BIRMINGHAM DEVELOPMENT PLAN

Strategic Housing Land Availability Assessment (SHLAA) 2019

December 2019

Contents

1. Summary of Findings

1.1 The 2019 SHLAA consists of 1,069 identified sites with a capacity of **42,316** dwellings. An additional unidentified capacity of **4,760** windfall dwellings brings the total SHLAA capacity to **47,076** dwellings.

Table 1.1: The 2019 SHLAA

Category	Dwellings
Under Construction	10,403
Detailed Planning Permission (Not Started)	8,068
Outline Planning Permission	2,065
Permitted Development (office, retail, agricultural to residential)	769
Allocation in Adopted Plan	7,837
Allocation in Draft Plan	251
Other Opportunity within a BDP Growth Area	7,212
Other Opportunity outside the BDP Growth Areas	5,711
Sub Total – Identified Sites	**42,316**
Windfalls Below the SHLAA survey threshold (<0.06ha)	560
Windfalls Above the SHLAA survey threshold (>=0.06ha)	4,200
Sub Total – Unidentified Sites	**4,760**
Total Capacity	**47,076**

1.2 In order to compare the capacity identified in the SHLAA (**47,076**) with the housing requirement set out in the Birmingham Development Plan (**51,100**) it is necessary to add delivery in the period 2011/12 to 2018/19 to the capacity identified in the SHLAA.

Table 1.2: Supply 2011-31

	Dwellings
SHLAA Capacity 2019	47,076
Completions 11/12-18/19	18,324
Total 2011-31	**65,400**

Table 1.3: Supply Period

Time Period	Identified Supply	Unidentified Supply	All
Short Term - Within 5 Years	18,437	1,360	**19,797**
Medium Term – 6 to 10 Years	15,746	2,250	**17,996**
Longer Term – Beyond 10 Years*	8,133	1,150	**9,283**
Total	**42,316**	**4,760**	**47,076**

*To 2031

1.3 A 5-Year housing land supply position statement is published annually as part of annual monitoring and can be viewed or downloaded from the City Council's web site at: www.birmingham.gov.uk/housingstudies

Table 1.4: Planning Status by Supply Period

Category	Within 5 Years	Years 6 to 10	Beyond 10 years*	Total
Under Construction	9,513	890	0	10,403
Detailed Permission (Not Started)	8,043	25	0	8,068
Outline Permission	114	1,651	300	2,065
Permitted Development**	755	14	0	769
Allocation in Adopted Plan	-193	3,658	4,372	7,837
Allocation in Draft Plan	0	251	0	251
Other Opportunity within BDP Growth Area	-92	4,883	2,421	7,212
Other Opportunity outside BDP Growth Areas	297	4,374	1,040	5,711
Total – Identified Sites	**18,437**	**15,746**	**8,133**	**42,316**
Windfalls	1,360	2,250	1,150	4,760
Total – Unidentified Sites	**1,360**	**2,250**	**1,150**	**4,760**
Total SHLAA	**19,797**	**17,996**	**9,283**	**47,076**

* To 2031
** Office, Retail, Agricultural to Residential

2. Introduction

2.1 The SHLAA is a study of sites within Birmingham that have the potential to accommodate housing development. Its purpose is to provide evidence to support the Local Development Framework, in particular the Birmingham Development Plan. Taken together, the SHLAA and the ELAA constitute Birmingham's Strategic Housing and Employment Land Availability Assessment (SHELAA). These are both key components of the evidence base to support the delivery of land to meet the need for new housing and employment development within the city. The main role of the assessment is to:

- Identify sites (and broad locations) with potential for housing and employment development
- Assess their development potential
- Assess their suitability for housing and employment uses and the likelihood of development coming forward.

2.2 Whilst this SHLAA is a key part of the Birmingham Development Plan evidence base it is a technical document only. It is not a decision making document and it does not allocate land for development. As a technical exercise the SHLAA is based on the best information at a given point in time. The inclusion of a site in the SHLAA does not mean that it will be developed for housing, it does not mean that housing is the only suitable use for a site, and it does not necessarily mean, where it is not already the case, that planning permission would be granted for housing. Circumstances may change over time.

2.3 Development proposals on sites identified in the SHLAA are required to comply with relevant development plan policies. For example, where the existing use of the site is not residential, policies regarding the loss of employment land, open space or sports facilities may be relevant.

2.4 Some of the sites identified in this study may only be suitable for specialist housing, such as age restricted retirement housing, extra care housing or purpose built student accommodation where this accords with the Ministry of Housing of Communities and Local Government's (MHCLG) definition of a dwelling. Other sites may require additional land assembly to ensure a satisfactory scheme can be delivered.

2.5 The 2019 SHLAA, which covers the period 2019-31, has not been undertaken with a view to arriving at any specific dwelling capacity. It has been undertaken as a self-contained assessment to consider potential housing land supply in the short, medium and longer term.

3. Background

Policy Context

3.1 The requirement to produce a SHLAA was first introduced by Government in November 2006 with the publication of Planning Policy Statement 3 (PPS3): Housing with further guidance in relation to SHLAAs ('Strategic Housing Land Availability Assessments – Practice Guidance') being published in July 2007.

3.2 The National Planning Policy Framework (NPPF) was first published in March 2012 and was replaced with a revised NPPF in July 2018 and updated in February 2019. Planning Policy Guidance (PPG), which provides more detail in respect of undertaking housing and economic land availability assessments, was published in March 2014 and updated in July 2019.

3.3 The requirement to produce a SHLAA is now set out at paragraph 67 of the NPPF (2019):

"Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

a) specific, deliverable sites for years one to five of the plan period; and
b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan."

3.4 In addition, Paragraph 73 of the revised NPPF states:

"…Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

a) 5% to ensure choice and competition in the market for land; or
b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply."

3.5 In defining what constitutes a deliverable housing site, the Glossary of the NPPF states:

"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:
a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless

there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) *where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years"*

3.6 The Glossary also defines what constitutes a developable housing site:

"To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged"

The SHLAA in Birmingham

3.7 The City Council has monitored planning commitments for many years. This has provided accurate, up to date information regarding progress towards meeting the city's housing targets. In 2004, in order to get a better understanding of housing land supply Chesterton's PLC were commissioned to undertake an Urban Capacity Study. This in turn provided a useful starting point for the city's first SHLAA which was undertaken by ENTEC UK and published in 2008.

3.8 Guidance states that once undertaken the assessment should be kept up to date. It acknowledges that whilst a comprehensive first assessment is required it may only be necessary to carry out a full resurvey when significant changes make this necessary. As such the City Council's approach since the ENTEC study was undertaken has not been to "reinvent the wheel" but to build on the sound base provided by that assessment. The SHLAA has been updated annually since 2010 and the City Council's approach has been to improve and add value to the SHLAA with each update.

3.9 The City Council has worked with a range of stakeholders in producing its SHLAAs including volume house builders, property agents, landowners, representatives of the home builders' federation, Homes England and the Housing Birmingham Partnership, many of whom were present at the BDP examination. The City Council has undertaken an annual call for sites and a request for comments on the sites in the SHLAA is made each year in the SHLAA report. The City Council is also working with the West Midlands Combined Authority and the Local Enterprise Partnership in respect of the SHLAA's wider role within the Housing Market Area.

Consistency with the PPG

3.10 Prior to 2015 the city's SHLAAs have been undertaken in such a way as to be consistent with national guidance set out in 'Strategic Housing Land Availability Assessments – Practice Guidance'. For 2015 the methodology was reviewed to ensure that it was consistent with the guidance in the PPG and this has been reviewed again following the publication of the new national guidance which was published in July 2019. These reviews have sought to ascertain whether any changes were required to the methodology and, if so, to consider the impact of the changes on the outcome (see appendix A1). Whist the City Council's aim is to ensure that the SHLAA is consistent with the PPG it is important to note that the PPG is not policy and that, at Paragraph: 004 Reference ID: 3-004-20190722, the PPG acknowledges that:

'This guidance indicates what inputs and processes can lead to a robust assessment of land availability. Plan-making bodies are expected to have regard to the guidance in preparing and updating their assessments. Where they depart from the guidance, it will be important to explain the reasons for doing so when setting out the evidence base that informs the plan. Assessment needs to be thorough but proportionate, building where possible on existing information sources outlined within the guidance'.

3.11 The methodology which has been used to undertake the SHLAA in Birmingham remains consistent with national guidance. The key stages in the preparation of the SHLAA are set out at appendix A2.

The Birmingham Development Plan (BDP)

3.12 The Birmingham Development Plan was adopted in January 2017. The public examination which took place during October and November 2014 included examination of housing land supply issues which addressed the 2015 SHLAA, the 5-Year Land Supply Position Statement (2015-20) and the Sites Delivery Plan (2014). The inspector found that the Council's approach to land supply, informed by the SHLAA, was sound (see appendix A3).

3.13 As is clear from the inspector's report the objectively assessed need for housing in Birmingham is of such a magnitude that it cannot be met within the city's boundary. The City Council is therefore working with neighbouring authorities in the wider Housing Market Area (HMA) to ensure that sufficient housing to meet the needs not only of Birmingham but of the whole Greater Birmingham and Black Country Housing Market Area are met.

Former North Worcestershire Golf Club Appeal Decision

3.14 The City Council's housing land supply was also tested through an appeal against the refusal of permission for 950 dwellings at the former North Worcestershire Golf Club (2017/02724/PA). At the appeal hearings, the assumptions and methodology which underpin the assessment of sites within the SHLAA were debated and tested, including the windfall allowance, the meaning of 'deliverable' and whether a lapse rate should be applied. The Secretary of State issued his decision on 24th July 2019 and this makes clear that these assumptions and the methodology underpinning the SHLAA do not need to be changed. There were however a number of sites which the Planning Inspector and the Secretary of State stated should be taken out of the five year housing land supply, and these have been excluded from the five year supply within this year's assessment unless they have subsequently received detailed planning approval or more detailed evidence has since become available regarding their deliverability.

Maintaining a Five-Year Supply of Deliverable Sites

3.15 The findings of the SHLAA should be considered alongside the city's housing target in order to determine the five year supply of deliverable sites. A 5-Year housing land supply position statement is published annually as part of annual monitoring and can be viewed at, or downloaded from www.birmingham.gov.uk/housingstudies.

The Database

3.16 The SHLAA 2019 database is held in MAPINFO format. The SHLAA database includes the following key information:

- A list of sites, cross-referenced to maps showing locations and boundaries of sites.
- An assessment of the potential quantity of housing that could be delivered on each identified site.
- An assessment of when the site is realistically expected to be developed.
- Other pertinent information such as progress bringing sites forward, constraints, planning status, previous/current use etc.

3.17 SHLAA Sites can be viewed on the City Council's interactive web mapping system: https://maps.birmingham.gov.uk/webapps/shlaa/

3.18 For this year's SHLAA report, the City Council has been working towards achieving closer alignment between SHLAA sites and planning approvals, so that there is a more direct relationship between the SHLAA and the monitoring of planning approvals, including where sites are under construction and where dwellings have been completed. To support this, some of the boundaries for the SHLAA sites have been amended to match the planning application boundaries to which they relate to. In most cases this has involved a minor redrawing of the boundaries where they followed the approximate line of the planning application boundary but didn't exactly match, however in other cases the work has involved splitting up the SHLAA site into smaller parcels to take account of different areas which have planning approval and other parts of the SHLAA site which do not. Where sites have been split they been relabelled with a letter added at the end of the reference number (e.g. S001A, S001B etc.), and capacities have been apportioned according to the planning approval and any left-over capacity from the original SHLAA site.

4. Fundamentals and Assumptions

4.1 The primary purpose of the SHLAA is to demonstrate that the housing trajectory set out in the Birmingham Development Plan can be met by identifying sites which are suitable for housing development, assessing how much housing the sites can deliver and assessing when the sites are likely to be developed. But it is also important that the SHLAA identifies a varied portfolio of development opportunities which are:

- Capable of delivering the types, sizes and tenures of housing that are required in the city so as to meet the diverse needs of all members of the community.
- Suitable for, and attractive to, a wide range of developers from large national volume builders to small local builders and niche developers.
- Suitable for both the private sector and the social/affordable sector.
- Distributed throughout the city.

4.2 In addition, the sites identified in the SHLAA should:

- Contribute to the creation of sustainable, mixed communities and
- Maximise the potential for development in the city.

4.3 The SHLAA therefore supports the delivery of Policies PG1 and TP27 to TP33 of the Birmingham Development Plan and data on the availability of land for housing development from the SHLAA is used to inform the monitoring of these policies within the Authority Monitoring Report.

4.4 In accordance with the PPG, sites identified in the SHLAA may be suitable for various tenures or for specific needs such as housing for the elderly or students.

The City Centre

4.5 The city centre is the regional centre of the West Midlands. Pre-recession, it was a major source of new housing in the city with almost 10,500 additional dwellings being delivered in ten years (2001-11) bringing the city centre population to 30,000.

4.6 The city centre market took longer to emerge from recession than the more traditional markets but recent monitoring shows that the city centre market is flourishing. A total of 6,445 dwellings have been completed since 2011 and nearly 3,000 of those were completed in the last two years.

Purpose Built Student Accommodation

4.7 With five universities and six large further education colleges, Birmingham has a large student population and a significant amount of housing demand originates from students. According to the latest Higher Education Statistics Agency (HESA) data there were 67,890 full time and 13,919 part time students studying at Birmingham's five main universities in 2017/18 (an increase of 1,471 from 2016/17). Around 44% of full time students live at their own or their parental home and 3% are 'not in attendance' due to e.g. distance learning or industrial placement, resulting in a minimum demand for bespoke accommodation of around 36,218 bedspaces. The city currently has around 20,826 bedspaces in purpose built accommodation and a further 4,415 bedspaces in the pipeline, as shown in the table below.

4.8 Student households are included in MHCLG's household projections and as such are included in the housing requirement. The PPG states "All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can in principle count towards contributing to an authority's housing land supply based on:

- the amount of accommodation that new student housing releases in the wider housing market (by allowing existing properties to return to general residential use); and / or
- the extent to which it allows general market housing to remain in such use, rather than being converted for use as student accommodation".

4.9 In 2017/18, the most recent year for which information is available, there were 15,433 students residing in 'other rented'/HMO accommodation which could be released to the general housing market through the provision of additional purpose built accommodation. The number of bedspaces in the 'other rented'/HMO properties varies. In the city centre many students rent single bed apartments while family homes are more frequently occupied by students elsewhere. A dwelling in the general housing market can therefore be freed up through the provision of a purpose built, one person apartment or a cluster flat containing five, six or more bedspaces. The City Council's approach is, therefore, to count self-contained units of accommodation not bedspaces, despite this significantly undercounting the number of students being accommodated.

4.10 In 2017/18, 6,954 students lived in university accommodation and 9,918 lived in private sector halls, while 17,468 students resided in 'other rented' accommodation principally but not exclusively, in shared Housing in Multiple Occupation (HMOs)[1].

4.11 Sites which are under construction or have detailed planning permission for student accommodation and have been cleared are included within the five year supply. Those with planning permission but with existing buildings remaining on the site have been included in the supply for years 6 to 10. Sites without planning permission are not included in the SHLAA.

4.12 The City Council will continue to monitor the development of purpose built student accommodation and the contribution made towards meeting the city's housing requirements.

Table 4.1: Bedspaces and Clusters in the SHLAA (2018/19)

Purpose Built Student Accommodation – Planning Status (Net)	Total Bed Spaces	Number of Self Contained Cluster Flats / Studio Apartments (dwellings freed up)
Under Construction	3,561	1,982
Planning Permission (Not Started)	854	356
Total	4,415	2,338

[1] A building or part of a building in which more than one household resides as their only or main residence and shares an amenity e.g. kitchen or bathroom, and which is a converted building that does not entirely comprise self-contained flats.

Assumptions

4.13 The following assumptions were made when assessing sites.

The Housing Potential of the Sites – Dwelling Capacities

4.14 The following rules have been applied in assessing the capacity of sites:

- Where sites already had planning permission the site capacity is as specified in the permission, unless the best information available indicated that a revised scheme was likely to be brought forward and this would result in a higher or lower capacity.

- On sites allocated in adopted or draft plans the capacity is as set out in the plan.

- Where sites have not previously been allocated or had approval the minimum densities set out in Policy TP30 of the Birmingham Development Plan were applied. The policy states that development should take place at a minimum of 100 dwellings per hectare (dph) in the city centre, 50 dph in local centres and on good public transport corridors and 40 dph elsewhere. The policy acknowledges that there may be occasions where lower densities would be appropriate, for instance in conservation areas, mature suburbs or to enable diversification, for instance through the provision of family housing in the city centre. The densities set out in the policy were therefore refined on a site-by-site basis if necessary to take account of site specific information and constraints. Capacities were reduced on sites where there was a reasonable prospect that the site would come forward for mixed use development.

4.15 The densities in the SHLAA relate to the land covered by the residential development itself, spaces associated with that development such as gardens, driveways and roads within the site boundary. They do not include ancillary uses such as open space.

4.16 In many cases the densities assumed for sites in the city centre will require the development of apartments. There are, however, sites in the city centre where development would not necessarily need to be apartments as the suggested capacities could be achieved with high density mews or town houses if suitably designed.

4.17 Although the capacities are based on the best information available it is accepted that actual development capacities may differ – some will be lower but others will be higher. In addition, different types of developer, from volume builders to small local builders and housing associations to specialist developers such as those providing retirement housing or 'city living' type housing, will produce different proposals (and capacities) for the same site. The actual capacity of SHLAA sites that are developed will continue to be monitored.

Delivery Rates

4.18 Historical Delivery Rate Assessments were undertaken as part of the preparation of SHLAA 2018 update to assist in making delivery rate assumptions for sites currently in the SHLAA. Assessments were made for a sample of developments, where residential units have been delivered in the preceding ten years (2007-2018). This looked at the period of time it took from planning consent to commencement on site (lead in time) and from commencement on site to completion (build out time). The average lead in and build out times per development size were then calculated; the resulting figures are presented in Appendix A5. The average delivery rates have been applied to sites in the SHLAA and have been carried forward in to this year's update.

5. The Assessment – Site Specific Supply

5.1 There are two distinct elements to the Birmingham SHLAA. The first is concerned with committed sites (i.e. those which have been, or are proposed to be allocated for residential development within a development plan document or where a residential planning permission has been granted) and the second is concerned with other development opportunities which are not currently in the planning 'system'.

Review of Committed Sites

5.2 The City Council has a longstanding and effective system in place for monitoring planning commitments for residential development. The Birmingham Land Availability and Development Enquiry Service ('BLADES'), is a system which has been developed to provide comprehensive details of all sites (not just residential) which constitute a strategic land resource, and allows the development of these sites to be monitored. The database contains data relating to any parcel of land which has a commitment for development. The information provided has, over many years, proved to be essential in monitoring the Local Development Scheme, enabling policy development at both the local and regional level, and enabling the completion of statutory returns to government.

5.3 The planning commitments database is updated on an ongoing basis throughout the year by City Council Planning Officers. Each planning application, planning decision and demolition notice is reviewed in order to assess whether it affects or constitutes a land resource site. Planning Committee reports provide a useful check to ensure that all of the planning applications have been examined (including delegated decisions). Internal liaison ensures that changes to the status of plans and allocations are identified.

5.4 The main 'stock-check' of sites with full planning permission and sites with served demolition notices is undertaken annually to a base date of 1st April. All sites are visited in order to ascertain the number of dwelling completions and starts during the year and dwellings under construction at the year end.

5.5 The annual stock check of sites resulted in a planning commitments database of factual and unadjusted data. These sites were then considered for inclusion in the SHLAA. Additional work was undertaken to establish whether any of the committed sites should be discounted or excluded from the SHLAA. For 2019, further work has been undertaken to ensure closer alignment between SHLAA sites and planning approvals. This has included a review of SHLAA boundaries and capacities to match those of relevant planning approvals. Some SHLAA sites have been split to distinguish between parts of sites that have received planning approval and other areas and capacities that are left over. Where sites have been split they retain their original reference number but a letter has been appended to denote the new site parcels (e.g. S001A, S001B etc.).

5.6 Committed sites are those which are under construction, have detailed planning permission but are not under development, have outline planning permission, are allocated in an adopted or draft plan or are permitted development.

Review of Uncommitted Sites

5.7 Although all committed sites, irrespective of size, were considered for inclusion in the SHLAA it was necessary to set a threshold when considering uncommitted sites.

5.8 The PPG states that the assessment should consider all sites and broad locations capable of delivering five or more dwellings but also states that plan makers may wish to consider alternative thresholds. In Birmingham all previous SHLAAs have been undertaken using a threshold of 0.06ha. As this is a lower threshold than 5 dwellings and much information already exists for sites meeting it, 0.06ha continues to be used in this SHLAA.

5.9 There were two main stages involved in updating the uncommitted element of the SHLAA. The first was to re-examine all of the existing sites in the previous SHLAA and the second was to consider new sites.

5.10 A wide range of sources of data have been used to identify sites. In particular:

- Existing SHLAA information
- Development starts and completions records
- Planning applications not yet determined
- Pre application enquiries
- Ordnance Survey maps
- Aerial photography
- Site surveys
- Infill in residential areas including under-used garage blocks
- Large scale redevelopment and re-design of residential areas
- Urban extensions
- Non-residential allocations and permission for which are no longer required for those uses
- Vacant and derelict land and buildings
- Surplus public sector land
- Sub division of existing Housing
- Flats over shops
- Returning empty homes to use
- Surplus City Council land
- Open space (if declared surplus)
- Sports pitches (if declared surplus)
- School Playing fields (if declared surplus)
- Allotments (if declared surplus)
- Other bodies' plans
- Call for sites

The 'Call for Sites'

5.11 The City Council issues a call for sites each year. A notice is placed on the City Council's web site and submissions are invited in the previous year's SHLAA report. The City Council has in the past written to around 250 stakeholders inviting submissions but the response was extremely disappointing.

5.12 Eleven sites were submitted for consideration in the 2019 SHLAA, the details of which can be seen at Appendix A6. A further two submissions were received which provided updated details for existing SHLAA sites N26 and E863. These updated details have been incorporated in to this year's assessment of these sites where they are consistent with the SHLAA methodology.

5.13 A form setting out the information requirements is available on the City Council's web site (and is at Appendix A6) to assist stakeholders when submitting sites for consideration.

Site Submissions in the Green Belt

5.14 Over recent revisions to the SHLAA a number of sites within the adopted Green Belt have been put forward for inclusion. Green Belt land has also been submitted for consideration for allocation at the recent BDP examination. The City Council's position in response to these submissions has been, and remains, consistent with the NPPF. There is a general presumption against inappropriate development within the Green Belt, and such development will not be permitted unless very special circumstances exist. Development proposals, including those involving previously developed land and buildings in the Green Belt, will be assessed in relation to the relevant national planning policy and policy TP10 of the BDP.

5.15 The BDP, which was adopted in January 2017, includes an allocation for 6,000 dwellings (by 2031) at Langley in Sutton Coldfield on 274 hectares of land removed from the Green Belt. This allocation is included in the SHLAA under site reference number N646.

Reviewing Existing Sites

5.16 The review of the existing SHLAA sites included:

- The removal of sites which had been developed since the current SHLAA was undertaken. Developed sites were removed from the SHLAA irrespective of whether they had been developed for residential or any other use. The principal source of information was the BLADES commitments monitoring system which monitors completions for all strategic uses across the city.
- The removal of uncommitted sites that had been granted planning permission for an alternative use or which had been allocated for an alternative use in an adopted plan.
- The removal of committed sites where a planning permission for an alternative use was likely to be implemented.
- A realignment of site boundaries to reflect the above where only part of an existing SHLAA site was affected. Where site sizes were reduced capacities were reduced pro rata to the site size.
- The removal of both committed and uncommitted sites where up to date information suggested that they were now unlikely to come forward for housing development. This took account of the 'local knowledge' of planning management officers, local planners, regeneration officers, housing renewal officers, emerging development plans and on advice offered by developers.
- Commitments were amended where the best information available indicated that a revised scheme with fewer or more dwellings was likely to be brought forward
- A review of constraints where new information was available.
- A re-evaluation of each site's suitability, availability and deliverability where new information was available.

6. The Assessment – Unidentified Supply

The Housing Potential of Windfall Sites

6.1 The NPPF permits a windfall allowance to be included in all of the SHLAA's supply periods, including the first 5 years with further guidance being provided in the PPG. Paragraph 70 of the revised NPPF states that "Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends".

6.2 Birmingham is a city with an urban area covering more than 22,000 hectares. The resources required to undertake a comprehensive survey in such a large built up area are huge. Whilst every effort has been made to be as comprehensive as possible when undertaking the SHLAA it is inevitable that opportunities will have been missed. It is also the case that with an urban area of this size there will be a continual supply of land and buildings reaching the end of their useful life in their current use which may be suitable for residential development. These opportunities can be very difficult to foresee in the short term, let alone ten or fifteen years in advance.

6.3 Birmingham has a long and impressive track record in delivering windfall sites, with 67% of all completions during the period covered by the UDP (1991 to 2011) taking place on sites which came forward as windfalls. Between 2001 and 2019, 25,149 windfalls received planning permission; an average of 1,397 per annum and 26,060 windfall dwellings were completed at an average of 1,448 per annum. The rate at which windfalls are brought forward and developed will continue to be monitored on an annual basis.

6.4 Sites which come forward as permitted development as part of the recent government initiatives enabling change of use (mainly but not exclusively) from offices (B1a) to residential, although not requiring planning permission, are also effectively windfalls where these have not previously been identified. In 2018/19 notification was received for 488 net dwellings to be created from such conversions. While these have not been taken into account in establishing the windfall allowance they add flexibility to the allowance and the SHLAA.

6.5 Some windfall sites receive planning permission and are developed in the same year and are therefore never included within a SHLAA. This can particularly happen where smaller builders or self-builders are involved.

6.6 A windfalls assumptions paper is at Appendix A4. In assessing the potential of windfalls, sites above and below the SHLAA survey threshold have been considered separately.

6.7 The windfall methodology in this SHLAA remains unchanged from that examined at the BDP hearings (although it takes account of the reduced time period covered). In his report of the examination the Inspector stated "I am satisfied therefore that the overall windfall allowance is based on sound evidence and is realistic and achievable. Indeed, in practice it is likely to be exceeded" (Paragraph 58). In addition, the decision letter for the Former North Worcestershire Golf Club appeal states that "the Secretary of State sees no reason to adjust the (windfall) allowance".

Windfall sites below the SHLAA survey threshold

6.8 It is assumed that small windfall sites, below the SHLAA survey threshold will continue to be brought forward and developed throughout the period covered by the SHLAA.

6.9 Typically, these small sites include flats above shops, the sub division of existing housing, intensification – for instance where a single dwelling is replaced by two – and small self-build schemes. Occasionally high density apartment schemes also fall under the threshold.

6.10 The change made to national planning policy to the definition of garden land (from Greenfield to Brownfield) in June 2010 had an impact on small windfalls as garden development has tended to be on small sites. As development on garden land is now much less likely to be permitted and to ensure consistency with the NPPF no allowance has been made for windfalls on garden land.

6.11 Table A4.3 of appendix A4 shows the annualised windfall assumptions on small sites. From that table the following anticipated windfall provision on small sites has been determined.

Table 6.1: Smaller Sites (<0.06ha) Windfall Allowance

Time Period	Period Contribution (Dwellings)
Short Term: 2019/20- 2023/24	160*
Medium Term: 2024/25 – 2028/29	250
Longer Term: 2029/30 - 2030/31	150

*Assumes no windfalls in year 1

Windfall sites above the SHLAA survey threshold

6.12 Although the initial SHLAA was undertaken as a comprehensive survey of potential residential development opportunities of at least 0.06ha, unidentified sites above this threshold continue to deliver significant levels of new housing.

6.13 The rate at which new windfall sites are coming forward (being granted detailed planning permission) slowed in line with worsening economic conditions although the success of the city's SHLAAs in identifying development opportunities will also have had an impact. Since the low point in 2009/10 the trend in the number of windfall dwellings receiving detailed planning permission has been upwards as economic conditions improve and the market recovers.

6.14 The annualised assumptions with regard to the rate at which windfall dwellings will be developed is set out in Table A4.3 of appendix A4. This is a conservative estimate and it is likely that the windfall assumptions will be significantly exceeded as conditions continue to improve.

Table 6.2: Larger Sites (>=0.06ha) Windfall Allowance

Time Period	Period Contribution (Dwellings)
Short Term: 2019/20- 2023/24	1200*
Medium Term: 2024/25 – 2028/29	2000
Longer Term: 2029/30 - 2030/31	1000

*Assumes no windfalls in year 1.

Empty Houses – Bringing Vacant Properties Back into Use

6.15 The NPPF encourages local authorities to bring vacant properties back into residential use. The City Council's Empty Property Strategy 2019-2024 sets targets for bringing empty private sector homes back into use with a headline target of bringing 350 long term empty properties back into use per year. Between 2011/12 and 2018/19 a total of 1,604 long term vacant dwellings have been brought back into use.

6.16 In previous years, long term vacant properties returned to use have been counted towards annual dwelling completions and an allowance of 200 dwellings per year for future supply included in the SHLAA and five year housing land supply calculations (up to 2018). The BDP inspector, in his report of the examination, found this to be a reasonable approach. However, to ensure there has been no double counting, empty homes returned to use have now been removed from dwelling completions and no allowance is made for empty homes returned to use towards future supply projections.

The Housing potential of Broad Locations

6.17 The PPG states that broad locations should be included in the SHLAA even though specific sites have not yet been identified. This is part of a proactive approach to planning, which reflects positive choices about the direction of future housing development, rather than a reactive approach to development opportunities as they arise.

6.18 This SHLAA has sought to identify specific development opportunities rather than broad locations. The Birmingham Development Plan seeks to maximise the opportunities for growth in the city up to 2031 and it identifies ten growth areas including a large urban extension on land removed from the Green Belt. The City Council have sought to identify specific development opportunities within these growth areas. There is, therefore, no additional capacity which can be included within broad locations for growth by 2031. Whist additional opportunities may well come forward during the plan period within the growth areas these are accounted for in the windfall allowance. This approach conforms to paragraph 023 (Reference ID: 3-023-20190722) of the PPG and paragraph 67 of the NPPF.

7. Assessing When & Whether Sites Will Be Developed

7.1 The glossary to the revised NPPF provides the following definitions of 'deliverable' and 'developable' sites:

Deliverable: *To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission for major development, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*

Developable: *To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.*

7.2 The suitability, availability and achievability of each site was therefore examined in order to determine whether, using the best information available, the site is likely to be developed in the short term (within 5 years), medium term (6 to 10 years) or longer term (beyond 10 years). For each site an assessment of any policy or physical constraints and any required mitigation measures was also carried out. A schedule of sites, including their individual assessments is attached at Appendix A8 along with an explanation of the site assessment criteria.

Assessing the Suitability for Housing

7.3 The PPG prescribes that sites can be considered suitable if they would provide an appropriate location for development when considered against relevant constraints (e.g. conformity with national policy, market attractiveness, contribution to regeneration priorities and potential impacts on landscapes, nature and heritage) and where there is potential for impacts to be mitigated. Sites in existing development plans or with planning permission can generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability.

7.4 All sites included within the 2019 SHLAA are, at the current time, considered to be suitable for housing development. All were considered against national and local policy and examined for constraints. All new sites were reviewed by officers from the City Council's Planning and Regeneration area teams prior to inclusion. Sites which were included in the 2018 SHLAA which are no longer considered suitable have been removed.

7.5 Planning permissions were reviewed and relevant sites removed where there were strong reasons to believe that the permission would not be implemented and where an application for renewal would, due to changing circumstances, be resisted. Other sites without formal planning status were rejected for a variety of reasons including serious constraints, incompatibility with adjoining uses and incompatibility with current and emerging policy. As stated earlier, sites within the Green Belt (which would be considered as not suitable) are not included in the SHLAA.

Assessing Availability for Housing

7.6 The PPG states that a site is considered available for development, when, on the best information available, there is confidence that there are no legal or ownership problems (e.g. unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners). Land controlled by a developer or landowner who has expressed an intention to develop may be considered available. The existence of a planning permission can be a good indication of the availability of sites. Sites without permission can be considered available within the first five years – subject to them also being suitable and achievable. Consideration can also be given to the delivery record of the landowner or developer and whether the planning background shows a history of unimplemented permissions.

7.7 Where site specific information was available this has been used to assess whether a site is available now or at some time in the future. Area based planning and regeneration officers have sought to ascertain pertinent information from developers and landowners. However, it was not possible or practical to get detailed information for all SHLAA sites. For those where specific information was not available a number of assumptions were used to ascertain availability. A site is available now if:

- It is under construction.
- The site has planning permission and is either owned by a housing developer or the application was submitted by a housing developer.
- The site has planning permission and has been cleared.
- The site has detailed planning permission and no known constraints.
- The site is in the BMHT five year development programme.

Assessing Achievability for Housing

7.8 The PPG states "A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgment about the economic viability of a site and the capacity of the developer to complete and let or sell the development over a certain period".

The Housing Market

7.9 There has been major change in the housing market over the last ten years with respect to the viability of development. The economic conditions brought about by the recession significantly undermined the house building industry. In order to help understand the issues in September 2010 the City Council brought together stakeholders including representatives from the house building industry (including the Home Builders Federation), and the social housing sector to discuss issues concerning the viability of housing provision in Birmingham. It was clear from this event and from other discussions with house builders that difficult times were anticipated. The issues affecting the industry included:

- The limited availability of mortgages to potential buyers
- The large deposits which are required by the banks

- Concerns over potential interest rate rises
- The reluctance of households to commit to moving house due to concerns over job security in the current economic climate
- With residential land values falling towards other land use values the expectations of land owners are not being met. In many cases this is causing landowners to hold on to land, waiting for better times and higher values.
- The requirement of the banks that development achieves a certain level of profit.

7.10 A Stakeholder meeting on 27th February 2014 highlighted that although the situation was improving times were still quite difficult in the house building industry. The demand remained mainly for 3 and 4 bedroom properties and landowners were continuing to hold onto land in the hope of a higher value in the future. There was competition for good sites but developing average sites remained difficult.

7.11 Over recent years the economic situation has improved, banks have been restructured, house builders have refinanced and government initiatives such as 'Help to Buy' have been introduced. The market for smaller (1 and 2 bedroom) city centre apartments has also dramatically increased in the past couple of years, with these playing a significant contribution to the increased level of dwelling completions since 2017.

7.12 Land Registry data shows that average house prices in Birmingham continue to rise. Between 1 April 2018 and 31 March 2019 the average purchase price of a residential property in the city was £276,358, up significantly from £208,242 in April 2018. The number of homes sold in Birmingham in 2018/19 was 15,844. This is a much higher level than the 12,771 properties sold in 2017/18 and in any of the preceding three years.

Assessing Achievability

7.13 All sites in the SHLAA are considered to be achievable at some point during the BDP plan period.

7.14 A number of assessments have been undertaken with regards to the viability and deliverability of housing sites which have helped inform whether sites are likely to be developed in the short, medium or longer term. Details of these are provided below. These assessments have been supplemented by site specific information, for instance from developers with regard to their intentions, but also from consideration of a site's attractiveness in terms of location and the ease at which it could be developed.

Community Infrastructure Levy Viability Assessment

7.15 New regulations governing Section 106 agreements were published in 2010 allowing Local Authorities to adopt a Community Infrastructure Levy (CIL) as the mechanism to secure funding to contribute to infrastructure. The City Council commissioned GVA to produce a draft charging schedule in accordance with the regulations. As the CIL charges should not be set at such a level that it risks the delivery of the Birmingham Development Plan a detailed assessment of financial viability was undertaken[2] during the preparation of the draft charging schedule.

[2] CIL Economic Viability Assessment, BCC, October 2012

7.16 The viability of residential development in the city was assessed by consultants GVA. The assessment used a Residual Appraisal Model which enabled the impact of differing levels of CIL on land values and scheme viability to be examined[3]. A series of fourteen hypothetical development typologies were tested comprising nine residential and four residential-led mixed-use. Between them the typologies are based upon the envisaged scale, nature and characteristics of current and future residential development likely to take place in the city i.e. scheme designs that while notional are realistic and reflect the current and future proposed policy environment.

7.17 The assessment was undertaken for the whole city and for the seven residential market areas into which the city had been divided in order to enable differential impacts that may arise due to differing values and costs across the area to be considered. The assessment tested both a 2012 market and a 2016 market - estimating where costs and values were likely to be in 2016. The assumptions were tested through engagement with developers, agents and registered providers active in Birmingham.

7.18 Following this assessment the draft CIL tariff for residential development in the city was set at £55 / £115 per square metre depending on whether the scheme was located in a low or high value area. These were the levels at which the majority of schemes (greater than 70%) were viable with 35% affordable housing. For the remaining schemes the City's affordable housing policy is sufficiently flexible to reduce or waive the affordable housing requirement in order to ensure the viability of the scheme. Following consultation in 2014 these charges were reviewed, and revised charges of £0 / £69 per square metre were set with the intention to further increase the viability of residential development. The CIL public examination took place in April 2015 and the inspectors report was published in June 2015. No further changes were proposed to the residential charging schedule following this and so charging under the new schedule commenced on 4th January 2016. A further review of the CIL Charging Schedule in now planned, with public consultation scheduled in Spring 2020, examination in Autumn 2020 and adoption anticipated in Spring 2021. Further information regarding CIL can be viewed at www.birmingham.gov.uk/cil

Economic viability of implementing the BDP

7.19 The BDP inspector concluded in his Final Report that implementation of the BDP has been shown to be economically viable: *"Up-to-date viability evidence relevant to the BDP is set out in the Council's CIL Economic Viability Assessment [IMP4] and CIL Revised Viability Assessment [EXAM 27], supplemented by EXAM 148 and EXAM 160."* (Para. 273.)

7.20 Viability assessments carried out in preparation for the introduction of the Community Infrastructure Levy (CIL) demonstrated that a substantial majority of typical residential schemes (70%) would remain viable with affordable housing provision at 35% from all development of 15 or more dwellings, and with CIL charges set at £115 per square metre [psm] in high-value areas and £55 in low-value areas. In the event, however, the Council have chosen to set the high-value CIL rate at £69 psm and the low-value rate at zero, with the express intention of maintaining viability and maximising affordable housing content.

7.21 The inspector noted that the Plan allows flexibility in its policy requirements so that appropriate account can be taken of viability considerations. He states that: *"Accordingly, I am satisfied that*

[3] Whereby gross development value minus total costs minus developers profit equals residual land value

the cumulative impact of the BDP's policy requirements, together with those of other applicable standards and policies, will not put its implementation at serious risk over the course of the Plan period. A similar conclusion was reached by the examiner in respect of the Council's proposed CIL charging schedule." (BDP Inspectors Report Paragraph 273)

8. Future Reviews

8.1 The SHLAA is not a one off study. It will be kept up to date and will be revised on a regular basis and published on the City Council's web site.

8.2 Interested parties are invited to submit sites for consideration for inclusion in the following years SHLAA at any time usually prior to the end of August. The information required is set out on the form attached as appendix A6.

8.3 In addition the City Council acknowledge that the circumstances of individual SHLAA sites can change and would therefore welcome any comments from developers, agents, landowners or other stakeholders with regard to any of the sites in the SHLAA 2019 so that changing circumstances can be reflected in the next revision.

8.4 As part of an ongoing 'Call for Sites' please send any new SHLAA site submissions or any additional information regarding sites in the 2019 SHLAA to:

Planning and Growth Strategy
1 Lancaster Circus Queensway
Birmingham
B4 7DQ

Or by email to: planningstrategy@birmingham.gov.uk

8.5 The 2019 SHLAA, like those before it, has concentrated on identifying development opportunities up to 2031 (the end date of the BDP). With the BDP having been adopted attention will now increasingly focus on post 2031 development opportunities and future SHLAAs will set out details of any longer term (post 2031) sites. Submissions in respect of potential longer term sites are welcomed.

Appendices

A1 SHLAA / PPG[4] Consistency Check

Table A1.1: Initial Assessment of the Consistency of the previous SHLAA Methodology with the PPG

Methodology – Stage 1: Identification of sites and broad locations	
What geographical area should the assessment cover?	Consistent
Who can plan makers work with?	Consistent
Can the assessment be constrained by the need for development?	Consistent
What sizes of site or broad locations can be considered for assessment?	Consistent
How can sites/broad locations be identified?	Consistent
What types of sites and sources of data should be used?	Consistent
Can plan makers issue a call for sites and broad locations for development?	Consistent
What can be included in the site and broad location survey?	Consistent
How detailed does the initial survey need to be?	Consistent
What information should be recorded during the survey?	Consistent
Methodology – Stage 2: Site/broad location assessment	
How can the development potential be calculated?	Consistent
What can be considered by plan-makers when assessing whether sites / broad locations are likely to be developed?	Consistent
What factors can be considered when assessing the suitability of sites / broad locations for development ?	Consistent
What factors can be considered when assessing availability?	Consistent
What factors should be considered when assessing achievability including whether the development of the site is viable?	Consistent
What happens when constraints are identified that impact on the suitability, availability and achievability?	Consistent
How can the timescale and rate of development be assessed and presented?	Consistent
Methodology – Stage 3: Windfall assessment (where justified)	
How should a windfall allowance be determined in relation to housing?	Consistent
Methodology – Stage 4: Assessment review	
How should the assessment be reviewed?	Largely consistent but overall risk assessment to be considered further
What happens if the assessment indicates that there are insufficient sites / broad locations to meet needs?	Consistent
Methodology – Stage 5: Final evidence base	
Following the assessment, what are the outputs?	Consistent

4 PPG at 13th May 2015

Table A1.2: Guidance Requiring Further Consideration

Issue	Consideration
The area selected for the assessment should be the housing market area	It is necessary to produce a SHLAA for the city in order to demonstrate a five year land supply against the city's housing target. The City Council are working with neighbouring authorities in the wider Housing Market Area (HMA) and SHLAAs from all the authorities are brought together to establish a HMA baseline housing supply position. The approach of undertaking individual SHLAAs for each authority in the HMA and then combining them at HMA level satisfies both requirements.
The character of surrounding area should be recorded during the survey	Land uses of the sites are recorded but the character of the surrounding area is not. It is considered that establishing and recording this information for approximately 1000 sites would be too onerous and not proportionate to the detail required. All sites included in the SHLAA are considered suitable for residential development so the absence of this information will not affect the outcome.
How should the assessment be reviewed? An overall risk assessment should be made as to whether sites will come forward as anticipated	The PPG suggests an overall risk assessment should be made as to whether sites will come forward as anticipated. It is not considered practical or proportionate to undertake a detailed risk assessment of 1000 sites. Risks are mitigated as far as possible through their consideration before including a site in the five year supply, supported by monitoring of delivery overall.
Housing for older people, including institutions in Class C2, count against the housing requirement	Self-contained housing aimed at older people has historically been included in the SHLAA. Residential institutions for older people have not. The Council is working to establish a methodology to enable account to be taken of these institutions and this potentially could result in a small uplift in supply. At this point in time the methodology has not been finalised and such institutions are not included in this SHLAA.
What information should be recorded when monitoring?	The PPG suggests progress removing constraints on development should be monitored / recorded. When work to mitigate constraints has been undertaken site assessment information is updated to reflect this. However, details of the work undertaken are not recorded.

A2 Key Stages of SHLAA process

Key Stages
Check methodology Prepare work programme
Review Committed Sites Ensure planning commitments monitoring system up to date Visit all committed housing sites (c700 sites) / record latest position Update the planning commitments database – data input & verification Establish / check availability & achievability (including any discounting) Review sites - omit those unlikely to be delivered Assign time period
Review Uncommitted Sites Review BMHT Development Programme (c100+ sites) Remove any current sites which are no longer suitable or developable Establish / check availability & achievability (including any discounting) Remove any current sites which are no longer suitable or developable Assign time period Review any comments received on the 2018 SHLAA Review 'Call for Sites' submissions and adjust database where necessary
Review Unidentified Supply Vacant properties, windfalls, broad areas for growth etc.
Establish SHLAA Database Merge committed / uncommitted elements of the database. Consistency checking and verification Final data trawl to fill any gaps in the database Ensure 5 year supply reasoning is robust
Reporting Analysis, establish findings and prepare draft Publish 2019 SHLAA including mapping Publish 2019 5-Year Supply Position Paper

A3 Extract from BDP Inspector's Report

Extract[5] from the report on the Examination of the Birmingham Development Plan ("Birmingham Plan 2031"), Roger Clews BA MSc DipEd DipTP MRTPI (Inspector appointed by the Secretary of State for Communities and Local Government). 11 March 2016

Meeting the overall need for housing – capacity within Birmingham

54. In seeking to meet the objectively-assessed need for housing, the Council's *Strategic Housing Land Availability Assessment*, published in September 2014 [2014 SHLAA, EXAM 6], demonstrates capacity for 46,830 dwellings over the rest of the BDP period. Adding completions (4,159) and long-term vacant dwellings brought back into use (793) since 2011 gives a total supply of around 51,800 dwellings over the Plan period as a whole. About 4,500 of these dwellings are on sites under construction and a further 11,000 have full or outline planning permission. Because the subsequent SHLAA was published in November 2015, it was too late to be considered by examination participants, but the overall position it presents is very similar.

55. The SHLAA is prepared on an annual cycle, which includes a "call for sites" and a robust process of reassessment of existing sites, involving some 1,200 site visits. Individual sites are identified as being available for development within five, 10 or 15 years, according to their circumstances. Site capacities are based wherever possible on extant planning permissions or direct evidence from their promoter; elsewhere they are based on standard densities but with appropriate adjustments made to take account of site-specific constraints. For the larger[6] housing sites the evidence in the 2014 SHLAA is supported by the Council's *Site Delivery Plan* [EXAM 25], which provides a more in-depth analysis of the factors affecting their deliverability.

56. Having sought further explanation about the assessments of a number of individual sites, I am satisfied that the SHLAA methodology is sound, and that it provides an accurate account of the sites that are either deliverable within five years or developable in later years, in accordance with NPPF footnotes 11 and 12[7]. It is true that a high proportion of the identified sites are relatively small, and that most of the larger sites are located in the inner-city wards (particularly Ladywood and Nechells), rather than the higher-value suburbs. But that is because Birmingham is heavily built-up, with most development opportunities to be found on brownfield land in the older parts of the city. Based on development trends since 2000, in a wide range of economic conditions, there is a realistic prospect that the identified sites will be brought forward for development by the end of the Plan period.

57. Student households are included in the DCLG household projections. The sites identified in the SHLAA include sites with planning permission for just over 4,000 bedspaces in purpose-built student

---

[5] The full report can be viewed / downloaded from Birmingham.gov.uk/plan2031

[6] Sites for more than 100 dwellings in the city centre and 50 dwellings elsewhere

[7] The identified sites include two Green Belt sites which are allocated for around 5,000 and 350 dwellings respectively in the Plan period. The justification for those allocations, and for not allocating other Green Belt or greenfield sites, is considered under Issue E.

cluster flats and studio apartments. This level of provision is justified by evidence from the city's universities on the current demand from students[8], and DCLG have confirmed that such accommodation should be included in the monitoring of housing supply[9].

58. Alongside the identified sites, the 2014 SHLAA includes a windfall allowance for some 7,600 dwellings over the remainder of the BDP period. This figure is based on an annual allowance that is initially set some way below the lowest windfall completion rates of recent years, and then increases gradually over the period to reflect the expected recovery in the housing market. Nonetheless, the maximum annual allowance is less than a quarter of the highest level experienced before the 2008 financial crisis. The calculation of the allowance specifically excludes development of residential gardens. I am satisfied therefore that the overall windfall allowance is based on sound evidence and is realistic and achievable. Indeed, in practice it is likely to be exceeded.

59. Finally, the 2014 SHLAA makes a modest allowance of 800 additional dwellings from the Council's Empty Homes Strategy. There is clear evidence that the Strategy has succeeded in bringing well over 200 long-term empty homes back into use each year since 2011. The allowance of 800 assumes that 200 more will have been brought back into use each year until 2018, when current funding for the Strategy runs out. That is a realistic assumption.

60. Thus the figure of around 51,800 dwellings, derived from the 2014 SHLAA, represents a sound assessment of the potential overall housing land supply during the BDP period.

---

8 See EXAM 6, paras 6.7-6.13.

9 See EXAM 6, Appendix 3.

A4 Windfalls Assumptions Paper

1. Purpose

1.1 To determine the extent to which windfalls contribute to meeting the City's housing requirement and to establish and justify the windfall allowances in the 2019 SHLAA.

2. Background

2.1 The 2012 NPPF addressed the issue of including windfalls in the housing land supply in a more positive manner than the guidance which it replaced (PPS3). The revised NPPF (July 2018, reissued February 2019) also permits the inclusion of a windfall allowance at paragraph 70:

"Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends".

2.2 The most recent Planning Practice Guidance (PPG), published in July 2019 provides additional guidance, stating "A windfall allowance may be justified in the anticipated supply if a local planning authority has compelling evidence as set out in paragraph 70 of the National Planning Policy Framework. Local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance".

2.3 Birmingham has a long and impressive track record in delivering windfall sites, with 67% of all completions during the period covered by the UDP (1991 to 2011) taking place on windfall sites. In a city with an urban area of over 22,000 hectares it is inevitable that there will be a continual supply of land and buildings reaching the end of their useful life in their current use which are suitable for residential use. These opportunities can be very difficult to foresee.

2.4 This paper examines the supply and development of windfall sites since 2001. It reviews the assumptions made for the 2018 SHLAA and considers any implications for the 2019 SHLAA.

2.5 Data used in this assessment has been taken from the Birmingham Land Availability and Development Enquiry Service ('BLADES'), a system which monitors planning commitments and residential development. In order to undertake this analysis data relating to windfalls has been extracted from the database and analysed. All figures in this paper are net.

3. What is a Windfall Site?

3.1 The revised NPPF defines windfall sites as "Sites not specifically identified in the development plan".

3.2 For the purpose of this paper and the windfall allowance in the SHLAA, windfalls are sites which have not previously been identified at the time that detailed planning permission is granted. That means, not only have they not been identified through the local plan process but also that they have not been included within the SHLAA.

4. The Supply of Windfall Sites

4.1 Since 2001 25,149 dwellings have received detailed planning permission on windfall sites, an average of 1,397 per annum. Of these 21,085 (84%) were for new build schemes and 4,064 (16%)

involved the conversion of an existing building. 13,487 (53.6%) of windfalls were located in the city centre. 21,605 (85.9%) of the windfalls coming forward were apartments and 3,544 (14.1%) were houses.

4.2 Although 25,149 windfall dwellings have been granted detailed planning permission since 2001 there have been large variations year to year from a high of over 3,500 in 2005/6 to a low of just under 200 in 2009/10. Generally the six years from 2001/2 to 2006/7 saw high levels of windfalls coming forward (2,450 per annum). Thereafter, the number of windfalls declined sharply with just 739 receiving detailed planning permission in the period 2008/9 to 2010/11, an average of 246 per annum. Since the beginning of the BDP plan period (2011/12) the annual supply of windfalls has varied considerably from 401 in 2013/14 to 2,789 in 2017/18.

Table A4.1: The Supply of Windfalls

Year	Windfalls Granted Detailed Permission	New build / Conversion		In / Out of City Centre		House / Apartment		Over / Under 0.06ha	
		New Build	Conv	In	Out	House	Apt	0.06>	<0.06
2001/2	2798	2637	161	777	2021	397	2401	2570	228
2002/3	807	713	94	453	354	105	702	649	158
2003/4	2698	2612	86	1725	972	224	2474	2528	170
2004/5	2452	1981	471	1639	813	249	2203	2306	146
2005/6	3522	3464	58	2407	1115	366	3156	3355	167
2006/7	2422	2380	42	1674	748	221	2201	2338	84
2007/8	822	748	74	368	454	134	688	698	124
2008/9	339	307	32	54	285	110	229	221	118
2009/10	185	192	-7	59	126	109	76	56	129
2010/11	215	171	44	28	187	38	177	118	97
2011/12	456	294	162	44	412	164	292	304	152
2012/13	545	260	285	41	504	188	357	417	128
2013/14	401	269	132	23	378	154	247	272	129
2014/15	1024	300	724	499	525	260	764	840	184
2015/16	936	770	166	301	635	229	707	787	149
2016/17	586	302	284	130	456	179	407	407	179
2017/18	2789	1987	802	1868	921	194	2595	2550	239
2018/19	2152	1698	454	1397	755	223	1929	1900	252
Total	25149	21085	4064	13487	11661	3544	21605	22316	2833

4.3 Of the 25,149 windfall dwellings granted detailed consent 2,833 were on sites below the SHLAA survey threshold. Small windfall sites typically include flats above shops, the sub division of existing housing, intensification – for instance where a single dwelling is replaced by two - and small self-build schemes. Occasionally high density apartment schemes also fall under the threshold. Previous uses of small sites coming forward as windfalls included retail, offices, and industrial. A breakdown of windfall completions by site size is at appendix B of this paper.

5. The Development of Windfall Sites

5.1 Since 2001 26,060 dwellings have been completed on sites which came forward as windfalls, an average of 1,448 completions per annum. Of these 22,477 were new build schemes. 11,652 (45%) of the 26,060 dwellings completed on windfall sites were located in the city centre. 20,456 (78.5%) of the windfalls completed were apartments and 5,604 were houses.

5.2 This year has seen the highest level of windfall completions in the past 18 years. The lowest level was 442 in 2011/12, reflecting the economic conditions of that time. Windfall completions since the start of the BDP plan period (2011/12) have fluctuated with the last three years yielding the largest numbers in this time. This now appears to be back towards the similarly high levels reached in 2005/6 and 2007/8.

5.3 Of the 26,060 windfall completions 2,182 were on sites below the SHLAA survey threshold. Of these 929 were new build and 1,253 were conversions. 669 (31%) of dwellings built on small windfall sites were in the city centre. A breakdown of windfall completions by site size is at appendix B of this paper.

Table A4.2: The Development of Windfalls

Year	Windfalls Completed	New build / Conversion		In / Out of City Centre		House / Apartment		Over / Under 0.06ha	
		New Build	Conv	In	Out	House	Apt	0.06 >	< 0.06
2001/2	1252	942	310	367	885	247	1005	1099	153
2002/3	1474	1207	267	715	759	266	1208	1301	173
2003/4	1826	1650	176	935	891	189	1637	1712	114
2004/5	1416	1252	164	595	821	233	1183	1278	138
2005/6	2382	2132	250	1453	929	293	2089	2277	105
2006/7	1839	1750	89	1115	724	289	1550	1698	141
2007/8	2106	1724	382	1311	795	325	1781	1914	192
2008/9	2311	2132	179	1397	914	209	2102	2191	120
2009/10	985	902	83	544	441	214	771	890	95
2010/11	919	863	56	305	614	242	677	860	59
2011/12	442	414	28	14	428	204	238	406	36
2012/13	1065	879	186	102	963	477	588	874	95
2013/14	479	417	62	107	372	129	350	428	51
2014/15	900	793	107	115	785	322	578	785	115
2015/16	844	480	364	241	603	326	518	678	166
2016/17	1395	1285	110	178	1217	787	608	1261	134
2017/18	1593	1187	406	470	1123	455	1138	1422	171
2018/19	2832	2468	364	1688	1144	397	2435	2708	124
Total	26060	22477	3583	11652	14408	5604	20456	23782	2182

5.4 It is clear from the tables that windfalls have historically played a very important role in enabling housing growth in the city. Indeed at first glance the windfall completions figures can appear disproportionately high when they are compared with annualised completions summaries (for instance in the Authority Monitoring Report). One reason for this is that windfalls very rarely come forward on sites which are already in residential use. There are, therefore, very few demolitions of existing housing on windfall sites which means that the gross and net capacities on windfall sites tend to be similar.

5.5 With identified sites this is not the case. Since 2001 many sites identified through the local planning process involved the demolition and replacement of existing housing. With a substantial housing stock there is a continual programme of renewal and regeneration of housing which is no longer suitable for purpose. In many cases this involves the demolition of high rise tower blocks and their replacement with traditional low rise housing.

5.6 Although windfall sites have traditionally come forward in large numbers it is important to ensure that there is no double counting. When detailed planning permission is granted the site is checked against the SHLAA to ensure that it is not already identified as a development opportunity. Windfalls coming forward in one year will be included as identified supply in the following years SHLAA (and the windfall allowance will be reduced by the applicable annual assumption). Some windfall sites come forward and are developed or partially developed in the same year. Where this occurs the completed dwellings will never be included in a SHLAA.

6. Commentary

6.1 Windfalls have made an important contribution to meeting the city's housing growth over the last 18 years. Windfall dwellings make a major contribution to net completions as they rarely involve the demolition of existing housing.

6.2 Figures for new supply coming forward and for completions on windfall sites are not directly comparable on a year to year basis as there is usually a time lag between permission and completion. They are better considered as flows. Since 2001 the number of windfalls receiving detailed planning permission and the number of completions on windfall sites have been broadly similar although there were some large variations between new supply coming forward and completions taking place in individual years.

6.3 There was a noticeable downturn in the number of windfall dwellings being granted detailed planning permission after 2005/6 although the numbers still remained reasonably high for the next year or two. This reduction reflected the country's worsening economic position and the difficulties this brought for the house building industry. This was, however, not unique to windfall sites as planning applications for housing development generally, with the exception of those for subsidised housing, saw a downturn after 2005/6.

6.4 The drop off in new windfall supply began to impact on completions a couple of years later in 2008/9. Despite this windfall sites continued to make a substantial and important contribution to the provision of new housing.

6.5 The market for apartments, particularly in the city centre, was particularly affected by the economic downturn. Prior to 2007 a significant proportion of windfalls coming forward and being built had been apartments, many of which were in the city centre. The market was reluctant to provide apartments in the difficult economic climate during and this has had a significant impact on new windfall supply coming forward, however, market for apartments and the 'city living' concept has now been re-established.

7. Looking Forward

7.1 It is anticipated that, with the economy much improved and the housing market having become much stronger, that the number of windfalls coming forward will continue to make a significant contribution to delivering housing supply in Birmingham.

7.2 The two markets which have traditionally had the biggest influence on the number of windfalls (apartments and the city centre) are both delivering at high levels and are likely to continue to have a big impact on the level of windfall development going forward as small plots can deliver many hundreds of dwellings.

7.3 The fact that there was a decrease in the number of windfall sites coming forward and receiving planning permission during the recession and in its immediate aftermath does not necessarily mean that sites were not becoming available. It is likely that new sites were continuing to become available, potentially in greater numbers as the recession impacted on businesses, but they were not being brought forward for development due to the poor state of the economy and the difficulties within the housing market. This could potentially have resulted in a 'backlog' of sites which are now being brought forward as the economy and the housing market continues to improve.

8. Windfall Assumptions

8.1 The contribution that windfalls can reasonably be expected to make to housing delivery is set out in table A4.3. These assumptions are based on a continuing recovery of the economy and the housing market.

8.2 Windfall supply increased in 2014/15 and increased completions in 2016/17, 2017/18 and 2018/19 reflect this. It is anticipated that windfalls will continue to play a prominent role as time goes on as the degree of certainty which can be attached to the SHLAA is likely to diminish.

8.3 No windfall allowance is made for the first year as all supply identified at the SHLAA base date is already accounted for.

8.4 Although not included in the windfall allowance, sites which come forward as permitted development, for instance, change of use from offices (B1a), retail (A1), etc to residential (C3), although not requiring planning permission, are also effectively windfalls where these have not previously been identified at the point notification to develop is received. In 2018/19 notification was received to create 488 dwellings from such conversions. While these have not been taken into account in establishing the windfall allowance they add an element of flexibility to the allowance.

Table A4.3: Windfall Assumptions

Time Period	Annual Contribution (Dwellings)
Small Sites	
Short Term - Within 5 Years	40
Medium Term – Years 6 to 10	50
Longer Term – Beyond 10 Years	75
Larger Sites	
Short Term - Within 5 Years	300
Medium Term – Years 6 to 10	400
Longer Term – Beyond 10 Years	500

9. Implications for the 2019 SHLAA

9.1 The windfall allowance over the period covered by the 2019 SHLAA (2019-2031) is 4,760 dwellings.

9.2 With regards to the supply period, it is assumed that windfalls will contribute 1,360 dwellings within 5 years, 2,250 dwellings in years 6 to 10 and 1,150 beyond 10 years (2029-31).

9.3 The City Council will continue to monitor windfalls and will adjust the windfall assumptions in future updates to the SHLAA should the best information available indicate that it would be appropriate to do so.

9.4 The windfall assumptions remain conservative when compared to actual performance. As such they allow for an element of flexibility in the SHLAA.

Table A4.4: The Supply of Larger Windfalls (Above the SHLAA Survey Threshold)

Year	Windfalls Granted Detailed Planning Permission	New build / Conversion		In / Out of City Centre		House / Apartment		Over / Under 0.06ha	
		New Build	Conv.	In	Out	House	Apt	0.06 >	< 0.06
2001/2	2570	2573	-3	622	1948	375	2195	n/a	n/a
2002/3	649	619	30	413	236	42	607	n/a	n/a
2003/4	2528	2504	24	1654	873	157	2371	n/a	n/a
2004/5	2306	1904	402	1575	731	208	2098	n/a	n/a
2005/6	3355	3399	-44	2364	991	302	3053	n/a	n/a
2006/7	2338	2343	-5	1671	667	193	2145	n/a	n/a
2007/8	698	689	9	348	350	78	620	n/a	n/a
2008/9	221	265	-44	40	181	73	148	n/a	n/a
2009/10	56	129	-73	34	22	73	-17	n/a	n/a
2010/11	118	143	-25	-1	119	0	118	n/a	n/a
2011/12	304	227	77	18	286	128	176	n/a	n/a
2012/13	417	207	210	33	384	118	299	n/a	n/a
2013/14	272	208	64	5	267	112	160	n/a	n/a
2014/15	840	255	585	405	435	189	651	n/a	n/a
2015/16	787	722	65	267	520	199	588	n/a	n/a
2016/17	407	222	185	80	327	142	265	n/a	n/a
2017/18	2550	1854	696	1771	779	150	2400	n/a	n/a
2018/19	1900	1561	339	1289	611	169	1731	n/a	n/a
Total	22316	19824	2492	12588	9727	2708	19608	n/a	n/a

Table A4.5 The Supply of Small Windfalls (Below the SHLAA Survey Threshold)

Year	Windfalls Granted Detailed Planning Permission	New build / Conversion		In / Out of City Centre		House / Apartment		Over / Under 0.06ha	
		New Build	Conv.	In	Out	House	Apt	0.06 >	< 0.06
2001/2	228	64	164	155	73	22	206	n/a	n/a
2002/3	158	94	64	40	118	63	95	n/a	n/a
2003/4	170	108	62	71	99	67	103	n/a	n/a
2004/5	146	77	69	64	82	41	105	n/a	n/a
2005/6	167	65	102	43	124	64	103	n/a	n/a
2006/7	84	37	47	3	81	28	56	n/a	n/a
2007/8	124	59	65	20	104	56	68	n/a	n/a
2008/9	118	42	76	14	104	37	81	n/a	n/a
2009/10	129	63	66	25	104	36	93	n/a	n/a
2010/11	97	28	69	29	68	38	59	n/a	n/a
2011/12	152	67	85	26	126	36	116	n/a	n/a
2012/13	128	53	75	8	120	70	58	n/a	n/a
2013/14	129	61	68	18	111	42	87	n/a	n/a
2014/15	184	45	139	94	90	71	113	n/a	n/a
2015/16	149	48	101	34	115	30	119	n/a	n/a
2016/17	179	80	99	50	129	37	142	n/a	n/a
2017/18	239	133	106	97	142	44	195	n/a	n/a
2018/19	252	137	115	108	144	54	198	n/a	n/a
Total	2833	1261	1572	899	1934	836	1997	n/a	n/a

Table A4.6: The Development of Larger Windfalls (Above the SHLAA Threshold)

Year	Windfalls Completed	New build / Conversion		In / Out of City Centre		House / Apartment		Over / Under 0.06ha	
		New Build	Conv.	In	Out	House	Apt	0.06 >	< 0.06
2001/2	1099	896	203	477	622	283	820	n/a	n/a
2002/3	1301	1149	152	643	658	234	1067	n/a	n/a
2003/4	1712	1589	123	936	776	156	1556	n/a	n/a
2004/5	1278	1189	89	556	724	191	1089	n/a	n/a
2005/6	2277	2069	208	1490	787	257	2020	n/a	n/a
2006/7	1698	1669	29	1088	610	274	1424	n/a	n/a
2007/8	1914	1633	281	1226	688	277	1637	n/a	n/a
2008/9	2191	2085	106	1340	851	175	2016	n/a	n/a
2009/10	890	873	17	541	349	182	708	n/a	n/a
2010/11	860	815	45	457	403	226	634	n/a	n/a
2011/12	406	392	14	0	406	210	196	n/a	n/a
2012/13	970	844	126	92	878	442	528	n/a	n/a
2013/14	428	393	35	95	333	118	310	n/a	n/a
2014/15	785	732	53	82	703	299	486	n/a	n/a
2015/16	678	431	247	169	509	264	414	n/a	n/a
2016/17	1261	1235	26	159	1102	750	511	n/a	n/a
2017/18	1422	1142	280	412	1010	413	1009	n/a	n/a
2018/19	2708	2412	296	1666	1042	351	2357	n/a	n/a
Total	23878	21548	2330	11429	12451	5102	18782	n/a	n/a

Table A4.7: The Development of Small Windfalls (Below the SHLAA Survey Threshold)

Year	Windfalls Completed	New build / Conversion		In / Out of City Centre		House / Apartment		Over / Under 0.06ha	
		New Build	Conv.	In	Out	House	Apt	0.06 >	< 0.06
2001/2	153	46	107	62	91	21	128	n/a	n/a
2002/3	173	58	115	109	64	32	141	n/a	n/a
2003/4	114	61	53	44	70	33	81	n/a	n/a
2004/5	138	63	75	24	112	42	94	n/a	n/a
2005/6	105	63	42	22	83	36	69	n/a	n/a
2006/7	141	81	60	42	99	15	126	n/a	n/a
2007/8	192	91	101	85	107	48	144	n/a	n/a
2008/9	120	47	73	33	87	34	86	n/a	n/a
2009/10	95	29	66	4	91	32	63	n/a	n/a
2010/11	59	48	11	1	58	16	43	n/a	n/a
2011/12	36	22	14	14	22	-6	42	n/a	n/a
2012/13	95	35	60	10	85	35	60	n/a	n/a
2013/14	51	24	27	12	39	11	40	n/a	n/a
2014/15	115	61	54	33	82	23	92	n/a	n/a
2015/16	166	49	117	72	94	62	104	n/a	n/a
2016/17	134	50	84	19	115	37	97	n/a	n/a
2017/18	171	45	126	58	113	42	129	n/a	n/a
2018/19	124	56	68	22	102	46	78	n/a	n/a
Total	2182	929	1253	666	1514	559	1617	n/a	n/a

A5 Historical Delivery Rate Assessments

1.1 A Historical Delivery Rate Assessment was undertaken as part of the preparation of the 2018 SHLAA update to assist in making delivery rate assumptions for sites currently in the SHLAA. Assessments were undertaken on a sample of developments where residential units have been delivered in the previous ten years (2007-2018). This looked at the period of time it took from planning consent to commencement on site (lead in time) and from commencement on site to completion (build out time). The average lead in and build out times per development size were then calculated; the resulting figures are presented below. It has not been considered necessary to review this assessment of historic delivery rates again in 2019 and so the assumptions listed below from 2018 have been carried forward in to this year's SHLAA report.

1.2 The lead in time is defined as the period between grant of permission to commencement on site. It should be noted that the status of sites is only monitored at one point in time during the year (1 April) so a site may have started prior to April in that monitoring year.

1.1 The build out rate is defined as the average number of dwellings completed per annum from commencement to completion. Once again, the status of sites is only monitored at one point in time during the year so a site may have completed prior to April in that monitoring year.

Table A5.1 Average build Out Rates 2007-2018 for BMHT Sites

Size (units)	Average Lead in time (months)	Average Build out (months)	Total (months)	Total (years)	Average Build rate (dpa)
1-100	4.5	18	22.5	1.9	28.3
100-200	14.7	28	42.7	3.6	49.4
200+	21	48	69	5.75	101

Table A5.2 Average build Out Rates 2007-2017 for City Centre apartments

Size (units)	Average Lead in time (months)	Average Build out (months)	Total (months)	Total (years)	Average Build rate (dpa)
1-100	17	12	29	2.4	71
100-200	13	18	31	2.6	92.3
200+	15.5	24	39.5	3.3	137.8

Table A5.3 Average build Out Rates 2007-2017 for other housing sites

Size (units)	Average Lead in time (months)	Average Build out (months)	Total (months)	Total (years)	Average Build rate (dpa)
1-49	12	14.4	26.4	2.2	23.9
50-99	11.5	30	41.5	3.5	41.9
100-199	14.6	31.2	45.8	3.8	63
200+	10.7	40	50.7	4.2	69.7

A6 Call for Sites

Submissions considered for the 2019 SHLAA

Ref	Location	Promoter	Outcome
CFS1/19	193 Camp Hill	Eutopia Homes	Added to SHLAA as site C465. Site currently in employment use, therefore requirements of Policy TP20 and associated SPD must be met. However, if these policy requirements can be demonstrated, the site may be suitable for residential redevelopment in the longer term.
CFS2/19	Land bounded by Sherifoot Lane and Worcester Lane, Mere Green	CBRE Ltd	Omitted. Within adopted Green Belt. The City Council's policy will continue to be to resist inappropriate development in the Green Belt and only where land is removed from the Green Belt following a local plan review will it be included in the SHLAA. The SHLAA is not a policy making document.
CFS3/19	Land to the south of Hawkesley at Wast Hills	GVA Grimley Ltd	Omitted. Within adopted Green Belt and also extends outside of the City Council's administrative area. The City Council's policy will continue to be to resist inappropriate development in the Green Belt and only where land is removed from the Green Belt following a local plan review will it be included in the SHLAA. The SHLAA is not a policy making document.
CFS4/19	Land at Frankley	Harris Lamb Ltd	Omitted. Within adopted Green Belt and also extends outside of the City Council's administrative area. The City Council's policy will continue to be to resist inappropriate development in the Green Belt and only where land is removed from the Green Belt following a local plan review will it be included in the SHLAA. The SHLAA is not a policy making document.
CFS5/19	Land at Blake Street/Ryknild Close, Sutton Coldfield	CT Planning	Omitted. Within adopted Green Belt. The City Council's policy will continue to be to resist inappropriate development in the Green Belt and only where land is removed from the Green Belt following a local plan review will it be included in the SHLAA. The SHLAA is not a policy making document.
CFS6/19	The former North	Harris Lamb Ltd	Included in this year's SHLAA. This site

Ref	Location	Promoter	Outcome
	Worcestershire Golf Club, Hanging Lane, Northfield.		was the subject of a planning appeal, and the inspector's decision has informed a review of the SHLAA's methodology and assumptions this year (which do not need to be changed).
CFS7/19	51 – 61 Price Street, Birmingham	Harris Lamb Ltd	Added to SHLAA as site C466. Site currently in employment use, therefore requirements of Policy TP20 and associated SPD must be met. However, if these policy requirements can be demonstrated, the site may be suitable for residential redevelopment in the longer term.
CFS8/19	Land north of Kingsbury Road (land north of The Greaves), Minworth	Severn Trent Water Limited	Omitted. Within adopted Green Belt. The City Council's policy will continue to be to resist inappropriate development in the Green Belt and only where land is removed from the Green Belt following a local plan review will it be included in the SHLAA. The SHLAA is not a policy making document.
CFS9/19	Land at Lindridge Road, Sutton Coldfield (Former Langley Mill STW)	Severn Trent Water Limited	Omitted. Within adopted Green Belt. The City Council's policy will continue to be to resist inappropriate development in the Green Belt and only where land is removed from the Green Belt following a local plan review will it be included in the SHLAA. The SHLAA is not a policy making document.
CFS10/19	Wheatmoor Farm Area A	Private individual	Omitted. Within adopted Green Belt. The City Council's policy will continue to be to resist inappropriate development in the Green Belt and only where land is removed from the Green Belt following a local plan review will it be included in the SHLAA. The SHLAA is not a policy making document.
CFS10/19	Wheatmoor Farm Area B	Private individual	Omitted. Within adopted Green Belt. The City Council's policy will continue to be to resist inappropriate development in the Green Belt and only where land is removed from the Green Belt following a local plan review will it be included in the SHLAA. The SHLAA is not a policy making document.
CFS11/19	Land to rear of Sheldon Hall, off Thaxted Road / Stanwick Avenue	JHB Development Ltd	Omitted. Within adopted Green Belt. The City Council's policy will continue to be to resist inappropriate development in the Green Belt and only where land is removed from the Green Belt following a local plan review will it be included in

Ref	Location	Promoter	Outcome
			the SHLAA. The SHLAA is not a policy making document.

2018/19 Call for Sites Form

Information Required	Site Details
1. What is the Address of the Site?	
2. What is the Size of the Site (in Hectares)	
3. What is the estimated capacity of the site (net dwellings)	
4. Is the site: A. Previously Developed – Cleared B. Previously Developed – Vacant (not cleared) C. Previously Developed – Still in use D. Greenfield	
5. What is the current use of the site? (if applicable)	
6. If the site is cleared, derelict or vacant what was its most recent use?	
7. Are there any buildings on the site? If so, how many? Are they derelict, vacant or in use?	
8. What are the adjoining land uses?	
9. What impact would these adjoining land uses have on the sites attractiveness / marketability for housing?	
10. Are there any known constraints to the development of the site which would: • need to be addressed before the site could be developed, or • which would impact on the residential capacity of the site.	Yes / No Yes / No
11. If 'Yes' give details. (Consider - Contamination, Access, Topography, TPO's, Pylons, Noise, Conservation Area, National or Local listing, Flood Risk).	

Continued overleaf……

12. Generally, what is your opinion of the housing market in the local area? Is it: • Strong • Average • Weak	
13. Does a house builder / developer have an interest in the site? 14. If Yes what interest? (Owner / Option to Buy etc.) 15. What is the name and address of the house builder / developer?	Yes / No
16. Has the site owner indicated that they are prepared to sell the site for development?	Yes / No
17. When would you envisage the site being delivered? (Best estimate). From 1st April 2020? • Within 5 years • 5 to 10 years • Beyond 10 years	
18. Any other Comments / Details	
19. Are you: A. The site owner B. A developer C. A planning consultant D. A housing association E. Other (please state)	
20. If you are a Planning Consultant / Agent, who are you representing?	
21. Your Contact Details: Name/ Address/Telephone number/email	
22. What is the Name and Address of site owner?	
23. Is the site owner aware that the site has been submitted for inclusion within the SHLAA?	Yes / No

Please complete a separate form for each site, append a plan showing the site boundary, and return to, Planning Strategy, 2nd Floor, 1 Lancaster Circus, Queensway, Birmingham, B4 7DQ or planningstrategy@birmingham.gov.uk

A7 Summary Outputs

Table A7/1: Status by Time Period

Status	Time Period			
	Within 5 years	6 – 10 Years	Beyond 10 Years	Total
Under Construction	9,513	890	0	10,403
Detailed PP	8,043	25	0	8,068
Outline PP	114	1,651	300	2,065
Permitted Development	755	14	0	769
Allocation in adopted plan	-193	3,658	4,372	7,837
Allocation in draft plan	0	251	0	251
Other Opportunity in BDP Growth Area	-92	4,883	2,421	7,212
Other Opportunity not in BDP Growth Area	297	4,374	1,040	5,711
Total	**18,437**	**15,746**	**8,133**	**42,316**

Table A7/2: Status by Distribution

Status	Location[10]				
	North West	East	South	City Centre	Total
Under Construction	516	1037	2090	6760	10403
Detailed PP	2267	588	710	4503	8068
Outline PP	1008	297	260	500	2065
Permitted Development	10	314	115	330	769
Allocation in adopted plan	5154	621	390	1672	7837
Allocation in draft plan	0	251	0	0	251
Other Opportunity in BDP Growth Area	2095	272	5	4840	7212
Other Opportunity not in BDP Growth Area	761	2634	2316	0	5711
Total	**11811**	**6014**	**5886**	**18605**	**42316**

Table A7/3: Time Period by Distribution

Time Period	Location				
	North west	East	South	City Centre	Total
Within 5 years	2813	1873	2916	10835	18437
6 to 10 years	5592	3398	2586	4170	15746
Beyond 10 years	3406	743	384	3600	8133
Total	**11811**	**6014**	**5886**	**18605**	**42316**

[10] Administrative boundaries used by the Planning and Regeneration Area Teams. See map at appendix A8.

A8 Site Assessment and Schedule of Sites

Site Assessment

For each site in the SHLAA an assessment has been made of its suitability, availability and achievability along with an evaluation of any policy or physical constraints affecting the site. This assessment was made based on the information currently available and for each site the following is provided:

Site Reference Number
Address
Site Area (Ha)
Capacity (dwellings)
Timeframe for development - 0-5 years (no. of dwellings) - 6-10 years (no. of dwellings) - 10+ years (no. of dwellings)
Ownership - Birmingham City Council (BCC) - Non-BCC - Mixed
Greenfield/ Brownfield/ Mix
Developer Interest (if known)
Planning Status - Under construction - Detailed Planning Permission - Outline Planning Permission - Permitted Development (office/retail/agriculture conversion to residential) - Allocated in adopted plan - Allocated in draft plan - Other opportunity in BDP Growth Area - Other opportunity not in BDP Growth Area Also provided is additional information such as a planning application reference number, the relevant plan for allocated sites or whether the site is in the Birmingham Municipal Housing Trust (BMHT) 5 year delivery programme.
Expiry date of planning application (if relevant)
Growth area The BDP identifies 10 Growth Areas across the city (policies GA1 – GA10)
Last known use The broad land use category which the site was last known to be in.
Year added to SHLAA
Suitability - The site is suitable as evidenced by the grant of planning permission - The site is suitable as evidenced by the grant of planning permission (now expired) - The site is suitable but does not have consent - The site is suitable but does not have consent and there are some constraints which are capable of being overcome - The site is not suitable
Policy factors - Planning permission granted - Allocated in adopted plan but no consent

- Allocated in draft plan but no consent
- Other opportunity with no identified policy constraints
- Other opportunity with some policy constraints which can be capable of being overcome
- Significant policy constraints

Accessibility by public transport
- Good
- Poor

This is based on a model of accessibility to public transport by the Birmingham population. This is shown in the map below.

Flood risk
- Zone 1 - little or no risk
- Zone 2 – low/ medium risk with strategy for mitigation in place
- Zone 3 – high risk - (discount unless mitigation can be introduced)

Natural environment designations

Is site affected by a Site of Special Scientific Interest (SSSI)/Site of Importance for Nature Conservation (SINC)/ Site of Local Importance to Nature Conservation (SLINC) / National Nature Reserve (NNR) / Local Nature Reserve (LNR)/ Tree Preservation Order (TPO)?

The site assessment has only considered natural environment designations. It is acknowledged that detailed site investigations may reveal undesignated natural environment constraints which may require mitigation.

Natural environment impact
- No adverse impact
- Adverse impact identified with strategy for mitigation in place
- Impact to be assessed
- Significant adverse impact (discount site unless mitigation can be introduced)

Historic environment designations

Is the site affected by a statutorily listed building, conservation area, locally listed building, Scheduled Ancient Monument (SAM), Historic Park & Garden?

Historic environment impact
- No adverse impact
- Adverse impact identified with strategy for mitigation in place
- Impact to be assessed
- Significant adverse impact (discount site unless mitigation can be introduced)

Historic Environment Record (HER)

Is there a HER record within the site?

HER Impact
- No adverse impact
- Potential adverse impact identified with strategy for mitigation in place
- Impact to be assessed
- Significant adverse impact (discount site unless mitigation can be introduced)

Open space designation

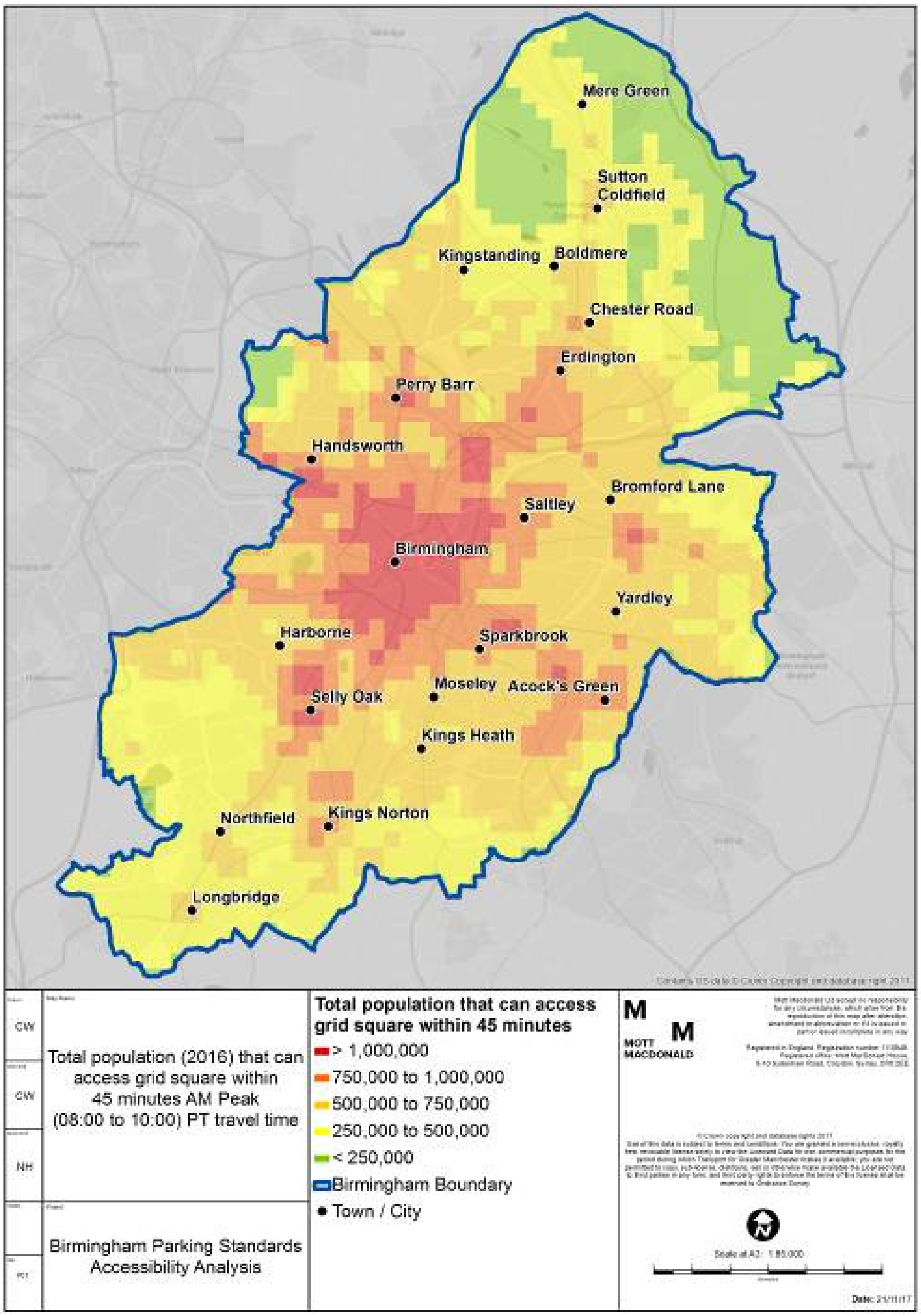
Is the site affected by an open space designation?

Open space impact
- No adverse impact
- Adverse impact identified with strategy for mitigation in place
- Impact to be assessed
- Significant adverse impact (discount site unless mitigation can be introduced)

Availability
- The site is considered available for development
- Reasonable prospect of availability

Achievability Is the site achievable? – Yes/ No
Viable - Yes – the site is viable - The site could be viably developed
Contamination - No known/ expected contamination issues - Known/ expected contamination issues that can be overcome through remediation - Significant contamination issues which cannot be realistically mitigated
Demolition - No demolition required - Cleared site, no demolition required - Demolition required, but expected that standard approaches can be applied - Complex demolition expected to be required
Vehicular access - No known access issues - Access issues with viable identified strategy to address - Unknown at current time - Major access issues with no identified strategy to address
Comments Any other information relevant to the site

Public Transport Accessibility



Each grid square within the map has been assessed to determine the total population that can access it within 45 minutes public transport journey time during the AM peak (8:00 to 10:00). Accessible population has been determined by modelling journeys from population weighted output area centroids to each grid square. The total population of output areas within 45 minutes journey time has been summed for each grid square. Those squares which are red can be accessed on public transport by over 1 million people within 45 minutes. The green squares are least accessible to the Birmingham population and these locations are considered to have poor accessibility to public transport. The mapping shows existing public transport provision and does not account for new infrastructure provision or revised timetabling which may be proposed in future years (new SPRINT routes for example).

Schedule of Sites

The sites on the schedule are ordered by Planning Administrative Area (City Centre, East, North West and South). These are shown below. Within each area the sites are ordered by reference number.

The sites can be viewed on the City Council's interactive web mapping system:
https://maps.birmingham.gov.uk/webapps/shlaa/