
Black Country Plan

Note on Brownfield Study (Chilmark)

Gerald Kells

July 2022

Following the Regulation 18 Consultation on the Black Country Plan the local authorities are preparing their Regulation 19 Submission for consultation in August-September 2022 with an Examination in April 2024.

In preparing that they have commissioned additional work from Chilmark Consultancy to review their brownfield housing supply and that report has just been published¹.

WM CPRE asked me to consider its broad conclusions and how they relate to earlier work I did on Urban Capacity prior to the Regulation 18 Consultation.

My report considered the differences resulting from using ONS2014, 2016 and 2018 figures for housing. It is worth noting that the recent Census results for 2021, while the distribution is slightly different, gives a similar overall baseline population figure to all the ONS figures but is most closely aligned to the ONS2016 household figure and household size. The ONS2014 is by far the poorest match with the census with nearly 9,000 additional households in 2021 in the ONS2014 figures (See Appendix).

As well as suggesting the base line ONS2014 figure is wrong this further brings into question the addition of 35% to Wolverhampton's overall requirement is also brought into question.

In terms of supply the new report accepts that the approach to supply in the plan has been undertaken correctly.

However, it suggests a number of sources of additional supply which should be reviewed before the Regulation 19 Plan is published:

Reducing the level of discounting from 15% to 10% on current employment sites identified for housing would create a modest 154 extra homes, more if further employment sites were identified,

The windfall analysis was accepted but the report notes the 812 additional homes identified in Wolverhampton for homes above shops and suggests further work to consider similar windfalls in the other boroughs.

¹ <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4m/>

In terms of the four main Tier 1 Centres the study considered West Bromwich and identified additional supply of 1009 homes (910 discounted). It suggests a similar approach is taken to understand further supply in the other 3 main centres.

In terms of the Tier 2 Centres, it examined Willenhall, which it considered could have significant potential for additional housing and identified 254 homes (230 discounted), but again, it suggests further consideration of the other 17 Tier Two Centres.

In terms of smaller Tier 3 Centres, it reviews these but considers additional housing could be covered by windfall provision.

It lastly considered additional housing from employment land and its review yielded between 1,130 and 1,530 additional houses, (conservatively 1020 at a 10% discount rate and 960 at a 15% discount rate.)

It should be noted that most of these suggestions are consistent with concerns I raised in the report I did on the Urban Capacity Study in June 2021. There is one important element not included. They agree with the 7,651 windfall assessment, based on a 10-year average, whereas I suggested, given the recessionary period early on, it was more realistic to rely on the 5-year average, which raised the then figure from 7984 to 9088, or 1104 additional homes.

Other issues I raised may overlap with their approach, for example, large windfalls may be accounted for in their additional employment land.

The table below sets out the potential additional housing. This assumes the figures in the centres they examined were replicated elsewhere, neither reduced or exceeded and there is some risk of double counting.

Additional Potential Housing Supply			
Homes above shops in other Boroughs	812	3	2436
Tier 1 Homes	910	4	3640
Tier 2 Homes	230	17	3910
Employment Land Existing Discount to 10%	154		154
Employment Land (Additional)	1130	10% discount	960
5 Year Windfall Average (Not advocated in Chilmark)	1104		1104
Potential Total			12,204

Currently the plan assumes a supply of 47,837 homes (of which 7,720 are in Green Belt, although it is understood additional sites in Walsall’s Green Belt are also currently being assessed), so 40,117 on Brown field sites.

That would imply a potential brownfield supply of 52,321.

The table below (from my previous Urban Capacity Report sets out the overall need). One can see that the potential brownfield capacity is only a little short of the ONS2016 need, approximately 4,000 in the ONS2016 case which matches most closely to the Census figures. While some caution is required until (and if) further work is undertaken for ABCA prior to the Regulation 19 Submission, this suggests the current figure of 28,000 shortfall is inflated and not consistent with genuine need or with a sustainable approach to providing for housing need.

Black Country Housing Need 2020-2039 (including affordability uplift) ²	Annual rate	With 35% extra for Wolverhampton	Plan Period (19 Years)	Plan Period (19 Years +35% for Wolverhampton)
SM ONS 2018	3324	3599	63156	68381
SM ONS 2016	2947	3161	55993	60059
SM ONS 2014	3711	3981 (4004 UCS)	70509	75639

It should also be noted that at present the Black Country Authorities have said they cannot adopt the ONS2016 figures because the Government requires compelling evidence to do so. Whether the Census would be considered sufficient justification for such a position is not clear to me.

The conclusion that the level of housing in the Green Belt could be reduced, as well as the ‘declared’ unmet need, is obvious, and it seems to me that the Councils should reconsider all the major Green Belt sites and assess their impact. My own work on the two Arboretum Sites has demonstrated that there are significant issues not addressed in the current assessment.

Gerald Kells

2 July 2022

² See Calculation Tables in Appendix A

Appendix:

Comparison of CENSUS and ONS Projections for the Black Country Boroughs

Population

2021	Census	ONS2014	ONS2016	ONS2018
Dudley	323,500	321,700	321,800	325,147
Sandwell	341,900	335,600	335,000	333,731
Walsall	284,100	285,400	287,400	289,406
Wolverhampton	263,700	263,100	265,200	267,530
Black Country	1,213,200	1,205,800	1,209,400	1,215,814
Difference to Census		7,400	3,800	-2,614

Household

2021	Census	ONS2014	ONS2016	ONS2018
Dudley	137,100	134,789	134,682	135,821
Sandwell	130,200	134,074	128,790	128,571
Walsall	112,200	115,825	113,626	113,951
Wolverhampton	105,100	108,673	106,757	107,664
Black Country	484,600	493,361	483,855	486,007
Difference to Census		-8,761	745	-1,407

Household Size

2021	Census	ONS2014	ONS2016	ONS2018
Dudley	2.36	2.39	2.39	2.39
Sandwell	2.63	2.50	2.60	2.60
Walsall	2.53	2.46	2.53	2.54
Wolverhampton	2.51	2.42	2.48	2.48
Black Country	2.50	2.44	2.50	2.50
Difference to Census		0.06	0.00	0.00