. not within the Green Belt and consistent with the definition of previously developed land set out in Annex 2 of the NPPF) did not identify

any potential sites. If suitable supply exists at urban edge locations it is likely, due to the site size, to be small scale and we would expect this to be accounted for in windfall housing calculations accordingly.

Unlocking Barriers to Brownfield Land Regeneration

Development and change of use of brownfield land in the Black Country requires a sustained and intervention-led approach given the complex underlying physical, ownership and value characteristics of vacant and under-utilised sites. Review of historic housing delivery and change of use rates demonstrates that catalytic projects and sustained attention to unlocking challenging sites will be necessary.

The preparation of the BCP as the principal strategic planning tool for the area needs to be combined with other activities and interventions including rationalisation and relocation of uses in order to bring brownfield land into effective use for housing or for employment uses.

Key activities and interventions that may assist in overcoming barriers to brownfield land development include:

- establishing a long term vision and objectives for the use of brownfield land;
- building up improved perceptions and confidence to invest time and resources into brownfield development to help address deep-seated development viability and market concerns;
- creating clusters and packages of brownfield sites that link them to anchors of activity, offer potential sites for re-location of existing uses and can be used to identify and direct the prioritisation of regeneration;
- addressing physical barriers and infrastructure needs through site clearance and remediation work;
- supporting and providing access to available public funding; focus updating and refinement of CIL and infrastructure delivery plans to tackling key physical barriers and also promote and highlight the potential land remediation tax reliefs available for regeneration of brownfield sites; and
- continuing to evolve and expand public-public and public-private partnering as a key mechanism to share development and finance risk; bring forward packages of

sites; better co-ordinate planning and corporate policies / objectives; and help focus work on priority sites and clusters.

Recommendations and Next Steps

R1: Accelerating and Expanding Housing Capacity Assessments for Strategic Centres and Tier Town / District Centres

A clear and comprehensive analysis of the potential capacity for new housing, including as part of employment and mixed-use development for the four Strategic Centres and also the Tier Two Town / District Centres is needed.

Additional work and support is recommended now to allow more detailed and extensive assessments of the potential housing capacity in each of the four Strategic Centres (and ideally the 17 Tier Two Centres) to expand the information and evidence base for the forthcoming Regulation 19 BCP. This work would need to draw on emerging assessments being conducted by the Black Country Authorities as well as fresh analysis of sites and opportunities where work has not been undertaken yet.

R2: Review Approach to Delivery of Some Brownfield Sites Capable of Housing Development

Our analysis and research suggests that with a more proactive frame of reference and approach to the delivery of some brownfield sites there could be potential for some additional level of new housing to be brought forward, including as part of mixed-use regeneration.

We understand and acknowledge the key barriers to unlocking often challenging sites in terms of the landowner / occupier intentions and also the lack of viability for re-development that is prevalent across much of the Black Country.

It is however important to reflect on approaches to successful regeneration of difficult brownfield land, including former industrial sites and contaminated or physically restricted sites where the identification of priority sites / land for regeneration and also the linkage and clustering of sites can play a catalytic role.

There is a greater prospect of achieving changes of use for under-used and vacant brownfield land where there has been a systematic analysis of the priority locations, the key opportunity sites and areas and then a focused delivery approach to unlocking the barriers arising, including deployment of public funding.

We are therefore recommending that work to further assess, evaluate and prioritise existing brownfield sites (including particularly some lower grade employment sites) is undertaken to develop a more detailed and refined view of the best opportunities for delivery (either individual sites or clusters / packages of sites) over the BCP plan period to 2039.

From the prioritisation analysis there will then be a more comprehensive and systematic basis for focusing available funding, land use allocations and other regenerative mechanisms available (such as land assembly and purchase) to intervene in the market for the most important sites and clusters / areas

1. Introduction

Overview

- 1.1 Independent consultants **Chilmark Consulting Ltd (CCL)** working with **Understanding Data Ltd (UDL)** were instructed by the West Midlands Combined Authority (**WMCA**) in September 2021 for the preparation of an objective 'Assessment of the Potential for Additional Brownfield Land / Development Capacity' (hereafter the 'Brownfield Land Study').
- 1.2 CCL is a RICS Registered firm of chartered town planners, housing, town centre and economics specialists founded in 2013 and working across the UK.
- 1.3 UDL was founded in 2015 and provides expertise and advice around the use and analysis of spatial data with a focus on demographic change, housing market conditions and housing need and economic trends.

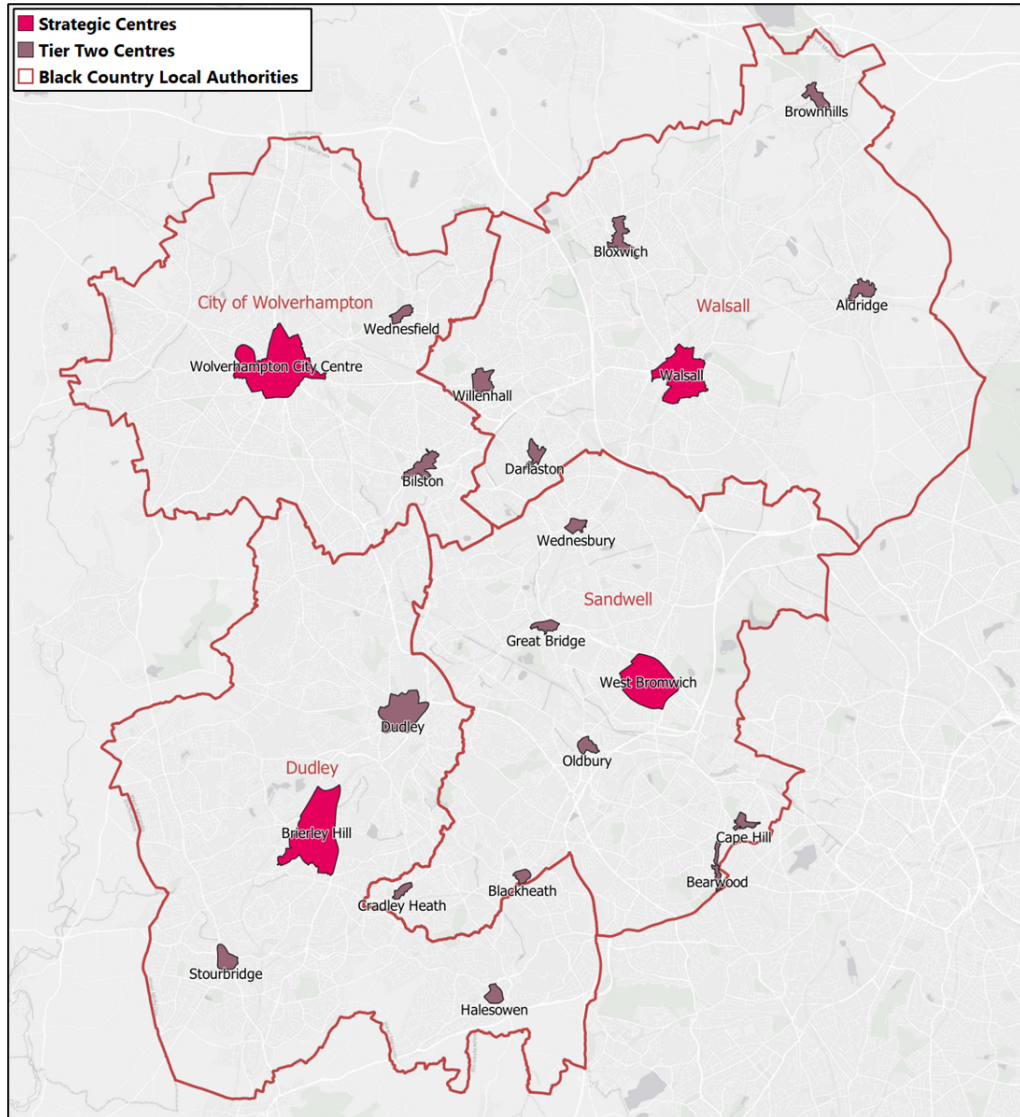
Context

The Black Country Authorities

- 1.4 The Black Country area forms a distinctive sub-region on the western side of the West Midlands conurbation. It shares an eastern boundary with Birmingham and to the north, west and south it is bounded by districts within Staffordshire, Shropshire and Worcestershire.
- 1.5 The four constituent Black Country Authorities (**BCA**) are Dudley, Sandwell, Walsall, and City of Wolverhampton. The authorities have shared a joint, cross boundary planning approach for many years. The Black Country Plan states that the BCA have worked closely together for some 14 years to establish a clear and collective set of ambitions and directions of travel, expressed in an agreed economic and spatial strategy with an adopted joint Black Country Core Strategy (February 2011) (**BCCS**) and economic investment through the Black Country Local Enterprise Partnership.

1.6 Since 2017, the four Black Country Authorities have formed an integral part of the wider West Midlands Combined Authority focused on housing, economic and infrastructure priority projects.

Figure 1.1: General Location Plan of the Black Country



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The Black Country Plan

1.7 The Regulation 18 *Draft Black County Plan* (the **BCP**) was published for a period of public consultation from August to October 2021. The Plan forms an

initial stage in the preparation of a new joint strategic plan that will, upon adoption, supersede the existing Black Country Core Strategy adopted in 2011 as well as elements of a number of 'Tier 2' local development plans in each of the four local authority areas.

1.8 At section 2 the BCP identifies an overarching vision to:

“Create a prosperous, stronger and sustainable Black Country”.

1.9 The Plan articulates the following main objectives for the Black Country area that are relevant to this Brownfield Land Study:

- providing good quality housing that meets the needs of a growing population;
- supporting a resurgent economy;
- reviewing the role and extent of the Green Belt;
- supporting strong and competitive centres;
- dealing with climate change and protecting and enhancing the environment;
- providing infrastructure to support growth; and
- health and wellbeing of communities.

Purpose and Scope

1.10 The aims and objectives of the Brownfield Land Study are to prepare an independent and objective assessment of the brownfield land capacity for housing in the Black Country Plan area. This involved an assessment of the suitability for new housing development of previously developed land including commercial employment sites, vacant and under-used land across the Black Country area.

1.11 The main objectives and outputs sought from the commission include testing the extent to which the urban land supply in the Black Country has been maximised and the steps that would need to be taken to bring forward

additional supply opportunities. It requires a re-assessment of the evidence base to demonstrate the extent to which:

- additional brownfield land and buildings can be identified to augment the supply in the Plan;
- the densities proposed in the plan are appropriate and / or could be increased in specific locations or types of location e.g. Strategic Centres, town centres, strategic growth corridors;
- assumptions on discount rates are reasonable given past trends and future assumptions regarding viability and deliverability;
- additional development could be accommodated in the four Strategic Centres and additional town / local centres.

Overall Data Sources, Assumptions and Limitations

1.12 The principal assumptions and limitations are recorded in more detail in each of the relevant sections of the report. The analysis, advice and findings must therefore be read in the context of the assumptions and limitations concerning available information and the level of analysis possible.

1.13 In more detail, the overarching assumptions and limitations are as follows:

- site level data was provided in a format that allowed for interrogation via QGIS and included housing sites (not selected, not assessed, carried forward and selected) and employment sites. Boundaries for Strategic Centre, Tier 2 and 3 centres, Core Regeneration Areas and 40 and 45 dph density zones were also provided by the BCA. Digital boundary data was sourced for transport stations from the Transport for West Midlands Data Portal. This was supplemented with aerial photography within QGIS cross referenced from Google Earth Pro and relevant Ordnance Survey basemaps;
- information and data provided to CCL and UDL has been used in good faith as to its completeness and accuracy. Where, upon checking and review there have been identified data gaps or issues these have been

raised as appropriate with the originator of the data / information in question; and

- no physical site visits have been undertaken as part of the work.

Report Structure

1.14 Following this introductory section, the Report is structured as follows:

- **Section 2** – reviews matters concerning various assumptions underlying the analysis and calculation of potential site capacities for new housing. The section includes consideration of existing and proposed housing densities; and the role and application of non-implementation rates for housing planning permissions;
- **Section 3** – is focused on reviewing, testing and re-appraising brownfield sites that have been proposed and rejected ('Not Selected Sites') for residential development as part of the BCP; and those sites that were not assessed ('Non-Assessed Sites') through the plan process to date. The section considers whether there is a possibility for additional housing sites and capacity to be identified from these 'existing sites';
- **Section 4** – is concerned with considering and illustrating various sources of additional brownfield land that could provide opportunities for new residential development. The section takes a wide-ranging approach to different locations and types of brownfield land that may, with a different frame of reference or approach be capable of contributing towards housing delivery in the BCP;
- **Section 5** – examines key identified barriers to unlocking brownfield land for housing development. It is concerned with identifying types of barriers and how these might be overcome or addressed; and
- **Section 6** – draws the report together with a summary of the main findings, thoughts on opportunities and potential to increase the supply of new dwellings on brownfield land and sets out recommendations for consideration by the WMCA.

2. Housing Development Assumptions

Introduction

- 2.1 This Section of the report reviews various assumptions underlying the analysis and calculation of potential site capacities for new housing on brownfield land. It includes consideration of existing and proposed housing densities; and the role and application of non-implementation rates for housing planning permissions. The section starts with a review of the overall stated housing supply as set out in the Regulation 18 Draft Black Country Plan.

The Black Country Plan - Housing Context

Housing Needs

- 2.2 Paragraph 3.21 of the Black Country Plan identifies the overall level of Local Housing Need (**LHN**) within the Black Country Authorities area for **76,076** new dwellings in the period 2020 – 2039 using the *Planning Practice Guidance* (**PPG**) Standard Methodology.
- 2.3 Paragraph 3.20 of the BCP concludes that the capacity of the Black Country is finite and it is not possible to provide for all of the Black Country's housing and employment land needs within its administrative boundaries.
- 2.4 On this basis, Section 3 of the BCP, Policy CSP1 (Development Strategy) confirms that at least **47,837** net new homes will be delivered (and at least 355 Ha of employment land).
- 2.5 The proposed delivery of 47,837 homes within the BCP area leaves a shortfall (the unmet need) of **28,239** dwellings to be accommodated elsewhere when measured against the total Local Housing Need.

Housing Land Supply

- 2.6 Table 2 of the BCP (page 27) sets out a summary of the Black Country Development Strategy 2020 – 2039. This explains how the overall LHN is to be met based on the allocation of sites of at least 0.4 hectares (Ha) or capable

of delivering at least ten dwellings. The proposed supply set out in the BCP is summarised in Table 2.1 below.

Table 2.1: Summary of the BCP Development Strategy

Location of Housing Provision	Total Dwellings	% of Total Supply
A: Four Strategic Centres (Brierley Hill, Walsall, West Bromwich and Wolverhampton)	9,561	13%
B: Eight Core Regeneration Areas	11,208	15%
C: Neighbourhood Growth Areas	6,792	9%
D: Town and Neighbourhoods Areas	12,625	17%
E: Small Windfall Sites (outside Strategic Centres)	7,651	10%
Sub Total (A – E) – Housing Supply in Black Country including Green Belt Release Sites (7,720 dwellings)	47,837	63%
Housing 'Exported' to Other Local Authorities (Un-Met Need)	28,239	37%
Overall Total	76,076	100%

Source: Extracted from Regulation 18 BCP, Table 2, pages 27 and 28

- 2.7 Paragraph 3.17 of the BCP identifies that **7,720** new dwellings (and 48 Ha of new employment land) will be allocated on sites currently in the Green Belt.
- 2.8 Policy HOU1 (Delivering Sustainable Housing Growth) of the Regulation 18 BCP identifies that sufficient land will be provided to deliver at least 47,837 net new homes over the period 2020 – 2039. The policy indicates that the minimum housing target for each BCA is to be phased for three interim periods 2020 – 2029; 2029 – 2034; and 2034 – 2039.
- 2.9 Tables 3 and 4 of the BCP provide greater detail as to the proposed housing land supply and phasing and these are summarised in Table 2.2 below.

Table 2.2: Summary Sources of Housing Land Supply 2020 - 2039

Source of Supply	Total Dwellings	% of Total Supply
A: Sites Under Construction	5,258	11%
B: Sites with Permission or Prior Approval	7,380	15%
C: Sites with Other Commitments (2020 SHLAAs)	3,802	8%
D: Existing Housing Allocations in Strategic Centres	4,973	10%
Sub-Total, Existing / Current Supply at April 2020 (A – D)	21,413	45%
E: Occupied Employment Land Release	3,091	6%
F: Green Belt Sites	7,720	16%
G: Other Sources	6,921	14%
H: Windfall Allowance (Wolverhampton Upper Floor Conversions and Small Sites <10 homes / 0.25 Ha across all 4 authorities)	8,463	18%
I: Additional Sites in Strategic Centres	1,300	3%
Sub-Total New Sites Supply (E – I)	27,495	57%
J: Net Dwelling Losses to Demolition (Dudley and Small Scale Demolitions)	-1,071	-2%
Total Net Housing Supply (Existing + New Sites – demolition losses)	47,837	100%

Source: Extracted from Regulation 18 BCP, Tables 3 and 4

- 2.10 For the new proposed housing land supply, Table 4 of the BCP identifies the following in more detail as shown in summary in Table 2.3 below.

Table 2.3: Summary of Total Proposed New Housing Land / Sites Supply by Type and Borough

Source of New Housing Supply	Total Dwellings	% Total New Supply	Dudley	Sandwell	Walsall	Wolverhampton
A: Employment Land Release	3,091	11%	732	1,882	0	477
B: Other Sources	6,921	25%	2,739	2,013	1,402	767
C: Windfalls	8,463	31%	2,816	1,728	1,455	2,464
D: Additional Sites in Strategic Centres	1,300	5%	350	200	0	750
Sub Total (A - D)	19,775	72%	6,637	5,823	2,857	4,458
E: Green Belt Release	7,720	28%	1,117	171	5,418	1,014
Total (A – D + E)	27,495	100%	7,754	5,994	8,275	5,472

Source: Extracted from Regulation 18 BCP, Tables 3 and 4

Unmet Housing Needs

- 2.11 The BCP identifies sufficient land to accommodate some **47,837** net new dwellings. This represents 63% of the identified Local Housing Need for the period to 2039 which the Plan states is 76,076 dwellings (at paragraph 3.21) There is therefore an unmet shortfall to the total housing need of some **28,239** dwellings (37% of the total need).

Housing Densities for Brownfield Land

Context

- 2.12 Draft BCP Policy HOU2 (Housing Density, Type and Accessibility) establishes a range of residential density standards to be applied to all sites of ten or more dwellings and which are unlikely to have secured planning permission prior to the adoption of the new plan anticipated in 2024.

2.13 The Policy identifies the aim to provide an overall mix of house types and sizes tailored to local and sub-regional needs. Minimum net densities for new housing are set out in the policy (subject to historic character and local distinctiveness) as follows:

- **100 dwellings per hectare (dph)** where accessibility standards for 'very high density' housing are met (see below) and the site is located within a Strategic Centre or defined Town Centre;
- **45 dph** where accessibility standards for 'high density' housing are met; and
- **40 dph** where accessibility standards for 'moderate' housing density are met.

2.14 Table 5 of the BCP (replicated below as Table 2.4) explains the levels of accessibility for sites to be considered as a 'very high', 'high' or 'moderate' housing density location.

Table 2.4: Proposed Black Country Housing Accessibility Standards

Density (dwellings per hectare net)	Very High: 100 + Only appropriate within a Strategic Centre or Town Centre	High: 45 +	Moderate: 40 +
Indicative proportion of flats	100%	>15%	0 – 15%
Indicative amount of housing suited to families	low	medium	High
Accessibility (by either walking or public transport, unless stated)			
Employment - Strategic Centre or other employment area	20 mins	20 mins	30 mins
Health - Doctor's surgery or Walk-in Centre	10 mins	10 mins	15 mins
Fresh Food - Centre or foodstore	Na	10 mins	15 mins
Education - Primary School (walking distance only)	Na	15 mins	10 mins
Education - Secondary School	Na	25 mins	20 mins

Source: Extract from Table 5 of the BCP and Table 1 of Black Country Urban Capacity Study Review (May 2021)

2.15 Paragraphs 6.15 – 6.19 of the BCP explain the importance of accessibility for different types and mixes of housing in relation to services including employment, health, fresh food and education and that the three dwelling density levels will need to address the need for access to services.

- 2.16 The proposed net housing densities in the BCP represent an overall increase to the current housing density policy set out in the adopted Black Country Core Strategy¹.
- 2.17 The existing BCCS established that developments of 15 or more dwellings should provide a range of house types and sizes with a minimum net density of **35 dph** except where higher densities would prejudice historic character and local distinctiveness. Table 8 of the BCCS then established applicable minimum net housing densities of:
- **60+ dph** for 'very high' accessibility locations within Strategic or Town Centres;
 - **45 – 60 dph** for 'high' accessibility locations; and
 - **35 – 45 dph** for 'moderate' accessibility locations.

Densities Anticipated from Sites Allocated or Carried Forward in the BCP

- 2.18 We have reviewed the densities for brownfield sites proposed to be allocated in the BCP ('Selected Sites') and also those sites that are 'Carried Forward' from the existing BCCS (i.e. sites previously allocated but not yet developed). The data source for this analysis was through the various tables set out in Section 13 of the BCP.
- 2.19 The findings of the analysis are summarised in Table 2.5 below. This indicates that in the Regulation 18 Draft BCP some 74% of all proposed housing sites have a density at or above the minimum level established in Policy HOU2 (Housing Density, Type and Accessibility). 26% of the sites therefore have a density below the minimum 40 dph proposed in the Policy and these are lower due to site specific characteristics or with reference to known constraints.

¹ Policy HOU2 and Table 8 Accessibility Standards for Housing Density, BCCS, 2011

Table 2.5: Selected and Carried Forward Sites – Summary of Stated Residential Development Densities

	Number of Sites with Proposed Densities Below 40 dph	Total	%
Dudley	18	77	23%
Sandwell	7	46	15%
Walsall	19	27	70%
Wolverhampton	4	38	11%
Total	48	188	26%

Source: CCL and UDL calculation from Regulation 18 Draft BCP

Consideration and Conclusions

Policy Basis

- 2.20 Securing and optimising higher densities of residential development accords with the objectives for making effective use of land set out in Section 11 of the NPPF.
- 2.21 Indeed, NPPF paragraph 120 (c) identifies the substantial weight and value of using suitable brownfield land within settlements for homes and other needs; and NPPF 120 (d) in promoting the development of under-utilised land and buildings especially if this would help meet identified needs for housing where land supply is constrained.
- 2.22 NPPF paragraphs 124 and 125 support the efficient use of land including policies for minimum density standards for city and town centres and other locations that are well served by public transport. Importantly, the NPPF expects a significant uplift in the average density of residential development within these areas. The use of density standards is also supported for other locations so that there is a range of densities that reflect accessibility and the potential of different areas rather than one broad range.
- 2.23 It is therefore evident, in our view, that the NPPF is supportive of establishing and raising minimum net residential density standards and that these are aligned with accessibility to key services.
- 2.24 In this respect the approach laid out in the draft BCP for minimum housing densities appears reasonable as the Plan proposes a range of densities aligned with optimisation of the use of land in the main Strategic and Town

Centres and in the identified Regeneration Corridors as well as a general minimum density for the Black Country as a whole.

- 2.25 We note that the proposed minimum densities for various types of locations at 40 and 45 dph are not especially high densities for urban locations and that these two proposed density categories are also relatively similar with little differential evident between them. A greater density range above 40 dph might be considered for the Regulation 19 BCP (subject to consideration of market deliverability of higher densities) to accentuate the differences between the 'moderate' (40 dph) and 'high' density locations described in the Plan.
- 2.26 It is our view that the range of minimum densities proposed for different locations will assist in ensuring that a mix of housing types and sizes can be delivered which is a critical component in the creation of sustainable communities.
- 2.27 Broadly, in our view, detached housing is usually circa >25 dph; 40 - 50 dph reflects smaller houses / linked housing intensively arranged on a site; 50 - 75 dph reflects a combination of housing and flats; 75-100 dph is predominantly flatted accommodation; and 100+ dph is achieved by flatted development over an increasing number of floors.
- 2.28 Importantly, wider research² tends to indicate that there is not a clear point at which increased housing density is unacceptable; but rather acceptability of higher densities is based on personal and cultural perceptions as well as on good design leading to successful places to live that are planned from the outset.

Densities of Selected Sites

- 2.29 It is evident that the Strategic and Town Centres offer a significant potential opportunity through regeneration and rejuvenation of land, sites and buildings to offer a reservoir for new residential development in the period to 2039.

² Including research conducted by the Greater London Authority as part of the preparation of the new London Plan:
https://www.london.gov.uk/sites/default/files/london_plan_topic_paper_on_density_policy_and_details_of_research_-_2017_final.pdf

- 2.30 The Regulation 18 BCP does not identify, allocate or review sites for housing development in the four Strategic Centres³. The indicative housing yield is included in the overall supply as well as the potential uplift in capacity for the Strategic Centres however.
- 2.31 Therefore there are no Selected Sites in the Plan located within the Strategic Centres and it is not possible to conclude whether the densities proposed through Policy HOU2 for these Centres would be achieved.

Densities of Carried Forward Sites

- 2.32 The density assumptions for Carried Forward housing sites (to which the existing BCCS densities would have formed the baseline at the time of their allocation) have been examined and understood to have been re-appraised in the BCP where their delivery is anticipated after 2024. All Carried Forward sites where densities have not changed are expected to be delivered by 2026 in line with the existing Black Country Core Strategy (BCCS) and Tier 2 plans in which they are currently allocated.
- 2.33 We conclude and recommend that site capacities for Carried Forward sites are revised to reflect the most recent planning permissions and that, where permissions are not expected to be in place by the time of adoption of the BCP, the capacities are revised to reflect the density expectations in BCP policy HOU2.
- 2.34 The Carried Forward site information in the draft Regulation 18 BCP included 60 sites with a density below 40dph, which after clarification from the BCA, were noted to be as a result of site specific characteristics and considerations in each case.
- 2.35 Overall, it will therefore be important to ensure that there is a full and effective justification set out in the forthcoming Regulation 19 BCP concerning the minimum density assumptions proposed and how / why these levels have changed from those in the adopted BCCS.

³ Site development allocations for the Strategic Centres are to be set out in second tier Local Plans and updated Area Action Plans for each centre.

Housing Development Non-Implementation Rates

Context

- 2.36 Non-Implementation or 'Discount Rates' have been applied to different sources of housing land supply in the Black Country to take account of the potential (and reality) of non-implementation of residential planning permissions in the plan period.
- 2.37 Non-Implementation Rates were established in the BCCS and were examined by the Local Plan Inspector at that time. The *Urban Capacity Review Update* (May 2021) (**UCRUR**) notes that a discount rate of 10% was applied to sites which were commitments in 2009 and a discount rate of 15% was applied to unidentified sites that were expected to come forward within the Regeneration Corridors or employment sites.
- 2.38 The UCRUR notes at paragraph 2.1.14 that a review of Non-Implementation Rates was undertaken using data from Wolverhampton City Council in the period 2001 – 2004. It was concluded that a 10% discount on sites with planning permission was too high and therefore an amended discount rate of 5% has subsequently been applied to sites with planning permission and not yet constructed. The UCRUR states that these discount rates reflect likely lapse rates and acknowledge the difficulties on sites within the urban area and particularly occupied employment land sites.
- 2.39 Paragraph 6.6 et seq. of the draft Regulation 18 BCP states that the following Non-Implementation discounts are applied:
- **5%** for sites with planning permission and not yet constructed;
 - **10%** discount from allocations on land in the urban area and on small (<ten dwellings / 0.25 Ha site size) and from sites without planning permission;
 - **15%** discount for housing supply from allocations on occupied employment land; and
 - **0%** (zero) discount applied for sites proposed to be released from the Green Belt.

Consideration and Conclusions

Overall Approach

- 2.40 The use of Non-Implementation Rates in establishing future housing supply is to reflect, *inter alia*: the characteristics and values of the local housing and land market; the challenges arising for development on specific types of sites or particular areas; and the complexities in bringing brownfield land into use for housing through re-development and regeneration.
- 2.41 Put simply, the principle under-pinning the Non-Implementation Rate approach is one of logic and reflects the relative degree of uncertainty surrounding the different components of supply. The greater the degree of uncertainty, the greater the discount.
- 2.42 The effect of applying the discounts is to require additional sites / land to be identified to meet the housing needs arising. It offers a cautious approach to housing land supply and serves to support the need to identify a range of sites capable of delivering the housing needs with some flexibility and resilience for the BCP.
- 2.43 Non-Implementation Rates or discount rates are therefore commonly applied to the capacity and yield arising from potential development sites in establishing realistic, flexible, housing delivery trajectories for Local Plans in accordance with NPPF paragraph 74; and as part of the overall risk assessment as to whether sites will come forward as anticipated as part of housing availability assessments (see PPG ID: 3-02420190722).
- 2.44 In this respect it is our view that it is appropriate to continue to use Non-Implementation Rates to reflect the characteristics and dynamics of brownfield land development in the Black Country.

Potential to Further Review and Reduce Non-Implementation Rates

- 2.45 Our view is that the 5% and 10% Non-Implementation Rates proposed in the draft Regulation 18 BCP are not unreasonable assumptions to make and are largely consistent with the approach taken in the existing BCCS, as well as with other Local Plans in the West Midlands and more widely across England.
- 2.46 There is however a need to thoroughly justify the Non-Implementation Rates proposed now in the BCP; reliance on analysis of past delivery and lapse rates using data only from Wolverhampton City in the 2001 – 2004 period (see paragraph 2.1.14 of the UCRUR and also paragraph 5.43 of the *Wolverhampton Strategic Housing Land Availability Assessment*, May 2021) might be of concern to representors to the Plan. The Regulation 19 BCP should seek to ensure that this evidence is more broadly based and more reflective of the current times.
- 2.47 Indeed, the need for Non-Implementation discounts will depend on the robustness of the evidence about the sites relied upon to deliver housing. The decision about whether and at what rate to include an allowance for non-implementation depends on how robust the delivery information is whether there is uncertainty about the sites that are proposed for allocation.
- 2.48 In our view there is a good opportunity now for the Regulation 19 BCP to consider and further explore the possibility of reducing the 15% Non-Implementation Rate applied to employment land that could be re-developed for housing in the plan period.
- 2.49 This is suggested on the basis that the BCP covers a long term period to 2039 during which there are likely to be significant and accelerating changes in the characteristics of the Black Country and wider West Midlands economy and to reflect Government policy to maximise the use of brownfield land and prioritise a place-making agenda.
- 2.50 The effect of reducing the discount rate on brownfield employment sites re-used for homes could be significant. The draft Regulation 18 BCP sets out in Table 3 that 3,091 dwellings are allocated on existing occupied employment with a 15% discount to be applied, if this was changed to 10% the yield could be some additional 154 dwellings. If more employment land were released for

housing, changing the Non-Implementation Rate from 15% to 10% would create further additional yield.

Windfall Sites Housing

- 2.51 Paragraph 71 of the NPPF and the Planning Practice Guidance (ID: 03-023-20190722) provide for an allowance to be made in Local Plans for windfall housing sites if there is compelling evidence that such sites have consistently become available in the area, with respect to future trends and that windfalls will continue to be a reliable source of housing supply.
- 2.52 The Regulation 18 BCP identifies that windfall housing sites (usually unallocated sites of <10 dwellings) should deliver some **7,651** new dwellings on sites across the Black Country according to Table 4.
- 2.53 The windfall housing sites allowance equates to some 10% of the total identified housing needs of the Black Country (76,076 dwellings) (see Table 2.1 above) and are categorised as sites of less than ten dwellings; former employment sites (for which policy DEL2 – Balance between Employment Land and Housing - is applicable); sites in the strategic centres; and large windfall sites (for example redundant school premises).
- 2.54 The assessment of capacity of the Black Country to support windfall housing development in the period to 2039 arising is based on analysis of historic completion rates (set out in the relevant Strategic Housing Land Availability Assessments – **SHLAA** - for each authority over the period from 2025 onwards⁴) for sites of less than ten dwellings according to paragraph 6.8 of the BCP.
- 2.55 Our opinion is that the approach to assessing potential windfall housing supply arising from small sites is appropriate and accords with the NPPF and PPG methodologies. It will however be important to ensure that the future windfall

⁴ Dudley MBC SHLAA 2019 / 20, paragraph 3.40 et seq. (**176 dpa**); Sandwell MBC SHLAA 2019 / 20 at paragraphs 10.1 et seq; (**108 dpa**); Walsall Council SHLAA 2020 / 21 at paragraphs 4.18 et seq. (**97 dpa**); and Wolverhampton City SHLAA 2021 at paragraphs 7.19 onwards (**158 dpa**).

potential adequately accounts for the rate of residential development arising from 'finite' sources such as through the conversion of former B1 Use Class office accommodation to new dwellings via Permitted Development Rights⁵.

- 2.56 It is noted that Table 4 of the BCP identifies windfall housing contributions from each of the four constituent Black Country authorities. For Wolverhampton City Centre there is a further allowance of 812 new dwellings⁶ (arising from the conversion of upper storey floorspace in the City for residential use via prior approval change of use and other conversions at a rate of 25 dpa).
- 2.57 Building on this we consider that adopting a similar approach in the BCP for the other three authorities represents an opportunity to be further explored as indicated in the Urban Capacity Review and the Centres Study 2021 sections of the Strategic Centres health-checks. We understand this work is underway by the BCAs investigating how structural change in centres can contribute to housing figures in the future Urban Capacity Review update and Regulation 19 BCP.

⁵ As set out in the *Town and Country Planning (General Permitted Development) (England) Order 2015* (as amended)

⁶ Paragraphs 7.13 – 7.16, Wolverhampton SHLAA, May 2021, City of Wolverhampton Council explains that upper floor conversions in the City Centre are anticipated to generate 350 dwellings (25 dpa) for the period 2025 – 2039 (14 years) based on past trends, with a further development of flexible land use allocations (remaining from the City Centre AAP) assumed to total 460 dwellings (33 dpa) over the period 2025 – 2039.

Summary Findings and Conclusions

Housing Density Assumptions

- a) Draft BCP Policy HOU2 establishes a range of residential density standards to be applied to all sites of ten or more dwellings:
 - o **100 dwellings per hectare (dph)** for 'very high density' housing located within a Strategic Centre or defined Town Centre;
 - o **45 dph** for 'high density' housing are met; and
 - o **40 dph** where accessibility standards for 'moderate' housing density are met.
- b) The NPPF is supportive of establishing and raising minimum net residential density standards and that these are aligned with accessibility to key services. The BCP sets reasonable densities proposing a range aligned with optimisation of the use of land in the main Strategic and Town Centres and in the identified Regeneration Corridors, although we note that the 'moderate' density (40 dph) and 'high' density (45 dpa) are not especially high densities for urban development. A greater range of densities above 40 dph might serve to better accentuate the differences and opportunities as between moderate and high density locations described in the Plan.
- c) The BCP does not identify, allocate or review sites for housing development in the four Strategic Centres and it is not possible to conclude whether the capacity of possible sites in the Strategic Centres could achieve the densities proposed through Policy HOU2.
- d) Site capacities for Carried Forward sites are revised to reflect the most recent planning permissions and that, where permissions are not expected to be in place by the time of adoption of the BCP, the capacities are revised to reflect the density expectations in BCP policy HOU2.
- e) It will be important to ensure that there is a full and effective justification set out in the forthcoming Regulation 19 BCP concerning the minimum density

assumptions proposed and how these levels have been increased from those in the adopted BCCS.

Housing Development Non-Implementation / Discount Rates

- a) Non-Implementation Rates have been applied to different sources of housing land supply to take account of the potential non-implementation or lapse of permissions. The Rates applied have a background and context drawing from the levels set out in the existing Black Country Core Strategy.
- b) the following Non-Implementation discounts are applied to brownfield land in the BCP:
 - o **5%** for sites with planning permission and not yet constructed;
 - o **10%** discount from allocations on land in the urban area and on small (<ten dwellings / 0.25 Ha site size) and from sites without planning permission;
 - o **15%** discount for housing supply from allocations on occupied employment land.
- c) Non-Implementation Rates or discount rates are commonly applied to the capacity and yield of sites for housing development. This helps supports a realistic, flexible, housing delivery trajectory in accordance with NPPF paragraph 74. It is appropriate to continue to use Non-Implementation Rates.
- d) the 5% and 10% Non-Implementation Rates in the draft BCP are not unreasonable. There is the potential to review and consider further the possibility of reducing the 15% Non-Implementation Rate applied to employment land to be developed for housing. This is on the basis that the BCP covers a long term period to 2039 during which there is likely to be significant and accelerating changes in the characteristics of the Black Country and wider West Midlands economy.
- e) The draft Regulation 18 BCP sets out in Table 3 that 3,091 dwellings are allocated on existing occupied employment with a 15% discount to be

applied, if this was changed to 10% the yield could be some additional 154 dwellings. If more employment land were released for housing, changing the Non-Implementation Rate from 15% to 10% would create further additional yield.

Windfall Housing

- a) Small windfall housing sites (<10 dwellings) are expected to deliver 7,651 new dwellings (representing some 10% of the total Black Country housing need) on sites across the Black Country.
- b) The approach to calculating windfall housing contributions appears to accord with the requirements of the NPPF and of the PPG overall.
- c) The approach undertaken by Wolverhampton City Council with respect to establishing an upper floor conversion windfall in the Wolverhampton City Centre area (equating to 25 dpa or 350 dwellings in the period 2025 – 2039) is being built on and reassessed across the Black Country Authority areas with work underway investigating how structural change in centres can contribute to housing figures in the future Urban Capacity Review update and Regulation 19 BCP. This will be a useful assessment to identify whether there could be any further windfall housing potential arising in the Strategic Centres (having regard to the finite potential arising from Prior Approval conversions of former offices to residential).

3. Existing Brownfield Land Housing Sites and Supply

Introduction

3.1 This Section focuses on reviewing, testing and re-appraising brownfield sites that have been proposed and rejected for residential development as part of the BCP. We also consider those sites that were not assessed through the plan process to date. The section considers whether there is a possibility for additional housing sites and capacity to be identified from these 'existing sites'.

Methodology

3.2 In addressing this task we did consider sites where the site size was under 0.5 Ha or capable of delivering at least 10 dwellings. We note that some carried forward sites in the BCP are under this threshold and appear to be based on site specific characteristics. Our focus was on brownfield sites. Although we reviewed all sites, we have not highlighted sites in this section that are greenfield or wholly greenfield within the Green Belt.

3.3 The key sources of information that were available for review include:

- Black Country GIS data layers with supporting information provided by the Black Country Authorities;
- the *Draft Black Country Plan Site Assessment Report: Assessment and Selection Methodology and Results* (August 2021) and appendices A-D;
- the individual Strategic Housing Land Availability Assessments undertaken by each constituent local authority and which incorporate relevant Brownfield Land Register data;
- the Regulation 18 Draft BCP at Section 13; and
- the Call for Sites process and outputs.

Selected Sites

- 3.4 We have reviewed all of the BCP's 'Selected' sites proposed for allocation for residential development using the data and explanatory information available in the Site Assessment Appendices⁷. In each instance we have reviewed the Selected sites to assess their suitability.
- 3.5 Our conclusion is that the Selected sites are appropriate in all cases for residential development.
- 3.6 In undertaking our analysis we have noted that there was not complete consistency between the Sites Assessment records, the GIS data layers and the supporting database with the information detailed in Section 13 of the Regulation 18 BCP. In such cases we assume the draft BCP has had subsequent information available to inform the analysis. It is recommended that the Regulation 19 version of the BCP should identify where changes have been made to the published Sites Assessment of the evidence base if this is not in itself updated.

Not Selected Sites

- 3.7 We have reviewed a total of 373 sites that were assessed but 'Not Selected'⁸ as appropriate for residential development allocation through the BCP. While our focus (for the purposes of this study) was on sites that contained an element of previously developed land, nonetheless, all Not Selected sites were considered.
- 3.8 Each site was investigated with respect to other plan allocations, known constraints and available information using GIS data layers to understand both the relationship with the surrounding area and with other sites.
- 3.9 Our initial conclusions were that the Black Country local authorities were correct in identifying 363 of the sites as 'Not Selected' (representing some

⁷ *Draft Black Country Plan Site Assessment Report: Assessment and Selection Methodology and Results* (August 2021) and appendices A-D
<https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4/>

⁸ Ibid

96.8% of the total). On provision of further detail we were able to understand the decision around the small number of sites we had queried.

- 3.10 Of the sites we originally queried, six were previously developed land within a larger Green Belt site area. We do not set out the total or brownfield only dwelling yield for these sites as the identification of a realistic previously developed land element of the wider Green Belt site falls outside the scope of our remit and could be subject to significant debate as to the precise extent of such brownfield land within each Green Belt site.

Not Assessed Sites

- 3.11 Using data and explanatory information provided in the published *Black Country Sites Assessment*, Appendices A-D that cover each individual local authority, each “Not Assessed” site was individually reviewed.
- 3.12 We considered the broad location and where appropriate identified the site location and characteristics based on the Call for Sites entry. Particular attention was paid to sites that contained elements of brownfield land although all sites were reviewed.
- 3.13 Of the 158 sites examined, we agreed with the respective Black Country local authorities decision not to make further assessment for all of these sites.

Sites Carried Forward

- 3.14 ‘Carried Forward’ housing sites are those sites, already allocated and identified in the BCCS or Tier 2 plans as appropriate for residential development, that have not yet been developed; effectively they are rolled forward site allocations. We reviewed 207 sites in total.
- 3.15 Of the total 207 Carried Forward sites, some 176 were categorised as previously developed brownfield land according to the available GIS data layer information. Of the 207 sites, 86 had a net development size identified as the

same as the gross size area, and 80 sites had a stated net developable size of zero. 83 sites had a gross site size of less than 0.5 hectares.

- 3.16 Having reviewed these sites, it is appropriate to carry them forward into the BCP. Any site to receive planning permission or assessed for housing post 2024 (the proposed BCP adoption date) would be based on the new BCP policies, including densities to ensure that the new net minimum density standards were applied and their potential capacities uplifted accordingly.

4. Potential Additional Sources of Brownfield Land Housing Supply

Introduction

- 4.1 In Section 4 we consider various sources of additional brownfield land supply that could provide opportunities to yield new residential development. This section takes a wide-ranging approach to different locations and types of brownfield land that may, with a different frame of reference or approach, be capable of contributing towards housing delivery in the BCP. This is in the context of the NPPF (particular paragraphs 16 and 35) which require Local Plans to be deliverable over their proposed plan periods.
- 4.2 Given the timeframe available for our work and the level of available information we have taken a proportionate approach which illustrates the possibilities for additional brownfield housing supply in various locations as a mechanism to demonstrate that, with further analysis and investigation, there could be additional housing supply identified and included in subsequent versions of the Black Country Plan.
- 4.3 The core sources used have been the layers of supporting evidence to the BCP, the Plan itself and for example where we have considered the accessibility of potential sites close to key transport hubs, we have sourced data from the Transport for West Midlands Data Portal.
- 4.4 We have included in the public transport nodes sensitivity and test analysis stations that are planned to be opened in the short term. There are rail stations on a previous freight line due to open for passenger service at Darlaston and Willenhall, and a metro extension running from Wednesbury to Brierley Hill and the Wolverhampton City Centre extension.

Strategic Centres

Overview

- 4.5 The Regulation 18 Draft BCP identifies four Strategic Centres; Brierley Hill, Walsall, West Bromwich and Wolverhampton.
- 4.6 The Strategic Centres together with the Core Regeneration Areas form The Growth Network of the BCP Development Strategy according to Policy CSP2 (The Strategic Centres and Core Regeneration Areas).
- 4.7 Policy CSP2 therefore sets the spatial housing distribution policy for the Black Country, including for the Strategic Centres that are stated to represent the primary focus for new development, regeneration and infrastructure investment and are therefore the main locations for land use change over the plan period to 2039.
- 4.8 Residential use in the centres is supported in Policy CEN1 (The Black Country Centres):
- “1) The priority for the Black Country’s Centres is to ensure they remain focused on serving the needs of their communities, through performing a well-balanced diversity of commercial, business and service functions. This includes retail provision and an increasing mix of leisure, office, **residential** and other appropriate, complementary uses that are accessible by a variety of sustainable means of transport.” (Our emphasis).*
- 4.9 The BCP also further recognises the opportunities to repurpose and re-energise the Strategic Centres, especially the core commercial areas to provide the widest range of facilities and maximise their status as the most sustainable locations. Policy CEN2 Tier One: Strategic Centres endorses the key role of the Strategic Centres and outlines the priority to serve the identified housing growth aspirations including maximisation of residential provision.
- 4.10 In terms of density, Policy HOU2 sets out a minimum net density of 100 dwellings per hectare for new residential development in the Strategic Centres subject to local heritage and character considerations.

- 4.11 Policy CSP2 and Table 2 of the Regulation 18 BCP establish a total of **9,561** net new dwellings to be delivered in the 2020 - 2039 period in the four Strategic Centres.
- 4.12 The indicated sources of supply of new dwellings in the Strategic Centres set out in the BCP is summarised in Table 4.1 below drawing from Tables 3 and 4 of the Regulation 18 Draft BCP.

Table 4.1: Summary of Identified Housing Supply, Strategic Centres

Strategic Centre	Brierley Hill	West Bromwich	Walsall	Wolverhampton	Total
Existing Allocations / Commitments	2,506	201	851*	2,248	5,806
Additional Site Capacity	350	200	0	750	1,300
Wolverhampton City Centre upper floor conversions				812	812
Total	2,856	401	851	3,810	7,918

Source: CCL and UDL summary from draft Regulation 18 BCP Tables 3 and 4

* 851 dwellings comprising 18 dwellings from allocated sites and 833 dwellings from committed homes on identified sites in Walsall Town Centre (according to Footnote 11 of the Regulation 18 Draft BCP)

- 4.13 In providing for 9,561 new homes within the Strategic Centres, the policy specifically outlines this will be of mixed tenure and type and primarily delivered as part of mixed-use development and at high density
- 4.14 We note the indicative housing capacity of the four Strategic Centres is also set out in the draft Regulation 18 BCP at Chapter 13, specifically in Tables 13, 21, 30 and 42 which identify the housing 'growth target' figures for each Strategic Centre respectively.

4.15 We summarise this position in Table 4.2 below that highlights differences to that shown in Table 4.1 (which is drawn from the BCP Tables 3 and 4).

Table 4.2: Summary of Identified Housing Growth Target, Strategic Centres

Strategic Centre	Brierley Hill	West Bromwich	Walsall	Wolverhampton	Total
Housing Growth Target	3,154	401	1,168	4,838	9,561
Total (Difference with Total in Table 4.1)	298	0	317	1,028	1,643

Source: Summary from Regulation 18 BCP Tables 13, 21, 30 and 42

4.16 The difference (**1,643** dwellings) between the housing supply in the four Strategic Centres set out in Tables 3 and 4 of the Regulation 18 BCP in comparison with the figures set out in the BCP at Tables 13, 21, 30 and 42 is concluded to be a discrepancy between these various sections of the Plan. It is clear (as shown in Table 4.2 above) that overall the BCP proposes to accommodate 9,561 new dwellings within the four Strategic Centres. It would assist if the forthcoming Regulation 19 BCP can ensure consistency across the various tables that set out the proposed future housing land supply.

4.17 The four Strategic Centres are subject to adopted Area Action Plans (**AAP**) that offer more detailed, centre-specific policies and development site allocations:

- Brierley Hill AAP (February 2011) – covers the period to 2026;
- West Bromwich AAP (December 2012) – covers the period to 2026;
- Walsall Town Centre AAP (January 2019) – covers the period to 2026;
and
- Wolverhampton City Centre AAP (September 2016) – covers the period to 2026.

- 4.18 In many cases the AAPs are now dated with all reaching the end of their stated lifetimes in 2026, but nevertheless contain policies and allocations which contribute to housing supply. We note that the AAPs are subject to a programme of review and updating and this work is progressing alongside the preparation of the BCP.
- 4.19 Emerging master-planning and assessment work is underway in West Bromwich, Walsall and Brierley Hill⁹ although it is understood these findings are not currently reflected in the BCP Regulation 18 future housing capacity figures for their respective Strategic Centres.
- 4.20 The Regulation 18 BCP sets out a proposed new housing supply total for the Strategic Centres. While it does not identify any housing allocations for the Strategic Centres it offers indicative housing supply figures for each. These targets are based on existing evidence comprising supply information from each borough's SHLAA regarding adopted AAP allocations and commitments likely to be delivered after 2024 (the assumed adoption date for the BCP) together with additional site capacity 'uplifts' informed by the Urban Capacity Review.
- 4.21 It is understood that the housing elements of the Strategic Centres AAPs will be guided by the targets set out in the BCP.

Potential Capacity Review Method – Strategic Centres

- 4.22 We were asked to consider whether additional brownfield housing supply could be identified within the four Strategic Centres.
- 4.23 The four Strategic Centres have markedly different characteristics and as set out above, the existing Tier 2 Plans range in age. We have undertaken a detailed review of capacity in West Bromwich only as this is the Centre with the oldest AAP and is currently subject to masterplanning work which will itself inform the AAP review and Regulation 19 BCP. Our conclusions to potential

⁹ For example, additional capacity (350 dwellings) has been determined for Brierley Hill through market intelligence and identified in the Urban Capacity assessment work and in the Regulation 18 Draft BCP at Table 3, page 90. This will be tested through the Brierley Hill AAP review in due course

additional residential development in relation to West Bromwich are therefore not necessarily capable of being applied on a pro-rata basis to the other Strategic Centres but we have identified the need for further analysis on a number of issues which could be undertaken elsewhere.

4.24 We reviewed the sites identified in the *West Bromwich Area Action Plan* (December 2012) which are located within the Strategic Centre. Given the date of adoption, a number of sites are no longer available. Equally a number remain and have been recently reviewed and 'refreshed' through the *Draft Interim Planning Statement for West Bromwich Town Centre Draft for Public Consultation July-August 2021¹⁰ (IPS)* (to be read in conjunction with the *Draft West Bromwich Masterplan¹¹*) which provide an indicative capacity figure for sites.

4.25 The detailed tasks undertaken were to review and examine:

- the AAP sites and history to check the status and opportunities within available AAP sites;
- available GIS data layers relevant to area of Strategic Centre (especially the employment land layer);
- the Draft IPS and Draft Masterplan August 2021 (the adopted boundary relates to the same area as the Strategic Centre);
- the Sandwell SHLAA and Brownfield Land Register for suitable sites;
- assumptions in the Black Country Centres Study 2021 Update and the Black Country Urban Capacity Review December 2019 and Update 2021; and
- commercial development data from EGi Radius to identify vacant sites, current planning applications, recent developer interest / and relevant media articles.

¹⁰ *Draft Interim Planning Statement for West Bromwich Town Centres Draft for Public Consultation July-August 2021*

¹¹ *Draft West Bromwich Masterplan*

West Bromwich Strategic Centre

Existing Position

4.26 The Regulation 18 BCP describes West Bromwich Strategic Centre at paragraph B.10 as the third largest centre in the Black Country and highlights that it

“is the focus for a wide range of civic, retail, cultural and leisure functions”.

4.27 The BCP identifies the housing capacity of West Bromwich Strategic Centre for the period 2020 – 2039 as **401** units (at Table 21). This is comprised of existing permissions, and allocations contained in the *West Bromwich Area Action Plan (WBAAP)* (December 2012) together with more recent evidence, informing potential residential uplifts in the Urban Capacity Review (see paragraph 3.1.27). We note this level of housing aligns with the indicative supply identified for the Strategic Centre in Tables 3 and 4 of the BCP.

4.28 A significant number of the WBAAP allocations, including some in the Strategic Centre, have been developed. Equally, we note that a number of allocations remain available at the time of writing, including those with opportunities for greater flexibility of mixed-use development as opposed to more limited uses proposed at the time of adoption.

4.29 As part of our review, we have drawn on the *Draft Interim Planning Statement for West Bromwich Town Centre* and *Draft West Bromwich Masterplan* prepared by Sandwell MBC in recognition of the current absence of a full review of the WBAAP as part of the BCP preparation. While it is a draft publication which was subject to consultation in the period July - August 2021, the Draft IPS outlines the Council's objective to deliver transformational change in West Bromwich Town Centre and seeks to facilitate land use proposals where they are at variance with the adopted WBAAP.

Review of Potential Supply

4.30 We have reviewed the current known status of the WBAAP sites alongside SHLAA details, the Draft IPS and Draft Masterplan, and Sandwell MBC comments dated December 2021 related to site specific amendments which

together have identified significant capacity for additional residential supply in West Bromwich Strategic Centre.

- 4.31 In our view, this reflects the opportunities for greater mixed-use regeneration of sites alongside repurposing of town centre uses to accommodate change. These fundamental factors help to support a positive approach towards greater flexibility of proposed end uses for existing WBAAP allocations alongside identification of indicative residential capacity where known. Our summary of prospective WBAAP sites offering residential potential, typically as part of mixed-use development is shown below in Table 4.3.

Table 4.3: Potential Sites for Residential Development, West Bromwich Strategic Centre

Address (WBAAP Site Reference)	Indicative Capacity (Dwellings)	Site Area (Ha)	Comments
Queen's Square (WBPr2)	326	2.9	Draft IPS & Masterplan identifies new capacity for residential. It is noted demolition of Bull Street multi-storey car park is underway (70 units included in SHLAA ref: 7131). Sandwell MBC advise amendments to identified capacity.
Farley Centre (WBPr4) and Kings Square (WBPr5)	343	3.6	Draft IPS & Masterplan identifies new capacity for residential. Sandwell MBC advise sites merged with amended capacity.
Town Hall Complex (WBPr10)	52	1.1	Draft IPS & Masterplan identifies new capacity for residential (retirement).

Address (WBAAP Site Reference)	Indicative Capacity (Dwellings)	Site Area (Ha)	Comments
			Sandwell MBC advise amended capacity.
Eastern Gateway South (WBPr16)	418	3.2	Draft IPS & Masterplan identifies capacity for residential. Sandwell MBC confirm a clerical error and amended capacity of 568 (of which 150 units identified in the SHLAA). The table identifies the net uplift in units.
TOTAL	1,139	10.8	

Source: Draft Interim Planning Statement for West Bromwich and Masterplan (2021), Sandwell SHLAA (2020); Sandwell MBC comments (2021)

- 4.32 Our review has identified the unadjusted potential for **1,139** units in the Strategic Centre spread across four sites within the Primary Shopping Area and Eastern Gateway Opportunity Areas of the WBAAP. The indicative capacity is derived from the potential dwellings identified in the Draft IPS (read in conjunction with the Draft Masterplan) together with amended site capacity details advised by Sandwell MBC. It should be noted the unadjusted figures adopted for the West Bromwich does not include a Non-Implementation Rate discount and do not include for incidental and ancillary space.
- 4.33 We also consider a significant potential source of residential capacity relates to the repurposing of existing retail floorspace, including Queens Square (reflected in its identification as site WBPr2 in the Draft IPS / Masterplan), which we understand is subject to low occupancy levels together with mixed use opportunities associated with other retail locations including the Farley Centre and Kings Square. The other area of opportunity relates to the Eastern Gateway, and especially the Eastern Gateway South site which has an indicative capacity of 568 units.

- 4.34 We are aware that the BCP identifies a housing capacity of 401 units for West Bromwich Strategic Centre which includes an 'uplift' allowance of 200 units. In order to avoid double counting, even if this 'uplift' assumption were discounted from the indicative new capacity outlined in Table 4.3, we consider the 'unadjusted' potential for an additional 939 homes could exist. The Black Country authorities are investigating how structural change in centres can contribute to housing figures in the future Urban Capacity Review update and Regulation 19 BCP informed by the initial consideration of residential potential in the Centres Study Update, including the conversion of vacant retail floorspace. Again, any future allowance would need to avoid any 'double counting' especially where future 'uplift' sites include vacant commercial floorspace.
- 4.35 In our opinion, the prospective level of additional supply in the Strategic Centre could likely be even higher based on consideration of potential longer term opportunities.
- 4.36 We are aware the Draft IPS identifies a WBAAP site at North Lyng (AAP site ref: WBPr13) totalling 2.6 hectares which is considered a potential future employment led mixed-use site that could offer opportunities for residential development. Whilst we note that Sandwell MBC consider that no capacity should be attributed to the site given the longer term timescales and the deliverability of the site will require high levels of public sector intervention (£62m), we remain of the opinion that the site offers long term delivery potential for an element of residential together with the neighbouring WBAAP site WPRr22 which is also identified as suitable for residential. In both cases, the sites at Lyng represent long term opportunities as part of a mixed-use vision for the area but recognise the future relocation of some employment uses will need to be addressed.
- 4.37 In addition, we have reviewed other WBAAP allocations identified for other proposed uses together with known vacant plots within allocation sites which we consider could offer potential alternative use for residential. Whilst this is a high-level exercise, one site identified in Table 4.4 below could offer further opportunities of 0.7 hectares which we estimate could support an indicative

unadjusted capacity of 70 units (based on 100% developable area given the sites' high intensity potential and accessible location within the Strategic Centre and a density of 100 dph).

Table 4.4: Other Possible Site for Residential Development

Address (AAP Site Ref)	Site Area (Ha)	Estimated Possible Dwelling Capacity	Comments
Providence Place Phase II (WBPr8)	0.7	70	The site is in current use as car parking to support Providence Place although the WBAAP indicates that car parking represents a short-term use.

Source: Draft Interim Planning Statement for West Bromwich and Masterplan (2021), West Bromwich Area Action Plan (2012)

4.38 In total, we have identified an indicative unadjusted capacity for some 1,209 units in West Bromwich Strategic Centre although allowing for a discount of 200 units to avoid double counting of the estimated 'uplift', a revised total of **1,009** units is identified. This is based on a high level review of the Centre drawing on published sources, comments made on site capacities and professional judgement of identified vacant / under-utilised sites which could offer potential for housing. A summary is set out in Table 4.5 below.

Table 4.5: Summary of Possible Residential Capacity in West Bromwich Strategic Centre

Source of Supply	Estimated Indicative Capacity
Potential Residential Development at WBAAP Sites (Draft IPS/Masterplan)	1,139
Other Possible Sites: Alternative Use of WBAAP Site	70
TOTAL	1,209 (1,009*)

Source: CCL and UDL summary of Draft Interim Planning Statement for West Bromwich and Masterplan (2021), Sandwell SHLAA (2020), Sandwell MBC comments (2021) and CCL / UDL estimates

Note: * Discount of 200 units made to avoid double counting of 'uplift' estimated in the Urban Capacity Study

Conclusions

- 4.39 As the top tier of the BCP Development Strategy and the most sustainable locations, the four Strategic Centres are identified as key drivers for growth and locations which offer opportunities for change and repurposing focused around greater flexibility and mixed uses, especially to support residential use.
- 4.40 At present, the BCP recognises that further work will be undertaken to inform the capacity for residential in the Strategic Centres. The BCAs are undertaking work to update the residential figures for all four Strategic Centres for the forthcoming Urban Capacity Review and the Regulation 19 BCP. In view of this, we have undertaken a high level review of one centre, West Bromwich, to investigate the potential capacity for additional housing supply.
- 4.41 This review has drawn on published information (including amended capacity for individual sites advised by Sandwell MBC) and identified a significant potential for new supply in West Bromwich, which we estimate could support an indicative unadjusted capacity of some 1,009 dwellings, over and above existing identified supply subject to viability. We recognise that a number of sites would more realistically represent longer term options but certainly agree with the aspirational potential of the sites identified in the Council's Draft IPS

and Masterplan which identifies residential uses as key components of 'refreshed' allocations originally identified in the 2012 WBAAP.

- 4.42 In reviewing prospective sources of additional supply in the Strategic Centres as a whole, we consider the West Bromwich example has identified the potential related to the repurposing of town centre uses, especially associated with the oversupply of retail floorspace, which offer opportunities for new residential as part of mixed-use development, recognising that the levels of surplus retail and commercial floorspace and therefore development opportunity will of course vary across the four Strategic Centres. In addition, there are anticipated to be opportunities for repurposing of office space (already driven by Permitted Development conversions) and other floorspace, which again will vary by centre. Consideration of some lower quality employment areas offers potential for transition to future mixed-use areas whilst existing vacant and / or under-utilised plots and buildings could offer prospects for residential reuse.
- 4.43 Our high level work has not, due to time, extended to the other Strategic Centres but we recommend that the further work being prepared by the BCAs to consider additional capacity within the Strategic Centres is progressed as a matter of urgency.

Town / District and Local Centres (Tier Two and Three Centres)

Tier Two Town and District Centres

Overview

- 4.44 The draft BCP sets out District and Town Centres (Tier Two) and Local Centres (Tier Three). The Regulation 18 BCP identifies and designates 17 Tier Two Centres. The Tier Two Centres consist of Walsall's District Centres and Dudley, Sandwell, and Wolverhampton's defined Town Centres.
- 4.45 Policy CEN1 (The Black Country Centres) and Table 7 identify the hierarchy of Centres and Policy CEN3 (Tier Two Centres) explains in more detail the approach to future development and uses in these areas. The policies explain that these centres are viewed as a distinctive and valued part of the Black

Country's character. The policies identify the provision of a diverse range of uses, including residential, as appropriate uses for these centres alongside their priority role driving growth outside the Strategic Centres and serving the needs of the BCP residential and employment allocations. There is also the recognition that the centres will be more flexible and adaptable, and offer opportunities to enhance, consolidate and diversify a broader range of in centre uses given the limited capacity for additional retail floorspace identified through the *Black Country Centres Study* (and Update).

- 4.46 Potential opportunities for change of use of sites and conversion from employment land exist especially within / edge of Tier Two Centres and where good transport connections are available.
- 4.47 Table 5 related to Policy HOU2 (Housing Density, Type and Accessibility) states that Town Centres in Tier Two are appropriate for 'Very High' 100+dph residential development density subject to appropriate accessibility to various services, facilities and employment opportunities.

Approach to Assessing Potential Capacity

- 4.48 In view of the number of Tier Two centres, our approach to investigate the potential for additional supply has focused on the review of a 'case study' centre – Willenhall, one of the five Tier Two centres in Walsall Borough.

Willenhall District Centre

- 4.49 Willenhall District Centre reflects several key drivers that we consider highlight the potential to support future residential growth opportunities, including targeted investment associated with the planned new railway station at the southern boundary of the District Centre and the role of Willenhall in the Wolverhampton-Walsall Core Regeneration Area.
- 4.50 This is recognised in the Regulation 18 Draft BCP at paragraph C.22 which identifies District Centres in Walsall Borough (including Willenhall) as accommodating more housing provision where possible:

"The priority for District Centres in 2039 will be to help drive forward the growth and regeneration of the borough outside of the strategic centre as a hub for

*their respective district areas, providing an enhanced level of town centre uses and services for residents in the district while strengthening connections to the town centre and the outlying local centres and residential areas on the urban fringe. District Centres will be more adaptable and flexible, **accommodating housing provision where possible** to improve vibrancy and the health of the centre, and offer the most sustainable areas well served by public transport links and a wide array of uses and services. Darlaston and **Willenhall lie within the Walsall to Wolverhampton Core Growth Area: they will serve as centres for targeted investment in infrastructure delivery and employment land to help deliver strengthened links between the Black Country's strategic centres**". (Our emphasis).*

- 4.51 Willenhall town centre is also identified as a key location which is expected to support the future delivery of new homes and jobs according to paragraph C.26 of the BCP.
- 4.52 As part of our analysis of Willenhall District Centre, we have reviewed the relevant BCP Regulation 18 and considered the development opportunity sites identified in Willenhall District Centre from the saved *Walsall Unitary Development Plan (2005)*¹² (**WUDP**) which remains in effect. We have also reviewed available evidence in the SHLAA, the Brownfield Land Register and the *Black Country Parking Study*¹³.
- 4.53 We are aware that Walsall Council are preparing a Masterplan for Willenhall (although we have not been provided with a copy) and it is anticipated to be reported to the Council's Cabinet in February 2022. Our work therefore takes no account of its findings.
- 4.54 Our review has identified a significant number of employment land sites which in our opinion represent the concentration of lower quality employment land sites that exists at the fringes of the District Centre and which are primarily identified as EMP4 sites in the BCP, or employment sites suitable for release

¹² *Walsall Unitary Development Plan (2005)* – the inset maps and relevant policies for the five District Centres remain relevant given the more recently adopted Walsall SAD and the Walsall Town Centre AAP (2019) do not cover the district centres

¹³ *Black Country Parking Study Stage 1 Report (August 2021)*

from that existing use. Overall, we consider many of these sites could offer more suitable prospects for residential or as part of mixed-use developments incorporating housing.

- 4.55 In addition, our assessment has identified a number of vacant and under-utilised sites which offer potential residential opportunities. These include a number of existing WUDP allocations which have not come forward together with existing Council operated car parks which the *Black Country Parking Study* confirms as having evidence of low occupancy levels (especially at Market Place, Wakes Ground Car Park and Wolverhampton Street).

Conclusions

- 4.56 We have identified a number of prospective opportunities in Willenhall District Centre which we estimate could provide an indicative unadjusted supply of 254 residential units (based on a density of 100 dwellings per hectare and 80% net developable area). In reality, we consider these capacity assumptions to be cautious, particularly given the potential to secure higher densities on sites in Willenhall District Centre over the Plan period driven by the enhanced accessibility associated with the new railway station. We further recognise there could be other sites that may be identified as part of the ongoing Willenhall Masterplan that could realistically contribute towards additional future capacity.
- 4.57 In assessing sources of potential supply, we have identified a number of lower quality employment land sites that could offer better alternative use for residential. In this context, we note that some of the employment sites have been identified with potential for release, and /or are identified as EMP4 sites in the BCP.
- 4.58 We consider there are opportunities to cluster lower quality employment sites which could provide more comprehensive redevelopment sites, and which we consider could be positively adopted in Willenhall to take advantage of the committed rail infrastructure.
- 4.59 In addition, our review has identified a number of vacant / under-utilised buildings and sites together with evidence of under-used public car park sites

which together further contribute potential opportunities that could support additional housing.

- 4.60 Overall, our review has identified some additional capacity in Willenhall and are of the opinion that the potential of all the Tier 2 Centres (as with the Strategic Centres and Tier Three Local Centres, discussed below) should be explored in more detail to ensure the Regulation 19 BCP fully considers the capacity of all the defined centres. We understand that this work is underway by the BCAs.

Tier Three Local Centres

Overview

- 4.61 The Tier Three Local Centres comprise a large and diverse network of smaller centres (113 in total that are identified in Draft BCP Policy CEN1 and at Table 7). These collectively represent Walsall's Local Centres, and Dudley, Sandwell and Wolverhampton's District and Local Centres.
- 4.62 The Tier 3 Centres are characterised as those that provide day to day 'top up' convenience and local service provision for their immediate local neighbourhoods needs, and by their nature are typically small scale (but not all reflecting the District Centre status of some) and anchored by a small supermarket and / or convenience store. By virtue of Policy CEN4 (Tier Three Centres) the draft BCP seeks to protect and support each centre and also to highlight the potential for the network of centres to support the needs of residential and employment development allocations.

Approach to Assessing Potential Capacity

- 4.63 We have reviewed the largest 29 Tier Three Local Centres that are greater than one hectare in area (many of the designated Tier 3 centres are smaller than 0.5 Ha overall). Boundaries for these centres are tightly drawn to match existing commercial and community facilities. This review found no additional likely supply which meets the minimum 0.5 Ha size threshold consistent with new BCP housing site allocations.
- 4.64 From our review of the Regulation 18 draft BCP and the *Black Country Centres Study* there is plainly a diverse and extensive number, size and form of Local

Centres, which could provide smaller opportunities for additional residential supply. This could be expected to comprise some smaller sites as well as windfall provisions, especially associated with change of use including residential over ground floor commercial, alongside potential redevelopment of vacant or under-utilised sites within centres, especially as part of mixed-use schemes.

- 4.65 We consider there is the opportunity for the BCA to review the Tier Three Local Centres prior to the Regulation 19 BCP (and understand such work is underway) to identify the potential for suitable housing, which would not be captured by windfall calculations. While many could be expected to be small scale, we are of the opinion that an approach could be adopted for rejuvenation and shaping of the Tier 3 centres (noting of course that some of the centres are small scale) to encourage new residential use in the centres, where appropriate, which would further enhance the vitality and viability of the local and district centres.

Core Regeneration Areas and Public Transport Nodes

Overview

- 4.66 Core Regeneration Areas (**CRA**) are part of the draft Plan's "Growth Network", made up of the Strategic Centres and Core Regeneration Areas (Policy CSP2) and are the primary focus for co-ordinated and sustained regeneration and infrastructure investment to support the delivery of regionally significant growth and promote wider benefits to local communities.
- 4.67 There are eight core regeneration area. Wolverhampton City Centre Core Regeneration Area shares the same area as Wolverhampton Strategic Centre, and Brierley Hill Strategic Centre shares the same area as the Central growth area. Walsall Strategic Centre is adjacent to the Walsall, Willenhall and Darlaston CRA and West Bromwich Strategic Centre is close to, but not adjacent to, two ends of the Sandwell CRA. The Core Regeneration Areas are together expected to deliver 11,208 homes during the BCP plan period.

4.68 The Core Regeneration Areas are mostly subject to a density of 45 dph, although some parts of the CRAs are within the 40 dph density area. Where they coincide with a Strategic Centre or Tier Two Town / District Centre the relevant minimum net density to apply would be 100 dph in accordance with Policy HOU2.

Potential Capacity Review Method

4.69 We have considered the role of public transport and the main linked public transportation corridors. We mapped the existing train, metro and bus stations and applied a 400m radius zone (equating to about a five minute walk).

4.70 We have included the planned new metro stops along the Wednesbury to Brierley Hill extension, the additional stops for the Wolverhampton City Centre extension, and we have added zones for the two new rail stations planned for Willenhall and Darlaston.

4.71 In considering the best way to assess possible additional brownfield housing supply for both Core Regeneration Areas and for land in proximity to key transport hubs, we have concluded that it was not practical to assess what is in or out of scope for each CRA as there is no readily available breakdown of sites within CRAs, although they have overall future housing capacity figures set out in Regulation 18 BCP Policy CSP2 (The Strategic Centres and Core Regeneration Areas).

4.72 For the public transport nodes there is significant overlap with Strategic Centres and Tier Two Centres. Any possible additional supply we identified through this analysis has been carefully considered to avoid double counting from the Strategic Centres and Tier Two capacity. There are however sites outside the Tier 1 and 2 Centres where additional housing density uplift might be applied.

4.73 We considered it practical to use the public transport nodes as a sensitivity test for the employment sites we identify as being good examples of alternative residential and mixed uses under EMP4 release. This means that for sites within 400m of public transport nodes we can apply a density uplift of 100 dph (to be consistent with the Strategic Centres and Tier Two centres) for sites

otherwise in a 40 or 45 dph zone, which is both reasonable and consistent to match both the existing capacity of these nodes and the investments behind new stations and routes. We define nodes as main bus stations, rail stations or metro interchanges.

- 4.74 The potential in these public transport areas for newly identified sources of brownfield land supply reflects the ambitions of the BCP, the investments that are being made to improve public transport use in high accessibility locations and to access to jobs, and town centres services.
- 4.75 We show the results of this testing at Table 4.7 later in this section of the report.

Employment Sites

Existing Employment Land Sites – Overview and Method

- 4.76 Our scoping involved a review of the relevant background documentation to understand the context of both new site selection and employment site retention or release. Given the time and resources available for this study no site visits, detailed viability analysis of site deliverability or landowner engagement to establish availability was possible.
- 4.77 There is a hierarchy of existing studies:
- West Midlands Strategic Employment Sites Study (May 2021);
 - Black Country Economic Development Needs Assessment (May 2017) (**EDNA1**);
 - Black Country Economic Development Needs Assessment (**EDNA2**) Update (August 2021);
 - Black Country Plan Black Country Employment Area Review (**BEAR**) (July 2021).
- 4.78 There are no recommended sites in the Black Country area arising from the *West Midlands Strategic Employment Sites Study*. The EDNA2 report updates the overall employment land requirement, and the BEAR is an assessment of sites from three sources:

- areas identified in the 2009 GVA Study (which informed the BCCS);
 - areas allocated as employment areas in subsequent Tier 2 plans; and
 - new sites identified through fieldwork and desk-top work.
- 4.79 The Regulation 18 BCP carried forward the broad approach from the earlier Black Country Core Strategy which is a four tier ranking of employment sites. These represent:
- **EMP1** – new currently vacant sites arising from the assessments of need in EDNA1 and 2;
 - **EMP2** – the existing strategic sites occupied by businesses with a focus on including high technology manufacturing and logistics sectors; and
 - **EMP3** and **EMP4** – are existing lower quality occupied sites with a more local focus.
- 4.80 A number of existing employment areas making up 109 hectares of land are allocated for redevelopment for housing; predominantly lower quality sites and premises where existing owners and occupiers are seeking to relocate to better quality accommodation.
- 4.81 The Regulation 18 Draft BCP notes that some EMP4 sites will become unsuitable for continued employment uses and enables development for employment uses to enable existing occupiers to invest and expand, or in some cases alternative uses including housing. These sites are currently occupied and there is no current evidence that landowners and occupiers have aspirations to bring the sites forward for redevelopment. However, some of these areas contain poor quality accommodation and it is highly likely that they will provide opportunities for redevelopment over the lifetime of the Plan.
- 4.82 The BCP is not explicit over the relationship between the housing capacity of the EMP4 areas and the windfall capacity of employment sites set out in the Urban Capacity Study and it is understood that further work is being progressed by the BCA's to clarify this. Experience of the delivery of the BCCS has shown that the total capacity of such areas is likely to be limited given

challenges of land assembly, viability and the need to support the business base of the area.

- 4.83 The land area of EMP4 sites is considerable at around 160 hectares net. As a straight-forward analysis, if 50% of the EMP4 sites were released over the BCP plan period this amounts to a potential supply of around 3,500 dwellings, at 10% it represents some 700 dwellings. This is subject to any separation from double counting windfall calculations from smaller sites. This approach is separate and cannot be double counted with the alternative analysis of employment sites set out below (from paragraph 4.90) and concluded in Tables 4.6 and 4.7.
- 4.84 In response to this hierarchy, our approach has been to focus the site reassessment on EMP1, EMP3 and EMP4 sites. Additionally, we have reviewed those sites identified as 'Not Employment Land' and 'For Release' on the accompanying GIS database supplied to us.
- 4.85 Due to the status of EMP2 sites as the most important and more strategic employment land / sites and premises we did not review these for their suitability for release or redevelopment as housing.
- 4.86 Our guiding principle was to illustrate the impacts of a different, more proactive approach towards the promotion of new residential development using existing employment land.
- 4.87 This represents an alternative frame of reference to the approach taken to date. Indeed, the *Draft Black Country Plan Site Assessment Report: Assessment and Selection Methodology and Results* (August 2021) sets out at paragraph 3.6:
- "A number of sites have been assessed for both housing and employment use. Sites considered suitable for both uses, following Site Assessment, **have generally been prioritised for employment use**, as there are limited opportunities for employment development in the Black Country and these are locationally specific". (Our emphasis).*
- 4.88 We conclude that taking this alternative, intervention-led approach is reasonable to consider for two reasons:

- firstly, it illustrates an alternative option of what might happen if a housing first approach had been taken to sites assessed for both housing and employment; and
- secondly the approach is linked to future economic uncertainty and structural changes to the economy post Covid-19.

4.89 We do not underestimate the enormity of the challenge of trying to provide high levels of housing and employment land within the local authority areas given the clear constraints that exist, and whether this more proactive strategy is an approach that the BCAs may wish to pursue given the potential impact on local businesses and jobs.

Findings

4.90 We reviewed a total of 603 employment sites. Table 4.6 below shows the extent of the sites considered within the policy categories of EMP1, EMP 3 and EMP4.

Table 4.6: Sites Reviewed within Each Employment Land Category (EMP1 – EMP4)

Total	
EMP1	106
EMP3	337
EMP4	160
Total	603

Source: CCL and UDL analysis

4.91 As previously highlighted, we have not reviewed EMP2 employment sites as the draft Regulation 18 BCP considers these to be most important (best quality) existing employment sites overall. Clearly there may be specific circumstances in which some of these EMP2 sites are considered as suitable for mixed use redevelopment if they became available.

4.92 EMP4 and EMP3 sites amount for 67% of the total sites we identify above. These sites reflect lower BEAR scores and are sites with the greatest potential

for housing use arising from their relatively lower ranking of quality (as identified in the BEAR analysis). Where these sites are larger in size, mixed use redevelopment may be suitable, retaining an element of employment use consistent with residential use.

- 4.93 The focus of sites that we think are capable and potentially suitable for housing development are largely found from the pool of EMP4 sites and is a recognition that some of these sites will be suitable for residential development and may well improve the amenity of the immediate neighbourhood. The BCP acknowledges this in paragraph 7.4:

*“to recognise that some sites **will become unsuitable for continued employment uses and to facilitate their redevelopment to alternative uses including housing** (Policy EMP4). However, the number of such sites is expected to be considerably less than was envisaged by the Black Country Core Strategy adopted in 2011”. (Our emphasis).*

- 4.94 We have highlighted the opportunity for the Regulation 19 BCP to review the potential residential capacity of EMP4 areas in terms of the relationship with the existing allowance made for windfall development on employment sites.
- 4.95 We consider that a number of EMP3 sites should be further reviewed and considered whether they would be a better fit under the Plan’s EMP4 planned release approach. There are a number of EMP4 sites that we have identified as good examples for detailed review to determine whether they should be deemed as early priorities to encourage release and residential redevelopment through a more proactive delivery approach.
- 4.96 For the identified employment sites we converted the gross site area into a net figure through applying an assumed 80% gross to net conversion. Where we illustrate potential yield from these approaches in Table 4.7 below, we also include a 10 and 15% non-implementation adjustment.
- 4.97 We applied the prevailing draft BCP density guidance to the sites as applicable, at 40, 45 and 100 dph in accordance with draft Policy HOU2.
- 4.98 As previously explained, we have sensitivity tested those sites in close proximity to existing or planned public transport nodes. If a site was within

400m of a main public transport node, we applied a density equivalent to Strategic Centres and Tier Two Centres of 100 dph. The findings of this are the higher part of the range shown in Table 4.7 below.

- 4.99 We set out the unconstrained indicative yield of bringing forward these sites in Table 4.7 below, which ranges from 1,130 to 1,530 dwellings. Some of the larger sites we have identified would be suitable for mixed use development, combining residential and suitable employment uses. If such an approach was taken this would of course reduce the indicative yield. We have not accounted for land release for essential ancillary uses, for example, schools, health and community facilities that could be appropriate as part of this additional provision.
- 4.100 At a more fundamental and practical level, such an approach could necessitate the active displacement of existing business operations and associated local jobs. The BCAs may consider that this is not appropriate given the importance of supporting the local economy to the overall delivery of their and stakeholders priorities and particularly in the context of the impact on local businesses and jobs that need to be considered.

Table 4.7: Indicative Additional Potential Housing Capacity Yield from Selected Employment Sites

			Non Implementation Rate Applied to Indicative Yield	
	Indicative Yield	Sensitivity	10%	15%
Total	1,130	1,530	1,020	960

Source: CCL and UDL analysis and calculation, figures rounded

Brownfield Land at the Edge of Urban Areas

Overview

4.101 Using available GIS data layers we have reviewed the potential of additional brownfield land at the edge of the existing urban area where it might be suitable for housing development. The key constraints and limitations to this analysis applied were:

- sites / land must not be within the designated Green Belt;
- sites / land must be 0.5 Ha or greater in size;
- sites / land must be within the definition of previously developed land as set out in the NPPF at Annex 2, which excludes gardens, parks, recreation grounds, allotments, etc. as being brownfield land.

4.102 The built-up urban edge boundary was followed within the local authority administrative boundaries. Our method diverged from this where the existing Green Belt land lay in between the built-up area and the local authority boundary.

Findings

4.103 Our analysis found no significant available or vacant brownfield sites at the edge of existing urban areas and therefore little prospect of any substantial additional potential housing yield.

Summary Findings and Conclusions

Overall Potential Additional Supply

- a) Drawing the various strands of analysis set out in this Section together (example Strategic Centre of West Bromwich, an example Tier 2 Centre at Willenhall, Tier 3 centres), we can find the following, indications of potential additional sources of housing supply. These however are partial, as we have considered West Bromwich and Willenhall as examples for the larger number of Strategic centres and Tier 2 centres. For the Regulation 19 Plan the BCA

will need to take a view of the realistic level of EMP4 release. At 10% this would amount to 700 dwellings, at 50% it would be some 3,500 dwellings.

Source	Unadjusted		Non Implementation Adjustment	
	Additional Potential Yield		10%	15%
Strategic Centre example	1010		910	-
Tier 2 Centre example	250		230	-
Tier 3 Centres	0			-
Employment	1,130	1,530	1,020	960
Edge of Urban Brownfield	0			

Note the figures above are rounded to the nearest 10

- b) It should be noted that no adjustment has been made for essential uses ancillary to residential development.

Strategic Centres

- c) As the top tier of the BCP Development Strategy and the most sustainable locations, the four Strategic Centres are identified as key drivers for growth and locations which offer opportunities for change and repurposing.
- d) At present, the BCP recognises that further work will be undertaken to inform the capacity for residential in the Strategic Centres.
- e) This review has drawn on published information and identified a significant potential for new supply in West Bromwich, which we estimate could support an indicative unadjusted capacity of some 1,010 dwellings (figure rounded), over and above existing identified capacity.
- f) In reviewing prospective sources of additional supply in the Strategic Centres, we consider the West Bromwich example has identified the potential related

to the repurposing of town centre uses, especially the oversupply of retail floorspace, which offer opportunities for new residential as part of mixed-use development.

- g) Our high level work has not extended to the other Strategic Centres but we consider that updated analysis and examination of sources of supply opportunities need to be identified in all of the Strategic Centres.

Town and District Centres

- h) We have undertaken a high-level review of Willenhall District Centre to investigate the potential capacity for additional housing and identified an indicative unadjusted, cautious capacity for 250 units (figure rounded). This has primarily focused on the potential of lower quality employment land sites, including those located in proximity to the committed new railway station together with repurposing of vacant/and or under-utilised sites and buildings, including scope offered by low occupancy public car parks.
- i) We consider opportunities within the 17 Tier Two centres should be explored in further detail to inform the Regulation 19 BCP and in our opinion would anticipate the source of opportunities would be comparable to those we have identified in Willenhall. We understand that this work is underway by the BCAs.

Tier 3 Local Centres

- j) We found no additional supply arising from sites of >0.5 Ha from our review and analysis of 29 of the 113 Tier Three Local Centres (we focused on those Centres that had a designated area covering >1 hectare in size). If suitable supply exists across these centres due predominantly to their small size, we consider that this would best be captured and accounted for in windfall calculations. We understand that this work is underway by the BCAs.

Employment Sites

- k) We recommend the relationship between the windfall allowance in the UCS and the potential capacity of EMP4 areas in particular is made more explicit.
- l) Subject to (k), we recommend that the BCAs review the policy approach to a number of sites and areas. We consider some existing employment sites that could, over the BCP plan period, make better contributions to the overall strategy as either residential or mixed use developments, replacing largely lower quality EMP3 and EMP4 sites.
- m) The indicative yield from this exercise is between 1,130 and 1,530 dwellings, subject to suitable non-implementation rates. The upper end of the range represents an additional uplift where sites aren't in Strategic Centres or Tier 2 Centres, but are within 400m of a bus station, rail or metro station. This figure is not seen as additional to the modelled EMP4 release figure.

Brownfield Land at the Urban Edge

- n) Our review of potential brownfield sites and land at the edge of the existing urban area (i.e. not within the Green Belt and consistent with the definition of previously developed land set out in Annex 2 of the NPPF) did not identify any potential sites.
- o) If suitable supply exists at these urban edge locations it is likely, due to the site size, to be small scale and we would expect this to be accounted for in windfall housing calculations.

5. Unlocking Barriers to Brownfield Land Housing Development

Introduction

- 5.1 This Section examines key identified barriers to unlocking brownfield land for housing development in the Black Country. It is concerned with identifying types of barriers and how these might be overcome or addressed in the context of the Levelling Up agenda as well as the evident, ongoing work by the Black Country Authorities with partners including the WMCA to support delivery of developments using brownfield land.

The Role of Local Authorities and Public Agencies

- 5.2 The NPPF identifies the national objective of supporting the re-use of brownfield land where vacant sites and buildings are re-used or redeveloped including through the use of Brownfield Land Registers (paragraph 38), making effective use of previously developed land (paragraph 119); and supporting opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land for homes and other identified needs (paragraph 120 c).
- 5.3 In paragraph 121, the NPPF is especially clear that a proactive approach to bringing forward land for development needs is required:

*“Local planning authorities, and other plan-making bodies, should take a **proactive role** in identifying and helping to bring forward land that may be suitable for meeting development needs, **including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them.** This should include **identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers**, where this can help to bring more land forward for meeting development needs and/or secure better development outcomes”. (Our emphasis).*

5.4 In this respect it is clear that the Black Country Authorities, Local Enterprise Partnerships, WMCA and other public-sector agencies have worked on the re-use and development of brownfield land regeneration over many years including focusing on the removal of barriers to development.

Types and Nature of Barriers to Unlocking Brownfield Land

5.5 There is an extensive body of research and literature covering the issues and barriers to regeneration of previously developed land in the UK.

5.6 Studies by the Joseph Rowntree Foundation¹⁴ and the Environmental Industries Commission¹⁵ and the London Assembly¹⁶, amongst others, have summarised the key issues found in developing brownfield land for housing. These include:

- Complexities of the planning process, the appropriate allocation of brownfield land and delays in decision-making;
- Securing funding and certainty in the ability to access capital for redevelopment of low value or risky sites / buildings;
- Tax relief incentives available; and
- Management of development / construction risks and the long-term potential of contaminated land liability.

5.7 These issues can be categorised into a series of thematic obstacles and barriers to re-development of brownfield land which the Campaign for the Protection of Rural England (CPRE) have helpfully described in various research studies¹⁷ in the past decade. This provides a useful framework to apply to brownfield land within the Black Country where our review and

¹⁴ *Obstacles to the Release of Brownfield Sites for Redevelopment*, JRF, May 2001

¹⁵ *Driving Regeneration: A Report on the National Brownfields Strategy*, EIC, May 2005

¹⁶ *Dereliction of Duty? A Report on Brownfield Development in London*, London Assembly Environment Committee, November 2005

¹⁷ Including *Removing Obstacles to Brownfield Development: How Government Can Work with Communities to Facilitate the Re-Use of Previously Developed Land – Foresight Paper 2*, CPRE, September 2014

analysis of various types, scales and locations of brownfield sites has found examples and evidence of the following:

- a) Viability barriers;
- b) Land ownership barriers; and
- c) Physical barriers.

Viability Barriers

- 5.8 The viability challenges of regeneration and development of sites in the Black Country are well documented in the BCP's evidence base including the *Black Country Plan Viability and Delivery Study* (May 2021) (**BCPVDS**).
- 5.9 Key concerns are identified in the evidence base viability study over significant and abnormal costs arising from the regeneration of brownfield land and buildings in a lower value housing market area¹⁸ in relation to the land value of the land / building and also the 'hope' value attached to open market values in excess of the land value¹⁹.
- 5.10 Fluctuations in housing market values and changing levels of developer contributions towards necessary infrastructure also affect viability; again highlighted by the BCPVDS in its testing analysis and conclusions drawn with respect to residential and commercial development with and without public sector grant funding support.
- 5.11 The combination of expectations from landowners in terms of land and hope value, combined with often high development costs for brownfield sites (due to regulatory requirements or uncertainties and abnormals) and relatively low sales values often make sites either marginally viable or unviable in the Black Country.
- 5.12 Viability barriers are therefore extensive and significant across the Black Country and it is appreciated that Local Plans, including the BCP, are

¹⁸ See for example paragraph 10.27 of the *Black Country Plan Viability and Delivery Study*, Aspinall Verdi Property Consultants, May 2021

¹⁹ See paragraphs 5.48 and 5.52 of the *Black Country Plan Viability and Delivery Study*, Aspinall Verdi Property Consultants, May 2021

examined on the basis of their deliverability and viability evidence in accordance with the NPPF at paragraph 16²⁰.

- 5.13 There is the possibility of shifting or influencing entrenched patterns of brownfield site unviability over time during the BCP plan period particularly if there were a greater focus on unlocking the financing and risk profile of sites that offer a significant, or catalytic opportunity to re-shape or re-define the housing offer and market in particular centres or highly accessible locations.

Land Ownership Barriers

- 5.14 Land ownership barriers evident in the Black Country have two distinct components.

Fragmentation of Ownership

- 5.15 Firstly there is the fragmentation of freehold, leasehold and rental licence agreements in place both within individual commercial sites and vacant land which makes the identification of underlying owners hard to track down and then to obtain agreement in principle from all relevant parties for any change of use to residential (or other re-development of the site or building). Unknown or uncontactable ownerships are a key barrier.
- 5.16 This is not at all unusual within the Black Country or indeed more widely across the UK. The history of many sites, including the sub-division of ownership and occupation interests over time is evident for many town centre and employment sites within the Regeneration Corridors.

Owner / Long Term Occupier Intentions

- 5.17 The second, inter-related and important ownership barrier is with regard to the stated intentions of owners and occupiers towards continuing the existing activity / use of a site as opposed to supporting its redevelopment for housing or another use.
- 5.18 The analysis of existing employment sites through the BEAR and in the various SHLAA's prepared as part of the evidence base for the Regulation 18 BCP

²⁰ NPPF paragraph 16 states at (b) that plans should be prepared positively, in a way that is aspirational but deliverable.

record a significant level of owners / long-term leasehold occupiers who are either investing in the continued existing use of their site / building, or who have not given any consideration to re-development or change of use ('passive ownership') even where the site is vacant or extensively under-utilised (often termed as 'latent' brownfield land).

- 5.19 Indeed, the withdrawal of a large volume of existing commercial / employment sites from forming part of the potential housing land supply in the Black Country stems from conclusions drawn by the four authorities as to the availability of sites / buildings.
- 5.20 To help unlock landownership and owner intention barriers there is a need to consider how, proactively (and within the bounds of available staff time resources), ownership information can be better captured and understood and how owner intentions can be challenged and also re-appraised over the BCP plan period to 2039.
- 5.21 There is also the potential to intervene further through land assembly and title accumulation programmes, re-organisation and re-location to help unlock ownership and latent brownfield owner / occupier inertia, resistance or reluctance to change.
- 5.22 A more proactive delivery approach would of course need to examine land owner intentions (as the BCA's work has done), but it is also reasonable to anticipate that landowner intentions could change over the longer term of the Plan period to 2039. This indicates the importance of maintaining accurate and updated / refreshed information on landownership and occupier intentions over time.

Physical Barriers

- 5.23 Physical barriers and obstacles to use of brownfield land for housing are to be found on many, if not most of, the potential supply of previously developed sites in the Black Country.
- 5.24 The nature of the brownfield land 'stock' across the Black Country reflects the long history of previous (and current) commercial, industrial and manufacturing use over the past 150+ years in many cases.

- 5.25 Both vacant land / buildings and those which are currently in-use but under-utilised or are adjacent to vacant land show evidence of a wide range of physical barriers to re-development and use. It is clear from the SHLAA and Urban Capacity Study work prepared by the four Black Country Authorities that the legacy of previous development and use has been well established and evidenced when assessing the potential for sites to be re-developed for new homes.
- 5.26 Key physical obstacles include the known or likely presence of contamination (both in the ground and in the construction materials used for existing industrial premises); the presence of below / at ground level obstructions (in the Black Country this includes the remains of mining / quarrying operations as well as underground storage tanks and voids / spaces below existing buildings and structures); and the poor quality of surfaces post closure of sites or due to the often ad hoc, poorly managed or unregulated open storage of materials, fuels, chemicals and the like.
- 5.27 These obstacles represent cost barriers that affect both development viability as well as the development / investment risk in purchasing sites with such liabilities²¹ with the responsibilities passed on to the current owner. They also reflect a high degree of uncertainty as to the precise nature and extent of the remediation or physical improvement of the site necessary to allow housing to be brought forward.
- 5.28 Without positive intervention or action, physical barriers will not be overcome for most sites and indeed may deteriorate further.

Approaches to Unlocking Brownfield and Latent Brownfield Land for Housing

- 5.29 Regeneration, development and change of use of brownfield land in the Black Country requires a sustained and intervention-led approach given the complex

²¹ Based on the landowner's responsibilities for the costs associated with remediation of sites if they have caused or knowingly permitted the contamination of land.

underlying physical, ownership and value characteristics of most of the vacant and under-utilised / latent sites and buildings.

- 5.30 The preparation of the BCP as the principal strategic planning tool for the area needs to be combined with other activities and interventions in order to bring brownfield land into effective use for housing or for employment uses that reflect future economic needs.
- 5.31 Having appraised and reviewed a very significant number of brownfield sites through this commission it is our view that addressing the obstacles and barriers to effective use of the land in the Black Country should be supported by a wider, strategic approach that includes addressing and tackling the following themes and activities shown in Table 5.1 below.

Table 5.1: Themes and Activities to Assist in Unlocking Brownfield Land Development

Unlocking Theme / Activity	Description
<p>Establishing a Long Term Vision for Brownfield Land Use</p>	<p>The NPPF (paragraph 119) requires strategic policies to set out a clear strategy for accommodating future needs in a way that makes as much use as possible of previously developed land.</p> <p>The need for a long term vision and approach to this key land use resource is essential in the context of the scale of previously developed land in the Black Country and it can be established both within and in addition to the statutory Development Plan.</p> <p>Successful brownfield land regeneration is most evident where there is a comprehensive, consistent and focused long term vision for the use of such land and sites which acts as an anchor and catalyst for development confidence. Key elements of a clear vision and approach to effective use of brownfield land include:</p> <ul style="list-style-type: none"> • provision of a clear policy and strategy context for brownfield land; • identification (and celebration) of key achievements in bringing forward brownfield sites; • clear identification and focus on the areas and site opportunities that have the greatest potential for change and effect on housing supply; • collation, review and monitoring of a comprehensive information set on brownfield land assets within the Black Country. <p>Case Examples:</p>

Unlocking Theme / Activity	Description
	<ul style="list-style-type: none"> i. <i>Bury Council – Brownfield Land Statement (2018)</i> ii. <i>East Staffordshire Borough Council – Plan to Deliver Development of Brownfield Land (2016)</i>
Building Improved Perceptions and Confidence	<p>Aligned with the creation of a long-term vision, there is a need to ensure that the centres and regeneration areas within the Black Country that contain much of the available or latent brownfield land supply are highlighted with respect to building up a positive, strong and consistent ‘brand’ / perception of areas of change, focus and investment (‘opportunity pull factors’). Successful brownfield regeneration and change of use needs to:</p> <ul style="list-style-type: none"> • show a locally distinctive and individual range of land and site products (especially if clustered and packaged – see below) to draw in investor and developer interest and reduce the extent of latent brownfield land which is supported by passive ownership and often low holding costs; • demonstrate the four Black Country authorities commitments to prioritising work on addressing obstacles to developing vacant and latent brownfield land; • use higher profile, catalytic or flagship redevelopment projects to re-shape and define the future brownfield land investment propositions for the Black Country’s centres and regeneration corridors; • signal specific opportunities drawing on the Brownfield Land Use Vision and identified list of priority areas / sites for change of use to housing or for mixed uses. <p>Case Examples:</p>

Unlocking Theme / Activity	Description
	<ul style="list-style-type: none"> i. <i>Corby Borough Local Brownfield Strategy (2012)</i> ii. <i>Grimsby Town Centre Masterplan Framework (2020)</i>
Linking, Clustering and Packaging Brownfield Sites	<p>There is good evidence that linking and clustering adjacent brownfield sites together can lead to a more successful and swifter regeneration than an ad hoc or site-by-site approach. This is particularly important and effective in resolving fragmented ownerships, providing opportunities for relocation of existing uses, overcoming awkward / irregular physical features or difficulties in accessibility to sites that would otherwise individually limit their attractiveness or scale of change for housing / mixed uses. Brownfield regeneration and housing development projects linked with anchors of activity and accessibility (i.e. town and other service centres as well as public transport hotspots) are likely to be more successful.</p> <p>Our review of existing and potential additional sources of housing supply arising from brownfield sites indicates that there could be, subject to a re-framed more proactive delivery approach, significant potential for clustering, linking and prioritising packages of former and existing commercial / vacant and under-utilised sites across the Black Country.</p> <p>Key facets and benefits of linking and clustering brownfield sites include:</p> <ul style="list-style-type: none"> • establishing a co-ordinated rather than piecemeal approach; • ability to link packages of sites to anchors of activity (transport hot spots, centres, etc.) and focus onto these

Unlocking Theme / Activity	Description
	<p>areas as key opportunities for change or intensification of uses;</p> <ul style="list-style-type: none"> • assisting in land assembly (by negotiation or compulsion) to reduce fragmentation, allow for the relocation of existing uses and owner / occupier interests in redevelopment and change; • provide the potential for re-location and re-organisation of existing uses (especially existing lower grade employment uses or activities that would be better clustered together and re-sited to enhance neighbouring amenity and improve the spatial distribution of land uses); • support the deployment of additional planning promotion and control tools / mechanisms including the use of Local Development Orders (LDO), Supplementary Planning Documents (SPD) and non-statutory development frameworks / masterplans; • rationalise and increase the profile and therefore effectiveness of Brownfield Land Registers and the potential use of Permission in Principle routes to secure residential planning consents for sites. <p>Case Examples:</p> <ol style="list-style-type: none"> i. <i>The London Plan’s approach to brownfield priority regeneration through designated Opportunity Areas and Areas for Intensification</i> ii. <i>The Brownfield Land Assembly Trust (BLAT), operated by the former South East Regional Development Agency</i>

Unlocking Theme / Activity	Description
<p>Addressing Physical Barriers and Infrastructure</p>	<p>Physical and site specific conditions reflect a wide spectrum of reasons why brownfield sites do not come forward or are often delayed in delivering new housing or other uses²².</p> <p>Physical barriers and lack of necessary infrastructure (or the cost of its provision) are directly linked to viability barriers to unlocking sites.</p> <p>Making sites and buildings ready for regeneration is a critical factor in the successful re-use of brownfield land. This requires organisation, prioritisation and focused investment to undertake the necessary works to remove or reduce barriers. This needs:</p> <ul style="list-style-type: none"> • comprehensive site clearance and remediation programmes for priority sites or clusters; • stability in the land remediation and de-contamination funding regimes that are available over the long term for regeneration of brownfield land in the Black Country; • promotion and support for the better use of available Land Remediation Tax Relief opportunities²³; • focused interventions (including through the updating and revision of Community Infrastructure Levy infrastructure delivery plans) to put in place physical and transport infrastructure as well as social infrastructure to remove barriers and help support an improved perception of priority brownfield sites and clusters.

²² See for example the national research findings on stalled residential development sites in *An Empirical Investigation of Stalled Residential Sites in England*, McAllister, Street and Wyatt, University of Reading, 2016

²³ See for example the Environmental Industries Council: *Brownfield First – Supporting Levelling Up*, 2021

Unlocking Theme / Activity	Description
Working in Partnership	<p>Risk sharing approaches involving multiple public and private sector partners have underpinned successful housing regeneration schemes in the Black Country (for example the Culwell Street, Brewers Yard site in Wolverhampton City Centre) as well as in many locations across the UK.</p> <p>The obvious purposes of partnering are in terms of sharing development and cost risks for regeneration; the opportunities to re-develop multiple sites and packages of land (including tackling land ownership fragmentation and passive / active occupier intentions); the increased confidence and strength to secure necessary and available funding to support re-development; the better co-ordination of policies, objectives and specific sites / projects; and the better communication of objectives and achievements to the wider community.</p> <p>In the Black Country there is evidence of successful and ongoing partnering including between the local authorities, the West Midlands Combined Authority, Homes England and with various residential and mixed use developers. There is potential for partnership working to unlock brownfield housing sites and land to be expanded and systemised further including through supporting the range of other activities and interventions set out above (particularly establishing a long term brownfield land vision; clustering and packaging individual sites; and setting up delivery vehicle support).</p> <p>Case Examples:</p> <ul style="list-style-type: none"> <i>i. Gateshead Regeneration Partnership between Gateshead Council, Home Group and Galliford Try – Local Asset Backed Vehicle</i>

Unlocking Theme / Activity	Description
	<p><i>ii. Moat Lane Regeneration, Towcester, Northamptonshire – public and private sector partnership between South Northants Council and Clayson</i></p> <p><i>iii. Breckland Bridge Ltd – a multi residential and mixed use regeneration site programme with a long-term development agreement venture between Breckland District Council and the Land Group</i></p>

Summary Findings and Conclusions

Types and Nature of Barriers to Brownfield Land Development

- a) The NPPF identifies the national objective of supporting the re-use of brownfield land where vacant sites and buildings are re-used or redeveloped. In paragraph 121, the NPPF is especially clear that a proactive approach to bringing forward land for development needs is required. The Black Country Authorities and the WMCA have a significant, evident record in working to unlock barriers to the regeneration of brownfield sites.
- b) There are a wide range of challenges and barriers evident in the Black Country that can be categorised as follows:
- **Viability barriers** - key concerns are identified in the evidence base viability study over significant and abnormal costs arising from the regeneration of brownfield land and buildings in a lower value housing market area. Viability barriers are therefore extensive and significant across the Black Country;
 - **Land ownership barriers** – including the fragmentation of freehold, leasehold ownerships and rental / licences; and a significant level of owners / long-term leasehold occupiers who are either investing in the continued existing use of their site / building, or who have not given any consideration to re-development or change of use ('passive ownership') even where the site is vacant or extensively under-utilised.
 - **Physical barriers** - and obstacles of many types (especially ground contamination, presence of underground voids / structures; poor quality surfaces and poorly regulated / managed storage of materials, etc. are to be found on much of, the potential supply of previously developed sites in the Black Country. It is clear from the BCP evidence base work that the legacy of previous development

and use has been well established and evidenced when assessing the potential for sites to be re-developed for new dwellings.

Approaches to Unlocking Brownfield / Latent Brownfield Land

- c) Regeneration, development and change of use of brownfield land in the Black Country requires a sustained and intervention-led approach given the complex underlying physical, ownership and value characteristics. These include actions, interventions and approaches that include:
- establishing a specific long term vision and objectives for the use of brownfield land;
 - building up improved perceptions and confidence to invest time and resources into brownfield development to help address deep-seated development viability and market concerns;
 - creating clusters and packages of brownfield sites that link them to anchors of activity (town and service centres, high accessibility public transport nodes for example) and can be used to identify and direct the prioritisation of regeneration (i.e. effectively focusing on those sites and clusters of sites that offer the greatest potential opportunity);
 - addressing physical barriers and infrastructure needs through site clearance and remediation work; support and advice to provide access to available public funding; focus updating and refinement of CIL and infrastructure delivery plans to tackling key physical barriers (especially related to priority clusters or sites); and also promote and highlight the potential land remediation tax reliefs available for regeneration of brownfield sites; and
 - continue to evolve and expand public-public and public-private partnering as a key mechanism to share development and finance risk; bring forward packages of sites; better co-ordinate planning and corporate policies / objectives; and help focus work on priority sites and clusters. This includes the potential role and support of the

WMCA aligned to the Government's Levelling Up objectives that place clear emphasis on the importance and desire to re-use brownfield land.

6. Conclusions and Recommendations

Introduction

- 6.1 In this section we draw the report's main findings together and offer conclusions as to the possible opportunities to increase the supply of new dwellings on brownfield land in the Black Country. We also offer a number of recommendations for action for consideration by the West Midlands Combined Authority. These are made in the context that the costs of taking a more proactive delivery approach have not formed part of the scope of this commission.
- 6.2 The following sub-sections set out more detail as to the findings from different aspects of the analysis.

Housing Needs and Supply Context

- a) The overall level of Local Housing Need within the Black Country Plan is identified as **76,076** new dwellings in the period 2020 – 2039 using the PPG's Standard Methodology.
- b) The BCP concludes (Policy CSP1) that the Black Country can accommodate **47,837** dwellings (some 63% of the total housing need) using both brownfield and greenfield (including Green Belt) land allocations. This leaves a significant identified shortfall of some **28,239** dwellings to be accommodated elsewhere outside of the Black Country area (37% of the total housing need).
- c) Of the proposed supply of housing set out in the BCP some **21,413** dwellings (45% of the total identified supply available in the Black Country area) is anticipated to come from sites under construction, consented or from existing undeveloped allocations.
- d) New sites supply (new allocations, indicative capacity for Strategic Centre, release of occupied employment land, and windfall development) is anticipated to supply some **27,495** dwellings (57% of the identified housing supply within the Black Country). A small number of net losses of

existing housing is also anticipated totalling **-1,071** (demolitions and site re-development) in Dudley.

- e) Of the total new housing supply, the release of occupied employment land for housing is anticipated to provide 3,091 dwellings (6% of total identified supply in the Black Country area); windfall developments account for some 8,463 dwellings (18% of planned supply); additional indicative capacity in the four Strategic Centres should provide an additional 1,300 dwellings (3% of identified supply); 'Other sites' are expected to generate 6,921 dwellings; and Green Belt release is to support 7,720 new dwellings (16% of total identified supply).

Housing Development Assumptions

- 6.3 Section 2 reviewed relevant housing development assumptions proposed in the Regulation 18 BCP.
- 6.4 Altering underlying housing density assumptions, Non-Implementation of permission rates and windfall development assumptions would have an effect on the levels of housing supply derived from brownfield land and sites. There is however a need to ensure that the assumptions used are evidenced and realistic in order for the BCP's approach to be considered sound and effective. Our consideration of these matters found as follows.

Housing Site Density Assumptions

- a) The BCP (Policy HOU2) proposes a range of housing development density assumptions (minimum densities of 40, 45 or 100 dwellings per hectare depending on the location and level of accessibility) that are increased from the levels established in the existing BCCS.
- b) The NPPF is supportive of establishing and raising minimum residential density standards especially where aligned to good accessibility to key services, jobs and facilities.
- c) It is our conclusion that the density assumptions are reasonable to ensure a mix of dwelling types and sizes are delivered as well as reflecting the importance of making the most effective use of available land and sites.

- d) We do not therefore propose that the density assumptions should be altered. We do however consider and recommend that for the Regulation 19 Draft BCP that there is a fuller and effective justification with greater background detail for the net development densities proposed; and also a demonstration of how the proposed site allocations (including carried forward sites) reflect the minimum densities sought in the Plan policy for development after 2024.

Non-Implementation or Discount Rates

- e) Non-Implementation Rates (ranging from 5% to 15% of potential capacity on sites) have been applied to different sources of housing land supply to take account of the potential non-implementation or lapse of planning permissions.
- f) It is our view and conclusion that it is appropriate to include Non-Implementation Rates in the BCP (continuing the approach previously taken in the BCCS and as widely found in other English Local Plan housing trajectories) as this helps support a realistic, flexible, housing delivery trajectory in accordance with the NPPF at paragraph 74.
- g) We consider that the proposed 15% Non-Implementation Rate applied to employment land to be developed for housing could be further evaluated for the Regulation 19 BCP on the basis that the BCP covers a long term period to 2039 during which there is likely to be significant and accelerating changes in the characteristics of the Black Country and wider West Midlands economy. The draft Regulation 18 BCP sets out in Table 3 that 3,091 dwellings are allocated on existing occupied employment with a 15% discount to be applied, if this was changed to 10% the additional yield generated could be some 154 dwellings.

Windfall Development

- h) Windfall housing sites are expected to deliver 7,651 new dwellings (representing some 10% of the total Black Country housing need) on sites across the Black Country.
- i) Our review concludes that the approach taken to the identification of windfall housing contributions to supply accords with the NPPF and the

relevant sections of the Planning Practice Guidance as it relates to specific historic and evident delivery trends in the four Black Country authority areas.

- j) We also conclude that analysis undertaken for Wolverhampton City Centre with respect to establishing an indicative windfall allowance for the conversion of upper floors in the City Centre to residential use is an important and useful consideration of the potential arising from structural changes to town centre retailing and commercial use as indicated in the Urban Capacity Review and the Centres Study 2021 sections on the Strategic Centres health-checks. The extension of this analysis, which was beyond the time and resource available for this commission, would be beneficial to quantifying additional rationalisation and conversion opportunities to be tested in other Strategic and Tier 2 Centres for the Regulation 19 BCP. We understand that the BCAs are investigating how structural changes can contribute to housing figures for the Regulation 19 BCP and in the future Urban Capacity Review update.

Existing Brownfield Land Housing Sites

- 6.5 In Section 3 we examined and reappraised the proposed housing contribution arising from sites selected for residential development in the BCP as well as reviewing and re-considering other sites that were not selected or were not assessed as part of the evidence base work for the Plan.

Selected, Non-Selected and Not-Assessed Sites

- a) We have reviewed all of the BCP's 'Selected' sites proposed for allocation for residential development using the data and explanatory information available in the Site Assessment Appendices;
- b) Our conclusion is that the Selected sites are appropriate in all cases for residential development;
- c) We reviewed a total of 373 sites that were assessed but 'Not Selected' as appropriate for residential development allocation through the BCP. Each site was investigated with respect to other plan allocations, known

constraints and available information using GIS data layers to understand both the relationship with the surrounding area and with other sites;

- d) We found that the Black Country local authorities were correct to identify these sites as 'Not Selected';
- e) For each individual local authority, each "Not Assessed" site was individually reviewed. Of the 158 sites examined, we agreed with the respective Black Country local authority's decision to not make a further assessment.

Carried Forward Allocation Sites

- f) 'Carried Forward' housing sites are those sites already allocated and identified in the BCCS or other Tier 2 plan as appropriate for residential development that have not yet been developed. We reviewed 207 such sites and found it appropriate to carry them forward into the BCP, although if they are not delivered for housing by 2024 it would be consistent with Policy HOU2 to ensure that the new net minimum density standards were applied and their potential capacities uplifted accordingly.

Potential Additional Brownfield Land Housing Capacity

6.6 In Section 4 we investigated the situation and potential arising from other sources of potential brownfield land housing supply that might yield additional new dwellings. A wide range of different locations and types of brownfield land were considered. The most important findings from this analysis are as follows.

Strategic Centres

- a) As the top tier of the BCP Development Strategy and the most sustainable locations, the four Strategic Centres are identified as key drivers for growth and locations which offer opportunities for change and repurposing.
- b) Given the key importance of the four Strategic Centres for the BCP Development Strategy, we consider the true housing capacity of the Strategic Centres is not currently reflected in the emerging Regulation 18 BCP and further work is being undertaken by the BCAs.

- c) In recognition, we have reviewed the potential for additional supply in one of the Strategic Centres as an illustration of the sources of capacity to which further studies should be focussed, West Bromwich, and identified significant potential to deliver additional housing capacity, including through mixed-use development, with an indicative unadjusted (i.e. no discount for a Non Implementation Rate) supply of 1,010 units (figure rounded) over existing identified capacity for the centre.
- d) We consider opportunities associated with the repurposing of existing vacant and under-utilised commercial floorspace, especially retail, alongside the potential offered by alternative use of lower quality employment sites and a proactive approach towards mixed-use development could help to drive new capacity for residential uses across the Strategic Centres. We expect that further new opportunities can be identified to lift the residential capacity currently identified for the Strategic Centres and remain of the opinion that this should inform the Regulation 19 BCP.

Tier 2 Town / District Centres

- e) We have undertaken a high-level review of Willenhall District Centre as an example illustration of the possible additional potential in the Tier Two Town and District Centres.
- f) We found a potential capacity for additional housing and identified an indicative unadjusted, cautious, capacity for 250 dwellings (figure rounded) in Willenhall. This has primarily focused on the potential of lower quality employment land sites, including those located in proximity to the committed new railway station together with repurposing of vacant/and or under-utilised sites and buildings, including scope offered by low occupancy public car parks.
- g) We conclude that there may be opportunities within the 17 Tier Two centres which can and should be explored in further detail to inform the Regulation 19 BCP.

Tier 3 Local Centres

- h) From our review and analysis of 29 of the 113 Tier Three Local Centres (we focused on those Centres that had a designated area covering >1 hectare in size) we found no additional supply arising from sites of >0.5 Ha that would usually be of sufficient size to allocate.

Employment Sites

- i) We have suggested an alternative, more proactive delivery approach to that taken in the Regulation 18 BCP where residential and employment use could be suitable, prioritising residential development potential. We consider that some existing employment sites could, over the BCP plan period, make contributions to the delivery of housing as either residential or mixed use developments, replacing largely lower quality occupied EMP3 and EMP4 sites. Our view is that the Regulation 19 BCP should take a more proactive stance to view EMP4 sites as contributing to the overall supply by better articulating the relationship to assumptions made in the Plan to the windfall capacity of existing employment land.
- j) The indicative yield from this exercise is between 1,130 and 1,530 dwellings, subject to suitable non implementation discounting. The upper end of the range represents an additional uplift where sites are not in Strategic Centres or Tier 2 Centres, but are within 400m of a bus station or rail or main metro station.

Brownfield Land at the Urban Edge

- k) Our review of potential brownfield sites and land at the edge of the existing urban area (i.e. not within the Green Belt and consistent with the definition of previously developed land set out in Annex 2 of the NPPF) did not identify any potential sites.
- l) If suitable supply exists at urban edge locations it is likely, due to the site size, to be small scale and we would expect this to be accounted for in windfall housing calculations accordingly.

Unlocking Barriers

6.7 Section 5 highlighted the nature of key barriers to brownfield land regeneration that appear to exist in the Black Country. Our findings resonate with extensive international and national evidence research of the barriers and challenges experienced in the re-use or redevelopment of often complex and difficult sites and buildings. In essence the main barriers evident in the Black Country are:

- Viability barriers;
- Land ownership barriers; and
- Physical barriers.

6.8 We have found that:

- a) Development and change of use of brownfield land in the Black Country requires a sustained and intervention-led approach given the complex underlying physical, ownership and value characteristics of vacant and under-utilised sites. Review of historic housing delivery and change of use rates demonstrates that catalytic projects and sustained attention to unlocking challenging sites will be necessary.
- b) The preparation of the BCP as the principal strategic planning tool for the area needs to be combined with other activities and interventions including rationalisation and relocation of uses in order to bring brownfield land into effective use for housing or for employment uses.
- c) There are key activities and interventions that can assist in overcoming barriers to delivery of new housing or employment on previously developed land. In Section 5 we outlined a number of these which should be considered alongside and in addition to the preparation of the BCP:
- d) Establishing a specific long term vision and objectives for the use of brownfield land;
- e) Building up improved perceptions and confidence to invest time and resources into brownfield development to help address deep-seated development viability and market concerns;
- f) Creating clusters and packages of brownfield sites that link them to anchors of activity (town and service centres, high accessibility public transport nodes for example), offer potential sites for re-location of existing uses and can be used to identify and direct the prioritisation of

regeneration (i.e. effectively focusing on those sites and clusters of sites that offer the greatest potential opportunity);

- g) Addressing physical barriers and infrastructure needs through site clearance and remediation work; support to provide access to available public funding; focus updating and refinement of CIL and infrastructure delivery plans to tackling key physical barriers (especially related to priority clusters or sites); and also promote and highlight the potential land remediation tax reliefs available for regeneration of brownfield sites; and
- h) Continue to evolve and expand public-public and public-private partnering as a key mechanism to share development and finance risk; bring forward packages of sites; better co-ordinate planning and corporate policies / objectives; and help focus work on priority sites and clusters.

Recommendations and Next Steps

- 6.9 Drawing the analysis, conclusions and implications together, the following recommendations are made with respect to possible next steps and actions that would, in our opinion, assist in improving the level of new residential, including as part of mixed use development derived from previously developed sites in the Black Country area and helping to reduce the overall, evident, shortfall in housing provision.

R.1: Accelerating and Expanding Housing Capacity Assessments for Strategic Centres and Tier Two Town / District Centres

- 6.10 There is an important role and need to provide a clear and comprehensive analysis of the potential capacity for new housing, including as part of employment and mixed-use development, for the four Strategic Centres and also the Tier Two Town / District Centres.
- 6.11 This is in the context that there will continue to be future requirements for land in centres for town centre activities and uses including leisure and education as well as retail and offices that support sustainable communities.
- 6.12 The recommendation R1 is made on the basis of the importance and weight attributed in the policies of the Regulation 18 Draft BCP to the role of the

Strategic Centres and also the Tier Two Centres as sustainable locations for housing growth.

- 6.13 The analysis and illustrations of the possible additional capacity that we have outlined in this report (noted to be based on a snapshot overview of a limited sample of the centres and using readily available information only) has identified the important potential for the Strategic Centres and the Tier Two Town / District Centres. It is plain that there is more residential development that could be achieved in these locations with due consideration of the structural economic changes and land use / floorspace use changes ongoing in many town centres. We note the work underway by the BCAs to inform the forthcoming Regulation 19 BCP in this respect.
- 6.14 We therefore recommend that additional work and support is provided now to allow more detailed and extensive assessments of the potential housing capacity in each of the four Strategic Centres (and ideally the 17 Tier Two Centres) to expand the information and evidence base for the forthcoming Regulation 19 BCP. This work would need to draw on a combination of emerging assessments being conducted by the Black Country Authorities as well as fresh analysis of sites and opportunities where work has not been undertaken yet.

R.2: Review Approach to Delivery of Some Brownfield Sites Capable of Housing Development

- 6.15 Our analysis and research suggests that with a more proactive frame of reference and approach to the delivery of some brownfield sites (and especially existing employment land as well as for some EMP1 designated sites) there could be potential for some additional level of new housing to be brought forward, including as part of mixed-use regeneration.
- 6.16 We understand and acknowledge the key barriers to unlocking often challenging sites in terms of the landowner / occupier intentions and also the lack of viability for re-development that is prevalent across much of the Black Country.
- 6.17 It is however important to reflect on approaches to successful regeneration of difficult brownfield land, including former industrial sites and contaminated or physically restricted sites where the identification of priority sites / land for

regeneration and also the linkage and clustering of sites can play a catalytic role.

- 6.18 Put simply, there is a greater prospect of achieving changes of use for under-used and vacant brownfield land where there has been a systematic analysis of the priority locations, the key opportunity sites and areas and then a focused delivery approach to unlocking the barriers arising, including deployment of public funding.
- 6.19 We are therefore recommending that work to further assess, evaluate and prioritise existing brownfield sites (including particularly some lower grade employment sites) is undertaken to develop a more detailed and refined view of the best opportunities for delivery (either individual sites or clusters / packages of sites) over the BCP plan period to 2039.
- 6.20 This should sit alongside a recognition of the role that the release of EMP4 categorised employment land (as the BCP allows), plays in contributing towards overall housing supply, and include mechanisms to prioritise and achieve this release across the Plan period.
- 6.21 This prioritisation needs to take a wide-ranging view of the best delivery opportunities with regard to location (within or adjacent to the main Strategic or District / Town Centres, or within the Core Regeneration Areas, especially where situated near to public transport routes and nodes).
- 6.22 From the prioritisation analysis there will then be a more comprehensive and systematic basis for focusing available funding, land use allocations and other regenerative mechanisms available (such as land assembly and purchase) to intervene in the market for the most important sites and clusters / packages of sites over the plan period.



Wiltshire

Chilmark Consulting Ltd.
Albany House
High Street, Hindon
Wiltshire
SP3 6DP

T: 0330 223 1510

Bath

Chilmark Consulting Ltd.
Cambridge House
Henry Street
BA1 1BT

T: 0330 223 1510

E: info@chilmarkconsulting.co.uk

Twitter: [@chilmarkUK](https://twitter.com/chilmarkUK)

chilmarkconsulting.co.uk