



BIRMINGHAM DEVELOPMENT PLAN

Strategic Housing Land Availability Assessment (SHLAA) 2021

March 2022

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1. Summary of Findings

- 1.1 The 2021 SHLAA consists of 936 identified sites with a capacity of **40,376** dwellings. An additional unidentified capacity of **3,610** windfall dwellings brings the total SHLAA capacity to **43,986** dwellings.

Table 1.1: The 2021 SHLAA

Category	Dwellings
Under Construction	13,818
Detailed Planning Permission (Not Started)	6,759
Outline Planning Permission	6,210
Permitted Development (office, retail, agricultural to residential)	678
Permission in Principle	9
Allocation in Adopted Plan	5,791
Other Opportunity within a BDP Growth Area	4,382
Other Opportunity outside the BDP Growth Areas	2,729
Sub Total – Identified Sites	40,376
Windfalls Below the SHLAA survey threshold (<0.06ha)	410
Windfalls Above the SHLAA survey threshold (>=0.06ha)	3,200
Sub Total – Unidentified Sites	3,610
Total Capacity	43,986

- 1.2 In order to compare the capacity identified in the SHLAA (**43,986**) with the housing requirement set out in the Birmingham Development Plan (**51,100**) it is necessary to add delivery in the period 2011/12 to 2020/21 to the capacity identified in the SHLAA.

Table 1.2: Supply 2011-31

	Dwellings
SHLAA Capacity 2021	43,986
Completions 11/12-20/21	26,175
Total 2011-31	70,161

Table 1.3: Supply Period

Time Period	Identified Supply	Unidentified Supply	All
Short Term - Within 5 Years	20,962	1,360	22,322
Medium Term – 6 to 10 Years*	19,414	2,250	21,664
Total	40,376	3,610	43,986

*To 2031

- 1.3 A 5-Year housing land supply position statement is published annually as part of annual monitoring and can be viewed or downloaded from the City Council's web site at: [Birmingham Housing Studies](#)

Table 1.4: Planning Status by Supply Period

Category	Within 5 Years	Years 6 to 10*	Total
Under Construction	12,864	954	13,818
Detailed Permission (Not Started)	6,075	684	6,759
Outline Permission	816	5,394	6,210
Permitted Development**	687	0	678
Permission in Principle	9	0	9
Allocation in Adopted Plan	520	5,271	5,791
Other Opportunity within BDP Growth Area	0	4,382	4,382
Other Opportunity outside BDP Growth Areas	0	2,729	2,729
Total – Identified Sites	20,962	19,414	40,376
Windfalls	1,360	2,250	4,185
Total – Unidentified Sites	1,360	2,250	4,185
Total SHLAA	22,322	21,664	43,986

* To 2031

** Office, Retail, Agricultural to Residential

2. Introduction

- 2.1 The SHLAA is a study of sites within Birmingham that have the potential to accommodate housing development. Its purpose is to provide evidence to support the Local Plan, in particular the Birmingham Development Plan. Taken together, the SHLAA and the ELAA constitute Birmingham's Housing and Employment Land Availability Assessment (HELAA). These are both key components of the evidence base to support the delivery of land to meet the need for new housing and employment development within the city. The main role of the assessment is to:
- Identify sites (and broad locations) with potential for housing and employment development
 - Assess their development potential
 - Assess their suitability for housing and employment uses and the likelihood of development coming forward.
- 2.2 Whilst this SHLAA is a key part of the Birmingham Development Plan evidence base it is a technical document only. It is not a decision making document and it does not allocate land for development. As a technical exercise the SHLAA is based on the best information at a given point in time. The inclusion of a site in the SHLAA does not mean that it will be developed for housing, it does not mean that housing is the only suitable use for a site, and it does not necessarily mean, where it is not already the case, that planning permission would be granted for housing. Circumstances may change over time.
- 2.3 Development proposals on sites identified in the SHLAA are required to comply with relevant development plan policies. For example, where the existing use of the site is not residential, policies regarding the loss of employment land, open space or sports facilities may be relevant.
- 2.4 The 2021 SHLAA, which covers the period 2021-31, has not been undertaken with a view to arriving at any specific dwelling capacity. It has been undertaken as a self-contained assessment to consider potential housing land supply in the short and medium term.
- 2.5 The Council has commenced work to update the BDP with a new plan which will be called the 'Birmingham Plan'. To inform the plan review, and in the context of the new Local Housing Need figure for Birmingham, a comprehensive Housing and Economic Land Availability Assessment (HELAA) is currently being undertaken. It is anticipated that the findings of the study will be published later in 2022, alongside the Birmingham Plan Issues and Options consultation.
- 2.6 The HELAA methodology was published for consultation in 2021 and future HELAA's will follow that methodology. However, this SHLAA follows the methodology that has been used for all previous SHLAA's, as detailed in the remainder of this report.

3. Background

National Planning Policy Framework

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

3.2 The National Planning Policy Framework (NPPF) was first published in March 2012 and was replaced with a revised NPPF in July 2018 and updated in 2019 and 2021.

3.3 The requirement to produce a SHLAA is now set out at paragraph 67 of the NPPF (2021):

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

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

3.4 In addition, Paragraph 74 of the revised NPPF states:

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

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

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

“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because*

they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

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

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

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

National Planning Practice Guidance

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

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

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

The Birmingham Development Plan (BDP)

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

The SHLAA in Birmingham

3.10 The City Council has monitored planning commitments for many years. This has provided accurate, up to date information regarding progress towards meeting the city’s housing targets. In 2004, in order to get a better understanding of housing land supply Chesterton’s PLC were commissioned to

undertake an Urban Capacity Study. This in turn provided a useful starting point for the city's first SHLAA which was undertaken by ENTEC UK and published in 2008.

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

The Database

- 3.12 The SHLAA 2021 database is held in MAPINFO format. The SHLAA database includes the following key information:
- A list of sites, cross-referenced to maps showing locations and boundaries of sites.
 - An assessment of the potential quantity of housing that could be delivered on each identified site.
 - An assessment of when the site is realistically expected to be developed.
 - Other pertinent information such as progress bringing sites forward, constraints, planning status, previous/current use etc.
- 3.13 SHLAA Sites can be viewed on the City Council's interactive web mapping system: [Birmingham SHLAA GIS Maps](#)
- 3.14 Over recent years, the City Council has been working towards achieving closer alignment between SHLAA sites and planning approvals, so that there is a more direct relationship between the SHLAA and the monitoring of planning approvals, including where sites are under construction and where dwellings have been completed. To support this, some of the boundaries for the SHLAA sites have been amended to match the planning application boundaries to which they relate to. In most cases this has involved a minor redrawing of the boundaries where they followed the approximate line of the planning application boundary but didn't exactly match, however in other cases the work has involved splitting up the SHLAA site into smaller parcels to take account of different areas which have planning approval and other parts of the SHLAA site which do not. Where sites have been split, they have been relabelled with a letter added at the end of the reference number (e.g. S001A, S001B etc.), and capacities have been apportioned according to the planning approval and any remaining capacity from the original SHLAA site.

Maintaining a Five-Year Supply of Deliverable Sites

- 3.15 The findings of the SHLAA should be considered alongside the city's housing target in order to determine the five year supply of deliverable sites. A 5-Year housing land supply position statement is published annually as part of annual monitoring and can be viewed at, or downloaded from [Birmingham Housing Studies](#).

4. Fundamentals and Assumptions

- 4.1 The primary purpose of the SHLAA is to demonstrate that the housing trajectory set out in the Birmingham Development Plan can be met by identifying sites which are suitable for housing development, assessing how much housing the sites can deliver and assessing when the sites are likely to be developed. But it is also important that the SHLAA identifies a varied portfolio of development opportunities which are:
- Capable of delivering the types, sizes and tenures of housing that are required in the city so as to meet the diverse needs of all members of the community.
 - Suitable for, and attractive to, a wide range of developers from large national volume builders to small local builders and niche developers.
 - Suitable for both the private sector and the social/affordable sector.
 - Distributed throughout the city.
- 4.2 In addition, the sites identified in the SHLAA should:
- Contribute to the creation of sustainable, mixed communities and
 - Maximise the potential for development in the city.
- 4.3 The SHLAA therefore supports the delivery of Policies PG1 and TP27 to TP33 of the Birmingham Development Plan and data on the availability of land for housing development from the SHLAA is used to inform the monitoring of these policies within the Authority Monitoring Report.
- 4.4 In accordance with the PPG, sites identified in the SHLAA may be suitable for various tenures or for specific needs such as housing for the elderly or students.

The City Centre

- 4.5 The city centre is the regional centre of the West Midlands. Pre-recession, it was a major source of new housing in the city with almost 10,500 additional dwellings being delivered in ten years (2001-11) bringing the city centre population to 30,000.
- 4.6 The city centre market took longer to emerge from recession than the more traditional markets but recent monitoring shows that the city centre market is flourishing. A total of 10,432 dwellings have been completed since 2011, with a further 16,752 dwellings in the pipeline (under construction or with detail or outline planning consent).

Purpose Built Student Accommodation

- 4.7 With five universities and six large further education colleges, Birmingham has a large student population and a significant amount of housing demand originates from students. According to the latest available Higher Education Statistics Agency (HESA) data, there were 76,850 full-time and 14,800 part-time students studying at the City's five main universities in 2020/21. The number of full-time students has grown by approximately 7,000 since 2017/18. .

- 4.8 Student households are included in ONS household projections and as such are included in the housing requirement. The PPG states “All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can in principle count towards contributing to an authority’s housing land supply based on:
- the amount of accommodation that new student housing releases in the wider housing market (by allowing existing properties to return to general residential use); and / or
 - the extent to which it allows general market housing to remain in such use, rather than being converted for use as student accommodation”.
- 4.9 In 2020/21, the most recent year for which information is available, 27% of students were residing in ‘other rented’/HMO accommodation which could be released to the general housing market through the provision of additional purpose built accommodation. A dwelling in the general housing market can therefore be freed up through the provision of a purpose built, one person apartment or a cluster flat containing five, six or more bedspaces. The City Council’s approach is, therefore, to count self-contained units of accommodation or cluster flats as one dwelling.
- 4.10 The City Council will continue to monitor the development of purpose built student accommodation and the contribution made towards meeting the city’s housing requirements.

Table 4.1: Bedspaces and Clusters in the SHLAA (2021/22)

	Total bedspaces	Bedspaces within clusters	Clusters	Studios
Under Construction	1,130	641	84	489
Detailed Permission	1,440	1,289	219	151
Total	2,570	1,930	303	640

Assumptions

- 4.11 The following assumptions were made when assessing sites.

The Housing Potential of the Sites – Dwelling Capacities

- 4.12 The following rules have been applied in assessing the capacity of sites:
- Where sites already had planning permission the site capacity is as specified in the permission, unless the best information available indicated that a revised scheme was likely to be brought forward and this would result in a higher or lower capacity.
 - On sites allocated in adopted or draft plans the capacity is as set out in the plan.
 - Where sites have not previously been allocated or had approval the minimum densities set out in Policy TP30 of the Birmingham Development Plan were applied. The policy states that development should take place at a minimum of 100 dwellings per hectare (dph) in the city centre, 50 dph in local centres and on good public transport corridors and 40 dph elsewhere. The policy acknowledges that there may be occasions where lower densities would be appropriate, for instance in conservation areas, mature suburbs or to enable diversification, for instance through the provision of family housing in the city centre. The

densities set out in the policy were therefore refined on a site-by-site basis if necessary to take account of site specific information and constraints. Capacities were reduced on sites where there was a reasonable prospect that the site would come forward for mixed use development.

- 4.13 The densities in the SHLAA relate to the land covered by the residential development itself, spaces associated with that development such as gardens, driveways and roads within the site boundary. They do not include ancillary uses such as open space.
- 4.14 In many cases the densities assumed for sites in the city centre will require the development of apartments. There are, however, sites in the city centre where development would not necessarily need to be apartments as the suggested capacities could be achieved with high density mews or town houses if suitably designed.
- 4.15 Although the capacities are based on the best information available it is accepted that actual development capacities may differ – some will be lower, but others will be higher. In addition, different types of developer, from volume builders to small local builders and housing associations to specialist developers such as those providing retirement housing or ‘city living’ type housing, will produce different proposals (and capacities) for the same site. The actual capacity of SHLAA sites that are developed will continue to be monitored.

Delivery Rates

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

Impact of Covid-19

- 4.17 The coronavirus outbreak is having and has had a damaging and devastating economic and business impact. The first national lockdown was imposed in March 2020 and although construction was suspended on most sites across the country during the initial lockdown, planning permissions remained stable due to remote working. According to research conducted by Savills¹, 85 per cent of suspended housebuilding sites in England had reopened by late July. Where sites had resumed construction, social distancing had meant that work progressed at a slower rate. Housebuilder reports vary, but most suggest they were operating between 50 per cent and 80 per cent of normal capacity. Despite this, residential completions in Birmingham for the 2020/21 monitoring year are among the highest since the beginning of the BDP plan period. 3,481 dwellings were completed in 2020/21 down only 8% from the 3,765 completed in the previous monitoring year.

¹ https://www.savills.co.uk/research_articles/229130/324818-0

4.18 Research and analysis conducted by Savills found that, in 2021 housing delivery came close to its pre-Covid peak. Energy Performance Certificate (EPC) data revealed 243,775 new homes were built in England in 2021 compared with the record 255,206 homes built in 2019. There is however some caution that new housing builds have peaked and will not continue at this level. According to Savills calculations using Glenigan (partnership of construction industry bodies) figures, full consent was granted for 272,000 new homes in 2021– the lowest yearly total since 2015. The implication of fewer consents could be related to the fact that supply of sites is limited. Developers are also having to contend with cost inflation and labour shortages. Therefore, residential completions may fall in 2022.

The Assessment – Site Specific Supply

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

Review of Committed Sites

- 4.20 The City Council has a longstanding and effective system in place for monitoring planning commitments for residential development. The Birmingham Land Availability and Development Enquiry Service ('BLADES'), is a system which has been developed to provide comprehensive details of all sites (not just residential) which constitute a strategic land resource and allows the development of these sites to be monitored. The database contains data relating to any parcel of land which has a commitment for development. The information provided has, over many years, proved to be essential in monitoring the Local Development Scheme, enabling policy development at both the local and regional level, and enabling the completion of statutory returns to government.
- 4.21 The planning commitments database is updated on an ongoing basis throughout the year by City Council Planning Officers. Each planning application, planning decision and demolition notice is reviewed in order to assess whether it affects or constitutes a land resource site. Planning Committee reports provide a useful check to ensure that all of the planning applications have been examined (including delegated decisions). Internal liaison ensures that changes to the status of plans and allocations are identified.
- 4.22 The main 'stock-check' of sites with full planning permission and sites with served demolition notices is undertaken annually to a base date of 1st April. All sites are visited in order to ascertain the number of dwelling completions and starts during the year and dwellings under construction at the year end.
- 4.23 The annual stock check of sites resulted in a planning commitments database of factual and unadjusted data. These sites were then considered for inclusion in the SHLAA. Additional work was undertaken to establish whether any of the committed sites should be discounted or excluded from the SHLAA. In recent years further work has been undertaken to ensure closer alignment between SHLAA sites and planning approvals. This has included a review of SHLAA boundaries and capacities to match those of relevant planning approvals. Some SHLAA sites have been split to distinguish between parts of sites that have received planning approval and other areas and capacities that are left over. Where sites have been split, they retain their original reference number but a letter has been appended to denote the new site parcels (e.g. S001A, S001B etc.).
- 4.24 Committed sites are those which are under construction, have detailed planning permission but are not under development, have outline planning permission, are allocated in an adopted or draft plan or are permitted development.

Review of Uncommitted Sites

- 4.25 Although all committed sites, irrespective of size, were considered for inclusion in the SHLAA it was necessary to set a threshold when considering uncommitted sites.
- 4.26 The PPG states that the assessment should consider all sites and broad locations capable of delivering five or more dwellings but also states that plan makers may wish to consider alternative thresholds. In Birmingham all previous SHLAAs have been undertaken using a threshold of 0.06ha. As this is a lower threshold than 5 dwellings and much information already exists for sites meeting it, 0.06ha continues to be used in this SHLAA.
- 4.27 There were two main stages involved in updating the uncommitted element of the SHLAA. The first was to re-examine all of the existing sites in the previous SHLAA and the second was to consider new sites.
- 4.28 A wide range of sources of data have been used to identify sites. In particular:
- Existing SHLAA information
 - Development starts and completions records
 - Planning applications not yet determined
 - Pre application enquiries
 - Ordnance Survey maps
 - Aerial photography
 - Site surveys
 - Infill in residential areas including under-used garage blocks
 - Large scale redevelopment and re-design of residential areas
 - Urban extensions
 - Non-residential allocations and permission for which are no longer required for those uses
 - Vacant and derelict land and buildings
 - Surplus public sector land
 - Sub division of existing Housing
 - Flats over shops
 - Returning empty homes to use
 - Surplus City Council land
 - Open space (if declared surplus)
 - Sports pitches (if declared surplus)
 - School Playing fields (if declared surplus)
 - Allotments (if declared surplus)
 - Other bodies' plans
 - Call for sites

The 'Call for Sites'

- 4.29 The Council is currently undertaking a comprehensive HELAA (see para 2.6 above) to inform the new Birmingham Plan. This process has included a Call for Sites which was open from June 2021 to January 2022. All sites submitted during that time will be considered as part of the new HELAA process and have not been assessed as part of this SHLAA.

4.30 It is still possible to submit site suggestions for consideration through the plan update process via the online form at: [Birmingham Call for Sites](#). Submitted sites will be assessed as part of the annual HELAA process.

Reviewing Existing Sites

4.31 The review of the existing SHLAA sites included:

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

5. The Assessment – Unidentified Supply

The Housing Potential of Windfall Sites

- 5.1 The NPPF permits a windfall allowance to be included in all of the SHLAA's supply periods, including the first 5 years with further guidance being provided in the PPG. Paragraph 70 of the revised NPPF states that "Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends".
- 5.2 Birmingham is a city with an urban area covering more than 22,000 hectares. The resources required to undertake a comprehensive survey in such a large built up area are huge. Whilst every effort has been made to be as comprehensive as possible when undertaking the SHLAA it is inevitable that opportunities will have been missed. It is also the case that with an urban area of this size there will be a continual supply of land and buildings reaching the end of their useful life in their current use which may be suitable for residential development. These opportunities can be very difficult to foresee in the short term, let alone ten or fifteen years in advance.
- 5.3 Birmingham has a long and impressive track record in delivering windfall sites, with 67% of all completions during the period covered by the UDP (1991 to 2011) taking place on sites which came forward as windfalls. Between 2011 and 2021, 12,480 windfalls received planning permission; an average of 1,248 per annum and 13,094 windfall dwellings were completed at an average of 1,309 per annum. The rate at which windfalls are brought forward and developed will continue to be monitored on an annual basis.
- 5.4 Sites which come forward as permitted development as part of the recent government initiatives enabling change of use (mainly but not exclusively) from offices (B1a) to residential, although not requiring planning permission, are also effectively windfalls where these have not previously been identified. In 2021/21 notification was received for 463 dwellings to be created from such conversions.
- 5.5 Some windfall sites receive planning permission and are developed in the same year and are therefore never included within a SHLAA. This can particularly happen where smaller builders or self-builders are involved.
- 5.6 A windfalls assumptions paper is at Appendix A4. In assessing the potential of windfalls, sites above and below the SHLAA survey threshold have been considered separately.
- 5.7 The windfall methodology in this SHLAA remains unchanged from that examined at the BDP hearings (although it takes account of the reduced time period covered).

Windfall sites below the SHLAA survey threshold

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

- 5.9 Typically, these small sites include flats above shops, the sub division of existing housing, intensification – for instance where a single dwelling is replaced by two – and small self-build schemes. Occasionally high density apartment schemes also fall under the threshold.
- 5.10 The change made to national planning policy to the definition of garden land (from Greenfield to Brownfield) in June 2010 had an impact on small windfalls as garden development has tended to be on small sites. As development on garden land is now much less likely to be permitted and to ensure consistency with the NPPF no allowance has been made for windfalls on garden land.
- 5.11 Table A4.3 of appendix A4 shows the annualised windfall assumptions on small sites. From that table the following anticipated windfall provision on small sites has been determined.

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

Time Period	Period Contribution (Dwellings)
Short Term: 2021/22- 2025/2026	160*
Medium Term: 2026/27 – 2030/31	250

*Assumes no windfalls in year 1

Windfall sites above the SHLAA survey threshold

- 5.12 Although the initial SHLAA was undertaken as a comprehensive survey of potential residential development opportunities of at least 0.06ha, unidentified sites above this threshold continue to deliver significant levels of new housing.
- 5.13 The rate at which new windfall sites are coming forward (being granted detailed planning permission) slowed in line with worsening economic conditions although the success of the city’s SHLAAs in identifying development opportunities will also have had an impact. Since the low point in 2009/10 the trend in the number of windfall dwellings receiving detailed planning permission has been upwards as economic conditions improve and the market recovers.
- 5.14 The annualised assumptions with regard to the rate at which windfall dwellings will be developed is set out in Table A4.3 of appendix A4. This is a conservative estimate and it is likely that the windfall assumptions will be significantly exceeded as conditions continue to improve.

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

Time Period	Period Contribution (Dwellings)
Short Term: 2021/22- 2025/26	1200*
Medium Term: 2026/27 – 2030/31	2000

*Assumes no windfalls in year 1.

Empty Houses – Bringing Vacant Properties Back into Use

- 5.15 The NPPF encourages local authorities to bring vacant properties back into residential use. The City Council’s Empty Property Strategy 2019-2024 sets targets for bringing empty private sector homes back into use with a headline target of bringing 350 long term empty properties back into use per year. Between 2011/12 and 2019/20 a total of 1,956 long term vacant dwellings have been brought back into use.

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

The Housing potential of Broad Locations

- 5.17 The PPG states that broad locations should be included in the SHLAA even though specific sites have not yet been identified. This is part of a proactive approach to planning, which reflects positive choices about the direction of future housing development, rather than a reactive approach to development opportunities as they arise.
- 5.18 This SHLAA has sought to identify specific development opportunities rather than broad locations. The Birmingham Development Plan seeks to maximise the opportunities for growth in the city up to 2031 and it identifies ten growth areas including a large urban extension on land removed from the Green Belt. The City Council have sought to identify specific development opportunities within these growth areas. There is, therefore, no additional capacity which can be included within broad locations for growth by 2031. Whilst additional opportunities may well come forward during the plan period within the growth areas these are accounted for in the windfall allowance. This approach conforms to paragraph 023 (Reference ID: 3-023-20190722) of the PPG and paragraph 67 of the NPPF.

6. Assessing When & Whether Sites Will Be Developed

- 6.1 The glossary to the revised NPPF provides the following definitions of ‘deliverable’ and ‘developable’ sites:

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

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

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

Assessing the Suitability for Housing

- 6.3 The PPG prescribes that sites can be considered suitable if they would provide an appropriate location for development when considered against relevant constraints (e.g. conformity with national policy, market attractiveness, contribution to regeneration priorities and potential impacts on landscapes, nature and heritage) and where there is potential for impacts to be mitigated. Sites in existing development plans or with planning permission can generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability.
- 6.4 All sites included within the 2021 SHLAA are, at the current time, considered to be suitable for housing development. All were considered against national and local policy and examined for constraints. All new sites were reviewed by officers from the City Council’s Planning and Regeneration area teams prior to inclusion. Sites which were included in the 2020 SHLAA which are no longer considered suitable have been removed.
- 6.5 Planning permissions were reviewed and relevant sites removed where there were strong reasons to believe that the permission would not be implemented and where an application for renewal would, due to changing circumstances, be resisted. Other sites without formal planning status were rejected for a variety of reasons including serious constraints, incompatibility with adjoining uses and

incompatibility with current and emerging policy. As stated earlier, sites within the Green Belt (which would be considered as not suitable) are not included in the SHLAA.

Assessing Availability for Housing

- 6.6 The PPG states that a site is considered available for development, when, on the best information available, there is confidence that there are no legal or ownership problems (e.g. unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners). Land controlled by a developer or landowner who has expressed an intention to develop may be considered available. The existence of a planning permission can be a good indication of the availability of sites. Sites without permission can be considered available within the first five years – subject to them also being suitable and achievable. Consideration can also be given to the delivery record of the landowner or developer and whether the planning background shows a history of unimplemented permissions.
- 6.7 Where site specific information was available this has been used to assess whether a site is available now or at some time in the future. Area based planning and regeneration officers have sought to ascertain pertinent information from developers and landowners. However, it was not possible or practical to get detailed information for all SHLAA sites. For those where specific information was not available a number of assumptions were used to ascertain availability. A site is available now if:
- It is under construction.
 - The site has planning permission and is either owned by a housing developer or the application was submitted by a housing developer.
 - The site has planning permission and has been cleared.
 - The site has detailed planning permission and no known constraints.
 - The site is in the BMHT five year development programme.

Assessing Achievability for Housing

- 6.8 The PPG states “A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgment about the economic viability of a site and the capacity of the developer to complete and let or sell the development over a certain period”.
- 3.46 The NPPG 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.”
- 3.47 There are many factors that can impact upon viability of a site, therefore, assessing achievability is challenging due to the complex factors at play and fluctuations in the housing market, particularly post Covid-19. The long-term impacts of Covid-19 on the achievability of sites is not yet known but may result in some sites with planning permission not being built out or built out at a slower rate. The suitability assessment criteria will also highlight potential development issues which may in turn impact on viability.
- 3.48 The NPPG 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. The BDP Inspector also noted that the BDP allows flexibility in its policy requirements so that appropriate account can be taken of viability considerations. Viability evidence will be updated in due course, but for the purposes of assessing the achievability of sites in the SHLAA, 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.

7. Future Reviews

- 7.1 The 2021 SHLAA, like those before it, has concentrated on identifying development opportunities up to 2031 (the end date of the BDP). The BDP was adopted more than five years ago (January 2017) and a review has identified the need for it to be updated.
- 7.2 The City Council has commenced work on the new Birmingham Plan, including a comprehensive Housing and Economic Land Availability Assessment (HELAA). It is anticipated that the HELAA will be published in Summer 2022 alongside the Issues and Options consultation on the new plan.
- 7.3 As part of an ongoing Call for Sites, submissions can be made via the online form at: [Birmingham Call for Sites](#).
- 7.4 If you would like further information about this SHLAA or the Birmingham Plan please contact planningstrategy@birmingham.gov.uk.

Appendices

A1 SHLAA / PPG² Consistency Check

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

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

² PPG at 13th May 2015

Table A1.2: Guidance Requiring Further Consideration

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

A2 Key Stages of SHLAA process

Key Stages
Check methodology Prepare work programme
Review Committed Sites Ensure planning commitments monitoring system up to date Visit all committed housing sites (c700 sites) / record latest position Update the planning commitments database – data input & verification Establish / check availability & achievability (including any discounting) Review sites - omit those unlikely to be delivered Assign time period
Review Uncommitted Sites Review BMHT Development Programme (c100+ sites) Remove any current sites which are no longer suitable or developable Establish / check availability & achievability (including any discounting) Remove any current sites which are no longer suitable or developable Assign time period Review any comments received on the 2018 SHLAA
Review Unidentified Supply Vacant properties, windfalls, broad areas for growth etc.
Establish SHLAA Database Merge committed / uncommitted elements of the database. Consistency checking and verification Final data trawl to fill any gaps in the database Ensure 5 year supply reasoning is robust Reporting Analysis, establish findings and prepare draft Publish 2021 SHLAA including mapping Publish 2021 5-Year Supply Position Paper

A3 Extract from BDP Inspector's Report

Extract³ from the report on the Examination of the Birmingham Development Plan ("Birmingham Plan 2031"), Roger Clews BA MSc DipEd DipTP MRTPI (Inspector appointed by the Secretary of State for Communities and Local Government). 11 March 2016

Meeting the overall need for housing – capacity within Birmingham

54. In seeking to meet the objectively assessed need for housing, the Council's *Strategic Housing Land Availability Assessment*, published in September 2014 [2014 SHLAA, EXAM 6], demonstrates capacity for 46,830 dwellings over the rest of the BDP period. Adding completions (4,159) and long-term vacant dwellings brought back into use (793) since 2011 gives a total supply of around 51,800 dwellings over the Plan period as a whole. About 4,500 of these dwellings are on sites under construction and a further 11,000 have full or outline planning permission. Because the subsequent SHLAA was published in November 2015, it was too late to be considered by examination participants, but the overall position it presents is very similar.
55. The SHLAA is prepared on an annual cycle, which includes a "call for sites" and a robust process of reassessment of existing sites, involving some 1,200 site visits. Individual sites are identified as being available for development within five, 10 or 15 years, according to their circumstances. Site capacities are based wherever possible on extant planning permissions or direct evidence from their promoter; elsewhere they are based on standard densities but with appropriate adjustments made to take account of site-specific constraints. For the larger⁴ housing sites the evidence in the 2014 SHLAA is supported by the Council's *Site Delivery Plan* [EXAM 25], which provides a more in-depth analysis of the factors affecting their deliverability.
56. Having sought further explanation about the assessments of a number of individual sites, I am satisfied that the SHLAA methodology is sound, and that it provides an accurate account of the sites that are either deliverable within five years or developable in later years, in accordance with NPPF footnotes 11 and 12⁵. It is true that a high proportion of the identified sites are relatively small, and that most of the larger sites are located in the inner-city wards (particularly Ladywood and Nechells), rather than the higher-value suburbs. But that is because Birmingham is heavily built-up, with most development opportunities to be found on brownfield land in the older parts of the city. Based on development trends since 2000, in a wide range of economic conditions, there is a realistic prospect that the identified sites will be brought forward for development by the end of the Plan period.

³ The full report can be viewed / downloaded from Birmingham.gov.uk/plan2031

⁴ Sites for more than 100 dwellings in the city centre and 50 dwellings elsewhere

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

57. Student households are included in the DCLG household projections. The sites identified in the SHLAA include sites with planning permission for just over 4,000 bedspaces in purpose-built student cluster flats and studio apartments. This level of provision is justified by evidence from the city's universities on the current demand from students⁶, and DCLG have confirmed that such accommodation should be included in the monitoring of housing supply⁷.
58. Alongside the identified sites, the 2014 SHLAA includes a windfall allowance for some 7,600 dwellings over the remainder of the BDP period. This figure is based on an annual allowance that is initially set some way below the lowest windfall completion rates of recent years, and then increases gradually over the period to reflect the expected recovery in the housing market. Nonetheless, the maximum annual allowance is less than a quarter of the highest level experienced before the 2008 financial crisis. The calculation of the allowance specifically excludes development of residential gardens. I am satisfied therefore that the overall windfall allowance is based on sound evidence and is realistic and achievable. Indeed, in practice it is likely to be exceeded.
59. Finally, the 2014 SHLAA makes a modest allowance of 800 additional dwellings from the Council's Empty Homes Strategy. There is clear evidence that the Strategy has succeeded in bringing well over 200 long-term empty homes back into use each year since 2011. The allowance of 800 assumes that 200 more will have been brought back into use each year until 2018, when current funding for the Strategy runs out. That is a realistic assumption.
60. Thus the figure of around 51,800 dwellings, derived from the 2014 SHLAA, represents a sound assessment of the potential overall housing land supply during the BDP period.

⁶ See EXAM 6, paras 6.7-6.13.

⁷ See EXAM 6, Appendix 3.

A4 Windfalls Assumptions Paper

1. Purpose

- 1.1 To determine the extent to which windfalls contribute to meeting the City's housing requirement and to establish and justify the windfall allowances in the 2021 SHLAA.

2. Background

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

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

- 2.2 The most recent National Planning Practice Guidance (NPPG), published in July 2019 provides additional guidance, stating "A windfall allowance may be justified in the anticipated supply if a local planning authority has compelling evidence as set out in paragraph 70 of the National Planning Policy Framework. Local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance".
- 2.3 Birmingham has a long and impressive track record in delivering windfall sites, with 67% of all completions during the period covered by the UDP (1991 to 2011) taking place on windfall sites. In a city with an urban area of over 22,000 hectares it is inevitable that there will be a continual supply of land and buildings reaching the end of their useful life in their current use which are suitable for residential use. These opportunities can be very difficult to foresee.
- 2.4 This paper examines the supply and development of windfall sites since 2001.
- 2.5 Data used in this assessment has been taken from the Birmingham Land Availability and Development Enquiry Service ('BLADES'), a system which monitors planning commitments and residential development. In order to undertake this analysis data relating to windfalls has been extracted from the database and analysed. All figures in this paper are net.

3. What is a Windfall Site?

- 3.1 The revised NPPF defines windfall sites as "Sites not specifically identified in the development plan".
- 3.2 For the purpose of this paper and the windfall allowance in the SHLAA, windfalls are sites which have not previously been identified at the time that detailed planning permission is granted. That means, not only have they not been identified through the local plan process but also that they have not been included within the SHLAA.

4. The Supply of Windfall Sites

- 4.1 Since 2001 28,740 dwellings have received detailed planning permission on windfall sites, an average of 1,437 per annum. Of these 23,708 (82%) were for new build schemes and 5,032 (18%) involved the conversion of an existing building. 15,718 (55%) of windfalls were located in the city centre. 22,360 (22%) of the windfalls coming forward were apartments and 6,390 (78%) were houses.

4.2 Although 28,740 windfall dwellings have been granted detailed planning permission since 2001 there have been large variations year to year from a high of over 3,500 in 2005/6 to a low of just under 200 in 2009/10. Generally the six years from 2001/2 to 2006/7 saw high levels of windfalls coming forward (2,450 per annum). Thereafter, the number of windfalls declined sharply with just 739 receiving detailed planning permission in the period 2008/9 to 2010/11, an average of 246 per annum. Since the beginning of the BDP plan period (2011/12) the annual supply of windfalls has varied considerably from 401 in 2013/14 to 2,860 in 2020/21.

Table A4.1: The Supply of Windfalls

Year	Windfalls Granted	New build / Conversion		In / Out of City Centre		House / Apartment		Over/Under 0.06ha	
		New Build	Conv	In	Out	House	Apt	0.06>	<0.06
2001/2	2798	2637	161	777	2021	397	2401	2570	228
2002/3	807	713	94	453	354	105	702	649	158
2003/4	2698	2612	86	1725	972	224	2474	2528	170
2004/5	2452	1981	471	1639	813	249	2203	2306	146
2005/6	3522	3464	58	2407	1115	366	3156	3355	167
2006/7	2422	2380	42	1674	748	221	2201	2338	84
2007/8	822	748	74	368	454	134	688	698	124
2008/9	339	307	32	54	285	110	229	221	118
2009/10	185	192	-7	59	126	109	76	56	129
2010/11	215	171	44	28	187	38	177	118	97
2011/12	456	294	162	44	412	164	292	304	152
2012/13	545	260	285	41	504	188	357	417	128
2013/14	401	269	132	23	378	154	247	272	129
2014/15	1024	300	724	499	525	260	764	840	184
2015/16	936	770	166	301	635	229	707	787	149
2016/17	586	302	284	130	456	179	407	407	179
2017/18	2789	1987	802	1868	921	194	2595	2550	239
2018/19	2152	1698	454	1397	755	223	1929	1900	252
2019/20	731	405	326	233	498	120	611	574	157
2020/21	2860	2218	642	1998	862	2716	144	2650	210
Total	28740	23708	5032	15718	13021	6380	22360	25540	3200

4.3 Of the 28,740 windfall dwellings granted detailed consent 25,540 were on sites below the SHLAA survey threshold. Small windfall sites typically include flats above shops, the sub division of existing housing, intensification – for instance where a single dwelling is replaced by two - and small self-build schemes. Occasionally high density apartment schemes also fall under the threshold. Previous uses of small sites coming forward as windfalls included retail, offices, and industrial. A breakdown of windfall completions by site size is at appendix B of this paper.

5. The Development of Windfall Sites

5.1 Since 2001 29,604 dwellings have been completed on sites which came forward as windfalls, an average of 1,480 completions per annum. Of these 25,242 were new build schemes. 13,351 (45%) of dwellings completed on windfall sites were located in the city centre. 23,151 (78%) of the windfalls completed were apartments and 6,453 were houses.

- 5.2 2018/19 recorded the highest level of windfall completions since 2001. The lowest level was 442 in 2011/12, reflecting the economic conditions of that time. Windfall completions since the start of the BDP plan period (2011/12) have fluctuated with the last five years yielding the largest numbers in this time. Windfall completions in recent years are similar to the high levels reached in 2005/6 and 2007/8.
- 5.3 Of the 29,604 windfall completions 27,032 were on sites below the SHLAA survey threshold. Of these 25,242 were new build and 4362 were conversions. 23,151 (78%) of dwellings built on windfall sites were in the city centre. A breakdown of windfall completions by site size is at appendix B of this paper.

Table A4.2: The Development of Windfalls

Year	Windfalls Completed	New build / Conversion		In / Out of City Centre		House / Apartment		Over/Under 0.06ha	
		New Build	Conv	In	Out	House	Apt	0.06 >	< 0.06
2001/2	1252	942	310	367	885	247	1005	1099	153
2002/3	1474	1207	267	715	759	266	1208	1301	173
2003/4	1826	1650	176	935	891	189	1637	1712	114
2004/5	1416	1252	164	595	821	233	1183	1278	138
2005/6	2382	2132	250	1453	929	293	2089	2277	105
2006/7	1839	1750	89	1115	724	289	1550	1698	141
2007/8	2106	1724	382	1311	795	325	1781	1914	192
2008/9	2311	2132	179	1397	914	209	2102	2191	120
2009/10	985	902	83	544	441	214	771	890	95
2010/11	919	863	56	305	614	242	677	860	59
2011/12	442	414	28	14	428	204	238	406	36
2012/13	1065	879	186	102	963	477	588	874	95
2013/14	479	417	62	107	372	129	350	428	51
2014/15	900	793	107	115	785	322	578	785	115
2015/16	844	480	364	241	603	326	518	678	166
2016/17	1395	1285	110	178	1217	787	608	1261	134
2017/18	1593	1187	406	470	1123	455	1138	1422	171
2018/19	2832	2468	364	1688	1144	397	2435	2708	124
2019/20	1932	1470	462	845	1087	535	1397	1772	160
2020/21	1612	1295	317	854	758	314	1298	1478	134
Total	29604	25242	4362	13351	16253	6453	23151	27032	2476

- 5.4 It is clear from the tables that windfalls have historically played a very important role in enabling housing growth in the city. Indeed at first glance the windfall completions figures can appear disproportionately high when they are compared with annualised completions summaries (for instance in the Authority Monitoring Report). One reason for this is that windfalls very rarely come forward on sites which are already in residential use. There are, therefore, very few demolitions of existing housing on windfall sites which means that the gross and net capacities on windfall sites tend to be similar.
- 5.5 With identified sites this is not the case. Since 2001 many sites identified through the local planning process involved the demolition and replacement of existing housing. With a substantial housing stock there is a continual programme of renewal and regeneration of housing which is no longer suitable for purpose. In many cases this involves the demolition of high rise tower blocks and their replacement with traditional low rise housing.

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

6. Commentary

- 6.1 Windfalls have made an important contribution to meeting the city's housing growth over the last 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, with the exception of those for subsidised housing, saw a downturn after 2005/6.
- 6.4 The drop off in new windfall supply began to impact on completions a couple of years later in 2008/9. Despite this windfall sites continued to make a substantial and important contribution to the provision of new housing. There has been an increase in the supply but a reduction in completion of windfall dwellings in 2020/21, compared to recent years. However, rates are still considerably higher than the lowest recorded levels since 2001.
- 6.5 The market for apartments, particularly in the city centre, was particularly affected by the economic downturn. Prior to 2007 a significant proportion of windfalls coming forward and being built had been apartments, many of which were in the city centre. The market was reluctant to provide apartments in the difficult economic climate during and this has had a significant impact on new windfall supply coming forward, however, market for apartments and the 'city living' concept has now been re-established.

7. Looking Forward

- 7.1 The evidence shows that windfalls make a significant contribution to the delivery of housing supply in Birmingham. It is anticipated that windfalls will continue to be relatively high as time moves on from the adoption of the BDP. However, windfall allowances remain low in order not to over-estimate supply from this source.
- 7.2 The new HELAA methodology will consider the role of windfall dwellings in the future delivery of housing.

8. Windfall Assumptions

- 8.1 The contribution that windfalls can reasonably be expected to make to housing delivery is set out in table A4.3. These assumptions are based on a continuing recovery of the economy and the housing market.
- 8.2 Windfall supply has increased since 2014/15 and this is reflected in increased completions from 2016/17 onwards. It is anticipated that windfalls will continue to play a prominent role as time goes on as the degree of certainty which can be attached to the SHLAA is likely to diminish.
- 8.3 No windfall allowance is made for the first year as all supply identified at the SHLAA base date is already accounted for.

Table A4.3: Windfall Assumptions

Time Period	Annual Contribution (Dwellings)
Small Sites (below 0.06ha)	
Short Term - Within 5 Years	40
Medium Term – Years 6 to 10	50
Longer Term – Beyond 10 Years	75
Larger Sites	
Short Term - Within 5 Years	300
Medium Term – Years 6 to 10	400
Longer Term – Beyond 10 Years	500

9. Implications for the 2021 SHLAA

- 9.1 The windfall allowance over the period covered by the 2021 SHLAA (2021-2031) is XXXX dwellings.

With regards to the supply period, it is assumed that windfalls will contribute 1,360 dwellings within 5 years and 2,250 dwellings in years 6 to 10.
- 9.2 The City Council will continue to monitor windfalls and will adjust the windfall assumptions in future updates to the SHLAA should the best information available indicate that it would be appropriate to do so.
- 9.3 The windfall assumptions remain conservative when compared to actual performance. As such they allow for an element of flexibility in the SHLAA.

Windfall Assumptions Paper - Appendix A

The Supply of Windfall Sites

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

Year	Windfalls Granted Detailed	New build / Conversion		In / Out of City Centre		House / Apartment		Over/Under 0.06ha	
		Planning Permission	New Build	Conv.	In	Out	House	Apt	0.06 >
2001/2	2570	2573	-3	622	1948	375	2195	n/a	n/a
2002/3	649	619	30	413	236	42	607	n/a	n/a
2003/4	2528	2504	24	1654	873	157	2371	n/a	n/a
2004/5	2306	1904	402	1575	731	208	2098	n/a	n/a
2005/6	3355	3399	-44	2364	991	302	3053	n/a	n/a
2006/7	2338	2343	-5	1671	667	193	2145	n/a	n/a
2007/8	698	689	9	348	350	78	620	n/a	n/a
2008/9	221	265	-44	40	181	73	148	n/a	n/a
2009/10	56	129	-73	34	22	73	-17	n/a	n/a
2010/11	118	143	-25	-1	119	0	118	n/a	n/a
2011/12	304	227	77	18	286	128	176	n/a	n/a
2012/13	417	207	210	33	384	118	299	n/a	n/a
2013/14	272	208	64	5	267	112	160	n/a	n/a
2014/15	840	255	585	405	435	189	651	n/a	n/a
2015/16	787	722	65	267	520	199	588	n/a	n/a
2016/17	407	222	185	80	327	142	265	n/a	n/a
2017/18	2550	1854	696	1771	779	150	2400	n/a	n/a
2018/19	1900	1561	339	1289	611	169	1731	n/a	n/a
2019/20	574	349	225	211	363	66	508	n/a	n/a
2020/21	2650	2122	528	1976	674	120	2530	n/a	n/a
Total	25540	22295	3245	14775	10764	2894	22646	n/a	n/a

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

Year	Windfalls Granted Detailed Planning Permission	New build / Conversion		In / Out of City Centre		House / Apartment		Over / Under 0.06ha	
		New Build	Conv.	In	Out	House	Apt	0.06 >	< 0.06
2001/2	228	64	164	155	73	22	206	n/a	n/a
2002/3	158	94	64	40	118	63	95	n/a	n/a
2003/4	170	108	62	71	99	67	103	n/a	n/a
2004/5	146	77	69	64	82	41	105	n/a	n/a
2005/6	167	65	102	43	124	64	103	n/a	n/a
2006/7	84	37	47	3	81	28	56	n/a	n/a
2007/8	124	59	65	20	104	56	68	n/a	n/a
2008/9	118	42	76	14	104	37	81	n/a	n/a
2009/10	129	63	66	25	104	36	93	n/a	n/a
2010/11	97	28	69	29	68	38	59	n/a	n/a
2011/12	152	67	85	26	126	36	116	n/a	n/a
2012/13	128	53	75	8	120	70	58	n/a	n/a
2013/14	129	61	68	18	111	42	87	n/a	n/a
2014/15	184	45	139	94	90	71	113	n/a	n/a
2015/16	149	48	101	34	115	30	119	n/a	n/a
2016/17	179	80	99	50	129	37	142	n/a	n/a
2017/18	239	133	106	97	142	44	195	n/a	n/a
2018/19	252	137	115	108	144	54	198	n/a	n/a
2019/20	157	56	101	22	135	54	103	n/a	n/a
2020/21	210	96	114	22	188	24	186	n/a	n/a
Total	3200	1413	1787	943	2257	914	2286	n/a	n/a

Windfall Assumptions Paper – Appendix B

The Development of Windfall Sites

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

Year	Windfalls Completed	New build / Conversion		In / Out of City Centre		House / Apartment		Over / Under 0.06ha	
		New Build	Conv.	In	Out	House	Apt	0.06 >	< 0.06
2001/2	1099	896	203	477	622	283	820	n/a	n/a
2002/3	1301	1149	152	643	658	234	1067	n/a	n/a
2003/4	1712	1589	123	936	776	156	1556	n/a	n/a
2004/5	1278	1189	89	556	724	191	1089	n/a	n/a
2005/6	2277	2069	208	1490	787	257	2020	n/a	n/a
2006/7	1698	1669	29	1088	610	274	1424	n/a	n/a
2007/8	1914	1633	281	1226	688	277	1637	n/a	n/a
2008/9	2191	2085	106	1340	851	175	2016	n/a	n/a
2009/10	890	873	17	541	349	182	708	n/a	n/a
2010/11	860	815	45	457	403	226	634	n/a	n/a
2011/12	406	392	14	0	406	210	196	n/a	n/a
2012/13	970	844	126	92	878	442	528	n/a	n/a
2013/14	428	393	35	95	333	118	310	n/a	n/a
2014/15	785	732	53	82	703	299	486	n/a	n/a
2015/16	678	431	247	169	509	264	414	n/a	n/a
2016/17	1261	1235	26	159	1102	750	511	n/a	n/a
2017/18	1422	1142	280	412	1010	413	1009	n/a	n/a
2018/19	2708	2412	296	1666	1042	351	2357	n/a	n/a
2019/20	1772	1402	370	821	951	491	1281	n/a	n/a
2020/21	1478	1254	224	845	633	282	1196	n/a	n/a
Total	27128	24204	2924	13095	14035	5875	21259	n/a	n/a

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

Year	Windfalls Completed	New build / Conversion		In / Out of City Centre		House / Apartment		Over / Under 0.06ha	
		New Build	Conv.	In	Out	House	Apt	0.06 >	< 0.06
2001/2	153	46	107	62	91	21	128	n/a	n/a
2002/3	173	58	115	109	64	32	141	n/a	n/a
2003/4	114	61	53	44	70	33	81	n/a	n/a
2004/5	138	63	75	24	112	42	94	n/a	n/a
2005/6	105	63	42	22	83	36	69	n/a	n/a
2006/7	141	81	60	42	99	15	126	n/a	n/a
2007/8	192	91	101	85	107	48	144	n/a	n/a
2008/9	120	47	73	33	87	34	86	n/a	n/a
2009/10	95	29	66	4	91	32	63	n/a	n/a
2010/11	59	48	11	1	58	16	43	n/a	n/a
2011/12	36	22	14	14	22	-6	42	n/a	n/a
2012/13	95	35	60	10	85	35	60	n/a	n/a
2013/14	51	24	27	12	39	11	40	n/a	n/a
2014/15	115	61	54	33	82	23	92	n/a	n/a
2015/16	166	49	117	72	94	62	104	n/a	n/a
2016/17	134	50	84	19	115	37	97	n/a	n/a
2017/18	171	45	126	58	113	42	129	n/a	n/a
2018/19	124	56	68	22	102	46	78	n/a	n/a
2019/20	160	92	68	24	136	44	116	n/a	n/a
2020/21	134	41	93	9	125	32	102	n/a	n/a
Total	2476	1062	1414	699	1775	635	1835	n/a	n/a

A5 Historical Delivery Rate Assessments

- 1.1 A Historical Delivery Rate Assessment was undertaken as part of the preparation of the 2018 SHLAA update to assist in making delivery rate assumptions for sites currently in the SHLAA. Assessments were undertaken on a sample of developments where residential units have been delivered in the previous ten years (2007-2018). This looked at the period of time it took from planning consent to commencement on site (lead in time) and from commencement on site to completion (build out time). The average lead in and build out times per development size were then calculated; the resulting figures are presented below.
- 1.2 The lead in time is defined as the period between grant of permission to commencement on site. It should be noted that the status of sites is only monitored at one point in time during the year (1 April) so a site may have started prior to April in that monitoring year.
- 1.1 The build out rate is defined as the average number of dwellings completed per annum from commencement to completion. Once again, the status of sites is only monitored at one point in time during the year so a site may have completed prior to April in that monitoring year.

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

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

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

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

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

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

A6 Summary Outputs

Table A6/1: Status by Time Period

Status	Time Period		
	Within 5 years	6 – 10 Years	Total
Under Construction	12,864	954	13,818
Detailed PP	6,075	684	6,759
Outline PP	816	5,394	6,210
Permitted Development	687	0	678
Permission in Principle	9	0	9
Allocation in adopted plan	520	5,271	5,791
Other Opportunity in BDP Growth Area	4,3820	4,382	4,382
Other Opportunity not in BDP Growth Area	0	2,729	2,729
Total	20,962	19,414	40,376

Table A6/2: Status by Distribution

Status	Location ⁸				
	North West	East	South	City Centre	Total
Under Construction	3338	1147	1490	7843	13,818
Detailed PP	477	739	581	4962	6,759
Outline PP	1567	326	952	3365	6,210
Permitted Development	67	54	136	421	678
Permission in Principle	9	0	0	0	9
Allocation in adopted plan	3768	813	200	1010	5,791
Other Opportunity in BDP Growth Area	209	171	160	3842	4,382
Other Opportunity not in BDP Growth Area	501	1400	828	0	2,729
Total	9936	4650	4347	21443	40376

Table A6/3: Time Period by Distribution

Time Period	Location				
	North west	East	South	City Centre	Total
Within 5 years	4364	2148	2352	12098	20962
6 to 10 years	5572	2502	1995	9345	19414
Total	9936	4650	4347	21443	40376

⁸ Administrative boundaries used by the Planning and Regeneration Area Teams. See map on page 46.

A7 Site Assessment and Schedule of Sites

Site Assessment

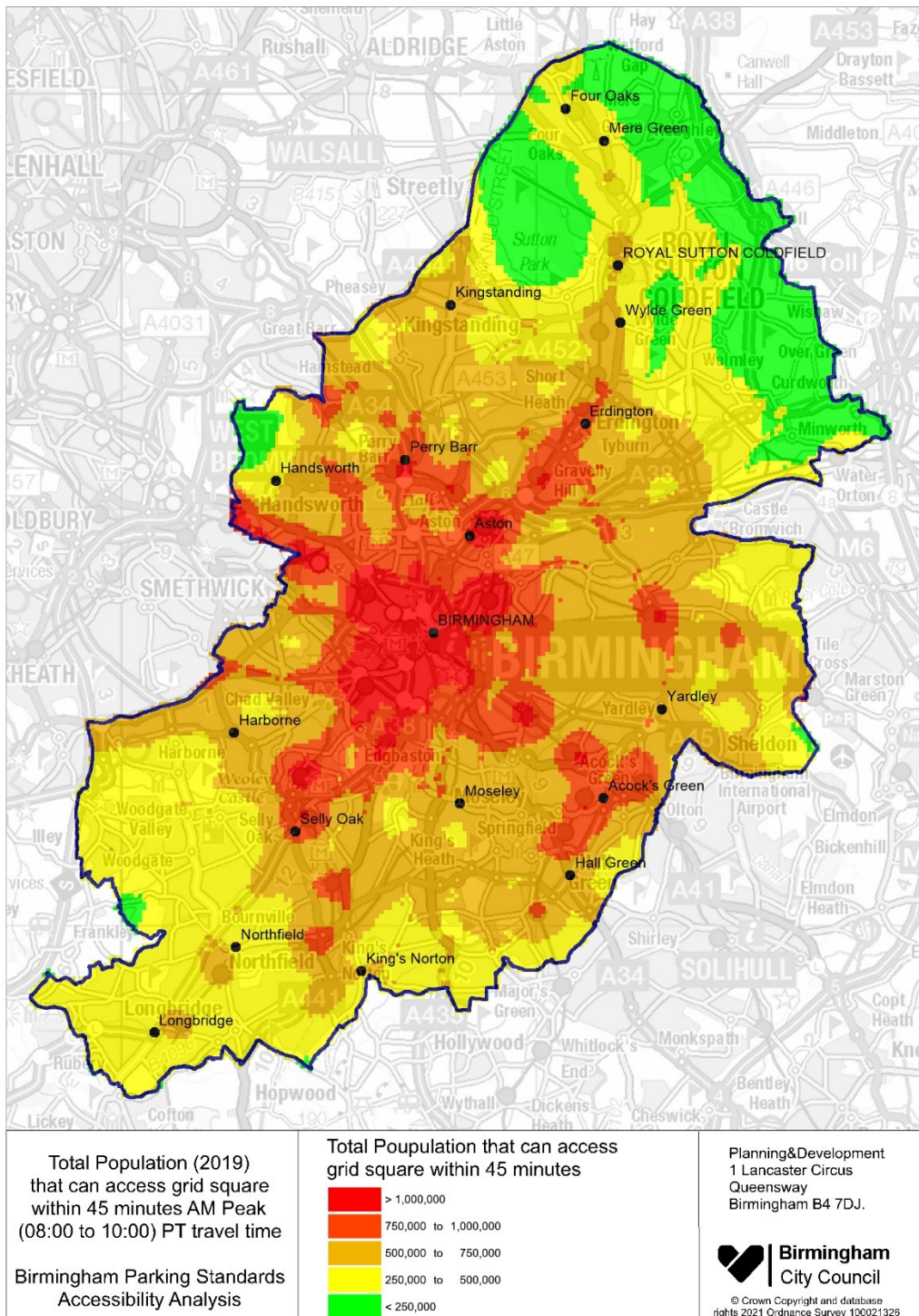
For each site in the SHLAA an assessment has been made of its suitability, availability and achievability along with an evaluation of any policy or physical constraints affecting the site. This assessment was made based on the information currently available and for each site the following is provided:

Site Reference Number
Address
Site Area (Ha)
Capacity (dwellings)
Timeframe for development <ul style="list-style-type: none"> - 0-5 years (no. of dwellings) - 6-10 years (no. of dwellings) - 10+ years (no. of dwellings)
Ownership <ul style="list-style-type: none"> - Birmingham City Council (BCC) - Non-BCC - Mixed
Greenfield/ Brownfield/ Mix
Developer Interest (if known)
Planning Status <ul style="list-style-type: none"> - Under construction - Detailed Planning Permission - Outline Planning Permission - Permitted Development (office/retail/agriculture conversion to residential) - Allocated in adopted plan - Allocated in draft plan - Other opportunity in BDP Growth Area - Other opportunity not in BDP Growth Area <p>Also provided is additional information such as a planning application reference number, the relevant plan for allocated sites or whether the site is in the Birmingham Municipal Housing Trust (BMHT) 5 year delivery programme.</p>
Expiry date of planning application (if relevant)
Growth area The BDP identifies 10 Growth Areas across the city (policies GA1 – GA10)
Last known use The broad land use category which the site was last known to be in.
Year added to SHLAA
Suitability <ul style="list-style-type: none"> - The site is suitable as evidenced by the grant of planning permission - The site is suitable as evidenced by the grant of planning permission (now expired) - The site is suitable but does not have consent - The site is suitable but does not have consent and there are some constraints which are capable of being overcome - The site is not suitable

Site Reference Number
Policy factors <ul style="list-style-type: none"> - Planning permission granted - Allocated in adopted plan but no consent - Allocated in draft plan but no consent - Other opportunity with no identified policy constraints - Other opportunity with some policy constraints which can be capable of being overcome - Significant policy constraints
Accessibility by public transport <ul style="list-style-type: none"> - Zone A – very high to high accessibility - Zone B – high accessibility - Zone C – medium to low accessibility <p>This is based on a model of accessibility to public transport by the Birmingham population. This is shown in the map below.</p>
Flood risk <ul style="list-style-type: none"> - Zone 1 - little or no risk - Zone 2 – low/ medium risk with strategy for mitigation in place - Zone 3 – high risk - (discount unless mitigation can be introduced)
Natural environment designations <p>Is site affected by a Site of Special Scientific Interest (SSSI)/Site of Importance for Nature Conservation (SINC)/ Site of Local Importance to Nature Conservation (SLINC) / National Nature Reserve (NNR) / Local Nature Reserve (LNR)/ Tree Preservation Order (TPO)?</p> <p>The site assessment has only considered natural environment designations. It is acknowledged that detailed site investigations may reveal undesignated natural environment constraints which may require mitigation.</p>
Natural environment impact <ul style="list-style-type: none"> - No adverse impact - Adverse impact identified with strategy for mitigation in place - Impact to be assessed - Significant adverse impact (discount site unless mitigation can be introduced)
Historic environment designations <p>Is the site affected by a statutorily listed building, conservation area, locally listed building, Scheduled Ancient Monument (SAM), Historic Park & Garden?</p>
Historic environment impact <ul style="list-style-type: none"> - No adverse impact - Adverse impact identified with strategy for mitigation in place - Impact to be assessed - Significant adverse impact (discount site unless mitigation can be introduced)
Historic Environment Record (HER) <p>Is there a HER record within the site?</p>
HER Impact <ul style="list-style-type: none"> - No adverse impact - Potential adverse impact identified with strategy for mitigation in place - Impact to be assessed - Significant adverse impact (discount site unless mitigation can be introduced)
Open space designation <p>Is the site affected by an open space designation?</p>

Site Reference Number
Open space impact <ul style="list-style-type: none"> - No adverse impact - Adverse impact identified with strategy for mitigation in place - Impact to be assessed - Significant adverse impact (discount site unless mitigation can be introduced)
Availability <ul style="list-style-type: none"> - The site is considered available for development - Reasonable prospect of availability
Achievability Is the site achievable? – Yes/ No
Viable <ul style="list-style-type: none"> - Yes – the site is viable - The site could be viably developed
Contamination <ul style="list-style-type: none"> - No known/ expected contamination issues - Known/ expected contamination issues that can be overcome through remediation - Significant contamination issues which cannot be realistically mitigated
Demolition <ul style="list-style-type: none"> - No demolition required - Cleared site, no demolition required - Demolition required, but expected that standard approaches can be applied - Complex demolition expected to be required
Vehicular access <ul style="list-style-type: none"> - No known access issues - Access issues with viable identified strategy to address - Unknown at current time - Major access issues with no identified strategy to address
Comments Any other information relevant to the site

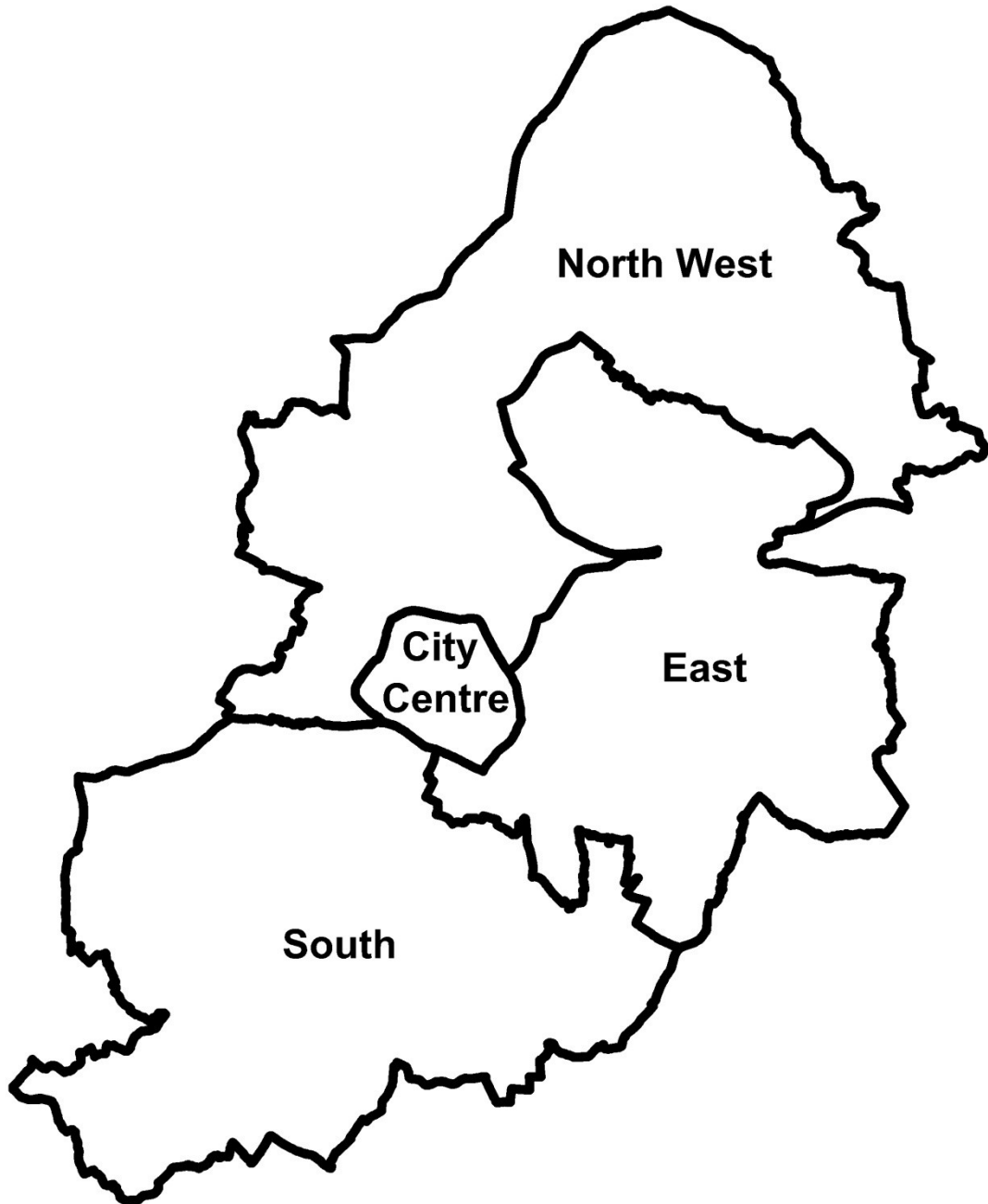
Public Transport Accessibility



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

Schedule of Sites

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



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The sites can be viewed on the City Council's interactive web mapping system: [Birmingham SHLAA GIS Maps](#)