



Housing and Economic Land Availability Assessment 2025

October 2025

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Executive summary

1. Birmingham City Council is currently preparing a new Local Plan which will cover the period up to 2044. To support its preparation, the Council undertakes an annual Housing and Economic Land Availability Assessment (HELAA), which identifies land that is suitable, available and achievable for housing and economic development uses over the plan period. The HELAA is an important source of technical evidence which will help inform and shape the strategy of the Birmingham Local Plan (BLP).
2. The HELAA does not seek to allocate individual sites for housing or employment development, and the inclusion of a site does not mean it will be allocated or that it will successfully achieve planning consent.
3. National Planning Practice Guidance (PPG) states that local planning authorities should not simply rely on sites that they have been informed about but should actively identify sites that may assist in meeting development needs through the desktop review process¹.
4. As well as looking at the more traditional sources of sites, we have undertaken a comprehensive and systematic 'urban capacity' assessment of land ownership parcels in the city's boundary using a digital planning tool. The purpose of this exercise was to identify additional sites which had not previously been included in the HELAA process. Further detail about this work is contained in Appendix 6 of this document.
5. An assessment of sites without planning permission was undertaken for the HELAA 2023, which resulted in the removal of over 250 sites. In these instances, the identified landowner had not confirmed that the site was available for development. Further exercises have been undertaken for each annual HELAA since then to contact the landowners and site promoters of planning permissions that have expired in the last monitoring year. These sites have only been kept in the HELAA if the landowners or site promoters have expressed a clear ongoing intention to bring the site forward for development. These steps have resulted in a robust supply of other opportunity sites that can be considered as developable.
6. The HELAA also identifies specific site allocations proposed for development within the Birmingham Local Plan Focused Preferred Options Document. These sites, alongside policies which seek to optimise residential densities, aim to deliver a significant scale of residential accommodation. Once the Local Plan is adopted the allocation of a site establishes the principle of a particular land use, but it does not grant planning permission for development on that site. Each proposed site allocation is detailed within the Focused Preferred Options Document as well as the HELAA site schedules that accompany this report.
7. The priority in Birmingham is to maximise the delivery of development within the built-up urban area by making as much use as possible of previously developed brownfield

¹ PPG, Paragraph: 010 Reference ID: 3-010-20190722

sites and underutilised land. The National Planning Policy Framework (NPPF) also requires local planning authorities to make efficient use of land by optimising densities while taking into account the identified need for different types of housing and the creation of well-designed, attractive and healthy places. The Council therefore seeks to take a density optimising approach as set out in the HELAA methodology paragraphs 3.20 – 3.26.

8. The HELAA 2025 shows that there is a potential capacity for the development of 94,828 dwellings and 140.23 hectares of industrial land on identified sites in the city. These figures are likely to change during the course of the plan-making process as the HELAA is refined through the continual review of sites.
9. A large number of call for site submissions were received during the consultation on the Birmingham Local Plan Preferred Options Document in Summer 2024. The findings of the assessment of these sites have been included in the HELAA 2025, along with all other call for site submissions received, and are presented in Appendix 8 of this report.
10. In line with the requirements of the December 2024 NPPF, Birmingham City Council commissioned Arup to undertake a Green Belt Assessment in Spring 2025. This has assessed how parcels of land perform against the five Green Belt purposes set out in paragraph 143 of the NPPF and whether any land in the city can subsequently be identified as grey belt.
11. At this stage no land has been proposed for release from the Green Belt and so this HELAA continues to consider all such promoted sites as not suitable for development. This will be kept under review as work on the Birmingham Local Plan progresses and an update to this HELAA report will be issued if it is determined that it would be appropriate to release land from the Green Belt at the Regulation 19 Publication Plan stage.
12. Over the course of the plan period, it is expected that there will continue to be high levels of windfall development (unidentified capacity). The unidentified windfall capacity for the period – 2025-2044 is 10,975 dwellings.
13. Adding in completions between 2020/21 and 2024/25 of 18,718 gives a total capacity of **122,411** dwellings.

Source	Dwellings
Identified capacity	94,828
12% lapse rate (applied to outline consents and other opportunity sites)	-2110
Unidentified capacity (windfalls)	10,975
Completions (2020/21 – 2024/25)	18,718
Total capacity	122,411

14. In terms of the employment land supply position, when the 74.42 hectares of completions between 2020 and 2025 are added to the identified supply 140.23 hectares this provides a total capacity of 214.65 hectares. The Focused Preferred Options Document also identifies 53 hectares of land supply at the West Midlands Rail Freight Interchange in South Staffordshire, which brings the total land supply to 267.65 hectares.

1. Introduction

Purpose of the HELAA

- 1.1 The Housing and Economic Land Availability Assessment (HELAA) is a technical assessment of the availability, suitability and achievability of land in a local planning authority's area for housing and economic development uses over the plan period. The HELAA forms an important part of the evidence base to inform the new Birmingham Local Plan (BLP) and will establish if there are sufficient sites to meet the housing and economic development needs of the city.
- 1.2 The HELAA sets out the findings of the site assessment based on the methodology established following the consultation exercise on the revised methodology in July-August 2021. The HELAA 2024/25 supersedes all previous HELAAs, SHLAAs and ELAAs prepared by Birmingham City Council.
- 1.3 The base date for this HELAA is the 1st April 2025 and it includes planning approval data up to the 2024/25 monitoring year. All Call for Site submissions received since the plan review commenced in 2021 through to 31st August 2025 have been considered in the HELAA 2025. The results of the assessment of these site submissions can be found in Appendix 8.
- 1.4 The HELAA is a key document in monitoring the delivery of land for residential and economic development and the ongoing supply required to meet the targets set through the local plan. The sites identified within the HELAA can be broadly divided into the following three categories consistent with the definitions in the NPPF:
 - Deliverable sites – are those sites which are available now, offer a suitable location for development and be achievable with a realistic prospect that development can be delivered on the site within the next five years. The definition of 'deliverable' within the NPPF makes clear that where sites do not have detailed planning permission then these should only be considered deliverable where there is clear evidence that completions will be delivered within five years.
 - Developable sites – are those sites that are in a suitable location, with a reasonable prospect that they will be available and could be viably developed at the point envisaged (beyond the next five years).
 - Not Developable – are those sites where one or more of the constraints assessed are severe and it is not known when/whether/how such constraints might be overcome, thus rendering the site not suitable. These sites will not be included in the final HELAA supply of sites which are deliverable and developable.

National policy and guidance

- 1.5 The NPPF requires strategic policy-making authorities to 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 five years following the intended date of adoption; and b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.”
- 1.6 The National Planning Practice Guidance entitled ‘Housing and economic land availability assessment’ (updated 22 July 2019) (referred to as the PPG) states that an assessment should:
- identify sites and broad locations with potential for development;
 - assess their development potential; and
 - assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

Disclaimers

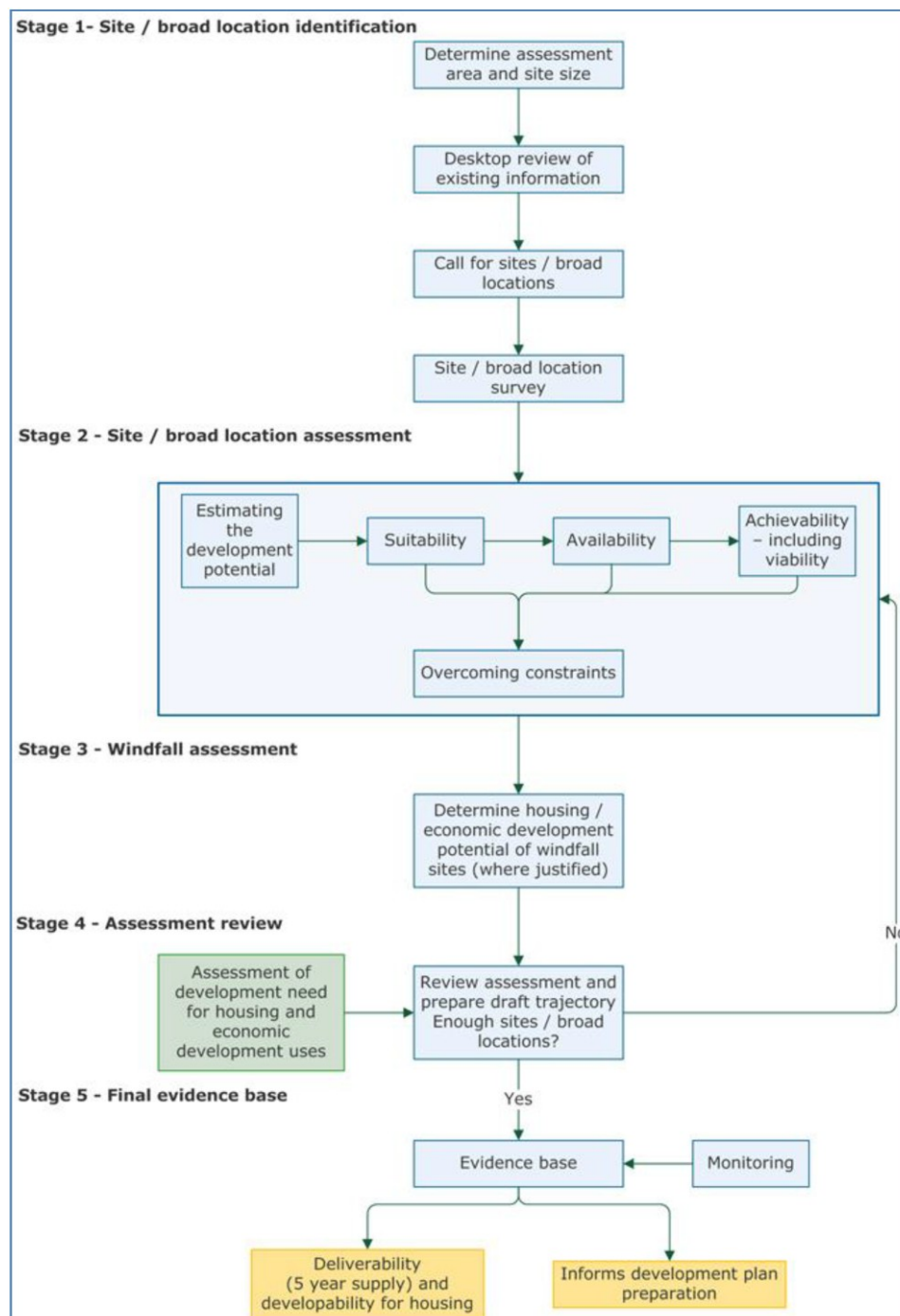
- 1.7 It is important to note that inclusion of a site in the HELAA does not indicate that it will be allocated for development or that it will successfully obtain planning permission. It should also be noted that not all sites considered in the assessment will be suitable for development. Those that are discounted through the assessment will be clearly identified. Not all sites identified in the HELAA as being ‘developable’ for housing and economic uses will be allocated in the Birmingham Local Plan. The identification of a site for housing or economic development does not preclude it from being developed for another purpose. The exclusion of a site does not preclude the possibility of permission for development being granted on that site.

2. Context

- 2.1 The Birmingham Development Plan (BDP) was adopted in January 2017 and sets out the spatial strategy and policy framework for the future development of the city over the period 2011-2031. To be effective plans need to be kept up to date. In accordance with the NPPF the council undertook a review of the BDP which determined that a full update of the plan was required due major changes in national planning policy and local priorities and circumstances since the BDP was adopted. In June 2021 the Council's Cabinet approved the update of the BDP along with a new Local Development Scheme setting out the timetable for the production of the new local plan.
- 2.2 The Council is now in the process of preparing the new local plan; called the Birmingham Local Plan (BLP). The development of the BLP will involve several stages. We previously consulted on the Issues and Options for the new local plan in October to November 2022 and the Preferred Options consultation took place in July and August 2024. The HELAA 2025 informs and supports public consultation on Focused Preferred Options Document which is taking place between October and December 2025.
- 2.3 The HELAA will continue to form part of the evidence base to support the progression of the BLP towards examination and adoption, and also to inform the monitoring of the current BDP. A further round of public consultation on the Publication Plan is planned in 2026 before being submitted for examination. The HELAA will be further reviewed and updated at the next stage to support Publication Local Plan.
- 2.4 The Council records completions annually as part of the HELAA process. In order to provide a comprehensive picture of the capacity for development in the city since the plan review commenced, it is necessary to add delivery in the period between 2020/21 and 2024/25 to the capacity identified in the HELAA.
- 2.5 The completions data is up to date as of the 1st April 2025. Planning approval data after the baseline date will be recorded within the Council's databases and published within next year's HELAA. More recent call for site submissions will be included as far as practically possible, such as those that may be submitted during the upcoming public consultation period for the Focused Preferred Options Document.

3. Methodology

- 3.1 A draft methodology for the HELAA was subject to consultation in July-August 2021 to provide stakeholders the opportunity to provide comments. A summary of the comments received and how they have been addressed can be found in Appendix 1.
- 3.2 The methodology is consistent with the guidance provided in the National Planning Practice Guidance (PPG) on Housing and Economic Land Availability Assessment. The flow chart below (extracted from the PPG) illustrates the approach used in the HELAA.



Stage 1: Identification of sites and broad locations

Geographical area of assessment

- 3.3 The PPG states that the area selected for the assessment should be the plan-making area. This could be the local planning authority area, two or more local authority areas, or areas covered by a spatial development strategy. This assessment will cover the administrative area of Birmingham City Council.

Working with stakeholders

- 3.4 The PPG suggests that assessments should be undertaken working with other local planning authorities in the housing market area or functional economic market area in line with the duty to cooperate. Birmingham sits within the Greater Birmingham and Black Country Housing Market Area (GBCCHMA). The Council will continue to engage with other relevant authorities in the production of evidence. All contacts on the Planning Policy Consultation Database were consulted on the draft revised methodology in July - August 2021. This included developers, agents, businesses, local communities and other local authorities.

Site size and broad locations

- 3.5 The PPG states that a range of different site sizes from small-scale sites to opportunities for large scale development should be assessed. It suggests that it is appropriate to consider all sites and broad locations capable of delivering five or more dwellings or economic development on sites of 0.25 hectares (or 500 square metres of floor space) and above but also states that plan makers may wish to consider alternative thresholds.
- 3.6 In Birmingham all previous SHLAAs have been undertaken using a threshold of 0.06ha. The Birmingham Development Plan Inspector was satisfied with this approach and stated in his final report (11 March 2016): "It is true that a high proportion of the identified sites are relatively small ... 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". The 0.06ha minimum site size therefore continues to be used in the HELAA.
- 3.7 The NPPF expects development plans to accommodate at least 10% of their housing requirement to sites no larger than one hectare, unless there are strong reasons why this cannot be achieved. For Birmingham to meet this expectation it is necessary to identify as many sites as possible given the significant scale of housing required. This provides a further reason for why it is appropriate to include sites below the threshold set out in the PPG.
- 3.8 There is no minimum size threshold for employment sites as these are included on the basis of the portfolio of employment land required by policy TP17 of the BDP, i.e. Best Quality (sites of 10 or more hectares), Good Quality (sites of between 0.4 and

10 hectares) and Other Quality (sites of less than 0.4 hectares) employment land. The HEDNA 2022 recommends a continuation of this portfolio approach but with a new categorisation that focuses more on the delivery of smaller sites below 1 hectare. Further details of this proposed new portfolio are provided in the Preferred Options Document. So that the evidence to inform the plan will be as comprehensive as possible and to align with the new portfolio it is proposed to continue applying no minimum site size threshold for employment sites.

Identification of sites/ broad locations

- 3.9 The PPG encourages plan-makers to be proactive in identifying as wide a range of sites and broad locations for development as possible. This makes clear that plan makers should not rely solely on sites which they have been informed about but also actively identify sites through a desktop review process. The Council has undertaken a comprehensive desktop review for the identification of sites. The sources of data explored are covered in the section below. This has included an extensive systematic site search of both HM Land Registry parcels and unregistered parcels within the city. The approach used to identify sites from this data source is detailed in Appendix 6 of this document.
- 3.10 The PPG notes that sites which have particular constraints (such as Green Belt), need to be included in the assessment for the sake of comprehensiveness but these constraints need to be set out clearly, including where they severely restrict development. Any sites falling within the Green Belt are categorised as unsuitable.

Types of sites and sources of data

- 3.11 The PPG states that plan-makers should consider all available types of sites and sources of data relevant to the assessment process and provides guidance on the sources of data which can be used to identify potential sites through the assessment. As noted above, a desktop review has taken place in accordance with the PPG. Sites have been identified from the following sources:

Table 1: Types of sites and potential data sources

Type of site	Potential data source
Existing housing and economic development allocations and site development briefs not yet with planning permission	Local and neighbourhood plans Planning application records Supplementary Planning Documents Masterplans/Development briefs
Planning permissions for housing and economic development that are unimplemented (including expired consents) or under construction	Planning application records (outline/ full) Development starts and completion records
Planning applications that have been refused or withdrawn	Planning application records

Type of site	Potential data source
Planning applications that have not been determined	Planning application records
Pre-applications for housing and economic development	Pre-application records
Permitted development (office to residential, retail to residential and any other updates to PD rights to residential)	Planning application records
Land in the local authority's ownership	Local authority records
Surplus and likely to become surplus public sector land	National register of public sector land Engagement with public sector bodies such as central government, NHS, police, fire services, utilities services, statutory undertakers
Sites with permission in principle and identified brownfield land register	Brownfield land register National Land Use Database Valuation Office database Active engagement with sector
Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes)	Local authority empty property register English Housing Survey National Land Use Database Commercial property databases Valuation Office database Active engagement with sector Brownfield land register
Additional opportunities for un-established uses (e.g. garage blocks)	OS maps Aerial photography Planning applications Site surveys
Business requirements and aspirations	Enquiries received by local planning authority Active engagement with sector
Large scale redevelopment and redesign of existing residential or economic areas	Local and neighbourhood plans Planning application records OS maps Aerial photography Site surveys
Sites in rural locations	Local and neighbourhood plans Planning application records OS maps Aerial photography Site surveys

Type of site	Potential data source
Site in adjoining villages and rural exceptions sites	Local and neighbourhood plans Planning application records OS maps Aerial photography Site surveys
Potential urban extensions	Local and neighbourhood plans Planning application records OS maps Aerial photography Site surveys
Sites submitted through 'Call for Sites'	'Call for Sites' submissions
Existing HELAA sites	HELAA, SHLAA and ELAA
Internal site suggestions from Council officers (including search of HM Land Registry Parcels and unregistered parcels)	Officer knowledge HM Land Registry

Call for Sites

- 3.12 A Call for Sites is an invitation to anyone interested in submitting a site for consideration in the HELAA process. The PPG states that it is important to issue a Call for Sites to ensure the process is transparent and identifies as many potential development opportunities as possible.
- 3.13 Birmingham City Council maintains an ongoing open Call for Sites process which allows sites to be submitted to the authority throughout the year. This is advertised on the Council's website.
- 3.14 All Call for Sites submissions received since the plan review commenced in 2021 up until 31st August 2025 have been assessed in this HELAA. This includes responses from landowners whom we contacted in relation to the availability of sites that we identified as potentially suitable through our urban capacity work. Any sites submitted after 31st August 2025 will be considered in the next update to the HELAA.

Site and broad location survey

- 3.15 Sites and broad locations derived from the above data sources have been assessed to;
- ratify inconsistent information gathered through the call for sites and desk-based assessment;
 - get an up to date view on development progress (where sites have planning permission);
 - obtain a better understanding of what type and scale of development may be appropriate;

- gain a more detailed understanding of deliverability, any barriers to their development and how these could be overcome; and
 - identify further sites with potential for development that were not identified through the data sources or the call for sites.
- 3.16 The site survey is a desk-based assessment using information submitted, GIS mapping information, planning application records and other relevant information. The site survey records the following characteristics:
- site size, boundaries, and location;
 - current land use and character;
 - physical constraints (e.g. access, contamination, flood risk, natural and historic features);
 - potential environmental constraints;
 - accessibility to public transport;
 - planning policy constraints (e.g. Green Belt)
 - where relevant, previous planning history or development progress (e.g. ground works completed, number of units started, number of units completed); and
 - initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development.

Stage 2: Site/broad location assessment

Estimating the development potential of housing sites

- 3.17 The PPG states that development potential can be determined using existing or emerging plan policies on density and also requires plan makers to make the most efficient use of land in line with policies set out in the NPPF.
- 3.18 Where sites already have planning permission, the site capacity and density will reflect the approved scheme, unless other information available indicates that a revised scheme is likely to be brought forward and this will result in a higher or lower capacity.
- 3.19 On sites allocated in adopted plans the capacity is as set out in the plan.

Density

- 3.20 In previous SHLAAs, the yield of each site was determined using Policy TP30 'The type, size and density of new housing' of the Birmingham Development Plan which states that "*New housing should be provided at a target density responding to the site, its context and the housing need with densities of at least:*
- *100 dwellings per hectare in the City Centre*
 - *50 dwellings per hectare in areas well served by public transport*
 - *40 dwellings per hectare elsewhere*"

- 3.21 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.
- 3.22 The Birmingham Local Plan Preferred Options Document proposed a new policy (HN4) which amends these minimum density figures as follows;
- 400 dwellings per hectare in and within 400m of the City Centre
 - 70 dwellings per hectare in and within 400m of Urban Centres and areas well served by public transport
 - 40 dwellings per hectare elsewhere
- 3.23 These proposed new densities are based on an assessment of approved and completed residential sites as part of the review of the HELAA methodology. To ensure a representative assessment, a range of sites were assessed in terms of their size and location. The findings are set out in Appendix 3 and Table 2 below shows the density assumptions proposed.

Table 2: Density assumptions

Area	Sample Size	Average Net Density (dwellings per hectare)
City Centre	69 sites	400
In and around Urban Centres	55 sites	70
Suburban	215 sites	40

- 3.24 The assessment revealed that the density for dwellings in suburban locations is in line with Policy TP30. The average density of residential development granted consent and delivered in and around urban centres was 70 dwellings per hectare. The average density granted consent and delivered in the city centre was 400 dwellings per hectare.
- 3.25 Acknowledging the density optimising approach set out in the NPPF and PPG, these higher densities in the city centre and in and around urban centres are now being applied to residential sites in the HELAA that do not have planning permission or are not allocated and where the capacity is not already known. The density assumptions are applied to the net developable area of the site, an explanation of which is provided below.
- 3.26 Where possible, known constraints will be taken into account when estimating the possible yield for a site. It is important to recognise that yields may also be affected by issues not evident at the time a site assessment is undertaken. The potential yield for a site derived through this assessment therefore has the potential to change throughout the planning process and will be refined on a site-by-site basis if necessary, to take account of site-specific information and constraints where known.

Net Developable Area

- 3.27 Development potential is also affected by Gross to Net development ratio, whereby the net area is a % of the gross. The gross to net ratio is likely to decrease with larger sites as more space is needed for ancillary uses of land, roads, open space, schools, landscaping, infrastructure etc. This helps to give a more accurate reflection of the anticipated land take from housing development, particularly on larger sites.
- 3.28 Table 4 below sets out the net developable area ratios which are used where there is no information on the developable area of the site. These are based on an assessment of a sample of sites approved and completed in the city since the BDP was adopted in 2017.

Table 3: Net Developable Area Definition

Excludes	Main roads, significant landscape buffers, open space serving a wider area, shops and other public facilities
Includes	Local access roads, private garden, parking areas, footpaths and local open space and amenity space that serves the development

- 3.29 For clarity, a local access road is defined as an unclassified road, except on a development of 10ha or more, which may have a larger spine road running through the site.

Table 4: Net developable area ratios (outside the City Centre)

Site size (hectares)	Gross to net ratio
Up to 0.25	100%
0.25 to 1.0	95%
1.0 to 3.0	85%
3.0 to 10.0	80%
10.0 and above	70%

- 3.30 Birmingham City Council uses the above findings to inform indicative yields for sites outside the City Centre. All of the recent approvals and completions in the City Centre that were assessed did not require any discounts to their developable area and so there is justification for applying a 100% gross to net ratio for all City Centre sites.
- 3.31 Where there are additional site-specific characteristics that may affect the net developable area (including on City Centre sites) such as flood zones, tree preservation orders etc. these will be taken into account alongside the above assumptions. This may therefore result in a deviation from the standard densities set out above.

Estimating the development potential of industrial sites

- 3.32 The site area figures (in hectares) that are reported for industrial sites in the HELAA relate to the gross area of the entire site. However, to enable an indication of the potential job creating floorspace that could be delivered on a site, paragraph 17.9 of the HEDNA 2022 identifies that it is appropriate to apply a 0.5 plot ratio for industrial uses. A further 5% discount is applied to estimate the potential gross internal floorspace, in square metres, that could be delivered on the site. The Call for Sites Form also allows for submissions to include as much detail as possible (including floorspace and jobs). Where considered to be a suitable form of development the information submitted by the site promoter will be used in the HELAA.

Assessing whether sites/ broad locations are likely to be developed

- 3.33 The PPG requires plan-makers to “assess the suitability, availability and achievability of sites, including whether the site is economically viable. This will provide information on which a judgement can be made as to whether a site can be considered deliverable within the next five years, or developable over a longer period.”
- 3.34 The PPG also states that “Sites which do not involve major development with any form of permission and all sites with detailed permission should be considered achievable within the next 5 years, unless evidence indicates otherwise.”
- 3.35 The methodology for the assessment of sites within the HELAA has been undertaken in accordance with these requirements of the PPG.

Assessing suitability

- 3.36 A site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated.
- 3.37 When considering constraints, the information collected as part of the initial site survey, as well as other relevant information, will be taken into account such as:
- national policy;
 - the adopted development plan;
 - emerging plans;
 - appropriateness and likely market attractiveness for the type of development proposed;
 - contribution to regeneration priority areas;
 - potential impacts including the effect upon landscapes including landscape features, conservation and enhancement of the natural
- 3.38 When assessing sites against national and local planning policy, the NPPF and adopted Birmingham planning documents will be used. Although the Birmingham Development Plan is in the process of being updated, it still forms part of the adopted development plan for the area and its policies are in general conformity with the

NPPF. Where any such policy indicates a presumption against development this will be recorded within the site assessment. Where such constraints apply this does not necessarily mean that a site is removed from the assessment, rather that the constraints are recorded and it be noted that existing policies would need to change through the plan-making process in order for such constraints to be overcome.

- 3.39 The PPG requires site assessments to consider physical constraints or limitations as part of a site's potential suitability. Each site will be assessed in terms of a range of physical constraints such as access, contamination, flood risk, hazardous risks, and potential impacts on nature, landscape and heritage features.
- 3.40 In accordance with the PPG sites in existing development plans or with planning permission will generally be considered suitable for development unless circumstances have changed which would alter their suitability. In this regard, sites with planning permission will therefore generally be considered as suitable unless there are strong reasons to believe that the permission would not be implemented, or where an application for renewal would, due to changing circumstances, be resisted.
- 3.41 In assessing suitability, information provided by site promoters will also be drawn upon and cross checked by the Council (e.g. using GIS mapping on key constraints, information from planning applications and discussions with Development Management colleagues dealing with applications or discussions with area regeneration/ Development Planning Officers).
- 3.42 The table below sets out the categories of sites that the Council will consider as 'suitable', 'potentially suitable', 'currently unsuitable' and 'not suitable'.

Table 5: Suitability categories and criteria

Database classification	Criteria and assumptions
Suitable - planning permission	All sites with a current planning permission will be considered suitable until the planning permission expires, at which point their suitability will be reassessed.
Suitable - expired planning permission	Sites with a recently expired planning permission, having been reassessed and meet the suitability criteria, will be considered suitable.
Suitable - allocated in adopted plan	Allocations in an adopted plan will be automatically considered suitable.
Suitable - no policy and/ or physical constraints	Sites which do not have planning permission and no policy or physical constraints will be considered suitable.

Database classification	Criteria and assumptions
Potentially suitable - physical constraints	Sites which do not have planning permission and minimal policy constraints but are subject to physical constraints e.g. ground conditions, access issues, flood risk (including climate change allowances), watercourses, priority habitats and species, contamination, designated heritage assets, existing uses, compatibility with adjacent uses, which are likely capable of being overcome will be considered potentially suitable.
Potentially suitable - allocated in emerging plan	Allocations in emerging plans will be considered potentially suitable.
Currently unsuitable - policy constraints	Sites which do not have planning permission and no major physical constraints. However, existing policy constraints e.g. Green Belt, housing proposals on designated employment land and open space mean that policy would have to be changed through the local plan review to enable the site to be suitable.
Not suitable	Not suitable sites include: • Isolated sites within the Green Belt*; • Sites significantly affecting ancient woodland, scheduled ancient monument(s), Sites of Special Scientific Interest (SSSI), Registered Parks and Gardens, Statutory Listed Buildings, National Nature Reserves (NNR), Local Nature Reserves (LNR), SINC, SLINC, Flood Zone 3. Where the minority of the site is covered by the above designation, or if site boundaries are redrawn to exclude such areas, these may be assessed in further detail; • Sites considered as inappropriate backland development

* Definition of isolated sites within Green Belt. This is intended to reflect paragraph 84 of the NPPF as interpreted by the Court of Appeal in *Braintree DC v SSCLG* [2018] EWCA Civ 610 (recently affirmed in *City & Country Bramshill Ltd v SSCLG* [2021] EWCA Civ 320). In the *Braintree* case the court said that this involves considerations of “whether [the development] would be physically isolated, in the sense of being isolated from a settlement”. In the context of Birmingham this will mean sites within the Green Belt which do not adjoin the settlement edge.

- 3.43 Sites which are promoted for inclusion in the HELAA but have been discounted because they are not considered suitable are clearly identified in Appendix 8.

Assessing availability

- 3.44 The PPG states that a site can be considered available for development, when, on the best information available there is confidence that there are no legal or ownership impediments to development (e.g. unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners). Any such issues are to be raised by the site promoter through the Council's Call for Sites process.
- 3.45 This approach is in accordance with the PPG which states that land will be considered available where it is controlled by a developer or landowner who has expressed an intention to develop. Where site promoters have indicated a timescale for when a site could be developed this has been recorded as being available at that point in time within the HELAA.
- 3.46 The existence of planning permission can be a good indication of the availability of sites. Where a site has planning permission, it will be assumed that the development will commence within the timescales of the planning permission unless clear evidence is provided which suggests otherwise.
- 3.47 Sites meeting the NPPF definition of 'deliverable' are considered available within five years unless evidence indicates otherwise. Sites with outline planning permission for major development, permission in principle, allocated in the development plan or identified on a brownfield register can be considered as deliverable where there is clear evidence that housing completions will begin within the first five years. Consideration will also be given to the delivery record of the developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions.
- 3.48 Based on the PPG, the table below sets out where the Council considers a site to be available for development or have a reasonable prospect of availability in the plan period.

Table 6: Availability categories and criteria

Database classification	Criteria and assumptions
Available for development	Sites considered available for development include: • sites under construction; • non-major developments with planning permission (both detailed and outline) • developments with detailed planning permission • outline planning permission for major development, permission in principle, allocated in the development plan or identified on the brownfield register and where there is clear evidence that housing completions will be begin on site within five years • sites submitted through Call for Sites where there are no legal or ownership impediments to development or where the landowner/promoter has advised that there is an agreement in place between the landowners that the site can come forward, such as a Memorandum of Understanding, letter or legal agreement. • Land controlled by a developer or landowner who has expressed an intention to develop • sites with expired planning permission or no consent where the landowner/ developer has confirmed availability, timeframe for delivery and no impediments to the site being delivered.
Reasonable prospect of availability	Sites considered as having a reasonable prospect of availability include: • outline planning permission for major development, permission in principle, allocated in the development plan or identified on the brownfield register • sites where the developer has indicated that ownership will be secured after 5 years or there is uncertainty when the site might become available • sites identified within an emerging or adopted masterplan/ framework as a development opportunity or area of change
Not available	Identified legal or ownership impediments to development.

Assessing achievability

- 3.49 The PPG states that “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 judgement 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.”
- 3.50 There are many factors that can impact upon the viability of a site, therefore, assessing achievability is challenging due to the complex factors at play and

fluctuations in the housing market. The suitability assessment criteria will also highlight potential development issues which may in turn impact on viability.

- 3.51 The PPG section on 'Viability' states that "Assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable. Plan makers can use site typologies to determine viability at the plan making stage. Assessment of samples of sites may be helpful to support evidence. In some circumstances more detailed assessment may be necessary for particular areas or key sites on which the delivery of the plan relies." Viability assessments carried out in preparation for the introduction of the Community Infrastructure Levy (CIL) in Birmingham in 2015 demonstrated that a substantial majority of typical residential schemes would be viable alongside the BDP policy requirements. Viability evidence has been updated to inform the Birmingham Local Plan Preferred Options Document and will be used to inform the preparation of future HELAAs.
- 3.52 Where no other information is available on the viability of sites, the assumption will be made that all sites will be achievable at a particular point in time unless otherwise indicated by individual landowners/ site promoters. Where additional evidence in relation to viability and achievability is available this will be recorded within the site assessment and used to assist in the assessment of achievability.

Timescales and rate of development

- 3.53 The information on suitability, availability, achievability and constraints will be used to assess the timescale within which each site is capable of development. The PPG states that the assessment may include indicative lead-in times and build out rates for the development of different scales of sites. Advice from developers and local agents will be important in assessing lead in times and build out rates.
- 3.54 Where possible, the developer's estimates of lead in time and build rates will be used. For all other sites, the lead in time and build rate assumptions tables 7 and 8 below will be applied. These assumptions are based on an assessment of historic delivery rates and, for larger residential sites, on Lichfields' Start to Finish research, as is explained in the section titled 'Sources of timescale and rate of development assumptions' below.

Table 7: Lead in* period assumptions for housing sites

Lead in time to first completion (monitoring years)

Site status		10-49 dwgs	50-99 dwgs	100- 199 dwgs	200- 499 dwgs	500- 999 dwgs	1,000- 1,999 dwgs	2,000+ dwgs
HELAA site** (lead-in time from submission of a planning application)	Apartments	3	4	4	4	4	4	4
	Houses	3	2	2	2	5	7	8

Site status		10-49 dwgs	50-99 dwgs	100-199 dwgs	200-499 dwgs	500-999 dwgs	1,000-1,999 dwgs	2,000+ dwgs
Full planning permission granted or reserved matters approval***	Apartments	2	3	3	3	3	3	3
	Houses	2	1	1	1	2	2	2
Outline planning permission granted***	Apartments	4	5	5	5	5	5	5
	Houses	4	3	3	3	3	3	3

* In this table 'lead in period' refers to the average number of monitoring years between the event specified in the first column and the first housing completions being recorded on site

** Lead in time in monitoring years, where the monitoring year in which a planning application is submitted is year zero

*** Lead in time in monitoring years, where the monitoring year in which permission is granted is year zero

Table 8: Build rate assumptions for housing sites

Build rate (dpa)*

	10-49 dwgs	50-99 dwgs	100-199 dwgs	200-499 dwgs	500-1,000 dwgs	1,000-1,999 dwgs	2,000+ dwgs
Apartments	24dpa	64dpa	138dpa	264dpa	264dpa	264dpa	264dpa
Houses	20dpa	33dpa	52dpa	68dpa	68dpa	112dpa	160dpa

* The average number of dwellings completed each year in the period from and including the year in which the first housing completion is recorded to the completion of the scheme

Sources of timescale and rate of development assumptions

3.55 For sites of fewer than 500 dwellings assumptions are based on an assessment of historic delivery rates. This is based on a sample of 93 residential and residential-led mixed-use developments delivered in the city over the 9 years since the start of the Birmingham Development Plan period (i.e. between 2011 and 2020). As the size of a site and type of housing often affects the rate at which it is built out, a range of site sizes were selected for assessment. The assessment analysed the following:

- Planning approval period. This is the time it took to obtain planning consent from validation of the planning application to the grant of permission. In the case of outline planning applications, the planning approval period is the period between the validation of the outline planning application and the approval of the first reserved matters consent which includes housing.

- Planning to delivery period. This is the period between the date of the grant of an implementable planning permission for housing (i.e. the date of grant of full permission or approval of the first reserved matters including housing) and the date on which the first housing completion is recorded on site.
 - Build period. This is the period from the date on which the first housing completion is recorded to the completion of the scheme.
 - Average build out rate. This is the average number of dwellings completed each monitoring year in the period from and including the monitoring year in which the first housing completion is recorded through to the completion of the scheme.
- 3.56 The assessment utilised housing completions data provided through annual land monitoring (at 1st April in each year). Consequently, the planning to delivery period and build period is expressed in monitoring years.
- 3.57 52 of the 93 sites reviewed comprised mainly or wholly apartments. The remaining 41 sites comprised mainly or wholly houses. All sites within Birmingham city centre comprised mainly or wholly apartments. However, there were also a significant number of apartment sites in the rest of the city, including mainstream homes, student accommodation and extra care/older persons' homes. The data showed the biggest difference in build rates was between sites for apartments and those for houses, rather than between sites in the city centre and those outside of the city centre. Although quicker to build out once started on site, sites for apartments had on average longer planning to delivery periods and marginally longer planning approval periods.
- 3.58 Very few recently built out housing permissions for sites greater than 500 dwellings were identified. Consequently, for sites of 500 dwellings or more national data is used from Lichfields' Start to Finish report, second edition February 2020. The Lichfields data is based on a sample of 180 sites across England but excluding London. The data includes mainly greenfield sites and doesn't distinguish between sites for apartments and those for houses, with the sample comprising mainly the latter. For this reason, the Lichfields report assumptions are only applied to sites for 500 or more houses and not to sites for 500 or more apartments. For apartment schemes of 500-999, 1,000-1,999 and 2,000+ units the historic delivery rates data for apartment sites 200-499 units in Birmingham are applied. This data is more representative of the build rates and lead-in times applicable to large sites for apartments in Birmingham. Build rate and lead-in time assumptions for housing sites of 1,000-1,999 are created using blended averages from Table 3 and Figure 4 of the Lichfields report, including all 26 sites of 1,000-1,999 dwellings analysed in that report. Lead-in times from the grant of outline planning permission for sites of 500+ houses are taken from Figure 3 of the Lichfields report.
- 3.59 Only a small proportion of applications considered in the analysis of historic delivery rates were submitted as outline planning applications. This reflects the fact that most sites in Birmingham come forward as full applications. In calculating lead in times for

HELAA sites which do not yet have planning permission it is therefore assumed that sites for fewer than 500 dwellings for houses and sites of all sizes for apartments would be submitted as full applications.

- 3.60 The results of the assessment of historic delivery rates are presented in Appendix 4.

Employment sites

- 3.61 Employment sites have been assessed under the same methodology as housing sites, but no assumptions have been applied in regard to lead in times and build out rates. This is because the existing portfolio of employment land set under policy TP17 of the BDP only requires a five-year rolling reservoir of 96 hectares of readily available employment land and there are no specific requirements for the delivery of employment sites beyond the initial five-year period. 'Readily available' sites are defined as 'committed employment sites with no major problems of physical condition, no major infrastructure problems and which are being actively marketed'. Such constraints are identified and considered through the suitability, availability and achievability assessment within this HELAA. Sites which are not deemed to be readily available are included in the 6+ year supply.
- 3.62 The HEDNA has reassessed the portfolio set by policy TP17 and recommends a new portfolio, as explained earlier in this report, and which has been proposed to be taken forward within policy EC1 of the Birmingham Local Plan Preferred Options Document. The new portfolio would constitute a rolling five-year reservoir of 67 hectares and an overall need over the plan period to 2042 of 295.6 hectares (increased to 322.56 hectares in Focused Preferred Options Document, to reflect the longer plan period to 2044).
- 3.63 The recommended new five year rolling reservoir is lower than the current BDP requirement due to factors such as changes in the economy and working practices, the reclassification of B1 uses to class E, and the recommendation of the HEDNA for a greater focus on delivering smaller sites to meet the needs of small and medium enterprises.

Stage 3: Windfall assessment

Background

- 3.64 The NPPF defines windfall sites as "sites not specifically identified in the development plan". For the purpose of this paper, windfalls are sites which have not previously been identified within the HELAA until such time as the time that detailed planning permission is granted.
- 3.65 The NPPF permits a windfall allowance in respect of residential development to be included in all of the HELAA's supply periods, including the first 5 years, where there is compelling evidence that they will provide a reliable source of supply. Allowances

must be realistic having regard to the HELAA, historic windfall delivery rates and expected future trends. Windfall rates are not applied to employment sites.

- 3.66 The windfall allowance represents a cautious approach based upon evidence from earlier SHLAAs and the Urban Capacity Assessment undertaken in 2011 that informed the preparation of the BDP.
- 3.67 The windfall allowance is kept under continuous review and Appendix 5 sets out the evidence and justification for the revised windfall assumptions. It examines the supply and development of windfall sites since 2001. Windfall sites above and below the minimum 0.06 hectare site size have been considered separately, to reflect that sites below this threshold are not included in the HELAA and will not therefore be duplicated.

The supply of windfall sites

- 3.68 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 unrealistic. Whilst every effort is made to undertake a comprehensive assessment as possible when undertaking the HELAA it is inevitable that opportunities will have been missed. In 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. These opportunities can be very difficult to foresee in the short term, let alone ten or fifteen years in advance.
- 3.69 Reflecting this, Birmingham has a long 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 2011 and 2025, 24,077 windfalls received planning permission; an average of 1,720 per annum. In the same period 18,969 windfall dwellings were completed at an average of 1,355 per annum. The rate at which windfalls are brought forward and developed will continue to be monitored on an annual basis.
- 3.70 Sites which come forward as permitted development (mainly but not exclusively) from the change of use of offices (B1a/class E) to residential, are counted as windfalls where these have not previously been identified in the HELAA. In 2024/25 notification was received for 291 dwellings to be created from such conversions.
- 3.71 Some windfall sites receive planning permission and are developed in the same year and are therefore never included within a HELAA. This can particularly happen where smaller builders or self-builders are involved.

Windfall sites below the site size threshold

- 3.72 It is assumed that small windfall sites below the 0.06ha threshold will continue to be brought forward and developed throughout the period covered by the HELAA.

- 3.73 Typically, these small sites include flats above shops, the subdivision 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. No allowance is made for windfalls on garden land.
- 3.74 Table A5.3 of Appendix 5 shows the annualised windfall assumptions on small sites. From that table the following anticipated windfall provision on small sites has been determined.

Table 9: Smaller Sites (<0.06ha) Windfall Allowance

Time Period	Annual Contribution (Dwellings)	Period Contribution (Dwellings)
Short Term – Within 5 years	50*	200*
Medium Term – Years 6 to 10	75	375
Longer Term – Beyond 10 years	100	900**

*Assumes no windfalls in year 1

**Covers the final 9 years of the forthcoming Birmingham Local Plan period (2034-2044)

Windfall sites above the site size threshold

- 3.75 Although the HELAA provides 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.
- 3.76 The annualised assumptions with regard to the rate at which windfall dwellings will be developed is set out in Table A5.3 of Appendix 5. The windfall assumption has been slightly increased from previous years but still represents a conservative estimate and it is highly likely that the windfall assumptions will continue to be exceeded.

Table 10: Larger Sites (>=0.06ha) Windfall Allowance

Time Period	Annual Contribution (Dwellings)	Period Contribution (Dwellings)
Short Term – Within 5 years	400*	1,600*
Medium Term – Years 6 to 10	500	2,500
Longer Term – Beyond 10 years	600	5,400**

*Assumes no windfalls in year 1

**Covers the final 9 years of the forthcoming Birmingham Local Plan period (2034-2044)

The housing potential of broad locations

- 3.77 The PPG states that broad locations should be included in the HELAA 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.

- 3.78 This HELAA has sought to identify specific development opportunities rather than broad locations. The emerging Birmingham Local Plan does identify broad locations in the form of Growth Zones and where sites are proposed for allocation in these locations (or anywhere else) they have been included as individual sites in the HELAA.
- 3.79 Further opportunities may well come forward during the plan period and these will be accounted for in the windfall allowance. This approach conforms to paragraph 023 (Reference ID: 3-023-20190722) of the PPG and paragraph 75 of the NPPF.

Stage 4: Assessment review

- 3.80 Following completion of the assessment of sites, the findings are presented to show the development potential of sites considered through the land availability assessment (See Section 4 of this document). The assessment is used to provide an indicative trajectory.
- 3.81 Where it is concluded that insufficient sites/ broad locations have been identified to meet local housing need the assessment will be revisited as per the PPG, for example by carrying out a further call for sites or changing assumptions about the development potential. The Council will continue to identify further sites where possible and the HELAA will be updated and published annually.

Non-implementation rate

- 3.82 Although the PPG does not specify the application of lapse or non-implementation rates, it says that “an overall risk assessment should be made as to whether sites will come forward as anticipated.”
- 3.83 An assessment has been undertaken of non-implementation rates on planning consents since the beginning of the BDP plan period (2011). Table 1 shows the total number of approved dwellings in each year and the number which were not implemented. It covers the period up to the 2021/22 monitoring year as this is the most recent time period that recently expired planning permissions will have been approved.
- 3.84 The percentage of expired dwellings varies from just over 1% of consents granted in 2013/14 to over 28% in 2011/12. Overall, between 2011/12 and 2020/21, 11% of consented dwellings were not implemented.

Table 11: total approved new dwellings and total expired dwellings 2011/12 – 2021/22.

Year	Total approved	Total expired	Expired %
2011/12	5,319	1,507	28.3%
2012/13	5,791	828	14.3%
2013/14	5,561	72	1.3%
2014/15	6,155	549	8.9%

Year	Total approved	Total expired	Expired %
2015/16	9,071	1,042	11.5%
2016/17	5,783	497	8.6%
2017/18	6,989	242	3.5%
2018/19	6,627	255	3.8%
2019/20	7,214	944	13%
2020/21	11,784	1,849	15.7%
2021/22	9,648	1,584	16.4%
Total	79,942	9,369	11.7%

- 3.85 When the HELAA methodology was consulted on in 2021, a lapse rate of 12% was recommended based on the monitoring available at that time and that rate has been applied to the 2025 HELAA. During the latest monitoring year 16.4% of consented dwellings were not implemented, and this brings the overall average lapse rate to 11.7%. It therefore appropriate to continue to apply a lapse rate of 12%. Lapse rates will continue to be monitored on an annual basis and should there be continuing trend above or below 12%, the HELAA lapse rate may be revised.
- 3.86 The 12% lapse rate discount is applied to the following types of site:
- sites with outline planning consent; and
 - other opportunity sites across the city.
- 3.87 The discount is not applied to detailed planning consents or to allocated sites, as there is a greater degree of confidence in their delivery. No lapse rate assumption is applied to employment sites as Policy TP17 of the BDP only requires a five-year rolling reservoir of 96 hectares of employment land to be maintained, so performance is measured against that shorter term target.

Stage 5: Final evidence base

- 3.88 The core outputs of the assessment are:
- a list of all sites or broad locations considered, with their locations shown on maps within the site schedules in the appendix;
 - an assessment of each site or broad location, including:
 - where these have been discounted, evidence justifying reasons given;
 - where these are considered suitable, available and achievable, the potential type and quantity of development, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome;
 - an indicative trajectory of anticipated development based on the evidence available.
- 3.89 Upon completion, the Council publishes the HELAA and updates it periodically (usually annually) using the most up to date information available.

- 3.90 The Council presents the identification of a five-year housing land supply through a separate paper entitled “Housing Land Supply Position Statement” and not through the HELAA itself.

4. Final evidence base

- 4.1 In total 865 sites have been identified through the HELAA process comprising 799 for residential development and 66 for employment development. Between 2020/21 and 2024/25, 18,718 dwellings and 74.42 hectares of employment land have been completed. Tables 12 – 15 summarise the conclusions of the assessment and details the housing land supply position at 1st April 2025 while Tables 16 – 19 summarise the employment land supply position.

Table 12: Housing land supply by category 2025

Category	Dwellings
Under Construction	19,955
Detailed Planning Permission (Not Started)	10,814
Outline Planning Permission	13,396
Permitted Development (office, retail, agricultural to residential)	246
Permission in Principle	8
Allocation in Adopted Plan	6,530
Allocated in Draft Plan	39,693
Other Opportunity (including suitable call for sites submissions)	4,186
Sub Total – identified sites	94,828
Lapse rate -12% (applied to outline consents and other opportunity)	-2110
Sub Total – Identified Sites minus lapse rate	92,718
Windfall Allowance (unidentified sites x18 years. No windfalls in year 1)	10,975
Total Capacity	103,693

Table 13: Summary housing land supply 2025

	Dwellings
HELAA Capacity 2025	103,693
Completions 2020/21-2024/25	18,718
Total Capacity 2020-2042	122,411

Table 14: Housing land supply by period

Time Period	Identified Supply	Unidentified Supply	Total
0 to 5 Years	33,105	1,800	34,905

Time Period	Identified Supply	Unidentified Supply	Total
6 to 10 Years	40,667	2,875	43,542
11 to 15 Years	17,730	3,500	21,230
16+ Years	3,326	2,800	6,126
Total	94,828	10,975	105,803

*N.B. the figures in this table do not include the 12% lapse rate, which is applied to the figures in tables 12 and 13.

Table 15: Housing land supply by planning status by supply period

Category	0 to 5 Years	6 to 10 Years	11 to 15 Years	16+ Years	Total
Under Construction	19,955	0	0	0	19,955
Detailed Permission (Not Started)	10,814	0	0	0	10,814
Outline Permission	0	9,115	2,968	1,313	13,396
Permitted Development	246	0	0	0	246
Permission in Principle	0	8	0	0	8
Allocation in Adopted Plan	2,090	2,791	1,649	0	6,530
Allocated in Draft Plan	0	24,795	12,885	2,013	39,693
Other Opportunity	0	3,958	228	0	4,186
Total – Identified Sites	33,105	40,667	17,730	3,326	94,828
Unidentified Sites (Windfalls)	1,800	2,875	3,500	2,800	10,975
Total HELAA	34,905	43,542	21,230	6,126	105,803

*N.B. the figures in this table do not include the 12% lapse rate, which is applied to the figures in tables 12 and 13.

Table 16: Employment land supply by category

Category	Hectares
Under Construction	28.36
Detailed Planning Permission (Not Started)	16.39
Outline Planning Permission	51.9
Allocation in Adopted Plan	5.26
Allocated in Draft Plan	35.17
Other Opportunity (call for sites submissions)	2.89
Total Capacity	140.23

Table 17: Summary employment land supply

	Hectares
HELAA Capacity 2024/25	140.23
Completions 2020/21- 2024/25	74.42
Total 2020 – 2042	214.65

Table 18: Current Portfolio of Readily Available Employment Land (measured against BDP Policy TP17)

Policy TP17 Portfolio of Employment land	Land Requirements	2025 Supply
Regional Investment Sites	No requirement	18.77 hectares
Best Quality Land (10+ hectares in size)	60 hectares	73 hectares
Good Quality Land (0.4 – 10 hectares in size)	31 hectares	44.88 hectares
Other Quality Land (less than 0.4 hectares in size)	5 hectares	3.58 hectares

Table 19: Current Portfolio of Readily Available Industrial Land (measured against BLP Preferred Options proposed policy EC1)

Proposed Policy EC1 Industrial Land Provision	Land Requirements	2025 Supply
10+ hectare sites	22.4 hectares	73 hectares
2.4 to 10 hectare sites	22.4 hectares	40.54 hectares
1 to 2.4 hectare sites	11.2 hectares	14.41 hectares
Less than 1 hectare sites	11.2 hectares	12.28 hectares

Appendix 1: HELAA Methodology Consultation Responses

Respondent	Summary of Comments	BCC response and how issues have been addressed in the methodology
Scottish & Southern Electricity Networks	Ascertain whether SSEN's network will be affected by site proposals. Records of SSEN's cable records are available via Linesearch.	The suitability of sites has been considered against National Grid network maps, OS Points of Interest and OS Utilities to identify utility infrastructure for the urban capacity/HELAA work. Linesearch will be referred to when taking sites forward in the plan-making process. SSE are already on our consultation database and so will continue to be notified at key stages of plan production.
Natural England	Bespoke feedback not provided, but generic advice on natural environment considerations for HELAAs is as follows: Landscape: assessment should be informed by the landscape character approach and should take account of cumulative, direct/indirect and short/long term impacts. National Character Area (NCAs) profiles provide useful information. NCAs inform Landscape Character Assessments (LCAs) which identify different landscape elements and give a place its unique character. More detailed study of landscape sensitivity and capacity may be necessary, particularly within or near protected landscapes. NCA profiles and LCAs identify potential opportunities for restoration and enhancement through development. Designated biodiversity sites: impacts can be cumulative (e.g. due to multiple HELAA sites), direct/indirect and short/long term. Indirect impacts can be assessed by understanding pathways that may exist between HELAA and sensitive sites, e.g. SSSI Impact Risk Zones. Magic website and Local Environmental Records Centres provide useful sources of data on designated sites.	More detailed assessments will be required if sites are proposed to be taken forward for allocation. This will need to include consideration of landscape character, capacity and sensitivity and will draw from information provided by NCAs and LCAs. No change to methodology. Designated biodiversity sites are shown as features that will affect the suitability of sites in appendix 2 of the methodology. The cumulative impacts of multiple development sites and the ecological networks/connections between designated sites will be considered through further assessment in the plan-making stages. This will involve engagement with the council's ecological officers and external organisations including Natural England and the Wildlife Trust and will draw from any further data sources such as those that you have highlighted. No change to methodology

Respondent	Summary of Comments	BCC response and how issues have been addressed in the methodology
	Priority habitats, protected species and ecological networks: Information available via UK BAP priority species and habitats and Standing advice for protected species, Nature on the Map and Local Records Centres. Watercourses, old buildings, significant hedgerows & trees provide potential habitats for protected species. Connectivity between habitats across landscapes is a key principle of ecological networks (e.g. river corridors). Phase 1 Habitat Surveys may also be required to appraise the biodiversity value of any potential development site. Restoration/re-creation of habitats, recovery of priority species and biodiversity enhancement: Potential allocations in the environs of Nature Improvement Areas (NIAs) should consider the potential to contribute to habitat enhancement. Local Biodiversity Action Plans (LBAPs) identify the local action and targets to deliver UK targets for habitats and species. Green Infrastructure: The HELAA should consider the availability of GI and opportunities to enhance GI networks. Designated geological sites: Nature on the Map, Local Environmental Records Centres and Natural England's Geodiversity webpage are useful sources of information. Consider potential for development to enhance geological sites e.g. exposure sites in road cuttings. Best and Most Versatile Agricultural Land: Agricultural Land Classification (ALC) maps available via MAGIC. Detailed field survey may be required to inform decisions about specific sites. Public rights of way and accessible natural green space: adverse impacts on National Trails and public rights of way to be avoided. Opportunities to maintain and enhance networks and add new links should be considered. Appropriate quantity/quality of green space to be provided through development. Natural England's Accessible Natural Greenspace Standard (ANGSt) may be useful in planning for future provision.	Priority species and habitats will be considered through the assessment as sites containing these will require further assessment through an ecological survey. All of Birmingham is a Nature Improvement Area. As this relates to allocations it is more appropriate to consider it within the plan-making stages rather than in the HELAA. No change to methodology. GI opportunities will be considered through the plan-making process. No change to methodology. Designated geological sites (e.g. SSSIs, LNRs and NNRs) are already included under the natural environment criteria. Potential enhancements are most appropriately considered within the more detailed work at the plan-making stages. No change to methodology. Only Grade 3 areas fall within Birmingham and these are largely in the Green Belt. This is therefore more appropriate to consider through detailed assessment at the plan-making/site selection stages. No change to methodology. Green space opportunities will be considered through the plan-making process. No change to methodology.

Respondent	Summary of Comments	BCC response and how issues have been addressed in the methodology
Environment Agency	Flood Risk: The 'Potentially Unsuitable' section of Table 5 should be updated to include climate change as a factor which may limit development suitability. Climate change allowances have been updated and these should be taken into account. The 'Not Suitable' section currently lists only flood zone 3. This should be updated to the 1 in 100 year plus climate change. Table 5 Sustainability categories and criteria should be updated to account for the impact that easements from watercourses can have on development. Development should be located at least 8m but ideally 20m away from the banks of the nearby watercourse to allow for the free flow of water, the maintenance of a green corridor and allow for access for maintenance. Appendix 2: Flood zone 2 risk should be amended from low/medium to medium. A section should be added to fully explain the impact that flood risk can have on where and to what scale development can safely take place, taking into account; the sequential approach; mitigation measures including floodplain compensation; safe access and egress during a flood event; the extent of the 1 in 100 year event plus climate change.	Following further discussion with the EA, it was agreed that sites falling within areas covered by the climate change allowance can be considered under the 'potentially suitable – physical constraints' category so that potential mitigation can be considered further in the next stages of plan-making. Table 5 amended to include 'flood risk <u>(including climate change allowances)</u>'. As above, it has been agreed with the EA that climate change allowances can be considered within the 'potentially suitable – physical constraints' category rather than the 'not suitable' category Table 5 amended to refer to watercourses. The specific width of the easements to be considered through more detail assessment. Change made. This is a higher level of detail than can be covered by the HELAA. It is more appropriate to address these points through the plan-making process. No change to methodology.
Council for British Archaeology, West Midlands	3.19 – refer to the Historic Environment Record as a potential environmental constraint. 3.28 – the statement that “yields may also be affected by issues not evident at the time a site assessment is undertaken” is welcomed. 3.36 – “natural and heritage conservation” should be replaced by “conservation and enhancement of the natural and historic environment” (bullet point 4).	Amendments have been made to Appendix 2 to recognise historic environment constraints which may be identified through the Historic Environment Record. Noted. No change. Para 3.36 is consistent with the PPG.

Respondent	Summary of Comments	BCC response and how issues have been addressed in the methodology
	3.40 – “Not suitable” bullet point 2 should say “designated heritage assets (scheduled monuments, listed buildings and registered parks and gardens)” and should refer to impacts on the setting of designated heritage assets. Appendix 2 – Site Assessment Criteria; Historic environment designations should also mention the setting of a heritage asset. Also, Appendix 2, amend text as follows; “It is acknowledged that detailed site investigations may reveal non-designated historic environment constraints heritage assets which may require mitigation.” It should also mention heritage assets which are currently unidentified or whose significance is not known. Historic environment impact: it is incorrect to say that the historic environment impact is “None” simply because the site has no designation. Detailed site investigations may reveal non-designated heritage assets. Setting of a heritage asset also needs to be included.	Table 5 in para 3.40 has been amended to include statutorily listed buildings as suggested. The impact on the setting of heritage assets will be considered at the detailed assessment stage. Appendix 2 has been amended as suggested. The methodology already acknowledges that non-designated heritage assets may be revealed, which may require mitigation. Appendix 2 has been amended to include an ‘unknown impact (further site investigation required)’ category. The impact on the setting of heritage assets will be considered at the detailed assessment stage.
RPS on behalf of Midlands Land Portfolio Ltd (Severn Trent Water) and Sutton Coldfield Charitable Trust	Most comments do not raise any concerns. Only those that raise concerns or propose changes are summarised below: Stage 2 - Estimating development potential: content with proposed approach provided that the assumptions are only applied where a landowner /promoter does not indicate quantum of development. Availability: suggest adding to the ‘Available for development’ category: <i>Sites in multiple landownerships where the landowner/promoter has advised that there is an agreement in place between the landowners that the site can come forwards, such as a Memorandum of Understanding, letter or legal agreement.</i> Achievability: agree but suggest the Council takes a view on a site-by-site basis as to whether there are likely to be viability issues.	Stage 2 - Estimating development potential - Support noted. No change to methodology. Related wording has been added to Table 6 Site specific viability issues will be considered where information is available. No change to methodology.

Respondent	Summary of Comments	BCC response and how issues have been addressed in the methodology
	Timescales and rate of development: agree with proposed approach and suggest that information provided by landowner/promoter about when a planning application could come forward is also used to inform timescales.	The consulted methodology already states that any information provided by the landowner/ promoter will be used to inform timescales. (Paras 3.49 and 3.50 in the Draft Methodology). No change to methodology
Canal & River Trust	The Trust has no comment to make.	Noted.

South Staffordshire District Council	Only comments that raise concerns or propose changes are summarised below: Identifying sites/broad locations (3.9 – 3.14): broadly support approach but further information required on how opportunities will be identified to intensify housing supply in the City's urban area to self-contain the 35% urban uplift to its housing need rather than exporting it. Unmet needs could place pressures on Green Belt in the City and the wider HMA, creating uncertainty that non-Green Belt land supply will truly be maximised prior to concluding that exceptional circumstances exist. The City Council should engage with wider GBHMA authorities on this, including how methods such as the National Model Design Code will be used.	Table 1 of the methodology identifies the sources of sites for assessment. The sources of sites accord with the guidance in Planning Practice Guidance paragraph 011 Reference ID: 3-011-20190722. Additionally, Birmingham City Council instructed consultancy company Urban Intelligence to undertake a city-wide digital review of all potential housing land sites. This uses geospatial analysis software to augment site identification by traditional methods as detailed in the HELAA methodology. The section of part 2 of the National Model Design Code (NMDC) you cite identifies several options for making more efficient use of land. We comment on the relevance of these to the HELAA methodology in turn below: • Co-locating higher density housing with shops, services and public transport nodes. The potential for this is reflected in the application of a higher density assumption for urban centres and the city centre than is specified in current planning policy. • Coding for the intensification of lower density areas. This is a potential future policy approach but is not a matter for the HELAA methodology. • Providing larger green/open space rather than multiple small strips. Council-owned land is included as a site source as is the large-scale redevelopment of existing residential areas. This would include open spaces. Open space designations and open space impacts are listed among the site assessment criteria in Appendix 2. The configuration of open space provision within individual sites is a detailed site design matter that is beyond the level of detail into which the HELAA can reasonably go. • Consolidating or building over surface car parks. Council-owned car parks will be considered alongside other council land as detailed in Table 1. Non-council owned car parks would only be included if falling within one of the categories of site listed in Table 1.
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Respondent	Summary of Comments	BCC response and how issues have been addressed in the methodology
	Suitability, Availability and Achievability assumptions (3.34 – 3.48): greater clarity required on what would constitute an “isolated” site within the Green Belt.	A definition of isolated sites within the Green Belt is provided in the final methodology. This is intended to reflect paragraph 80 NPPF as interpreted by the Court of Appeal in <i>Braintree DC v SSCLG</i> [2018] EWCA Civ 610 (recently affirmed in <i>City & Country Bramshill Ltd v SSCLG</i> [2021] EWCA Civ 320). In the <i>Braintree</i> case the court said that this involves considerations of “whether [the development] would be physically isolated, in the sense of being isolated from a settlement”. In the context of Birmingham this will mean sites within the Green Belt which do not adjoin the settlement edge. No change to methodology.

	Lead-in time and Build Rate assumptions (3.49 – 3.57): the build rates for large housing sites of 500+ and 1000+ dwellings rely too heavily on national averages in the Lichfields ‘Start to Finish’ report and have no regard to the local property market in Birmingham. Langley SUE is projected to deliver 3,042 homes over 15 years, implying a minimum 202 dwellings per annum (DPA) average build out rate. This will likely be even higher once lead-in times are factored in. North Worcestershire Golf Club capacity of 800 dwellings is projected to be delivered in the next 10 years; a 2 year lead-in time implies a 100 DPA build rate. The delivery rates for both sites appear broadly consistent with the previous BDP evidence base which indicated an anticipated range of 47-62 DPA per sales outlet. This suggests delivery on 500+ dwelling housing sites will outpace the assumptions given in the Lichfields report. The Lichfields report suggests that large-scale greenfield sites achieve a 34% higher build rate on average than brownfield sites of a similar size. Taking all of the factors above together, we strongly suggest that the build rates for 500+ and 1000+ home schemes should be revisited, with a focus on sales rates per outlet and outlets-per-site, supported by engagement with developers and Statements of Common Ground. The 7 year lead-in time period for 1000+ housing sites can be brought down significantly through early-years phasing and upfront work in advance of any planning application, which can take place prior to allocation through the updated BDP. Use site-specific delivery trajectories to seek to shorten this lead-in time wherever possible.	In the absence of local data sufficient to generate robust build rate assumptions the use of national level data is a reasonable approach. Basing assumptions on a very small number of local sites risks those assumptions being heavily influenced by site-specific factors. Three principal national data sources on build rates exist, of which the most comprehensive is the Lichfields report used as the basis for the large site assumptions in the draft methodology. The appendix to the preliminary report of the Letwin <i>Independent review of build out</i> was based on a smaller number of very large sites, while Savills’ 2019 <i>Planning and housing delivery</i> research was also based on a smaller sample. Trajectories for specific sites will continue to be based upon information supplied by developers where this is available, as is explained in para 3.50 of the methodology. However, it is necessary to generate assumptions for use in the absence of such site-specific information. The site-specific trajectories provided by the developers/landowners of the Langley SUE and former North Worcestershire Golf Club, while appropriate trajectories for those sites, are not considered to be generalisable to all large sites. We note and are familiar with the alternative suggested approach of using the published results of national PLC housebuilders to generate averages for completions per sales outlet and combining these with assumptions for the number of outlets on site. However, this approach is overly sensitive to the number of sales outlets assumed and there is no clear basis, beyond ‘rules of thumb’, for determining how many sales outlets will be provided on a site. This weakness is acknowledged in Appendix 1 of the 2013 PBA report, to which you refer. PBA estimate the number of outlets possible on each site based on constraints, but concede “in practice, the number of likely outlets at each development area is not likely to be limited by factors such as highway access, but instead by developers’ judgements about the number of housing sites which could be built out simultaneously”. The estimates of delivery rates used in the PBA report of 47-62 DPA per outlet were 2012 (report publication
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Respondent	Summary of Comments	BCC response and how issues have been addressed in the methodology
		date Jan 2013) projections for what might happen in the recovery from the global recession. There is no justifiable basis for using this outdated information today. For these reasons, overall, your suggested approach is not considered to present a more robust basis for generating built rate assumptions than the real world Lichfields data. While house prices on the Birmingham urban periphery are relatively strong within the West Midlands, they are not high in comparison with averages for the South East, East, and South West of England regions which contribute the bulk of the sites in the Lichfields sample. House prices in Birmingham therefore do not create a clear basis for rejecting the applicability of the national data. Notwithstanding the above, in response to your comments, in the final methodology we have added an additional category for sites of 2,000+ units, for which a build rate of 160dpa is used based on the Lichfields data. This allows the likely higher build rates of very large sites to be better reflected in the methodology. We note and agree with your comment that site-specific trajectories agreed with developers/landowners for large sites will likely supersede an assumptions-based approach at the site allocation stage.

Respondent	Summary of Comments	BCC response and how issues have been addressed in the methodology
	Windfall allowances (3.79 – 3.81) & Non-implementation rates (3.86 – 3.90): It is a concern that paragraph 3.81 suggests that windfalls will likely exceed the allowances set out due to changes to permitted development rights. This suggests that the HELAA will underestimate delivery from these sources. Also query the necessity of a non-implementation rate. The BDP was found sound without any such discount and appears to have underestimated the city's true supply. National policy does not impose the use of non-implementation rates and requires authorities to maximise their supply rather than discount it. This would also be contrary to the latest published GBHMA position statement. Next steps (Duty to Co-operate): the GBHMA-wide evidence base needs to be updated to sustainably distribute additional housing shortfalls. The HELAA methodology should be amended in line with the above and mechanisms for sustainably distributing any resulting unmet housing needs should be clarified, including alignment with future sustainable transport infrastructure investment plans.	It is not possible at this stage to estimate the likely supply contribution of the changes to The Town and Country Planning (General Permitted Development) Order 2015 (as amended) which came into effect on 1 August 2021. Although there has been considerable speculation about the extent of likely take up of these new PD rights, there is no data on which to base a robust assumption. As monitoring data becomes available over the next few years it may be possible to incorporate this source into future supply assumptions. As is explained in paragraph 3.90 of the draft methodology a non-implementation rate will not be applied to sites which are within the 5-year housing land supply (and therefore meet the NPPF definition of deliverable). A non-implementation rate will similarly not be applied to site allocations. However, as set out in paragraph 3.89 of the draft methodology a non-implementation rate will be applied to 'developable' sites with outline planning permission which are not expected to deliver housing within the 5-year period and to other identified opportunity sites which do not have planning permission. The application of a local-data-based non-implementation assumption will ensure that estimates of potential delivery from these sources are realistic and prudent. No change to methodology. We welcome your suggestion that we continue discussions on strategic matters with cross-border implications. These matters relate to future plan-making and spatial strategy and go beyond the scope of the HELAA methodology. No change to methodology.

Respondent	Summary of Comments	BCC response and how issues have been addressed in the methodology
St. Modwen Properties Ltd.	Only comments that raise concerns or propose changes are summarised below: Stage 1 – Identification of Sites and Broad Locations: The assessments of sites and broad locations will be fundamentally flawed unless it takes into account the wider needs of the HMA. Assessment should be holistic, including the constraints placed by Green Belt. The methodology should be split into urban capacity/delivery of sites within current settlement boundaries. The findings of this will reveal a shortfall of land, which then combined with the HMA shortfall will indicate a need to assess greenfield releases and further collaborative working. When reporting on sites the source of the site should be noted as it relates to deliverability. It needs to be understood whether owners have been contacted and whether sites are available and deliverable. Stage 2: Site/broad location assessment: Table 4 gross/net ratio standards should include a further category 10+ Hectare urban expansion sites with a 70% ratio as these typically require greater green infrastructure and community use provision, unless site specific evidence is provided to suggest otherwise. Table 6 should include a category for unallocated or unconsented sites that are controlled by developers and there is a stated intention to bring the site forward for development and will be supported by the Local Authority. In assessing availability on land allocated or consented which has not yet started, consideration needs to be given to representations made from landowners or those with a legal development related interest in the land.	The Council will continue to work with the wider HMA through the duty to co-operate on strategic cross boundary matters. No change to methodology. The HELAA will assess the availability, suitability and achievability of land within the local planning authority's area taking a 'policy off' approach. The site source will be reported as in the approach. Availability and deliverability form part of the assessment. No change to methodology. Agree, additional category for 10+ hectare sites has been included with a 70% ratio. The following wording has been added to Table 6 as an example of sites submitted through Call for Sites where there are no legal or ownership impediments to development. 'Sites in multiple landownerships where the landowner/promoter has advised that there is an agreement in place between the landowners that the site can come forwards, such as a Memorandum of Understanding, letter or legal agreement. Land controlled by a developer or landowner who has expressed an intention to develop.' The methodology already states in para. 3.43 that the assessment of availability will therefore be informed by information supplied by the landowner/ developer where available. No change to methodology.

Respondent	Summary of Comments	BCC response and how issues have been addressed in the methodology
	Para 3.85 – changes to Green Belt boundaries should be informed by discussions with neighbouring local authorities and this must be evidenced through the Statement of Common Ground.	Noted. These matters relate to future plan-making and spatial strategy and go beyond the scope of the HELAA methodology. No change to methodology.
Friends of Hill Hook Local Nature Reserve	The methodology fails to recognise the need for integrating environmental protection and the active management of remaining recreational green spaces to maximise biodiversity. The focus of the flow chart on ‘overcoming constraints’ means that ecological and biodiversity value/potential value of a site will likely be understated or ignored. Input should also be obtained from organisations such as the Wildlife Trust and local Friends’ groups to add evidence about a site’s ecological value and biodiversity. Green space benefits such as flood water management and health and wellbeing must be explicitly recognised in site assessments. The methodology should ensure that designated environmental assets such as SSSIs, NNRs, Local Nature Reserves (LNRs), SINCS and SLINCS have ‘absolute constraints’ against any proposed development.	These matters relate to future plan-making and spatial strategy and go beyond the scope of the HELAA methodology. No change to methodology. Environmental designations and impact on open space will be taken into in the assessment of sites. No change to methodology. The HELAA will be publicly available and the Council will engage with local residents and a wide range of stakeholders and organisations on the preparation of the local plan. No change to methodology. The methodology has been amended to state that the following sites will be considered unsuitable for development: Isolated sites within the Green Belt; Sites significantly affecting statutorily listed buildings, ancient woodland, scheduled ancient monument(s), Sites of Special Scientific Interest (SSSI), Registered Parks and Gardens, National Nature Reserves (NNR), Local Nature Reserves (LNR), SINC, SLINC, Flood Zone 3. Where the minority of the site is covered by the above designation, or if site boundaries are redrawn to exclude such areas, these may be assessed in further detail.
Historic England	We strongly recommend that advice should be sought from your Conservation Officer and Archaeological advisor. A wide definition of the historic environment should be used. This includes not only designated assets but also those which are locally valued and important. The historic environment also includes landscape and townscape and archaeology, which can often be unknown and may extend beyond designated areas.	Advice has and will continue to be sought from our Conservation Officer and Archaeological advisor. The methodology recognises and takes account of non-designated heritage assets.

Respondent	Summary of Comments	BCC response and how issues have been addressed in the methodology
	The Historic Environment Record (HER) may indicate areas of known interest or potential where further assessment is required. The possible harm resulting from the cumulative impacts of a number of sites should also be considered. Historic England Advice Note 3 advocates steps for site assessments, including understanding contributions an existing site makes to a heritage asset/s significance and what impact an allocation might have on this. Advice on “Managing Significance in Decision-Taking in the Historic Environment” will be useful for understanding impacts on the setting of heritage assets. This should not use distance-based criteria as a more holistic process is required which seeks to understand significance and value. If a site which affects heritage assets is pursued as a preferred site, we would expect to see reference in ensuring policies/supporting text on the need to conserve and seek to enhance the affected heritage assets and their setting. This should assist decision makers and developers and might include requirements such as high quality design. Sites that would have an unacceptable impact on the significance or special interest of heritage assets should not be taken forward.	Amendments have been made to Appendix 2 to recognise historic environment constraints which may be identified through the Historic Environment Record. The cumulative impacts of multiple development sites will be considered through further assessment in the plan-making stages. Historic England advice will be considered in undertaking the assessment. Historic England advice will be considered in undertaking the assessment. This is noted and will be taken into account when developing the plan policies. Agree. Table 5 of the methodology sets out sites that will not be suitable.

Appendix 2: Site assessment criteria

Site Reference Number
Address
Gross Site Area (Ha)
Net developable area (Ha)
Density rate applied (where applicable) (dph)
Capacity (dwellings/ floorspace sqm)
Timeframe for development - 0-5 years (no. of dwellings/ floorspace sqm) - 6-10 years (no. of dwellings/ floorspace sqm) - 11-15 years (no. of dwellings/ floorspace sqm) - 16+ years (no. of dwellings/ floorspace sqm)
Ownership - Birmingham City Council (BCC) - Non-BCC - Mixed
Developer Interest (if known)
Greenfield/ Brownfield/ Mix
Planning Status - Under construction - Detailed Planning Permission - Outline Planning Permission - Permitted Development to residential - Allocated in adopted plan - Allocated in draft plan - Other opportunity in BDP Growth Area - Other opportunity
Status further details 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)
Last known use The broad land use category which the site was last known to be in.
Year added to HELAA
Call for Sites Submission – Y/N
Suitability criteria:
Green Belt - Y/N
Accessibility by public transport - Zone A – Very high to high accessibility - Zone B – High accessibility - Zone C – Medium to low accessibility This is based on a model of accessibility to public transport by the Birmingham population.
Flood risk - Zone 1 - little or no risk - Zone 2 – medium risk - Zone 3 – high risk (discount unless mitigation can be introduced)

Natural environment designations Does the site include 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 non-designated natural environment constraints which may require mitigation.
Natural environment impact* - None (site has no designation) - Unknown (further site investigation required) - No adverse impact - Strategy for mitigation in place (e.g. planning permission) - Strategy for mitigation proposed (e.g. adopted or emerging plan/ SPD/ framework) - Adverse impact but mitigation measures are available - Adverse impact with no or limited potential for mitigation
Historic environment designations Does the site include a statutorily listed building, conservation area, locally listed building, Scheduled Ancient Monument (SAM), Historic Park & Garden? The site assessment has only considered historic environment designations. It is acknowledged that detailed site investigations may reveal non-designated heritage assets (such as those on the Historic Environment Record) which may require mitigation.
Historic environment impact* - None (site has no designation) - Unknown (further site investigation required) - No adverse impact - Strategy for mitigation in place (e.g. planning permission) - Strategy for mitigation proposed (e.g. adopted or emerging plan/ SPD/ framework) - Adverse impact but mitigation measures are available - Adverse impact with no or limited potential for mitigation
Open space designations Is the site affected by an open space designation?
Open space impact* - None (site has no designation) - Unknown (further site investigation required) - No adverse impact - Strategy for mitigation in place (e.g. planning permission) - Strategy for mitigation proposed (e.g. adopted or emerging plan/ SPD/ framework) - Adverse impact but mitigation measures are available - Adverse impact with no or limited potential for mitigation
Contamination - Unknown - No contamination issues (e.g. identified through planning applications) - Known/ expected contamination issues that could be overcome through remediation (e.g. identified through planning application or adopted and emerging plan/ SPD/ framework) - Significant contamination issues which cannot be realistically mitigated

Vehicular access - No access issues (e.g. planning permission or existing access available) - Access issues with viable identified strategy to address (e.g. planning permission or adopted and emerging plan/ SPD/ framework) - Access issues with potential strategy to address (e.g. other opportunity) - Major access issues with no identified strategy to address
Suitability Conclusion: - Suitable - planning permission - Suitable - expired planning permission - Suitable - allocated in adopted plan - Suitable - no policy and/ or physical constraints - Potentially suitable – physical constraints - Potentially suitable - allocated in emerging plan - Currently unsuitable – policy constraints - Not suitable
Availability - Available for development evidenced by: - o site under construction - o non-major development with planning permission (detailed or outline) - o major development with detailed planning permission - o outline planning permission for major development, permission in principle, allocated in the development plan or identified on the brownfield register and where there is clear evidence that housing completions will be begin on site within five years - o site submitted through Call for Sites where there are no legal or ownership impediments to development - o site with expired planning permission or no consent where the landowner/ developer has confirmed availability, timeframe for delivery and no impediments to the site being delivered. - Reasonable prospect of availability evidenced by: - o outline planning permission for major development, permission in principle, allocated in the development plan or identified on the brownfield register - o sites where the developer has indicated that ownership will be secured after 5 years or there is uncertainty when the site might become available. - Not available due to identified legal or ownership impediments to development.
Achievability Yes/ No
Comments Any other information relevant to the site

*There may be instances when it is appropriate to deviate from the standard response. For example if it is clear that a planning approval will not have an adverse impact on the natural environment, historic environment or open space then it is not appropriate to state that the approval will provide a strategy for mitigation.

Appendix 3: Density and Net Developable Area Calculations

To determine appropriate assumptions for densities and net developable areas where the capacities of sites are not known, an assessment has been undertaken of sites that have been granted planning approval and sites that have been completed since the Birmingham Development Plan was adopted in January 2017.

The results of this assessment for each of the main areas of the city are set out in the tables below. Please note that some of the totalled figures may not equate exactly to the preceding figures due to rounding, and due to reserved matters planning applications being included. The capacity of some sites may not appear to conform with the overall Minor Dwellings, Small Scale Major Dwellings and Large Scale Major Dwelling categories.

City Centre Completed Sites 2017-20

	Minor Dwellings	Small Scale Major Dwellings		Large Scale Major Dwellings	All Sites
	1-9 dwellings	10 -49 dwellings	50-199 dwellings	200+ dwellings	
Number of sites	5	6	3	2	16
Total dwellings	78	134	282	437	931
Site size range (dwellings)	1 - 65	14 – 40	92 – 113	220 - 217	1 - 217
Average site size (dwellings)	15	22	94	219	58
Total Gross Site Area (ha)	0.29	0.69	0.91	0.7	2.59
Site size range (ha)	0.01 - 0.12	0.08 – 0.14	0.2 – 0.47	0.1 - 0.6	0.01 - 0.6
Average Gross Site Area (ha)	0.06	0.12	0.3	0.35	0.16
Gross Density Range (dph)	50 – 542	108 – 500	196 – 471	367 - 2170	50 – 2170
Average Gross Density (dph)	174	212	351	1,268	358
Total Discounts (ha)	0	0	0	0	0
Average discount per site	0	0	0	0	0
Total Net Developable Area (ha)	0.29	0.69	0.91	0.7	2.59
Average Net Developable Area (ha)	0.06	0.12	0.3	0.35	0.16
Average Net Density	174	212	351	1,268	358
Average Gross to Net Ratio	100%	100%	100%	100%	100%

City Centre Approved Sites 2017-21

	Minor Dwellings	Small Scale Major Dwellings		Large Scale Major Dwellings	All Sites
	1-9 dwellings	10 -49 dwellings	50-199 dwellings	200+ dwellings	
Number of sites	9	12	16	16	53
Total dwellings	23	361	1,861	5,917	8,162
Site size range (dwellings)	1 – 5	10 – 48	52 – 309	116 - 995	1 – 995
Average site size (dwellings)	2.5	30	116	370	154
Total Gross Site Area (ha)	0.31	1.13	5.07	7.7	14.21
Site size range (ha)	0.01 – 0.08	0.03 – 0.18	0.05 – 0.6	0.12 - 1.38	0.01 – 1.38
Average Gross Site Area (ha)	0.03	0.09	0.32	0.48	0.27
Gross Density Range (dph)	38 – 300	127 – 600	184 - 1360	389 - 2012	38 – 2012
Average Gross Density (dph)	102	346	455	914	509
Total Discounts (ha)*	0	0	0	0	0
Average discount per site	0	0	0	0	0
Total Net Developable Area (ha)	0.31	1.13	5.07	7.7	14.21
Average Net Developable Area (ha)	0.03	0.09	0.32	0.48	0.27
Average Net Density	102	346	455	914	509
Average Gross to Net Ratio	100%	100%	100%	100%	100%

Completed Sites In/Around Urban Centres 2017-20

	Minor Dwellings	Small Scale Major Dwellings		Large Scale Major Dwellings	All Sites
	1-9 dwellings	10 -49 dwellings	50-199 dwellings	200+ dwellings	
Number of sites	25	12	2	1	40
Total dwellings	92	263	245	110	710
Site size range (dwellings)	1 – 15	4 – 43	92 – 153	110	1 – 153
Average site size (dwellings)	4	22	123	110	18
Total Gross Site Area (ha)	1.92	3.97	2.38	8.25	16.52
Site size range (ha)	0.01 – 0.26	0.05 – 1.53	0.46 – 1.92	8.25	0.01 – 8.25
Average Gross Site Area (ha)	0.08	0.33	1.19	8.25	0.41
Gross Density Range (dph)	20 – 200	25 – 342	48 – 333	13	13 – 342
Average Gross Density (dph)	69	117	191	13	88
Total Discounts (ha)*	0	1.34	0	3.51	4.85
Average discount per site	0	0.11	0	3.51	0.12
Total Net Developable Area (ha)	1.92	2.63	2.38	4.73	11.66
Average Net Developable Area (ha)	0.08	0.22	1.19	4.73	0.29
Average Net Density	69	125	191	23	91
Average Gross to Net Ratio	100%	91%	100%	57%	96%

Approved Sites In/Around Urban Centres 2017-21

	Minor Dwellings	Small Scale Major Dwellings		Large Scale Major Dwellings	All Sites
	1-9 dwellings	10 -49 dwellings	50-199 dwellings	200+ dwellings	
Number of sites	4	4	4	3	15
Total dwellings	18	111	434	544	1,107
Site size range (dwellings)	1 – 9	10 – 48	56 – 153	147 – 210	1 – 210
Average site size (dwellings)	4.5	28	109	181	74
Total Gross Site Area (ha)	0.23	2.6	6.31	13.51	22.65
Site size range (ha)	0.05 – 0.06	0.1 – 1.44	0.27 – 3.43	3.14 - 6.06	0.05 - 6.06
Average Gross Site Area (ha)	0.06	0.65	1.58	4.5	1.51
Gross Density Range (dph)	17 – 150	23 – 200	45 – 207	31 - 49	17 – 207
Average Gross Density (dph)	77	81	106	42	79
Total Discounts (ha)*	0	0.11	0.25	2.89	3.25
Average discount per site	0	0.03	0.06	0.96	0.22
Total Net Developable Area (ha)	0.23	2.49	6.06	10.62	19.4
Average Net Developable Area (ha)	0.06	0.62	1.52	3.54	1.29
Average Net Density	77	82	107	52	81
Average Gross to Net Ratio	100%	98%	98%	81%	95%

Completed Sites Elsewhere 2017-20

	Minor Dwellings	Small Scale Major Dwellings		Large Scale Major Dwellings	All Sites
	1-9 dwellings	10 -49 dwellings	50-199 dwellings	200+ dwellings	
Number of sites	157	31	8	8	204
Total dwellings	391	583	824	1,416	3,214
Site size range (dwellings)	1 – 9	10 – 43	63 – 146	64 – 402	1 – 402
Average site size (dwellings)	2.5	19	103	177	16
Total Gross Site Area (ha)	14.48	14.8	28.51	42.37	100.16
Site size range (ha)	0.01 – 0.56	0.11 – 1.15	1.24 – 5.54	1.4 – 12.16	0.01 – 12.16
Average Gross Site Area (ha)	0.09	0.48	3.56	5.3	0.5
Gross Density Range (dph)	2 – 150	15 – 154	14 – 52	24 – 54	2 – 154
Average Gross Density (dph)	40	47	33	36	40
Total Discounts (ha)*	0.62	0.4	6.48	5.9	13.4
Average discount per site	<0.01	0.01	0.81	0.74	0.07
Total Net Developable Area (ha)	13.86	14.4	22.03	36.47	86.76
Average Net Developable Area (ha)	0.09	0.47	2.75	4.56	0.43
Average Net Density	40	48	47	42	42
Average Gross to Net Ratio	98%	98%	79%	86%	97%

Approved Sites Elsewhere 2017-21

	Minor Dwellings	Small Scale Major Dwellings		Large Scale Major Dwellings	All Sites
	1-9 dwellings	10 -49 dwellings	50-199 dwellings	200+ dwellings	
Number of sites	3	3	3	2	11
Total dwellings	12	84	340	608	1044
Site size range (dwellings)	1 – 9	20 – 36	52 – 171	298 - 310	1 – 310
Average site size (dwellings)	4	28	113	304	95
Total Gross Site Area (ha)	0.56	2.27	8.9	15.86	27.59
Site size range (ha)	0.02 – 0.3	0.2 – 1.22	0.22 – 4.4	2.97 - 12.89	0.02 - 12.89
Average Gross Site Area (ha)	0.19	0.76	2.97	7.93	2.51
Gross Density Range (dph)	3 – 100	24 – 140	27 – 236	23 - 101	3 – 236
Average Gross Density (dph)	47	64	101	64	69
Total Discounts (ha)*	0	0.22	0.17	6.14	6.53
Average discount per site	0	0.07	0.06	3.07	0.59
Total Net Developable Area (ha)	0.56	2.05	8.73	9.72	21.06
Average Net Developable Area (ha)	0.19	0.68	2.91	4.86	1.92
Average Net Density	47	67	101	97	76
Average Gross to Net Ratio	100%	91%	99%	63%	91%

Appendix 4: Assessment of historic delivery rates

All sites sampled

Site size (dwellings)	Number of sites sampled	Planning approval period full (months)	Planning approval period outline (months)	Planning to delivery period (monitoring years)*	Build period (monitoring years)*	Average build out rate (dpa)
10-49	2 Outline 22 Full	3	35 (28)**	1.7	1.2	22
50-99	2 Outline 17 Full	6		2.6	1.8	48
100-199	4 Outline 24 Full	3		2.3	1.6	104
200+	4 Outline 18 Full	6		2.4	1.9	202

*figures rounded to the nearest whole monitoring year

** period from outline consent to reserved matters consent shown in brackets. In view of the small number outline planning application sites in the sample an average across sites of all sizes was taken

Apartment sites only

Site size (dwellings)	Number of sites sampled	Planning approval period full*	Planning to delivery period (monitoring years)	Build period (monitoring years)	Average build out rate (dpa)
10-49	11	3	1.6	1.0	24
50-99	9	8	3.7*	1.3	64
100-199	17	4	3.4	1.0	138
200+	15	6	3.0	1.4	264

*insufficient outline applications to create a reliable average

**this average is skewed upwards by two very slow to start consents, 3 years is used therefore as the assumption

Housing sites only

Site size (dwellings)	Number of sites sampled	Planning approval period full*	Planning to delivery period (monitoring years)	Build period (monitoring years)	Average build out rate (dpa)
10-49	13	2	1.8	1.4	20
50-99	10	5	1.2	2.2	33
100-199	11	3	1.2	2.5	52
200+	7	4	1.1	4.3	68

*insufficient outline applications to create a reliable average

Appendix 5: Windfall 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 used in the HELAA.

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 December 2024 NPPF permits the inclusion of a windfall allowance at paragraph 75:

"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 National 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 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 appendix examines the supply and development of windfall sites since 2001.
- 2.5 Data used in this assessment has been taken from Land Manager, a system which monitors planning commitments and residential development. All figures in this appendix are net.

3. What is a windfall site?

- 3.1 The 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 HELAA, 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 HELAA.

4. The supply of windfall approvals

- 4.1 Since 2001, 40,337 dwellings have received detailed planning permission on windfall sites, an average of 1,681 per annum. Of these 33,692 (84%) were for new build schemes and 6,645 (16%) involved the conversion of an existing building. 23,298 (58%) of windfalls were located in the city centre. 33,445 (83%) of the windfalls coming forward were apartments (including communal and student accommodation) and 6,892 (17%) were houses.
- 4.2 There have been large variations of windfalls permitted year to year from a high of nearly 4,000 in 2021/22 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 3,988 in 2021/22.

Table A5.1: The Supply of Windfalls

Year	Windfalls Granted Detailed Permission	New Build	Conver- -sion	In	Out	House	Apart- -ment	Over 0.06ha	Under 0.06ha
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
2019/20	731	405	326	233	498	120	611	574	157
2020/21	2860	2218	642	1998	862	2716	144	2650	210
2021/22	3988	3577	411	2740	1248	155	3833	3793	195
2022/23	3764	3505	259	2399	1365	76	3688	3503	261
2023/24	2058	1708	350	1284	774	185	1873	1826	232
2024/25	1787	1194	593	1157	630	96	1691	1602	185
Total	40337	33692	6645	23298	17038	6892	33445	36264	4073

- 4.3 Of the 40,337 windfall dwellings granted detailed consent 4,073 were on sites below the HELAA survey threshold. Small windfall sites typically include flats above shops, the subdivision 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 5.2 of this paper.

5. The development of windfall sites

- 5.1 Since 2001, 35,479 dwellings have been completed on sites which came forward as windfalls, an average of 1,478 completions per annum. Of these, 30,183 dwellings (85%) were new build schemes, 28,277 (80%) were apartments and 7,202 (20%) were houses. 16,274 (46%) were located in the city centre
- 5.2 2018/19 recorded the highest level of windfall completions since 2001 (2,832 dwellings). 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 completions in recent years being similar to the high levels reached in 2005/6 and 2007/8.
- 5.3 Of the 35,479 windfall completions, 3,002 were on sites below the HELAA survey threshold, 30,183 were new build and 5,296 were conversions. 16,274 (46%) were in the city centre. A breakdown of windfall completions by site size is at Appendix 5.2 of this paper.

Table A5.2: Windfall sites completed

Year	Windfalls Completed	New Build	Conversion	In	Out	House	Apartment	Over 0.06	Under 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
2019/20	1932	1470	462	845	1087	535	1397	1772	160
2020/21	1612	1295	317	854	758	314	1298	1478	134
2021/22	1641	1134	507	1160	481	103	1538	1502	139
2022/23	1069	845	224	351	718	222	847	975	94
2023/24	1055	938	117	364	691	112	943	924	131
2024/25	2110	2024	86	1048	1062	312	1798	1948	162

Year	Windfalls Completed	New Build	Conversion	In	Out	House	Apart-ment	Over 0.06	Under 0.06
Total	35479	30183	5296	16274	19205	7202	28277	32381	3002

- 5.4 It is clear from the above 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 HELAA 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 year's HELAA. 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 HELAA.

6. Commentary

- 6.1 Windfalls have made an important contribution to meeting the city's housing growth over the last 20+ 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 saw a downturn after 2005/6.

- 6.4 Since this time there has been a progressive increase in the number of windfalls permitted and completed each year, and the levels have been relatively consistent for most of the past 10 years. Windfall sites continue to make a substantial and important contribution to the provision of new housing and it is therefore considered appropriate to continue applying a windfall assumption to the city's housing land supply.

7. Windfall assumption

- 7.1 The evidence shows that windfalls make a significant contribution to the delivery of housing supply in Birmingham. The contribution that windfalls can reasonably be expected to make to housing delivery is set out in Table A5.3 below. These assumptions are based on a continuing pattern of current development trends.
- 7.2 It is assumed that following adoption of the new Birmingham Local Plan, the windfall rate will be lower in the first five years and increase as time goes on and the degree of certainty is likely to diminish. Given the historic rates of windfall sites delivered in the city over the past 20 years these assumptions are considered to be a conservative estimate to avoid over-estimating supply from this source. It is clear that Birmingham has consistently delivered windfall sites and that such sites have become available every year.
- 7.3 No windfall allowance is made for the first year as all supply identified at the HELAA base date is already accounted for.
- 7.4 Although not included in the windfall allowance, sites which come forward as permitted development are also effectively windfalls where these have not previously been identified. In 2024/25 notification was received for 291 dwellings to be created from such conversions. While these have not been taken into account in establishing the windfall allowance they add further credibility to the allowance being a conservative estimate.

Table A5.3: Windfall Assumptions

Time Period	Annual Contribution (Dwellings)
Small Sites (Under 0.06ha)	
Short Term - Within 5 Years	50
Medium Term – Years 6 to 10	75
Longer Term – Beyond 10 Years	100
Larger Sites (0.06ha and above)	
Short Term - Within 5 Years	400
Medium Term – Years 6 to 10	500
Longer Term – Beyond 10 Years	600

Windfall Assumptions Paper - Appendix 5.1

The Supply of Windfall Sites

Table A5.4: The Supply of Larger Windfalls (Above the HELAA Survey Threshold)

Year	Windfalls Granted Detailed Planning Permission	New Build	Conver- sion	In City Centre	Out of City Centre	House	Apart- ment
2001/2	2570	2573	-3	622	1948	375	2195
2002/3	649	619	30	413	236	42	607
2003/4	2528	2504	24	1654	873	157	2371
2004/5	2306	1904	402	1575	731	208	2098
2005/6	3355	3399	-44	2364	991	302	3053
2006/7	2338	2343	-5	1671	667	193	2145
2007/8	698	689	9	348	350	78	620
2008/9	221	265	-44	40	181	73	148
2009/10	56	129	-73	34	22	73	-17
2010/11	118	143	-25	-1	119	0	118
2011/12	304	227	77	18	286	128	176
2012/13	417	207	210	33	384	118	299
2013/14	272	208	64	5	267	112	160
2014/15	840	255	585	405	435	189	651
2015/16	787	722	65	267	520	199	588
2016/17	407	222	185	80	327	142	265
2017/18	2550	1854	696	1771	779	150	2400
2018/19	1900	1561	339	1289	611	169	1731
2019/20	574	349	225	211	363	66	508
2020/21	2650	2122	528	1976	674	120	2530
2021/22	3793	3493	300	2652	1141	127	3666
2022/23	3503	3385	118	2327	1176	59	3444
2023/24	1826	1642	202	1204	622	172	1826
2024/25	1602	1128	474	1117	485	102	1500
Total	36264	31943	4339	22075	14188	3354	33091

Table A5.5 The Supply of Small Windfalls (Below the HELAA Survey Threshold)

Year	Windfalls Granted Detailed Planning Permission	New Build	Conver- sion	In City Centre	Out of City Centre	House	Apart- ment
2001/2	228	64	164	155	73	22	206
2002/3	158	94	64	40	118	63	95
2003/4	170	108	62	71	99	67	103
2004/5	146	77	69	64	82	41	105
2005/6	167	65	102	43	124	64	103
2006/7	84	37	47	3	81	28	56
2007/8	124	59	65	20	104	56	68
2008/9	118	42	76	14	104	37	81
2009/10	129	63	66	25	104	36	93
2010/11	97	28	69	29	68	38	59
2011/12	152	67	85	26	126	36	116
2012/13	128	53	75	8	120	70	58
2013/14	129	61	68	18	111	42	87
2014/15	184	45	139	94	90	71	113
2015/16	149	48	101	34	115	30	119
2016/17	179	80	99	50	129	37	142
2017/18	239	133	106	97	142	44	195
2018/19	252	137	115	108	144	54	198
2019/20	157	56	101	22	135	54	103
2020/21	210	96	114	22	188	24	186
2021/22	195	84	111	88	107	28	167
2022/23	261	120	141	72	189	17	244
2023/24	232	84	148	80	152	13	219
2024/25	185	66	119	40	145	-6	191
Total	4073	1767	2306	1223	2850	966	3107

Windfall Assumptions Paper – Appendix 5.2

The Development of Windfall Sites

Table A5.6: The Development of Larger Windfalls (Above the HELAA Threshold)

Year	Windfalls Completed	New Build	Conversion	In City Centre	Out of City Centre	House	Apartment
2001/2	1099	896	203	477	622	283	820
2002/3	1301	1149	152	643	658	234	1067
2003/4	1712	1589	123	936	776	156	1556
2004/5	1278	1189	89	556	724	191	1089
2005/6	2277	2069	208	1490	787	257	2020
2006/7	1698	1669	29	1088	610	274	1424
2007/8	1914	1633	281	1226	688	277	1637
2008/9	2191	2085	106	1340	851	175	2016
2009/10	890	873	17	541	349	182	708
2010/11	860	815	45	457	403	226	634
2011/12	406	392	14	0	406	210	196
2012/13	970	844	126	92	878	442	528
2013/14	428	393	35	95	333	118	310
2014/15	785	732	53	82	703	299	486
2015/16	678	431	247	169	509	264	414
2016/17	1261	1235	26	159	1102	750	511
2017/18	1422	1142	280	412	1010	413	1009
2018/19	2708	2412	296	1666	1042	351	2357
2019/20	1772	1402	370	821	951	491	1281
2020/21	1478	1254	224	845	633	282	1196
2021/22	1502	1079	423	1125	377	83	1419
2022/23	975	814	161	325	650	219	756
2023/24	924	860	64	344	580	102	822
2024/25	1948	1952	-4	1040	908	318	1630
Total	32477	28909	3568	15929	16550	6597	25886

Table A5.7: The Development of Small Windfalls (Below the HELAA Survey Threshold)

Year	Windfalls Completed	New Build	Conversion	In City Centre	Out of City Centre	House	Apartment
2001/2	153	46	107	62	91	21	128
2002/3	173	58	115	109	64	32	141
2003/4	114	61	53	44	70	33	81
2004/5	138	63	75	24	112	42	94
2005/6	105	63	42	22	83	36	69
2006/7	141	81	60	42	99	15	126
2007/8	192	91	101	85	107	48	144
2008/9	120	47	73	33	87	34	86
2009/10	95	29	66	4	91	32	63
2010/11	59	48	11	1	58	16	43
2011/12	36	22	14	14	22	-6	42
2012/13	95	35	60	10	85	35	60
2013/14	51	24	27	12	39	11	40
2014/15	115	61	54	33	82	23	92
2015/16	166	49	117	72	94	62	104
2016/17	134	50	84	19	115	37	97
2017/18	171	45	126	58	113	42	129
2018/19	124	56	68	22	102	46	78
2019/20	160	92	68	24	136	44	116
2020/21	134	41	93	9	125	32	102
2021/22	139	55	84	35	104	20	119
2022/23	94	31	63	26	68	3	91
2023/24	131	78	53	20	111	10	121
2024/25	162	72	90	8	154	-6	168
Total	3002	1298	1704	788	2212	662	2334

Appendix 6: Digital land search and assessment methodology

1. Background

- 1.1 To support the preparation of the new Birmingham Local Plan, Birmingham City Council (BCC) engaged Urban Intelligence (UI) to help identify additional sites and develop a Sites Assessment Database (SAD). This database was informed by BCC's HELAA methodology, creating a digital resource to allow BCC officers to undertake further analysis and investigation into development potential in the city. The database was created with UI's PlaceMaker software.
- 1.2 This document sets out the methodologies used to identify and assess sites that within the SAD.

2. Methodology Overview

1. Site Identification

A list of sites is identified for assessment.

2. Suitability

At this stage any geo-spatial (i.e. mappable) constraints interacting with identified sites, including planning and environmental considerations, are assessed for their impact on a site's suitability. The full list of constraints and their associated parameters are set out in appendix 6.1.

3. Capacity

Once a suitable parcel has been defined, the site's capacity is assessed using the Council's HELAA methodology.

4. Availability

Within the SAD, there is functionality that allows for the input of availability information, allowing a full assessment of sites.

- 2.1 This document outlines each of these stages, providing a description of the methodology used.

3. Site Identification

- 3.1 In the SAD, there are five main sources of sites for assessment:

- Land Registry Parcels;
- Unregistered Parcels;
- Previously identified SHLAA and ELAA Sites;
- Call for Sites Submissions; and
- Custom Sites identified by Council Officers

Land Registry Parcels

- 3.2 HM Land Registry Parcels (LRP) and the data associated with them, are one of the main sources of sites for the SAD. Before using the full LRP dataset (derived from the

National Polygon Service), UI undertook a number of processing measures that 'cleaned up' the parcels to allow ease of analysis. These measures are as follows:

- In many cases, parcels with a single Land Registry title number are split into multiple polygons by the Land Registry. UI join these polygons into a single polygon and store and present any relevant information.
- Where there are multiple LRPs with more than 99% overlap, these are joined as a single parcel, with all relevant metadata stored. These identical polygons occur in a number of different scenarios, most notably on parcels containing buildings with multiple addresses, where there are separate parcels for each floor of the building, all sharing the same geographical extent within the two-dimensional dataset of the Land Registry.

- 3.3 This resulted in over 300,000 land parcels, which was the starting point for the urban capacity site search. As well as using LRP polygons for site identification, a number of predefined sites (e.g. call for site submission and custom sites) were assessed, and there were also mechanisms for custom sites to be imported into the SAD for analysis.

Call for Sites Submissions

- 3.4 As part of the commission, UI were responsible for the development of a 'Call for Sites' web-based submission form, to allow members of the public, landowners and other stakeholders to submit potential development sites for analysis. To accommodate this, UI in collaboration with BCC, created a tool that allowed users to draw their sites within a map-based custom drawing tool and also enter information related to this site, similar to a traditional call for sites process. This allowed site polygons created by users together with their metadata to be automatically fed into the SAD and subject to site analysis. Additionally, this ensured consistent formatting of data, and prevented double processing of data and information.

Unregistered Land

- 3.5 As part of the project UI also identified land that is not registered with the Land Registry. This was done through an 'inverse' search of the Land Registry, whereby polygons are created to fill any space where a LRP polygon does not exist.

Previously Identified SHLAA and ELAA Sites

- 3.6 Existing sites from BCC's 2020 SHLAA and ELAA were added to the SAD for reference. To avoid duplication, parcels which overlapped with 2020 SHLAA and ELAA sites were categorised as unsuitable as they have already been identified and would be included in the HELAA.

Custom Sites

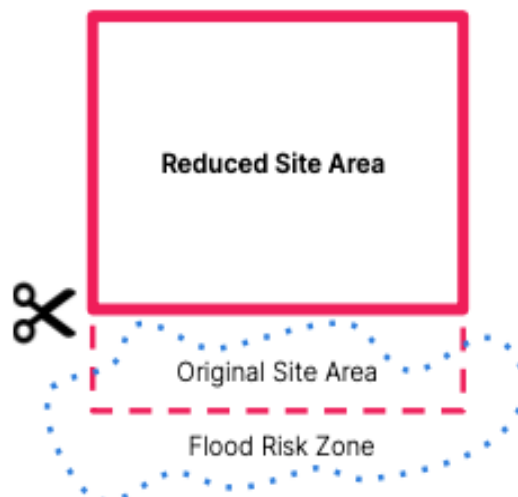
- 3.7 As part of the SAD system, UI developed a function that enables council officers to manually add sites. Sites created using the built-in polygon drawing tool are automatically assessed and included within the SAD as 'Custom Sites'.

4. Suitability

- 4.1 All of the initial sites identified at the 'Site Identification' stage were subject to an initial assessment or 'first sift' to identify potentially suitable sites.
- 4.2 Sites that already contain residential properties or other built elements such as highways, railways and canals, and sites that are too small (or the wrong shape to contain a single residential dwelling (identified via an 11.25 square metre 'square' shape test) were automatically marked as unsuitable for development. These amounted to over 286,000 land parcels, forming the bulk of the initial 300,000 land parcels that were discounted from the assessment.

Exclusions

- 4.3 Policies and designations that the HELAA methodology identifies as unsuitable for development were 'clipped' from the area of the identified sites. Where a 'Clip' exclusion left a very small area of land that would be too small to accommodate a single dwelling then the entire site was designated as unsuitable. This process is shown in the figure below. 5,000 sites were discounted as being unsuitable under this approach.



- 4.4 A full schedule of designations and classifications acting as suitability exclusions is within Appendix 6.1.

Cumulative Approaches

- 4.5 In addition to these exclusions, UI also devised a methodology to assess the cumulative effects of more minor constraints. There were two approaches to assessing these constraints:
- 'balance score'; and
 - 'manual'
- 4.6 These approaches, which are explained below, were applied to the areas of sites not clipped by exclusions detailed above.

Balance Score Approach

- 4.7 The balanced approach considers the combined effects that multiple designations and constraints can have on the suitability of a site using a 'points' system. A constraint was assigned a score out of 100, based on an officer judgement on the extent that it would affect the overall suitability of a site for development. If two or more of these constraints overlap with a site and their combined score amounted to more than 100 then the site would be identified as being unsuitable for development.
- 4.8 Some constraints were assigned higher scores than others, as follows:

Table A6.1 Scoring of designations/ constraints

Designation/Constraint:	Balance Score (out of 100)
Allotments	70
Flood Zone 2	40
Conservation Areas	25
Historic Landfill Sites	20

- 4.9 In addition to the above constraints, balance scores were also applied to sites overlapping with open space in wards where there is a surplus of provision. These scores were graduated, with wards having only a marginal surplus of open space being given a higher balance score of 80 and wards with a large surplus of provision being given a lower score of 20.
- 4.10 The reason for applying this approach to these constraints is because it is recognised that on their own, they do not make a site unsuitable for development, but a combination of them will.
- 4.11 Only 28 sites were identified as unsuitable due to the combination of these constraints. This is because most sites that would be likely to be affected by such combinations of constraints had already been discounted through the initial filtering or exclusion approaches described above, and often the combination of constraints was not severe enough to exceed the score of 100.
- 4.12 The automated processes undertaken through the initial filtering, exclusion and balanced score approaches resulted in just over 6,000 sites requiring officer review/ manual approach.

Manual Approach

- 4.13 The 'manual' approach was applied to constraints which were more subjective or contextual, and therefore required an officer judgement. Overlaps of these layers on each site are simply identified within the software with no automated assessment of suitability applied, thus allowing officers instead to make an informed decision over the overall suitability of the site. Examples of constraints that this approach was applied to include Tree Preservation Orders, Historic Environment Records, Rights of Way and Cycle Routes.

- 4.14 Taking in to account the above constraints alongside other factors such as whether the site is in an active use for another purpose (e.g. commercial or community uses) or already has planning permission for development, the officer review under this manual approach stage reduced the list of suitable sites to just over 600. These remaining suitable sites were then taken forward to the availability stage, whereby landowners were contacted to confirm their intentions and aspirations for development.

Exceptional Approaches

- 4.16 To avoid duplication, parcels which overlapped with 2020 SHLAA and ELAA sites were categorised as unsuitable as they have already been identified by other means and would be subject to further review within the HELAA.

5. Capacity

- 5.1 All suitable sites are assessed for their potential development capacity. To calculate the capacity of a site, UI used a digital translation of BCC's HELAA methodology which uses plot coverage and target minimum density to give a unit number for sites.

Plot Coverage

- 5.2 Once any clip exclusions have been removed from the site, the plot coverage ratios are applied to the site area, converting from a gross development area to a net area.

Table A6.2: Gross to Net ratios (from BCC HELAA methodology)

Site size (Hectares)	Gross to Net ratio
Up to 0.25 or City Centre	100%
0.25 to 1.0	95%
1.0 to 3.0	85%
3.0 and above	80%

Table A6.3: Gross to Net ratios inclusions and exclusions (from BCC HELAA methodology)

Includes	Excludes
Local Access Roads	Main Roads
Private Gardens	Significant Landscape Buffers
Parking Areas	Open space serving a wider area
Footpaths	Shops
Local Open Space	Other Public Facilities
Amenity Space serving the development	

6. Availability

- 6.1 Information collected from the Call for Sites process or manually inputted based on intelligence from officers is included within the Availability tab of the SAD tool. This enables officers to maintain a real-time database of site information including the ownership, known legal constraints or other factors that could influence the risk or timeframe of the delivery of the site.

Appendix 6.1: Suitability Layers

Environmental Layers

Layer Name	Constraint Type
Greenbelt	Manual
Sites of Importance for Nature Conservation (SINC)	Clip
Sites of Importance for Nature Conservation (SINC) 15m Buffer	Manual
Sites of Local Importance for Nature Conservation (SLINC)	Clip
Sites of Local Importance for Nature Conservation (SLINC) 15m Buffer	Manual
Sites of Special Scientific Interest (SSSI)	Clip
SSSI Risk Zones	Manual
Potential Site Of Importance	Manual
Potential Site Of Importance 15m Buffer	Manual
National Nature Reserve	Clip
National Nature Reserve 15m Buffer	Manual
Local Nature Reserve	Clip
Local Nature Reserve 15m Buffer	Manual
Ancient Woodland	Clip
Ancient Woodland 50m Buffer	Manual
Tree Preservation Orders (Polygons)	Manual
Tree Preservation Orders (Points)	Manual
Allotments	Balance
Public Open Space	Custom (Open Space Scoring)
Golf Courses	Manual
Public Playing Fields	Custom (Open Space Scoring)
Educational playing Fields	Custom (Open Space Scoring)
Private Playing Fields	Custom (Open Space Scoring)
Private Open Space	Manual
Statutory Common Land	Clip
Parks and Gardens	Clip
Domestic Waste Centres	Clip
Historic Landfill Sites	Balance

Rivers & Flooding Layers

Layer Name	Constraint Type
Flood Zone 2	Balance
Flood Zone 3	Clip
Bromford 1in100yr Plus Climate Change	Clip
Perry Barr and Witton 1in100yr Plus Climate Change	Clip
River Rea and Tributaries 1in100yr Plus Climate Change	Clip
Flood Storage Areas	Clip
Areas Benefiting from Flood Defences	Custom
Canals	Clip
Canal 8m Buffer	Clip
Lakes	Clip
Water Courses	Clip
Water Courses 8m Buffer	Clip

Heritage Layers

Layer Name	Constraint Type
Statutorily Listed Buildings	Manual
Locally Listed Buildings	Manual
Conservation Areas	Balance
Historic Parks and Gardens	Clip
Historic Environment Record (Polygons)	Manual
Historic Environment Record (Points)	Manual
Historic Environment Record (Lines)	Manual
Scheduled Ancient Monuments	Clip
Scheduled Ancient Monuments 20m Buffer	Manual

Safeguarding Layers

Layer Name	Constraint Type
HS2 Safeguarding Region	Clip

Other Constraints

Layer Name	Constraint Type
Hazardous Sites	Manual
Hazardous Sites 1km Buffer	Manual

Transport Layers

Layer Name	Constraint Type
Railway network	Clip
Proposed Station	Clip
Proposed Station 5m Buffer	Manual
M, A and B Classification Roads	Clip

Appendix 7: Site assessments – Suitable sites

Please see the separate appendices accompanying this HELAA report.

Appendix 8: Call for Sites

The following tables list the sites which have been submitted to the Council's 'Call for Sites', sites that have been promoted through formal representations on the new Local Plan, and expressions of interest received in response to the City Council's mailout to landowners of urban capacity sites. The sites included are all those that have been submitted from the start of the review of the Local Plan in 2021 through to 31st August 2025.

The sites are grouped according to their HELAA classification. Sites which have been classified as 'Suitable' can also be found in the site schedules in Appendix 7 by using the HELAA reference number.

8.0 HELAA Classification: Suitable – Planning Permission

CFS Ref	HELAA Ref	Address	Promoted Use	Comments
PODRep 124	2808	Oval Estates, Digbeth	Mixed use – residential, commercial/ employment, hotel, student accommodation, car parking, nightclubs	Included as a proposed site allocation in Focused Preferred Options Document. Has outline planning permission for residential development.
e7159f	2468	37 Icknield Street, Hockley	Residential	Has detailed planning permission for residential development.
707d7f	2475	Land at Bolton Street / Watery Lane Middleway, Bordesley	Residential	Has detailed planning permission for residential development.
852c5a	2466	Depot, Lutley Grove	Residential	Has detailed planning permission for residential development.
418f6b	2471	Lowhill Lane, Longbridge	Residential, employment	Has detailed planning permission for residential-led mixed use development.
1cf064 and feb78d	2769	The Beeches, 76-78 Selly Oak Road, Bournville	Residential, leisure, health	Has detailed planning permission for residential development.

776643	2467	28-30 Constitution Hill	Residential, retail	Has detailed planning permission for residential-led mixed use development and is under construction.
f5b62d	3006	Car Park, College Street, Longbridge	Employment, retail, leisure	Major outline planning approval, included as a proposed site allocation in Focused Preferred Options Document
56dfc7	2961	Park Square, Longbridge	Employment, retail, leisure	Major outline planning approval, included as a proposed site allocation in Focused Preferred Options Document
0bcfbd	S224 and 2757	Former MG Rover Works Bristol Road South	Residential	Has detailed planning permission for residential development and is under construction.
C17f95	3064	Curzon Wharf	Residential. Life Sciences	Major outline planning approval, included as a proposed site allocation in Focused Preferred Options Document
PODRep 75a	C219	Martineau Galleries	Mixed use residential, commercial, leisure, retail and hotel	Major outline planning approval, included as a proposed site allocation in Focused Preferred Options Document
PODRep 165	3036	Smithfield	Mixed use, including residential	Existing BDP allocation. Now also a major outline approval under 2022/09643/PA. Carried forward as a proposed site allocation in Focused Preferred Options Document.
965da3	2687 3232 3233	Site Of West Works Bristol Road South	Employment	Sites 2687, 3232 and 3233 have planning approval for employment development and are all under construction. Site 2686 has a different HELAA classification and can be found elsewhere within this report.

8.1 HELAA Classification: Suitable – No policy and/or physical constraints

CFS Ref	HELAA Ref	Address	Promoted Use	Comments
ae3966	2484	Cecil Street, Newtown	Employment	Within existing Core Employment Area. Included in employment land supply.
84ee52	2851	Eyre Street, Spring Hill	Employment	Suitable for employment use, included in employment land supply.
d6d785	2477	128 Moseley Street, Highgate	Residential	Suitable for residential, added to housing supply.
f0f62a	2449	Bailey Hotel, Sandon Road, Edgbaston	Residential	Suitable for residential, added to housing supply.
b86621	2450	Langstone Place, Pemberton Street	Residential	Suitable for residential, added to housing supply.
ac9cc6	2454	Land at Essex Street and Bristol Street	Residential	Suitable for residential, added to housing supply.
2f9578	2457	2-3 Great Hampton Street	Residential	Suitable for residential, added to housing supply.
541ef9	2458	Livery Street Car Park, Jewellery Quarter	Residential	Suitable for residential, added to housing supply.
ce4719	2459	Smith Street Car Park, Newtown	Residential	Suitable for residential, added to housing supply.
c9276f/ POD Rep147	2482	Summer Lane, Newtown	Residential, employment	Suitable for residential, added to housing supply.
a9423b	2485	36 Redhill Road, Hay Mills	Residential, employment	Within existing Core Employment Area. Suitable for employment use, included in employment land supply.
45f082	2483	Tyburn Road, Erdington	Residential, employment, retail, leisure	Within existing Core employment Area, suitable for employment use. Included in employment land supply.
1ed6ea and 5e6e2	2481	Lower Tower Street, Newtown	Residential, Employment, Retail, Leisure, Community Use	Suitable for residential, added to housing supply.
47266e	2480	Landor Street, Nechells	Residential, Employment, Retail, Leisure, Health	Suitable for employment use. Included in employment land supply.

CFS Ref	HELAA Ref	Address	Promoted Use	Comments
7f3c6d	2460	41 Dennis Road, Moseley	Residential, employment, retail, leisure, health, open space, community use	Suitable for residential, added to housing supply.
5a999e and d7bfe0	2465	940 Stratford Road, Sparkhill	Residential, retail	Suitable for residential, added to housing supply.
00e449 and b6c919	2448	224 Green Lane, Small Heath	Residential, retail, leisure, health, community use	Suitable for residential, added to housing supply.
0888a2	2759	Garages, Marion Way, Hall Green	Residential	Suitable for residential, added to housing supply.
2be24c	2843	44-48 Great Hampton Street, Hockley	Residential, employment, leisure	Suitable for residential, added to housing supply.
aef664	2844	26 Orphanage Road, Erdington	Residential	Suitable for residential, added to housing supply.
e10c63	2837	Hanley Street Car Park, Gun Quarter	Residential	Suitable for residential, added to housing supply.
5982dd	2838	Ward Street Car Park, Gun Quarter	Residential	Suitable for residential, added to housing supply.
de9c9f	2839	73 George Road, Tyseley	Residential	Suitable for residential, added to housing supply.
fd631c	2764	Land at Ashleigh Grove, Wake Green	Residential	Suitable for residential, added to housing supply.
403719	2765	Former Maypole Works, Highters Heath Lane, Maypole	Residential	Suitable for residential, added to housing supply.
7aa04d	N522	Bill House, Lozells	Residential, retail, leisure, health, community use	Suitable for residential, added to housing supply.
b4608c	2845	Lakeside Centre, Kings Norton	Residential	Suitable for residential, added to housing supply.
bbac66	2846	Lakeside Centre, Kings Norton	Residential	Suitable for residential, added to housing supply.

CFS Ref	HELAA Ref	Address	Promoted Use	Comments
cf78e5	2711	Land adjoining 268 Hagley Road	Residential	Suitable for residential, added to housing supply. Revised planning application 2023/06922/PA approved at Planning Committee on 28/08/2025.
53f2a9	2773	Newman House, 29 Harrisons Road, Edgbaston	Residential	Suitable for residential, added to housing supply.
5f4201	2801	Unit 5 Weston Works, Tyseley	None indicated	Suitable for industrial, added to employment supply.
a9549f	2777	12 & 14a Holyhead Road, Handsworth	Residential, retail	Suitable for residential, added to housing supply.
67cc9f	2778	129-133 Weston Lane Tyseley	Residential, Employment, Retail, Leisure, Community Use	Adjoins both industrial and residential uses. Suitable for residential, added to housing supply.
4a667e	2780	45 Frederick Street, Jewellery Quarter	Residential, employment, retail, leisure	Suitable for residential, added to housing supply.
27f0af	2785	Rear of 113-119 Glebe Farm Road	Residential	Suitable for residential, added to housing supply.
96abe3	N1060	164 Bridge Street West, Hockley	None	No promoted use, but the site has previously had planning approval for student accommodation
c3bb76	3287	Car park at Nursery Road, Hockley	Residential, Employment, Retail	Given adjoining residential planning approval and nearby proposed allocation at Hunters Road it is considered to be suitable for residential development. Added to housing supply.
0bbafb	2792	35 Boldmere Road, Sutton Coldfield Road	Residential, employment, retail, leisure, health	Suitable for residential, added to housing supply.

CFS Ref	HELAA Ref	Address	Promoted Use	Comments
f9d96d	2840	89-95 New Summer Street/ Cecil Street, Newtown	Residential	Suitable for residential, added to housing supply.
61045e	C315	12-16 Tenby Street North, Jewellery Quarter	Residential, employment	Suitable for residential, added to housing supply.
N/A (email submission)	2832	Guildhall Buildings, Navigation Street, City Centre	Residential	The principle of residential development in this location is suitable however the promoted capacity of 240 dwellings has been reduced to 32 dwellings (based on HELAA density assumption) in recognition of the current site being a historic building within a conservation area.
N/A (email submission)	2841	24-32 Princip Street, Newtown	Residential-led mixed use	Suitable for residential, added to housing supply.
0daa03	3294	Birmingham Chamber of Commerce, Harborne Road	Residential, employment	Suitable for residential, added to housing supply. Planning application 2022/08392/PA approved at Planning Committee on 13/02/2025.
N/A (email submission)	S751	16-22 Harborne Road (above existing retail units)	Residential	Suitable for residential, added to housing supply.
bd2de3	3295	Perry Barr Greyhound Stadium, Aldridge Road	Residential, Employment, Leisure, Health	Suitable for residential, added to housing supply.
5b0f69	2803	Doris Road, Bordesley Green	Employment	Suitable for industrial, added to employment supply.
PODRep 87	3293	43-45, 47, 51-55 Station Street	Residential	Suitable for residential, added to housing supply.
PODRep 116	3292	Victoria Square House	Residential, Employment, Retail, Leisure, PBSA, Hotel	Suitable for residential, added to housing supply.

8.2 HELAA Classification: Suitable – allocated in adopted plan

CFS Ref	HELAA Ref	Address	Promoted Use	Comments
c90d52	N37	71-77 Lozells Road, Lozells	Residential	Existing Area Action Plan allocation. Suitable for residential development.
296b8a	N510A	260 Summer Lane, Newtown	Residential	Part of an existing Area Action Plan allocation.
PODRep 115	C1	Land at Ledsam Street and Great Tindal Street, Ladywood	Residential	Existing BDP allocation, proposed to become part of wider allocation within Focused Preferred Options Document.
a782d9	N510A	231 Bridge Street West, Newtown	Residential, Retail	Part of an existing Area Action Plan allocation.
a8ba0a	N510A	228 Bridge Street West, Newtown	Residential	Part of an existing Area Action Plan allocation.
PODRep 162	N4	Icknield Square	Residential	The site is included in the HELAA as an existing allocation within the Birmingham Development Plan. Planning application 2023/03864/PA was approved subject to Conditions on 12-05-2025, this will be accounted for in the HELAA 2026.

8.3 HELAA Classification: Potentially suitable – Physical constraints

CFS Ref	Address	CFS Promoted Use	Comments
fbf008	Bridge Road / College Road, Saltley	None	Site has a range of existing uses, including listed buildings and open space. Further consideration is required as to the most appropriate future use of the site.
ccb51a	Rear of 1-87 Station Road, Northfield	Residential	Requires more detailed consideration of whether separation distances can be achieved and that there would be no adverse impacts on trees and adjacent river.
e1d73c and via email	Land at Ridgeacre Road West, Quinton	Residential	Site constrained by electricity pylon, unusual shape and close proximity to M5.

CFS Ref	Address	CFS Promoted Use	Comments
8838b5 and c7b155	Land at Bath Walk Industrial Estate, Balsall Heath	Residential	Requires land assembly to achieve wider redevelopment. Development of the site for residential uses in isolation and surrounded by industrial commercial uses means that it cannot be considered as suitable at this time.
651834	Land at corner of Rubery Lane and Hollymoor Way, Rubery	Residential	Site constrained by environmental conditions, reflected by the refusal of planning application 2023/07614/PA, which would need to be overcome before it can be considered as suitable.
ddef63	Birkdale Avenue, Selly Oak	Residential	Requires land assembly to achieve wider redevelopment. Development of the site for residential uses in isolation and surrounded by industrial commercial uses means that it cannot be considered as suitable at this time.
bb5774	7A Boulton Walk, Stockland Green	Residential	Requires land assembly to achieve wider redevelopment. Development of the site in isolation not considered suitable.
b1a3e6	47-59 Green Lane, Bordesley Green	Residential, Employment, Retail	Requires land assembly to achieve wider redevelopment. Development of the site in isolation not considered suitable.
cb742d	60-80 Holyhead Road, Handsworth	Residential	The site is in multiple ownerships and would require land assembly.
a3313b and fe0ccc	Beswick Grove, Yardley	Residential	The site is in multiple ownerships and would require land assembly.
1f7f7c	Rear of 209-215 Monument Road, Edgbaston	Residential	The site has poor access which will need to be overcome before it can be considered as suitable.
50cfdc	61-63 Green Lane, Bordesley Green	Residential, employment, retail, leisure, community use	Requires land assembly to achieve wider redevelopment. Development of the site in isolation not considered suitable.
76ebe7	Tally Ho, Pershore Road	Residential, employment, leisure	Site constrained by outdoor sports facilities, flood risk, long term use by West Midlands Police and approval of new horse stabling and training facility.
5977a0	123 Western Road, Hockley	Retail	Requires land assembly to achieve wider redevelopment. Development of the site in isolation not considered suitable.
8c9dab	125-135 Western Road, Hockley	Residential	Requires land assembly to achieve wider redevelopment. Development of the site in isolation not considered suitable.

CFS Ref	Address	CFS Promoted Use	Comments
3a4793, c4b804, e9718f, f334b6 and fe5eef	228-230 New John Street West, Newtown	Retail, residential	Existing retail use, promoted for retail and residential use. Introduction of residential uses at these small retail units considered inappropriate without wider redevelopment.
3ba65c	Land bounded by High Street, Meriden Street, Coventry Street and Oxford Street, Digbeth	Residential, Employment - Office, Education, Commercial, Retail, Media, Build to Rent, Co-Living, Hotel	Planning application 2025/02816/PA currently being considered. A decision on this planning application will be required before it can be considered for inclusion in the HELAA.
488674	Land bounded by Hockley Hill, Well Street, Great King Street and Barr Street, Jewellery Quarter	Residential. Creative commercial space	Planning application 2025/01109/PA currently being considered. A decision on this planning application will be required before it can be considered for inclusion in the HELAA.
f562ff	87 Eyre Street, Hockley	Residential	Requires land assembly to achieve wider redevelopment. Development of the site in isolation not considered suitable.
e488d4	41 Western Road, Hockley	Residential, leisure	Requires land assembly to achieve wider redevelopment. Development of the site in isolation not considered suitable.
N/A (email submission)	Western Road, Hockley	Residential	Requires land assembly to achieve wider redevelopment. Development of the site in isolation not considered suitable.

8.4 HELAA Classification: Potentially Suitable – Allocated in Draft Plan

CFS Ref	HELAA Ref	Address	CFS Promoted Use	Comments
N/A (email submission)	E494	Land East of Cherrywood Road, Bordesley Green	Residential	Existing Area Action Plan allocation, carried forward as a proposed site allocation in Focused Preferred Options Document. Boundary of proposed allocation amended to match this promoted site. Suitable for residential development.

CFS Ref	HELAA Ref	Address	CFS Promoted Use	Comments
468ba7, 9c7d509 49966	N518	Wretham Road/Soho Hill, Hockley	Residential, Retail, Leisure, health, employment	Existing Area Action Plan allocation, carried forward as a proposed site allocation in Focused Preferred Options Document.
N/A (email submission)	3283	Legacy Centre, Newtown	Residential, retail, community use	Included as a proposed site allocation in Focused Preferred Options Document.
N/A (email submission)	3031	Ladywood Regeneration Initiative	Residential-led regeneration scheme	Included as a proposed site allocation in Focused Preferred Options Document.
PODRep 144	C208	Digbeth High Street Major Development Site 1	Residential, commercial, community	Included as a proposed site allocation in Focused Preferred Options Document.
PODRep 42	3281	Land South of Pritchett Street and East of Aston Road	Residential	Included as a proposed site allocation in Focused Preferred Options Document.
PODRep 141a	2821	Warwick Bar	Residential	Included as a proposed site allocation in Focused Preferred Options Document.
PODRep 141b and via email	2842	Belmont Passage, Lawley Middleway	Residential	Included as part of a proposed site allocation in Focused Preferred Options Document.
N/A (email submission)	3280	Land at Darnley Road, Edgbaston	Residential	Included as a proposed site allocation in Focused Preferred Options Document.
569b85	S128	Druids Heath Estate Regeneration	Residential, employment, retail, leisure, health, open space, community use	Included as a proposed site allocation in Focused Preferred Options Document.
PODRep 45	3040 and 3273	One Stop Shopping Centre, Perry Barr	Residential, Employment, Retail, Leisure, Health, Community Use	Suitable for the promoted uses, included as a proposed site allocation in the Focused Preferred Options Document. As the representation suggested that land west of Regina Drive should be a separate industrial allocation this has been split out from the wider allocation covering the shopping centre.

CFS Ref	HELAA Ref	Address	CFS Promoted Use	Comments
862aaa	3286	17 Langley Drive, Castle Bromwich	Employment	Included as part of a proposed site allocation in Focused Preferred Options Document
97a853	3286	Land East and West of Bromford Vent	Employment	Included as part of a proposed site allocation in Focused Preferred Options Document
2762a0	3274	50 Summer Hill Road, Jewellery Quarter	Residential, employment, retail	Included as a proposed site allocation in Focused Preferred Options Document.
8b111e	C491	St Patricks Community Centre for Health, Frank Street	Residential, employment, retail, health.	Included as a proposed site allocation in Focused Preferred Options Document.
PODRep 138	2748	Sports Quarter Opportunity Area, Bordesley Park	Sports-led regeneration, including a new stadium facility, associated sporting infrastructure and complementary uses such as a hotel, leisure, retail, residential, cultural, community and other employment generating uses.	Included as a proposed site allocation in Focused Preferred Options Document.
45e7b3	3052	280-302 Windsor Street, Nechells	Residential	Included as part of a proposed site allocation in Focused Preferred Options Document.
N/A (email submission)	3277	Typhoo Wharf (area around new BBC building)	Residential, commercial	Included as a proposed site allocation in Focused Preferred Options Document.
5db33c	3287	The Cadbury Club, Bournville	Residential, Employment, Leisure	Included as a proposed site allocation in Focused Preferred Options Document.

CFS Ref	HELAA Ref	Address	CFS Promoted Use	Comments
PODRep 156	3289	Land at Icknield Port Loop	Residential, retail, service, employment, leisure, non-residential institution, hotel and community facilities.	The site is already in the HELAA residential supply. Only the remaining parts of the original major outline planning approval that haven't yet been granted detailed planning permission have been included as proposed site allocation in the Focused Preferred Options Document.
N/A (email submission), 4a4014 and 89f7b7	3275	Land at Somery Road, Weoley Castle	Residential	Included as a proposed site allocation in Focused Preferred Options Document. Previous call for site submissions on this site (4a4014 and 89f7b7) were identified as not suitable due to flood risk but new EA flood zones now fall outside the site boundary.
N/A (email submission)	3285	Garden House, Hagley Road	Residential	Included as a proposed site allocation in Focused Preferred Options Document
N/A (email submission)	3284	Berrow Court, Berrow Drive, B15 3BU	Residential	Included as a proposed site allocation in Focused Preferred Options Document
2c6890	2478	Elkington Street, Newtown	Employment	Included as a proposed site allocation in Focused Preferred Options Document
eb2353	2487	Site Of 235 Victoria Road, Aston	Residential	Included as a proposed site allocation in Focused Preferred Options Document
PODRep 89	2486	Central Square High Street	None	Included as part of a proposed site allocation in Focused Preferred Options Document. Boundary amended from previous submission to reflect more recent comments made in the representations on the first Preferred Options consultation.
18c4c7	2451	Heaton House, Heaton Street	None	Included as a proposed site allocation in Focused Preferred Options Document

CFS Ref	HELAA Ref	Address	CFS Promoted Use	Comments
0c84f8	2463	Land Bounded by Forster Street / Great Brook Street / Windsor Street / Lawley Middleway	Residential	Included as part of a proposed site allocation in Focused Preferred Options Document
4e1302	2453	Kings Norton Trading Estate, Stockmans Close	Residential, employment	Non-conforming industrial use. Included as part of a proposed site allocation in Focused Preferred Options Document
3aef31	2842	Land at Derby Street / Great Barr Street / Lawley Middleway	Residential, employment, retail, leisure	Included as part of a proposed site allocation in Focused Preferred Options Document
8e92b6	2469	The Axis, Holliday Street	Residential, employment, retail, leisure	Included as a proposed site allocation in Focused Preferred Options Document
1b49ec	2479	Watson Road, Nechells	Residential, Employment, Retail, Leisure, Health	Included as a proposed site allocation for industrial development in Focused Preferred Options Document
053d99	2446	Land Bounded by Great Lister Street / Adams Street / Lord Street / Dartmouth Middleway	Residential, employment, retail, health	Included as part of a proposed site allocation in Focused Preferred Options Document
3f741b	2470	17 Thorp Street	Residential, employment, retail, leisure, open space	Included as a proposed site allocation in Focused Preferred Options Document
905e8f	2461	82 Frederick Road, Selly Oak	Residential, employment, retail, leisure, health	Included as a proposed site allocation in Focused Preferred Options Document
337dfc	2464	Land at Abberley Street / Dugdale Street	Residential, retail, health, community use	Included as part of a proposed site allocation in Focused Preferred Options Document
b3e3b8	2456	8 Kings Road, Sutton Coldfield	Residential, retail	Included as a proposed site allocation in Focused Preferred Options Document
68a660 and a0d8e7	3051	Signet Car Park, Farm Street, Newtown	Residential, Employment	Included as part of a proposed site allocation in Focused Preferred Options Document

CFS Ref	HELAA Ref	Address	CFS Promoted Use	Comments
576167	E185	Former Cincinatti Building, Hanson's Bridge Road	Residential	Included as a proposed site allocation in Focused Preferred Options Document
ebdbb9	3052	31 Bullock Street, Nechells	Residential	Included as part of a proposed site allocation in Focused Preferred Options Document
03a827	3051	19-27 Hunters Road, Birmingham	Residential, employment, retail, community use	Included as part of a proposed site allocation in Focused Preferred Options Document
60e8b0	3052	Car Park, Adams Street, Nechells	Student accommodation	Included as part of a proposed site allocation in Focused Preferred Options Document
542e17	3052	222, Windsor Street, Nechells	Student accommodation	Included as part of a proposed site allocation in Focused Preferred Options Document
4aaf1b	3052	43, Great Lister Street, Nechells	Unknown	Included as part of a proposed site allocation in Focused Preferred Options Document
227c1c	2836	17-23 Stockfield Road, Acocks Green	Residential, retail, leisure	Included as a proposed site allocation in Focused Preferred Options Document
2aada4 and C94aba	2766	Car Park at South Parade, Sutton Coldfield	Residential	Included as a proposed site allocation in Focused Preferred Options Document
73fe31	2767	Ladywood Police Station, Ladywood Middleway	Residential	Included as a proposed site allocation in Focused Preferred Options Document
311da4	2772	Five Ways House and Five Ways Tower	Residential, commercial, community	Included as a proposed site allocation in Focused Preferred Options Document
N/A (email submission)	2774	West Point Car Park, Hermitage Road, Edgbaston	Residential	Included as proposed site allocation in Focused Preferred Options Document.
238009	2775	New Garden Square, Edgbaston	Residential, employment, retail	The area of site that does not yet have detailed planning permission has been included as a proposed site allocation in Focused Preferred Options Document
f22969	2807	126 Hagley Road, Edgbaston	Residential	Included as part of a proposed site allocation in the Focused Preferred Options Document

CFS Ref	HELAA Ref	Address	CFS Promoted Use	Comments
1b3ccc	2776	224-228 Broad Street	Student accommodation	Included as proposed site allocation in Focused Preferred Options Document.
689fd2	2802	Tyseley Energy Park	Employment	Included as a proposed site allocation in Focused Preferred Options Document
6d4038	3052	33-35 Adams Street, Nechells	Residential, employment, retail, leisure, health, community use	Included as part of a proposed site allocation in Focused Preferred Options Document
836bdb and 913a9b	N545	Newhall Walk Shopping Centre and adjoining land, Sutton Coldfield	Residential, retail, leisure, health, community use	Included as a proposed site allocation in Focused Preferred Options Document
a3fdb9	3052	239 Heneage Street, Nechells	Residential	Included as part of a proposed site allocation in Focused Preferred Options Document
7b6b41	3052	194/194A Windsor Street, Nechells	Residential	Included as part of a proposed site allocation in Focused Preferred Options Document
eeea7	2783	Car Park behind Sheldon Local Centre	Residential, employment, retail, leisure	Included as a proposed site allocation in Focused Preferred Options Document
5b484b and ddacf5	2784	Rear of 305-367 Stockfield Road, Yardley	Residential	Included as a proposed site allocation in Focused Preferred Options Document
348556	3051	29 Hunters Road, Hockley	Residential, Employment, Retail, Health, Community Use	Included as part of a proposed site allocation in Focused Preferred Options Document
4d35d3	2806	The H Suite and 102 Icknield Port Road	Residential, Employment, Open Space, Community Use	Included as part of a proposed site allocation in Focused Preferred Options Document
721ca5	2787	239 Walsall Road, Perry Barr	Residential, Employment, Health	Included as a proposed site allocation in Focused Preferred Options Document
3c1b95 and 6c173f	2788	Land between Camden Street, Camden Grove, Camden Drive and Albion Street, Jewellery Quarter	Residential, Retail	Included as a proposed site allocation in Focused Preferred Options Document

CFS Ref	HELAA Ref	Address	CFS Promoted Use	Comments
9ea516	2789	Land between Price Street and Vyse Street, Gun Quarter	Residential	Included as a proposed site allocation in Focused Preferred Options Document
a77a61 and c74026	3052	33 Proctor Street, Nechells	Residential, Retail	Included as part of a proposed site allocation in Focused Preferred Options Document
ee02b1	2791	Cadbury Car Park, Bournville	Residential	Included as a proposed site allocation in Focused Preferred Options Document
1407db	3052	25 Great Lister Street, Nechells	Residential, Employment, Retail, Leisure, Health	Included as part of a proposed site allocation in Focused Preferred Options Document
1b5cbc	3052	41 Great Lister Street, Nechells	Residential, Employment, Retail, Leisure	Included as part of a proposed site allocation in Focused Preferred Options Document
7b467c	3052	Land adjacent to, 20 Adams Street, Nechells	Residential, Leisure, Retail, Health	Included as part of a proposed site allocation in Focused Preferred Options Document
6120f5 and 8a2929	3051	Signet Trading Ltd, Hunters Road, Hockley	Residential, Employment, Retail	Included as part of a proposed site allocation in Preferred Options Document
d34dcd	3052	241-243 Heneage Street, Nechells	Residential, employment, retail, leisure, health, open space, community use	Included as part of a proposed site allocation in Focused Preferred Options Document
642369	2793	Former Kingsway Cinema, Kings Heath	Residential, retail, leisure, community use	Included as part of a proposed site allocation in Focused Preferred Options Document
94ae23	3052	244-245 Heneage Street, Nechells	None	Included as part of a proposed site allocation in Focused Preferred Options Document
ac3da9	2849	Rear of East End, Aston Cross	None	Included as a proposed site allocation in the Focused Preferred Options Document
4599d1	2807	126-144 Hagley Road, Edgbaston	Residential	Included as a proposed site allocation in the Focused Preferred Options Document

CFS Ref	HELAA Ref	Address	CFS Promoted Use	Comments
e618e2 and email submissions	2770	300-306 Hagley Road, Edgbaston	Residential	Included as a proposed site allocation in the Focused Preferred Options Document. Area reduced to just 306 Hagley Road as the other property is not in the site promoters control
N/A (email submission)	2829	8 Meadow Road, Edgbaston	Residential	Included as a proposed site allocation in Focused Preferred Options Document.
N/A (email submission)	2830	Oakhill, Edgbaston	Residential	Included as a proposed site allocation in Focused Preferred Options Document.
N/A (email submission)	2855	Edgbaston Mill, Edgbaston	Residential	Included as a proposed site allocation in Preferred Options Document
N/A (email submission)	2835	Gracechurch Centre, Sutton Coldfield	Residential, employment, retail, leisure, open space	Included as a proposed site allocation in Preferred Options Document
965da3	2686	Site Of West Works Bristol Road South	Employment	Included as a proposed site allocation in Focused Preferred Options Document Sites 2687,3232 and 3233 have a different HELAA classification and can be found elsewhere within this report.

8.5 HELAA Classification: Currently Unsuitable – policy constraints

CFS Ref	Address	CFS Promoted Use	Comments
43f069 and PODRep 104	Minworth Greaves	Employment	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site.
5262c4	Land at Dale Farm, Roughley	Residential	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site.
48bc98	300, Redhill Road, Kings Norton	Residential	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site.
86fb25	Land North of Stanwick Avenue, Tile Cross	Residential	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site.

CFS Ref	Address	CFS Promoted Use	Comments
1b4210	Land off Kempson Avenue, Wylde Green	Residential	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site. TPO on site.
325620 and d738f2	Land at Wast Hills, Redhill Road	Residential	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site.
78b7e4	Land at Blake Street/Ryknild Close, Hill Hook Road, Sutton Coldfield	Residential	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site.
c9a76d	Land at Lowhill Lane / Lickey Road	Residential, leisure, community use	Currently allocated as open space within Longbridge AAP.
13577d	Woodside Farm, Duttons Lane, Sutton Coldfield	Residential, open space	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site.
e4b77f	Land west of Grange Lane, Sutton Coldfield	Residential, open space	Green Belt adjoining urban area. Part of larger site which would require consideration.
431d62	The Mitchell Centre, Weeford Road, Sutton Coldfield	Residential, retail	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site.
136d59	Land south of Withy Hill Road, Sutton Coldfield	Residential, retail, open space, community use	Green Belt adjoining urban area. Potential Site of Wildlife Importance and HER on site.
d9c774	Handsworth Wood Bowling Club	Residential	Loss of bowling green requires justification under policies TP9 and TP11 of the BDP. 2023 Playing Pitch Study indicates a need to retain the bowling green.
ed8f56 and 6f7f8b	Land at Walmley Golf Club	Residential	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site.
079725 and 12eaad	Duttons Lane, Roughley	Residential, open space, community use	Green Belt adjoining urban area. Potential Site of Wildlife Importance and HER on site.
0a39b2 and a3482b	Weeford Road/Slade Road, Roughley	Residential, community use	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site.
604d77 771ab4	Slade Road, Roughley	Residential, open space, community use	Green Belt adjoining urban area. Potential Site of Wildlife Importance and HER on site.
PODRep81 and 1a7016	Land South of Hillwood Road, Roughley	Residential	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site.

CFS Ref	Address	CFS Promoted Use	Comments
81b964	Land North of Sutton Coldfield	Residential, employment, retail, open space	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site.
Ebabbe	Gravelly Park Service Station, Tyburn Road	Residential, retail	Within a Core Employment Area where the promoted uses are not currently considered to be suitable.
50f381	The Cadbury Club, Bournville	Residential, Employment, Leisure	Also includes part of more recent submission 5db33c (see suitable table). Loss of tennis courts requires justification under policies TP9 and TP11 of the BDP and the 2023 Playing Pitch Strategy.
N/A (email submission)	Pebble Mill, Edgbaston	Residential	The site has planning approval for another use which is being implemented.
N/A (email submission)	Pebble Mill Plot 7, Edgbaston	Residential – keyworker/ student	Loss of outdoor sports facilities requires justification under policies TP9 and TP11 of the BDP and the 2023 Playing Pitch Strategy. Also dependent on 2022/08469/PA which is currently pending a decision.
N/A (email submission)	Richmond Hill, Edgbaston	Residential	Loss of outdoor sports facilities requires justification under policies TP9 and TP11 of the BDP and the 2023 Playing Pitch Strategy.
N/A (email submission)	Colts Ground, Edgbaston	Residential	Loss of outdoor sports facilities requires justification under policies TP9 and TP11 of the BDP and the 2023 Playing Pitch Strategy.
N/A (email submission)	Barrows Lane, Yardley	Residential, Open Space	Loss of outdoor sports facilities requires justification under policies TP9 and TP11 of the BDP and the 2023 Playing Pitch Strategy.
793fd4	Withy Hill	Residential	Green Belt adjoining urban area. Listed building and HER on site.
22b585	Country Park View, Walmley	Residential	Green Belt adjoining urban area. HER on site.
6afa7f	Clive Road, Quinton	Residential	Planning application 2024/05691/PA for residential development recently refused and subsequent appeal dismissed due to loss of sports facilities and impacts on biodiversity.
N/A (email submission)	Fox Hill	Residential, employment, retail, leisure, health, open space, community use	Green Belt adjoining urban area. Listed building and HER on site.

CFS Ref	Address	CFS Promoted Use	Comments
db9390, PODRep67, PODRep180a and email submissions	Land at Frankley	Residential	Green Belt adjoining urban area. HER on site.
PODRep180b	Land at Maypole	Residential	Green Belt adjoining urban area. Listed building and HER on site.
136d59, f073b0 and PODRep176	Land South of Withy Hill Road Sutton Coldfield	Residential, retail, open space, community use	Green Belt adjoining urban area. Flood risk and HER on site.
N/A (email submission)	New Hall Golf Course and New Hall Valley Country Park	Residential	Green Belt adjoining urban area. HER on site.
N/A (email submission)	Land at Farquhar Road East	Residential	Private open space.

8.6 HELAA classification – Not suitable

CFS Ref	Address	CFS Promoted Use	Comments
0d5227	Bridge Road, Alum Rock	Residential	Inappropriate boundary which overlaps with another submission (fbf008).
a404a1	The Bungalow, Worcester Lane, Sutton Coldfield	Residential	Isolated site in Green Belt.
36bede	Adj 11 Newton Place, Hockley	Residential	Site significantly affected by Flood Zone 3
769987	Adj 11 Newton Place, Hockley	Residential	Site significantly affected by Flood Zone 3 and too small
12dce4	Collets Brook Farm, Foxhill Lane and Tamworth Road, Sutton Coldfield	Residential	Isolated site in Green Belt.
549f10	Rear of 17-23 Jerry's Lane, Short Heath	Residential	Would be considered inappropriate backland development.
311e7d	Rear of 25-43 Erdington Hall Road, Gravelly Hill	Residential	Site as submitted likely to be considered inappropriate backland development. A larger site would need to be assembled, including existing residential properties.
2d427e	Rear of 8 St Agnes Road, Moseley	Residential	Likely to be considered inappropriate backland development.

CFS Ref	Address	CFS Promoted Use	Comments
cef984	Gildas Avenue, Sisefield Road, Pleck Walk, Glenhill Drive, Barratts Road, Bentmead Grove, Kings Norton	Residential, health, open space	Unusual site boundary, uncertainty around delivery.
3ab516	Berkley Street, Birmingham City Centre	Employment	The site contains a range of well established city centre uses. Insufficient information included in submission to determine whether or not redevelopment would be appropriate.
386c2d	Industrial units between Sampson Road North and Stratford Street North, Sparkbrook	Residential	The site is sandwiched between industrial uses and would not be suitable for residential development.
906d94	Land at Eyre Street, Hockley	Residential, Employment, Retail, Leisure	The site is too small to be considered for inclusion in the HELAA.
20a3e9	Land at Marden Walk, Stockland Green	Residential	The site is too small to be considered for inclusion in the HELAA.
a11164	20 Bournbrook Road, Selly Oak	Residential	The site is too small to be considered for inclusion in the HELAA.
989d32	Land at Hillside Farm, Roughley	Residential	Isolated site in Green Belt.
N/A (email submissions)	Bassetts Pole, Slade Lane, Roughley	Employment	Isolated site in Green Belt.

8.7 HELAA Classification – not appropriate for HELAA

CFS Ref	Address	CFS Promoted Use	Comments
b7264c	Nechells Police Station	Residential	Submission withdrawn by the site promoter
f5fa7f and 3e2f11	7 Mole Street, Sparkhill	Retail	Promoted for retail development only. The HELAA can only consider sites for housing and employment development.
a636ee	Vesey Close, Four Oaks	Residential	The site is promoted for residential development but it already contains residential dwellings.
075552	Eyre Street, Spring Hill	None	Unusual site boundary and no promoted use.

CFS Ref	Address	CFS Promoted Use	Comments
2592d5, 43103a and 6fe81d	Corner of Linden Road and Bournville Lane, Bournville	Community Use	Promoted for community use only. The HELAA can only consider sites for housing and employment development.
b7b720	Data Centre, Cadbury, Bournville	Employment	The site is promoted for employment development, but it is already in an active employment use.
528c75	Beswick Grove, Yardley	None	The site is too small to be considered in the HELAA and there is no promoted use.
ec0fe9	St. Georges Church, Newtown	None	Submitted information appears to be for another site, for which there is a separate call for site submission. No promoted use.
44b0ad	Land adjacent to Tame Valley Canal off Moor Lane, Witton	Telecoms	The site is an irregular shape and is promoted for telecoms development. The HELAA can only consider sites for housing and employment development.
3b670b	Kyotts Lake Road, Sparkbrook	Residential, employment	Irregularly shaped site and incomplete information on call for sites form.
a8c09c	Thornton Road, Ward End	None	Irregularly shaped site and incomplete information on call for sites form.
78605d	24-28 Moat Lane	Residential, Commercial	The site falls within the area covered by the approved hybrid planning application for the Smithfield development (2022/09643/PA). That site is already in the HELAA.
22731c	Central Square High Street, Erdington	Residential led with ground floor town centre uses	Superseded by newer call for site submission PODRep89.
555fba	The Mitchell Centre, Weeford Road, Sutton Coldfield	Residential, retail	Duplicate site submission - disregard this submission (superseded by newer call for site submission for Fox Hill received via email)
4faa2b	Chase Farm, Weeford Road, Roughley	Residential	Superseded by a newer call for site submission for Fox Hill received via email, which covers a much larger area.
05b298	Weeford Road, Roughley	Residential	Superseded by a newer call for site submission for Fox Hill received via email, which covers a much larger area.
6c3314	Fox Hill Road, Roughley	Residential	Superseded by a newer call for site submission for Fox Hill received via email, which covers a much larger area.
1cbf51 and a6e4ce	Fox Hill, Roughley	Residential, employment, retail, leisure, health, open space, community use	Superseded by a newer call for site submission for Fox Hill received via email, which covers a larger area.
a8cc84	Birmingham Wheels Park	Leisure, open space, community use	Superseded by new Sports Quarter proposal.

CFS Ref	Address	CFS Promoted Use	Comments
b05e3b	Land Between Hermitage Road and Westfield Road, Edgbaston	Residential	Superseded by a newer call for site submission received via email which reduces the promoted site area.
7fa7a3	138-142 Hagley Road, Edgbaston	Residential	Superseded by newer call for site submission 4599d1 which covers a larger area.
bab324	Digbeth Railway Arches	Residential, employment, retail, leisure.	Given nature of railway arches the most suitable use is considered to be commercial and a proposed allocation has been included in the Focused Preferred Options Document on that basis. As the HELAA is focused on housing and employment uses it is not appropriate to include a proposed commercial development site within it.
PODRep 39	Coleshill Street Car Park	Commercial, including hotel	Proposed as an allocation in the Focused Preferred Options Document. As the HELAA is focused on housing and employment uses it is not appropriate to include a proposed commercial development site within it.
dd5b26	Oxford Street, Digbeth	Employment, education	Although promoted for employment it is not considered that industrial uses are appropriate in this City Centre location. Commercial uses are considered to be suitable use but these are outside the scope of uses included in the HELAA.
PODRep 75b	Edgbaston Street Car Park	Mixed Use residential, commercial, retail, leisure, cultural and employment uses, including PBSA	The site falls within the area covered by the approved hybrid planning application for the Smithfield development (2022/09643/PA). That site is already in the HELAA.
PODRep 119	Paradise Masterplan Site	Mixed use - commercial (offices & retail/leisure), hotel and residential	The remaining land still to be developed from the major outline planning approval has been included as a proposed allocation in the Focused Preferred Options Document. As this area is only proposed for commercial uses it is outside the scope of the HELAA.
73fb00	63-65 Hunters Vale, Birmingham	Residential	Planning application for residential development recently refused and subsequent appeal dismissed