



# **Housing and Economic Land Availability Assessment 2023**

July 2024

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## Executive summary

1. Birmingham City Council is currently preparing a new local plan called 'The Birmingham Local Plan' which will cover the period up to 2042. As part of its preparation, the Council has undertaken a Housing and Economic Land Availability Assessment (HELAA), which identifies land which 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 and the inclusion or exclusion of a site from it does not mean that a site will be allocated or successfully achieve planning consent.
3. National Planning Practice Guidance (NPPG) states local planning authorities should not simply rely on sites that they have been informed about, but actively identify sites that may assist in meeting development needs through the desktop review process.<sup>1</sup> This is particularly important given the city's significant Local Housing Need.
4. As well as looking at the more traditional sources of sites, we have undertaken a comprehensive and systematic assessment of land 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, which resulted in over 250 sites being removed from the 2023 HELAA. In these instances, the identified landowner had not confirmed that the site was available for development. This has resulted in a robust supply of other opportunity sites which are developable.
6. The HELAA also identifies specific site allocations proposed for development within the Birmingham Local Plan 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 Preferred Options Document as well as the HELAA site schedules that accompany this report. The Preferred Options Document sets out the site-specific detail that will need to be taken into account when developing the site, including planning constraints and the reason for allocation.
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 sites and underutilised land. The NPPG 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-

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<sup>1</sup> NPPG, Paragraph: 010 Reference ID: 3-010-20190722

designed, attractive and healthy places. The Council therefore seeks to take a density optimising approach as set out in the HELAA methodology paras 3.20 – 3.31.

8. The HELAA currently shows that there is a potential capacity for the development of 86,758 dwellings and 184.14 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 and their capacities.
9. 'Call for Sites' submissions which fall within Green Belt have been categorised as currently unsuitable. This is in reflection of the city committing to not undertaking a review of Green Belt boundaries as part of the preparation of the new Birmingham Local Plan. The reasons for this decision are provided in the Preferred Options Document.
10. Over the course of the plan period there will be windfall development (unidentified capacity). The unidentified capacity (windfalls) for the period – 2023-2042 is 8,575 dwellings.
11. Adding in completions between 2020/21 and 2022/23 of 9,718 gives a total capacity of 103,027 dwellings.

<b>Source</b>	<b>Dwellings</b>
Identified capacity	86,758
12% lapse rate (applied to outline consents and other opportunity sites)	-2,024
Unidentified capacity (windfalls)	8,575
Completions (2020/21 – 2021/23)	9,718
<b>Total capacity</b>	<b>103,027</b>

12. As set out at Section 4 of this document it is concluded that there are currently insufficient sites to meet the total Local Housing Need including those sites which have been delivered during the plan period.
13. In terms of the employment land supply position, when the 20.59 hectares of completions between 2020 and 2023 are added to the identified supply this provides a total capacity of 204.73 hectares. The 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 257.73 hectares. The Housing and Economic Development Needs Assessment 2022 identifies a need for 295.6 hectares of employment land between 2020 and 2042, so there is currently a shortfall of 37.87 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 2022/23 supersedes all previous SHLAAs and ELAAs prepared by Birmingham City Council.
- 1.3 The base date for this HELAA is the 2022/23 monitoring year. Sites submitted to the Council through the 'Call for sites' process up until 31<sup>st</sup> July 2023 have also been considered within the assessment.
- 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 within guidance within the NPPF:
  - Deliverable sites – are those sites which are available now, offers a suitable location for development and there is 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, or likely to become available for development where there is a reasonable prospect they could be developed in the future (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. These sites will not be included in the final supply of sites which are deliverable and developable.

## National policy and guidance

- 1.5 The National Planning Policy Framework (NPPF) requires local planning authorities to have a "clear understanding of the land available in its area through the preparation of 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

specific, deliverable sites for years one to five of the plan periods; and specific, developable sites or broad location for growth, for years 6-10 and, where possible for years 11-15 of the plan.”

- 1.6 The National Planning Practice Guidance entitled ‘Housing and economic land availability assessment’ (updated 22 July 2019) (referred to as the NPPG) 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).
- 1.7 The Council has carefully followed national policy and guidance in preparing the HELAA.

### Disclaimers

- 1.8 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 BLP. 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 National Planning Policy Framework (NPPF) we 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 therefore 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 we are now at the preferred options consultation stage, which is the second consultation stage in the process. 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.
- 2.3 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, it is necessary to add delivery in the period between 2020/21 and 2022/23 to the capacity identified in the HELAA.
- 2.4 The completions data is up to date as of the 1<sup>st</sup> April 2023. Information submitted after the data baseline will be recorded within the Council's databases and published within the next edition of the HELAA.
- 2.5 The BLP will be informed by a large suite of technical evidence documents relating to various issues. Some of these studies will influence the assessment of suitability of land for development. The list below is not intended to be exhaustive but to highlight the interdependencies between documents in the Council's evidence base relating to land availability assessment. Some of the documents cited have yet been produced. As these documents are prepared, the HELAA will be updated to reflect their findings.
- **Housing and Economic Development Needs Assessment (HEDNA) and Core Employment Areas Assessment (completed)** - the HEDNA provides an assessment of the size, type and tenure of housing needed for different groups in the community to inform local plan policies. It also considers the projected need for employment land in the future and the quality of existing core employment areas. A review of the Core Employment Areas has been undertaken. Through this review it has been possible to identify poor, underutilised, vacant/ derelict commercial or industrial land which could potentially be suitable for development. Where landowners have confirmed an

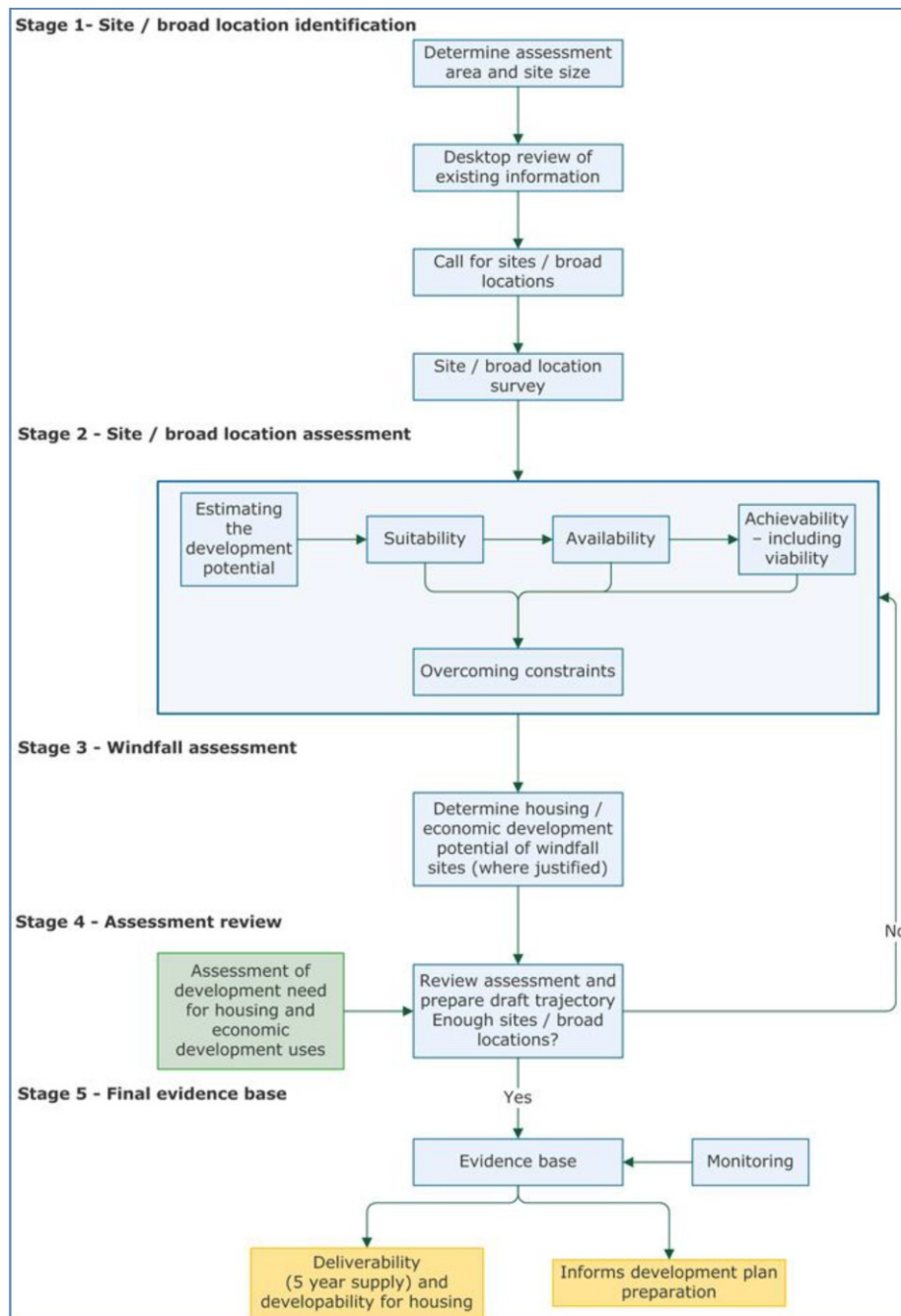
intention to develop these sites they have been included in the HELAA supply.

- **Open Space Assessment (OSA) (completed)** - the OSA provides an assessment of the quality, quantity and accessibility of publicly accessible open spaces in the city in order to establish local provision standards and create an up to date evidence base which can be used to inform new local plan policy. Where the development of a site would negatively impact on an open space which the OSA identifies as important to meet local needs it is identified as not suitable and is not included in the HELAA supply.
- **Playing Pitch Assessment (PPA) (completed)** – as with the OSA, the PPA provides an assessment of the quality, quantity, accessibility of playing pitches and outdoor sports facilities in the city and updates the evidence base to inform relevant policies for the new local plan. This includes an assessment of current and future demand and details of any deficiencies and surpluses by sport and site. As with the OSA, where the development of a site would negatively impact on playing pitch which is important to meet local needs it is identified as not suitable and is not included in the HELAA supply.
- **Strategic Flood Risk Assessment (SFRA) and Water Cycle Study (WCS) (Level 1 completed, Level 2 underway)** - a SFRA is being prepared which will map the risk from all sources of flooding factoring in climate change. The sequential and exception test to development sites is being applied providing a Level 1 site screening assessment, which has already been completed, before proceeding to a more detailed Level 2 SFRA which is currently underway. If a potential development site has a high level of flood risk and there is no prospect of addressing this then it is considered as not suitable and it is not included in the HELAA supply.
- **Sustainability Appraisal (Sustainability Appraisal) (ongoing process)** - the SA looks at the economic, social and environmental effects of the plan and possible alternative options to help us identify the most appropriate options that will deliver the best outcomes for our area. SA reports have so far been undertaken on the Issues and Options and Preferred Options Documents and are published alongside both consultation documents.



### 3. Methodology

- 3.1 A draft methodology for the HELAA was subject to consultation in July-August 2021 to provide stakeholders the opportunity to comment on the methodology. 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 (NPPG) on Housing and Economic Land Availability Assessment. The flow chart below (extracted from the NPPG) illustrates the approach used in the HELAA.



## Stage 1: Identification of sites and broad locations

### Geographical area of assessment

- 3.3 The NPPG states that the area selected for the assessment should be the plan-making area. This could be the local planning authority area, 2 or more local authority areas, areas covered by a spatial development strategy, or areas covered by the Local Enterprise Partnership. This assessment will cover the administrative area of Birmingham City Council.

### Working with stakeholders

- 3.4 The NPPG 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) and the Greater Birmingham and Solihull Local Enterprise Partnership. 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, other local authorities, amongst others.

### Site size and broad locations

- 3.5 The NPPG 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. It is therefore proposed that 0.06ha continues to be used in the HELAA. 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".
- 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. The Council therefore considers it appropriate to include sites below the threshold set out in the NPPG.

- 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 NPPG 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 NPPG 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.
- 3.11 Land parcels and call for sites submissions which fall within the Green Belt have been assessed and categorised as currently unsuitable due to existing policy constraints.

#### Types of sites and sources of data

- 3.12 The NPPG 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 NPPG. 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 Development briefs

Type of site	Potential data source
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
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

Type of site	Potential data source
Sites in rural locations	Local and neighbourhood plans Planning application records OS maps Aerial photography Site surveys
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	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

- 3.13 A Call for Sites is an invitation to anyone interested in submitting a site for consideration in the HELAA process. The NPPG 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.
- 3.14 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.
- 3.15 Call for sites submissions received up until 31<sup>st</sup> July 2023 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.
- 3.16 It will not be assumed that a site that was put forward for consideration for the previous SHLAA or ELAA has the same circumstances attached to it. Site promoters have been encouraged to re-submit sites if they wish for them to be considered for assessment through the new HELAA process.

### Site and broad location survey

- 3.17 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 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 and how they could be overcome; and
- identify further sites with potential for development that were not identified through data sources or the call for sites.

3.18 The PPG 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.”

3.19 The site survey is a desk-based assessment using information submitted, GIS mapping information, planning application records and other relevant information.

The site survey will record 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

3.20 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.

3.21 Where sites already have planning permission, the site capacity and density will reflect the planning permission, 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.

3.22 On sites allocated in adopted plans the capacity is as set out in the plan.

3.23 In previous SHLAAs, the yield of each site has been 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”

3.24 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.

3.25 The Birmingham Local Plan Preferred Options Document proposes 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

3.26 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. It is important to note that densities are based on net developable areas rather than the gross site area. 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

3.27 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 dwelling per hectare.

3.28 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.

3.29 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. The capacity will therefore be refined on a site-by-site basis if necessary, to take account of site-specific information and constraints where known.

- 3.30 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 roads, open space, schools, landscaping etc. The definition of Net Developable Area is not set out in the PPG. 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.
- 3.31 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 sample of sites approved and completed in the city since the BDP was adopted in 2017. These ratios are designed to take into account ancillary uses of land within a development, for example roads and infrastructure, open spaces and planting. This helps to give a more accurate reflection of the anticipated land take from housing development, particularly on larger sites.

**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

**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%

- 3.32 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. 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



- 3.33 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 identifies that it is appropriate to apply a 0.5 plot ratio for industrial uses. This ratio is applied within the HELAA data to help to indicate the potential floorspace in square metres that can be delivered on the site where no other data is available, such as within planning application documents. The Call for Sites Form also allows for submissions to include as much detail as possible (including floorspace) and, where possible, the information submitted by the site promoter will be used.

#### Assessing whether sites/ broad locations are likely to be developed

- 3.34 The NPPG 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.” The assessment of sites has been undertaken in accordance the NPPG.

#### Assessing suitability

- 3.35 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.
- 3.36 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
- 3.37 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 will not 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. For example, where a site lies within the Green Belt, national and local planning policy provide a presumption against development. This will be recorded, and the site will be categorised as ‘currently unsuitable’ within the site assessment.
- 3.38 The NPPG 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.

- 3.39 In accordance with the NPPG sites in existing development plans or with planning permission will generally be considered suitable for development having assessed whether 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.
- 3.40 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).
- 3.41 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**

<b>Database classification</b>	<b>Criteria and assumptions</b>
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.
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.

Database classification	Criteria and assumptions
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	<p>Not suitable sites include:</p> <ul style="list-style-type: none"> <li>• Isolated sites within the Green Belt*;</li> <li>• 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;</li> <li>• Sites considered as inappropriate backland development</li> </ul>

\* Definition of isolated sites within Green Belt. This is intended to reflect paragraph 80 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.

3.42 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. These will not be considered further through the local plan review evidence base.

### Assessing availability

3.43 The NPPG 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). These issues are raised in the Council’s Call for Sites Form and Site Availability Form. The assessment of availability has therefore been informed by information supplied by the landowner/ developer/ agent of sites through the Calls for Sites and the urban capacity work.

3.44 Where landowners/developer/agents have indicated when a site could be developed this has been recorded as being available within the site assessment. 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.

- 3.45 In accordance with the NPPG land controlled by a developer or landowner who has expressed an intention to develop will be considered available. The existence of planning permission can be a good indication of the availability of sites. Sites meeting the NPPF definition of ‘deliverable’ are considered available 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.
- 3.46 Based on the NPPG, 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	<p>Sites considered available for development include:</p> <ul style="list-style-type: none"> <li>• sites under construction;</li> <li>• non-major developments with planning permission (both detailed and outline)</li> <li>• major developments with detailed planning permission</li> <li>• 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</li> <li>• 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 forwards, such as a Memorandum of Understanding, letter or legal agreement.</li> <li>• Land controlled by a developer or landowner who has expressed an intention to develop</li> <li>• 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.</li> </ul>

Database classification	Criteria and assumptions
Reasonable prospect of availability	Sites considered as having a reasonable prospect of availability include: <ul style="list-style-type: none"> <li>• outline planning permission for major development, permission in principle, allocated in the development plan or identified on the brownfield register</li> <li>• sites where the developer has indicated that ownership will be secured after 5 years or there is uncertainty when the site might become available</li> <li>• sites identified within an emerging or adopted masterplan/ framework as a development opportunity or area of change</li> </ul>
Not available	Identified legal or ownership impediments to development.

### Assessing achievability

- 3.47 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.”
- 3.48 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.
- 3.49 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. Viability evidence has been updated to inform the Birmingham Local Plan Preferred Options Document and this will be used to inform the preparation of the HELAA 2024.
- 3.50 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

- 3.51 The information on suitability, availability, achievability and constraints will be used to assess the timescale within which each site is capable of development. The NPPG 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.
- 3.52 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
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**

3.53 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. 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.

3.54 The assessment utilised housing completions data provided through annual land monitoring (at April in each year). Consequently, the planning to delivery period and build period is expressed in monitoring years.

3.55 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.

- 3.56 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.
- 3.57 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.
- 3.58 The results of the assessment of historic delivery rates are presented in Appendix 4.

### Employment sites

- 3.59 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.
- 3.60 The HEDNA has reassessed the portfolio set by policy TP17 and recommends a new portfolio, as described above, and which is 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 of 295.6 hectares. The new reservoir is lower than the



current plan 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

- 3.61 The NPPF defines windfall sites as “sites not specifically identified in the development plan.” 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.
- 3.62 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.
- 3.63 The current local plan and all previous SHLAAs include a windfall allowance. The windfall allowance in previous SHLAAs represents a cautious approach based upon evidence within earlier editions of the SHLAA and the Urban Capacity Assessment undertaken in 2011 as part of the BDP.
- 3.64 The windfall allowance has been reviewed for this HELAA 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. In assessing the potential of windfalls, sites above and below the SHLAA survey threshold have been considered separately.

### The supply of windfall sites

- 3.65 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 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.
- 3.66 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 2023 20,232 windfalls received planning permission; an average of 1,686 per annum. In the same period 15,804 windfall dwellings were completed at an average of 1,317 per annum. The rate at which windfalls are brought forward and developed will continue to be monitored on an annual basis.

- 3.67 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/class E) to residential, although not requiring planning permission, are also effectively windfalls where these have not previously been identified. In 2022/23 notification was received for 107 dwellings to be created from such conversions.
- 3.68 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

- 3.69 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.
- 3.70 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.
- 3.71 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.
- 3.72 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

#### Windfall sites above the site size threshold

- 3.73 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.
- 3.74 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 be exceeded.

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

<b>Time Period</b>	<b>Annual Contribution (Dwellings)</b>	<b>Period Contribution (Dwellings)</b>
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

### The housing potential of broad locations

- 3.75 The NPPG 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.
- 3.76 This HELAA has sought to identify specific development opportunities rather than broad locations. There is, therefore, no additional capacity which can be included within broad locations for growth. Whilst additional opportunities may well come forward during the plan period 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 69 of the NPPF.

### Stage 4: Assessment review

- 3.77 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.
- 3.78 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 NPPG, for example by carrying out a further call for sites or changing assumptions about the development potential. As set out at Section 4 of this document it is concluded that there are currently insufficient sites to meet the identified need including those sites which have been delivered during the plan period.
- 3.79 The Council will continue to identify further sites where possible and the HELAA will be updated and published annually. The NPPG goes on to say that “If there is clear evidence that strategic policies cannot meet the needs of the area, factoring in the constraints, it will be important to establish how needs might be met in adjoining areas through the process of preparing statements of common ground, and in accordance with the duty to cooperate. If following this, needs cannot be met then the plan-making authority will have to demonstrate the reasons why as part of the plan examination.”

### Non-implementation rate

- 3.80 Although the NPPG 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.”
- 3.81 Previous SHLAAs have not included a non-implementation rate for sites with consents which are not implemented or other identified sites which do not ultimately come forward for residential development.
- 3.82 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. 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 2017/18 10.6% of consented dwellings were not implemented.

**Table 11: total approved new dwellings and total expired dwellings 2011/12 – 2017/18.**

Year	Total approved	Total expired	Expired %
2011/12	5,319	1,507	28.3%
2012/13	5,791	828	14.3%
2013/14	5561	72	1.3%
2014/15	6155	549	8.9%
2015/16	9,071	1042	11.5%
2016/17	5,783	497	8.6%
2017/18	6,989	242	3.5%
<b>Total</b>	<b>44,669</b>	<b>4,737</b>	<b>10.6%</b>

- 3.83 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 2023 HELAA. During the latest monitoring year 3.5% of consented dwellings were not implemented, and this brings the overall average lapse rate down to 10.6%. 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.
- 3.84 A 12% discount is applied to the following sites:
- sites with outline planning consent; and
  - other opportunity sites across the city.
- 3.85 The discount is not applied 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 target.

## Stage 5: Final evidence base

- 3.86 The core outputs of the assessment are:
- a list of all sites or broad locations considered, cross-referenced to their locations on maps;

- 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.

3.87 Upon completion, the Council publishes the HELAA and updates it periodically using the most up to date information available.

3.88 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 913 sites have been identified through the HELAA process comprising 847 for residential development and 66 for employment development. Between 2020/21 and 2022/23 9,718 dwellings and 20.59 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 2023 while Tables 16 – 19 summarises the employment land supply position.

**Table 12: Housing land supply by category 2023**

Category	Dwellings
Under Construction	16,452
Detailed Planning Permission (Not Started)	16,124
Outline Planning Permission	5,026
Permitted Development (office, retail, agricultural to residential)	407
Permission in Principle	20
Allocation in Adopted Plan	6,784
Allocated in Draft Plan	30,104
Other Opportunity (including suitable call for sites submissions)	11,841
<b>Sub Total – identified sites</b>	<b>86,758</b>
Lapse rate -12% (applied to outline consents and other opportunity)	2,024
<b>Sub Total – Identified Sites minus lapse rate</b>	<b>84,734</b>
Windfall Allowance (unidentified sites x18 years. No windfalls in year 1)	8,575
<b>Total Capacity</b>	<b>93,309</b>

**Table 13: Summary housing land supply 2023**

	Dwellings
HELAA Capacity 2023	93,309
Completions 2020/21-2022/23	9,718
<b>Total Capacity 2020-2042</b>	<b>103,027</b>

**Table 14: Housing land supply by period**

Time Period	Identified Supply	Unidentified Supply	Total
0 to 5 Years	29,734	1,400	<b>31,134</b>

6 to 10 Years	37,328	2,375	<b>39,703</b>
11 to 15 Years	7,235	3,000	<b>10,235</b>
16+ Years	12,461	1,800	<b>14,261</b>
<b>Total</b>	<b>86,758</b>	<b>8,575</b>	<b>95,333</b>

\*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	15,964	488	0	0	16,452
Detailed Permission (Not Started)	12,337	2,894	893	0	16,124
Outline Permission	0	4,286	560	180	5026
Permitted Development	407	0	0	0	407
Permission in Principle	0	20	0	0	20
Allocation in Adopted Plan	890	3,617	1,909	368	6,784
Allocated in Draft Plan	136	19,427	3,606	11,913	35,082
Other Opportunity	0	6,596	267	0	6,863
<b>Total – Identified Sites</b>	<b>29,734</b>	<b>37,328</b>	<b>7,235</b>	<b>12,461</b>	<b>86,758</b>
Unidentified Sites (Windfalls)	1,400	2,375	3,000	1,800	8,575
<b>Total HELAA</b>	<b>31,134</b>	<b>39,703</b>	<b>10,235</b>	<b>14,261</b>	<b>95,333</b>

\*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	59.05
Detailed Planning Permission (Not Started)	18.21
Outline Planning Permission	51.9
Allocation in Adopted Plan	25.41
Allocated in Draft Plan	24.53
Other Opportunity (call for sites submissions)	5.04
<b>Total Capacity</b>	<b>184.14</b>

**Table 17: Summary employment land supply**

	<b>Hectares</b>
HELAA Capacity 2022/23	184.14
Completions 2020/21- 2022/23	20.59
<b>Total 2020 - 2042</b>	<b>204.73</b>

**Table 18: Current Portfolio of Readily Available Employment Land**

<b>Policy TP17 Portfolio of Employment land</b>	<b>Land Requirements</b>	<b>2023 Supply</b>
<b>Regional Investment Sites</b>	No requirement	11.43 hectares
<b>Best Quality Land</b> (10+ hectares in size)	60 hectares	77.31 hectares
<b>Good Quality Land</b> (0.4 – 10 hectares in size)	31 hectares	45.85 hectares
<b>Other Quality Land</b> (less than 0.4 hectares in size)	5 hectares	2.5 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	<ul style="list-style-type: none"> <li>• Ascertain whether SSEN's network will be affected by site proposals.</li> <li>• Records of SSEN's cable records are available via Linesearch.</li> </ul>	<ul style="list-style-type: none"> <li>• 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</li> <li>• Linesearch will be referred to when taking sites forward in the plan-making process.</li> <li>• SSE are already on our consultation database and so will continue to be notified at key stages of plan production.</li> </ul>

<p>Natural England</p>	<p>Bespoke feedback not provided, but generic advice on natural environment considerations for HELAAs is as follows:</p> <ul style="list-style-type: none"> <li>• <b>Landscape:</b> 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.</li> <li>• <b>Designated biodiversity sites:</b> 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.</li> <li>• <b>Priority habitats, protected species and ecological networks:</b> 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 &amp; 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.</li> <li>• <b>Restoration/re-creation of habitats, recovery of priority species and biodiversity enhancement:</b> Potential</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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</li> <li>• Priority species and habitats will be considered through the assessment as sites containing these will require further assessment through an ecological survey.</li> <li>• All of Birmingham is a Nature Improvement Area. As this relates to allocations it is more appropriate to consider it within the plan-making</li> </ul>
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Respondent	Summary of Comments	BCC response and how issues have been addressed in the methodology
	<p>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.</p> <ul style="list-style-type: none"> <li>• <b>Green Infrastructure:</b> The HELAA should consider the availability of GI and opportunities to enhance GI networks.</li> <li>• <b>Designated geological sites:</b> 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.</li> <li>• <b>Best and Most Versatile Agricultural Land:</b> Agricultural Land Classification (ALC) maps available via MAGIC. Detailed field survey may be required to inform decisions about specific sites.</li> <li>• <b>Public rights of way and accessible natural green space:</b> 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.</li> </ul>	<p>stages rather than in the HELAA. No change to methodology.</p> <ul style="list-style-type: none"> <li>• GI opportunities will be considered through the plan-making process. No change to methodology.</li> <li>• 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.</li> <li>• 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.</li> <li>• Green space opportunities will be considered through the plan-making process. No change to methodology.</li> </ul>

Respondent	Summary of Comments	BCC response and how issues have been addressed in the methodology
Environment Agency	<ul style="list-style-type: none"> <li>• 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.</li> <li>• The 'Not Suitable' section currently lists only flood zone 3. This should be updated to the 1 in 100 year plus climate change.</li> <li>• 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.</li> <li>• Appendix 2: Flood zone 2 risk should be amended from low/medium to medium.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• 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>)'.</li> <li>• 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.</li> <li>• Table 5 amended to refer to watercourses. The specific width of the easements to be considered through more detail assessment.</li> <li>• Change made.</li> <li>• 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.</li> </ul>

Respondent	Summary of Comments	BCC response and how issues have been addressed in the methodology
Council for British Archaeology, West Midlands	<ul style="list-style-type: none"> <li>• 3.19 – refer to the Historic Environment Record as a potential environmental constraint.</li> <li>• 3.28 – the statement that “yields may also be affected by issues not evident at the time a site assessment is undertaken” is welcomed.</li> <li>• 3.36 – “natural and heritage conservation” should be replaced by “conservation and enhancement of the natural and historic environment” (bullet point 4).</li> <li>• 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.</li> <li>• Appendix 2 – Site Assessment Criteria; Historic environment designations should also mention the setting of a heritage asset.</li> <li>• Also, Appendix 2, amend text as follows; “It is acknowledged that detailed site investigations may reveal non-designated <del>historic environment constraints</del> <b>heritage assets</b> which may require mitigation.” It should also mention heritage assets which are currently unidentified or whose significance is not known.</li> <li>• 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.</li> <li>• Setting of a heritage asset also needs to be included.</li> </ul>	<ul style="list-style-type: none"> <li>• Amendments have been made to Appendix 2 to recognise historic environment constraints which may be identified through the Historic Environment Record.</li> <li>• Noted.</li> <li>• No change. Para 3.36 is consistent with the NPPG.</li> <li>• Table 5 in para 3.40 has been amended to include statutorily listed buildings as suggested.</li> <li>• The impact on the setting of heritage assets will be considered at the detailed assessment stage.</li> <li>• Appendix 2 has been amended as suggested. The methodology already acknowledges that non-designated heritage assets may be revealed, which may require mitigation.</li> <li>• Appendix 2 has been amended to include an ‘unknown impact (further site investigation required)’ category.</li> <li>• The impact on the setting of heritage assets will be considered at the detailed assessment stage.</li> </ul>

Respondent	Summary of Comments	BCC response and how issues have been addressed in the methodology
<p>RPS on behalf of Midlands Land Portfolio Ltd (Severn Trent Water) and Sutton Coldfield Charitable Trust</p>	<p>Most comments do not raise any concerns. Only those that raise concerns or propose changes are summarised below:</p> <p>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.</p> <p>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></p> <p>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.</p> <p>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.</p>	<p>Stage 2 - Estimating development potential - Support noted. No change to methodology.</p> <p>Related wording has been added to Table 6</p> <p>Site specific viability issues will be considered where information is available. No change to methodology.</p> <p>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</p>
<p>Canal &amp; River Trust</p>	<p>The Trust has no comment to make.</p>	<p>Noted.</p>

<p>South Staffordshire District Council</p>	<p>Only comments that raise concerns or propose changes are summarised below:</p> <p><b>Identifying sites/broad locations (3.9 – 3.14):</b> 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.</p>	<p>For ease of reference, we have utilised the headings used in your response.</p> <p><b>Identifying sites</b></p> <p>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.</p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Coding for the intensification of lower density areas. This is a potential future policy approach but is not a matter for the HELAA methodology.</li> <li>• 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.</li> <li>• 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.</li> </ul>
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	<p><b>Suitability, Availability and Achievability assumptions (3.34 – 3.48):</b> greater clarity required on what would constitute an “isolated” site within the Green Belt.</p> <p><b>Lead-in time and Build Rate assumptions (3.49 – 3.57):</b> 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</p>	<p><b>Suitability, availability and achievability assumptions</b></p> <p>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 &amp; 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.</p> <p><b>Lead-in time and build rate assumptions</b></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>We note and are familiar with the alternative suggested approach of using the published results of national PLC housebuilders to</p>
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	<p>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.</p>	<p>generate averages for completions per sales outlet and combining these with assumptions for the number of outlets on site.</p> <p>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 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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
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Respondent	Summary of Comments	BCC response and how issues have been addressed in the methodology
	<p><b>Windfall allowances (3.79 – 3.81) &amp; Non-implementation rates (3.86 – 3.90):</b> 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.</p> <p>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.</p> <p><b>Next steps (Duty to Co-operate):</b> 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.</p>	<p><b>Windfall allowances and non-implementation rate</b></p> <p>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.</p> <p>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.</p> <p>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.</p> <p><b>Duty to cooperate</b></p> <p>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.</p>

<p>St. Modwen Properties Ltd.</p>	<p>Only comments that raise concerns or propose changes are summarised below:</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Para 3.85 – changes to Green Belt boundaries should be informed by discussions with neighbouring local</p>	<p>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.</p> <p>The HELAA will assess the availability, suitability and achievability of land within the local planning authority's area taking a 'policy off' approach.</p> <p>The site source will be reported as in the approach. Availability and deliverability form part of the assessment. No change to methodology.</p> <p>Agree, additional category for 10+ hectare sites has been included with a 70% ratio.</p> <p>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.'</p> <p>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.</p> <p>Noted. These matters relate to future plan-making and spatial strategy and go beyond</p>
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Respondent	Summary of Comments	BCC response and how issues have been addressed in the methodology
	<p>authorities and this must be evidenced through the Statement of Common Ground.</p>	<p>the scope of the HELAA methodology. No change to methodology.</p>
<p>Friends of Hill Hook Local Nature Reserve</p>	<p>The methodology fails to recognise the need for integrating environmental protection and the active management of remaining recreational green spaces to maximise biodiversity.</p> <p>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.</p> <p>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.</p> <p>Green space benefits such as flood water management and health and wellbeing must be explicitly recognised in site assessments.</p> <p>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.</p>	<p>These matters relate to future plan-making and spatial strategy and go beyond the scope of the HELAA methodology. No change to methodology.</p> <p>Environmental designations and impact on open space will be taken into in the assessment of sites. No change to methodology.</p> <p>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.</p> <p>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.</p>

Respondent	Summary of Comments	BCC response and how issues have been addressed in the methodology
Historic England	<p>We strongly recommend that advice should be sought from your Conservation Officer and Archaeological advisor.</p> <p>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.</p> <p>The Historic Environment Record (HER) may indicate areas of known interest or potential where further assessment is required.</p> <p>The possible harm resulting from the cumulative impacts of a number of sites should also be considered.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Sites that would have an unacceptable impact on the significance or special interest of heritage assets should not be taken forward.</p>	<p>Advice has and will continue to be sought from our Conservation Officer and Archaeological advisor.</p> <p>The methodology recognises and takes account of non-designated heritage assets.</p> <p>Amendments have been made to Appendix 2 to recognise historic environment constraints which may be identified through the Historic Environment Record.</p> <p>The cumulative impacts of multiple development sites will be considered through further assessment in the plan-making stages.</p> <p>Historic England advice will be considered in undertaking the assessment.</p> <p>Historic England advice will be considered in undertaking the assessment.</p> <p>This is noted and will be taken into account when developing the plan policies.</p> <p>Agree. Table 5 of the methodology sets out sites that will not suitable.</p>

## Appendix 2: Site assessment criteria

<b>Site Reference Number</b>
<b>Address</b>
<b>Gross Site Area (Ha)</b>
<b>Net developable area (Ha)</b>
<b>Density rate applied (where applicable) (dph)</b>
<b>Capacity (dwellings/ floorspace sqm)</b>
<b>Timeframe for development</b> <ul style="list-style-type: none"> <li>- 0-5 years (no. of dwellings/ floorspace sqm)</li> <li>- 6-10 years (no. of dwellings/ floorspace sqm)</li> <li>- 11-15 years (no. of dwellings/ floorspace sqm)</li> <li>- 16+ years (no. of dwellings/ floorspace sqm)</li> </ul>
<b>Ownership</b> <ul style="list-style-type: none"> <li>- Birmingham City Council (BCC)</li> <li>- Non-BCC</li> <li>- Mixed</li> </ul>
<b>Developer Interest (if known)</b>
<b>Greenfield/ Brownfield/ Mix</b>
<b>Planning Status</b> <ul style="list-style-type: none"> <li>- Under construction</li> <li>- Detailed Planning Permission</li> <li>- Outline Planning Permission</li> <li>- Permitted Development to residential</li> <li>- Allocated in adopted plan</li> <li>- Allocated in draft plan</li> <li>- Other opportunity in BDP Growth Area</li> <li>- Other opportunity</li> </ul> <b>Status further details</b> 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.
<b>Expiry date of planning application (if relevant)</b>
<b>Last known use</b> The broad land use category which the site was last known to be in.
<b>Year added to HELAA</b>
<b>2021/22 Call for Sites Submission – Y/N</b>
<b>Suitability criteria:</b>
<b>Green Belt - Y/N</b>
<b>Accessibility by public transport</b> <ul style="list-style-type: none"> <li>- Zone A – Very high to high accessibility</li> <li>- Zone B – High accessibility</li> <li>- Zone C – Medium to low accessibility</li> </ul> This is based on a model of accessibility to public transport by the Birmingham population.
<b>Flood risk</b> <ul style="list-style-type: none"> <li>- Zone 1 - little or no risk</li> <li>- Zone 2 – medium risk</li> <li>- Zone 3 – high risk (discount unless mitigation can be introduced)</li> </ul>

**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
<b>Average site size (dwellings)</b>	<b>15</b>	<b>22</b>	<b>94</b>	<b>219</b>	<b>58</b>
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
<b>Average Gross Site Area (ha)</b>	<b>0.06</b>	<b>0.12</b>	<b>0.3</b>	<b>0.35</b>	<b>0.16</b>
Gross Density Range (dph)	50 – 542	108 – 500	196 – 471	367 - 2170	50 – 2170
<b>Average Gross Density (dph)</b>	<b>174</b>	<b>212</b>	<b>351</b>	<b>1,268</b>	<b>358</b>
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
<b>Average Net Developable Area (ha)</b>	<b>0.06</b>	<b>0.12</b>	<b>0.3</b>	<b>0.35</b>	<b>0.16</b>
<b>Average Net Density</b>	<b>174</b>	<b>212</b>	<b>351</b>	<b>1,268</b>	<b>358</b>
<b>Average Gross to Net Ratio</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>

### City Centre Approved Sites 2017-21

	<b>Minor Dwellings</b>	<b>Small Scale Major Dwellings</b>		<b>Large Scale Major Dwellings</b>	<b>All Sites</b>
	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
<b>Average site size (dwellings)</b>	<b>2.5</b>	<b>30</b>	<b>116</b>	<b>370</b>	<b>154</b>
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
<b>Average Gross Site Area (ha)</b>	<b>0.03</b>	<b>0.09</b>	<b>0.32</b>	<b>0.48</b>	<b>0.27</b>
Gross Density Range (dph)	38 – 300	127 – 600	184 - 1360	389 - 2012	38 – 2012
<b>Average Gross Density (dph)</b>	<b>102</b>	<b>346</b>	<b>455</b>	<b>914</b>	<b>509</b>
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
<b>Average Net Developable Area (ha)</b>	<b>0.03</b>	<b>0.09</b>	<b>0.32</b>	<b>0.48</b>	<b>0.27</b>
<b>Average Net Density</b>	<b>102</b>	<b>346</b>	<b>455</b>	<b>914</b>	<b>509</b>
<b>Average Gross to Net Ratio</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>

### 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
<b>Average site size (dwellings)</b>	<b>4</b>	<b>22</b>	<b>123</b>	<b>110</b>	<b>18</b>
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
<b>Average Gross Site Area (ha)</b>	<b>0.08</b>	<b>0.33</b>	<b>1.19</b>	<b>8.25</b>	<b>0.41</b>
Gross Density Range (dph)	20 – 200	25 – 342	48 – 333	13	13 – 342
<b>Average Gross Density (dph)</b>	<b>69</b>	<b>117</b>	<b>191</b>	<b>13</b>	<b>88</b>
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
<b>Average Net Developable Area (ha)</b>	<b>0.08</b>	<b>0.22</b>	<b>1.19</b>	<b>4.73</b>	<b>0.29</b>
<b>Average Net Density</b>	<b>69</b>	<b>125</b>	<b>191</b>	<b>23</b>	<b>91</b>
<b>Average Gross to Net Ratio</b>	<b>100%</b>	<b>91%</b>	<b>100%</b>	<b>57%</b>	<b>96%</b>

### 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
<b>Average site size (dwellings)</b>	<b>4.5</b>	<b>28</b>	<b>109</b>	<b>181</b>	<b>74</b>
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
<b>Average Gross Site Area (ha)</b>	<b>0.06</b>	<b>0.65</b>	<b>1.58</b>	<b>4.5</b>	<b>1.51</b>
Gross Density Range (dph)	17 – 150	23 – 200	45 – 207	31 - 49	17 - 207
<b>Average Gross Density (dph)</b>	<b>77</b>	<b>81</b>	<b>106</b>	<b>42</b>	<b>79</b>
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
<b>Average Net Developable Area (ha)</b>	<b>0.06</b>	<b>0.62</b>	<b>1.52</b>	<b>3.54</b>	<b>1.29</b>
<b>Average Net Density</b>	<b>77</b>	<b>82</b>	<b>107</b>	<b>52</b>	<b>81</b>
<b>Average Gross to Net Ratio</b>	<b>100%</b>	<b>98%</b>	<b>98%</b>	<b>81%</b>	<b>95%</b>

### 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
<b>Average site size (dwellings)</b>	<b>2.5</b>	<b>19</b>	<b>103</b>	<b>177</b>	<b>16</b>
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
<b>Average Gross Site Area (ha)</b>	<b>0.09</b>	<b>0.48</b>	<b>3.56</b>	<b>5.3</b>	<b>0.5</b>
Gross Density Range (dph)	2 – 150	15 – 154	14 – 52	24 – 54	2 – 154
<b>Average Gross Density (dph)</b>	<b>40</b>	<b>47</b>	<b>33</b>	<b>36</b>	<b>40</b>
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
<b>Average Net Developable Area (ha)</b>	<b>0.09</b>	<b>0.47</b>	<b>2.75</b>	<b>4.56</b>	<b>0.43</b>
<b>Average Net Density</b>	<b>40</b>	<b>48</b>	<b>47</b>	<b>42</b>	<b>42</b>
<b>Average Gross to Net Ratio</b>	<b>98%</b>	<b>98%</b>	<b>79%</b>	<b>86%</b>	<b>97%</b>

### 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
<b>Average site size (dwellings)</b>	<b>4</b>	<b>28</b>	<b>113</b>	<b>304</b>	<b>95</b>
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
<b>Average Gross Site Area (ha)</b>	<b>0.19</b>	<b>0.76</b>	<b>2.97</b>	<b>7.93</b>	<b>2.51</b>
Gross Density Range (dph)	3 – 100	24 – 140	27 – 236	23 - 101	3 - 236
<b>Average Gross Density (dph)</b>	<b>47</b>	<b>64</b>	<b>101</b>	<b>64</b>	<b>69</b>
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
<b>Average Net Developable Area (ha)</b>	<b>0.19</b>	<b>0.68</b>	<b>2.91</b>	<b>4.86</b>	<b>1.92</b>
<b>Average Net Density</b>	<b>47</b>	<b>67</b>	<b>101</b>	<b>97</b>	<b>76</b>
<b>Average Gross to Net Ratio</b>	<b>100%</b>	<b>91%</b>	<b>99%</b>	<b>63%</b>	<b>91%</b>

## 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 (period from OL consent to RM consent in brackets) (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

\*\* 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

<b>Site size (dwellings)</b>	<b>Number of sites sampled</b>	<b>Planning approval period full*</b>	<b>Planning to delivery period (monitoring years)</b>	<b>Build period (monitoring years)</b>	<b>Average build out rate (dpa)</b>
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 in the 2023 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 revised NPPF (December 2023) also permits the inclusion of a windfall allowance at paragraph 72:

*"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 Land Manager, 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 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 sites

4.1 Since 2001 36,492 dwellings have received detailed planning permission on windfall sites, an average of 1,659 per annum. Of these 30,790 (84%) were for new build schemes and 5,702 (16%) involved the conversion of an existing building. 20,857 (57%) of windfalls were located in the city centre. 29,881 (82%) of the windfalls coming forward were apartments and 6,611 (18%) were houses.

4.2 Although 36,492 windfall dwellings have been granted detailed planning permission since 2001 there have been large variations 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	Conversion	In	Out	House	Apartment	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
<b>Total</b>	<b>36492</b>	<b>30790</b>	<b>5702</b>	<b>20857</b>	<b>15634</b>	<b>6611</b>	<b>29881</b>	<b>32836</b>	<b>3656</b>

4.3 Of the 36,492 windfall dwellings granted detailed consent 3,656 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 32,314 dwellings have been completed on sites which came forward as windfalls, an average of 1,469 completions per annum. Of these, 27,221 dwellings were new build schemes. 14,862 (46%) of dwellings completed on windfall sites were located in the city centre. 25,536 (79%) of the windfalls completed were apartments and 6,778 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 completions in recent years being similar to the high levels reached in 2005/6 and 2007/8. The completion figure for 2023 is notably lower than the previous five-year average, but as this is a single year it does not demonstrate a sustained downward trend. Trends will continue to be monitored in future years.
- 5.3 Of the 32,314 windfall completions 29,509 were on sites below the SHLAA survey threshold, 27,221 were new build and 5,093 were conversions. 14,862 (46%) of dwellings built on windfall sites 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

Year	Windfalls Completed	New Build	Conversion	In	Out	House	Apartment	Over 0.06	Under 0.06
<b>Total</b>	<b>32314</b>	<b>27221</b>	<b>5093</b>	<b>14862</b>	<b>17452</b>	<b>6778</b>	<b>25536</b>	<b>29509</b>	<b>2709</b>

- 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 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 years HELAA (and the windfall allowance will be reduced by the applicable annual assumption). Some windfall sites come forward and are developed or partially developed in the same year. Where this occurs, the completed dwellings will never be included in a 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, 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 over the last three monitoring years since the peak in 2018/19. 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 2008 financial crisis. 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. 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 A5.4 below. These assumptions are based on a continuing recovery of the economy and the housing market. It is assumed that following adoption of the new 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.
- 7.2 No windfall allowance is made for the first year as all supply identified at the SHLAA base date is already accounted for.
- 7.3 Although not included in the windfall allowance, sites which come forward as permitted development (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 2022/23 notification was received for 107 dwellings to be created from such conversions. While these have not been taken into account in establishing the windfall allowance, they add flexibility to the allowance and the HELAA.

**Table A5.3: Windfall Assumptions**

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

Time Period	Annual Contribution (Dwellings)
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
<b>Total</b>	<b>32836</b>	<b>29173</b>	<b>3663</b>	<b>19754</b>	<b>13081</b>	<b>3080</b>	<b>29765</b>

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

<b>Year</b>	<b>Windfalls Granted Detailed Planning Permission</b>	<b>New Build</b>	<b>Conver- sion</b>	<b>In City Centre</b>	<b>Out of City Centre</b>	<b>House</b>	<b>Apart- ment</b>
<b>2001/2</b>	228	64	164	155	73	22	206
<b>2002/3</b>	158	94	64	40	118	63	95
<b>2003/4</b>	170	108	62	71	99	67	103
<b>2004/5</b>	146	77	69	64	82	41	105
<b>2005/6</b>	167	65	102	43	124	64	103
<b>2006/7</b>	84	37	47	3	81	28	56
<b>2007/8</b>	124	59	65	20	104	56	68
<b>2008/9</b>	118	42	76	14	104	37	81
<b>2009/10</b>	129	63	66	25	104	36	93
<b>2010/11</b>	97	28	69	29	68	38	59
<b>2011/12</b>	152	67	85	26	126	36	116
<b>2012/13</b>	128	53	75	8	120	70	58
<b>2013/14</b>	129	61	68	18	111	42	87
<b>2014/15</b>	184	45	139	94	90	71	113
<b>2015/16</b>	149	48	101	34	115	30	119
<b>2016/17</b>	179	80	99	50	129	37	142
<b>2017/18</b>	239	133	106	97	142	44	195
<b>2018/19</b>	252	137	115	108	144	54	198
<b>2019/20</b>	157	56	101	22	135	54	103
<b>2020/21</b>	210	96	114	22	188	24	186
<b>2021/22</b>	195	84	111	88	107	28	167
<b>2022/23</b>	261	120	141	72	189	17	244
<b>Total</b>	<b>3656</b>	<b>1617</b>	<b>2039</b>	<b>1103</b>	<b>2553</b>	<b>959</b>	<b>2697</b>



## 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
<b>Total</b>	<b>29605</b>	<b>26097</b>	<b>3508</b>	<b>14545</b>	<b>15062</b>	<b>6177</b>	<b>23434</b>

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

<b>Year</b>	<b>Windfalls Completed</b>	<b>New Build</b>	<b>Conversion</b>	<b>In City Centre</b>	<b>Out of City Centre</b>	<b>House</b>	<b>Apartment</b>
<b>2001/2</b>	153	46	107	62	91	21	128
<b>2002/3</b>	173	58	115	109	64	32	141
<b>2003/4</b>	114	61	53	44	70	33	81
<b>2004/5</b>	138	63	75	24	112	42	94
<b>2005/6</b>	105	63	42	22	83	36	69
<b>2006/7</b>	141	81	60	42	99	15	126
<b>2007/8</b>	192	91	101	85	107	48	144
<b>2008/9</b>	120	47	73	33	87	34	86
<b>2009/10</b>	95	29	66	4	91	32	63
<b>2010/11</b>	59	48	11	1	58	16	43
<b>2011/12</b>	36	22	14	14	22	-6	42
<b>2012/13</b>	95	35	60	10	85	35	60
<b>2013/14</b>	51	24	27	12	39	11	40
<b>2014/15</b>	115	61	54	33	82	23	92
<b>2015/16</b>	166	49	117	72	94	62	104
<b>2016/17</b>	134	50	84	19	115	37	97
<b>2017/18</b>	171	45	126	58	113	42	129
<b>2018/19</b>	124	56	68	22	102	46	78
<b>2019/20</b>	160	92	68	24	136	44	116
<b>2020/21</b>	134	41	93	9	125	32	102
<b>2021/22</b>	139	55	84	35	104	20	119
<b>2022/23</b>	94	31	63	26	68	3	91
<b>Total</b>	<b>2709</b>	<b>1148</b>	<b>1561</b>	<b>760</b>	<b>1947</b>	<b>658</b>	<b>2045</b>

## 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;
  - Existing SHLAA and ELAA Sites;
  - Call for Sites Submissions; and
  - Custom Sites

#### 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 has resulted in over 300,000 land parcels, which is 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 are also mechanisms for custom sites to be imported into the SAD for analysis.

#### Call for Sites Submissions

- 3.4 As part of this 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.

#### Existing 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

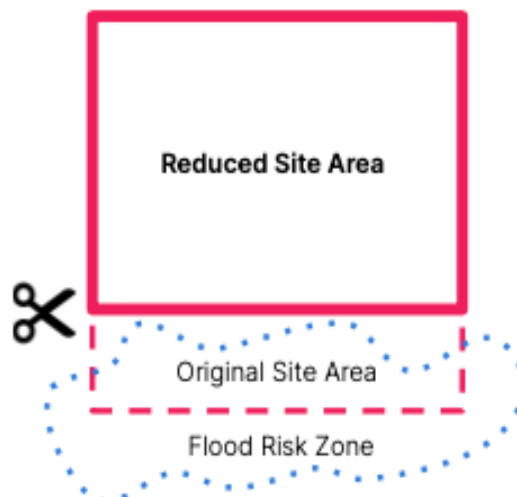
- 3.7 As part of the SAD system, UI have developed a function that enables council officers to manually add sites. Sites created using the built-in polygon drawing tool are automatically assessed and included within the SAD as 'Custom Sites'.

## 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 (failed the 11.25 sq.m. area test) or the wrong shape (failed the 11.25sq.m. square test) to contain a single residential dwelling 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**

<b>Designation/Constraint:</b>	<b>Balance Score (out of 100)</b>
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.
- 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.

- 4.15 In conjunction with this process, the Council are in the process of undertaking a comprehensive exploration of its land and property assets to determine whether any are suitable and available for housing or economic 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

Includes	Excludes
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' and sites which have been submitted by landowners in response to the Council's letter to seeking information on the availability of land for development.

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 ref. number.

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

CFS Ref	HELAA Ref	Address	CFS 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	Included as part of a proposed site allocation in Preferred Options Document
2c6890	2478	Elkington Street, Newtown	Employment	Within existing Core Employment Area. Included in employment land supply.
eb2353	2487	Site Of 235 Victoria Road	Leisure, open space	Suitable for residential, added to housing supply.
22731c	2486	Central Square High Street	None	Included as part of a proposed site allocation in Preferred Options Document
18c4c7	2451	Heaton House, Heaton Street	None	Included as a proposed site allocation in Preferred Options Document
d6d785	2477	128 Moseley Street, Highgate	Residential	Suitable for residential, added to housing supply.
e7159f	2468	37 Icknield Street, Hockley	Residential	Suitable for residential but ideally should be developed comprehensively with adjoining parcels. Added to housing supply.
707d7f	2475	Land at Bolton Street / Watery Lane Middleway, Bordesley	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.

<b>CFS Ref</b>	<b>HELAA Ref</b>	<b>Address</b>	<b>CFS Promoted Use</b>	<b>Comments</b>
ac9cc6	2454	Exchange House 737 Hagley Road West	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	31 Sutton Street, Ladywood	Residential	Suitable for residential, added to housing supply.
ce4719	2459	Smith Street Car Park, Newtown	Residential	Suitable for residential, added to housing supply.
0c84f8	2463	Land Bounded by Forster Street / Great Brook Street / Windsor Street / Lawley Middleway	Residential	Included as a proposed site allocation in Preferred Options Document
852c5a	2466	Depot, Lutley Grove	Residential	Suitable for residential, added to housing supply.
c9276f	2482	Summer Lane, Newtown	Residential, employment	Suitable for residential, added to housing supply.
418f6b	2471	Lowhill Lane, Longbridge	Residential, employment	Outline PA 2021/08642/PA approved for residential-led mixed use development. Included as a proposed site allocation in Preferred Options Document
4e1302	2453	Kings Norton Trading Estate, Stockmans Close	Residential, employment	Non-conforming industrial use. 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.
3aef31	2842	Land at Derby Street / Great Barr Street / Lawley Middleway	Residential, employment, retail, leisure	Included as part of a proposed site allocation in Preferred Options Document
45f082	2483	Tyburn Road, Erdington	Residential, employment, retail, leisure	Within existing Core employment Area, suitable for employment use. Included in employment land supply.
8e92b6	2469	The Axis, Holliday Street	Residential, employment, retail, leisure	Included as a proposed site allocation in Preferred Options Document

<b>CFS Ref</b>	<b>HELAA Ref</b>	<b>Address</b>	<b>CFS Promoted Use</b>	<b>Comments</b>
5e26e	2481	Lower Tower Street, Newtown	Residential, Employment, Retail, Leisure, Community Use	Suitable for residential, added to housing supply.
1b49ec	2479	Watson Road, Nechells	Residential, Employment, Retail, Leisure, Health	Within existing Core employment Area, suitable for employment use. Included in employment land supply.
47266e	2480	Landor Street, Nechells	Residential, Employment, Retail, Leisure, Health	Suitable for employment use. Included in employment land supply.
3f741b	2470	17 Thorp Street	Residential, employment, retail, leisure, open space	Suitable for residential, added to housing supply.
053d99	2446	Land Bounded by Gret Lister Street / Adams Street / Lord Street / Dartmouth Middleway	Residential, employment, retail, health	Included as part of a proposed site allocation in Preferred Options Document
905e8f	2461	82 Frederick Road, Selly Oak	Residential, employment, retail, leisure, health	Suitable for residential, subject to demonstrating current policy requirements for the loss of employment land. Added to housing supply.
7f3c6d	2460	41 Dennis Road, Moseley	Residential, employment, retail, leisure, health, open space, community use	Suitable for residential, added to housing supply.
feb78d	2769	76-78 Selly Oak Road, Bournville	Residential, leisure, health	Suitable for residential, added to housing supply.
776643	2467	28-30 Constitution Hill	Residential, retail	Suitable for residential, added to housing supply.
5a999e	2465	940 Stratford Road, Sparkhill	Residential, retail	Suitable for residential, added to housing supply.
337dfc	2464	Land at Abberley Street / Dugdale Street	Residential, retail, health, community use	Included as part of a proposed site allocation in Preferred Options Document

<b>CFS Ref</b>	<b>HELAA Ref</b>	<b>Address</b>	<b>CFS Promoted Use</b>	<b>Comments</b>
00e449	2448	224 Green Lane, Small Heath	Residential, retail, leisure, health	Suitable for residential, added to housing supply.
b3e3b	2456	8 Kings Road, Sutton Coldfield	Residential, retail	Suitable for residential, added to housing supply.
a0d8e7	3051	Farm Street, Newtown	Residential, Employment	Included as part of a proposed site allocation in Preferred Options Document
576167	E185	Former Cincinatti Building, Hanson's Bridge Road	Residential	The site is already in the HELAA residential supply (ref E185)
73fb00	3051	63-65 Hunters Vale, Birmingham	Employment	Included as part of a proposed site allocation in Preferred Options Document
f562ff	2851	87 Eyre Street, Hockley	Residential	Included as part of a proposed site allocation in Preferred Options Document
0888a2	2759	Garages, Marion Way, Hall Green	Residential	Suitable for residential, added to housing supply.
8c9dab	3045	125-135 Western Road, Hockley	Residential	Included as part of a proposed site allocation in Preferred Options Document
ebdbb9	3052	31 Bullock Street, Nechells	Residential	Included as part of a proposed site allocation in Preferred Options Document
906d94	2851	Land at Eyre Street, Hockley	Residential, Employment, Retail, Leisure	Included as part of a proposed site allocation in Preferred Options Document
03a827	3051	19-27 Hunters Road, Birmingham	Residential, employment, retail, community use	Included as part of a proposed site allocation in Preferred Options Document
60e8b0	3052	Car Park, Adams Street, Nechells	Student accommodation	Included as part of a proposed site allocation in Preferred Options Document
542e17	3052	222, Windsor Street, Nechells	Student accommodation	Included as part of a proposed site allocation in Preferred Options Document



<b>CFS Ref</b>	<b>HELAA Ref</b>	<b>Address</b>	<b>CFS Promoted Use</b>	<b>Comments</b>
4aaf1b	3052	43, Great Lister Street, Nechells	Unknown	Included as part of a proposed site allocation in Preferred Options Document
2be24c	2843	44-48 Great Hampton Street, Hockley	Residential, employment, leisure	Suitable for residential, added to housing supply.
e488d4	3045	41 Western Road, Hockley	Residential, leisure	Included as part of a proposed site allocation in Preferred Options Document
aef664	2844	26 Orphanage Road, Erdington	Residential	Suitable for residential, added to housing supply.
e10c63	2837	Hanley Street to Summer Lane Car Park, Hanley Street	Residential	Suitable for residential, added to housing supply.
5982dd	2838	Ward Street Car Park, Ward Street	Residential	Suitable for residential, added to housing supply.
de9c9f	2839	73 George Road, Tyseley	Residential	Suitable for residential, added to housing supply.
227c1c	2836	17-23 Stockfield Road, Acocks Green	Residential, retail, leisure	Suitable for residential, added to housing supply.
f5b62d	3006	Car Park, College Street, Longbridge	Employment, retail, leisure	Included as a proposed site allocation in Preferred Options Document
3a4793	3051	229-230 New John Street West, Newtown	Retail	Included as part of a proposed site allocation in Preferred Options Document
56dfc7	2961	Park Square, Longbridge	Employment, retail, leisure	Included as a proposed site allocation in Preferred Options Document
5977a0	3045	123 Western Road, Hockley	Retail	Included as part of a proposed site allocation in Preferred Options Document
fd631c	2764	Land at Ashleigh Grove, Wake Green	Residential	Suitable for residential, added to housing supply.

<b>CFS Ref</b>	<b>HELAA Ref</b>	<b>Address</b>	<b>CFS Promoted Use</b>	<b>Comments</b>
403719	2765	Former Maypole Works, Highters Heath Lane, Maypole	Residential	Suitable for residential, added to housing supply.
6120f5	3051	Signet Trading Ltd, Hunters Road, Hockley	Residential	Included as part of a proposed site allocation in Preferred Options Document
7aa04d	N522	Bills House, Lozells	Residential, retail, leisure, health, community use	Included as a proposed site allocation in Preferred Options Document
1ed6ea	2481	Lower Tower Street, Newtown	Residential	Suitable for residential, added to housing supply.
2aada4	2766	Car Park at South Parade, Sutton Coldfield	Residential	Included as a proposed site allocation in Preferred Options Document
c94aba	2766	Car Park at South Parade, Sutton Coldfield	Residential	Included as a proposed site allocation in Preferred Options Document
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.
73fe31	2767	Ladywood Police Station, Ladywood Middleway	Residential	Suitable for residential, added to housing supply.
1cf064	2769	The Beeches, Selly Oak Road, Bournville	Residential	Already in HELAA as a suitable housing site due to previous call for site submission feb78d.
76ebe7	2811	Tally Ho, Pershore Road	Residential, employment, leisure	Part of the site includes playing fields, tennis courts and bowling greens. The remaining area is suitable for development and so the developable area and capacity have been reduced to reflect this.

<b>CFS Ref</b>	<b>HELAA Ref</b>	<b>Address</b>	<b>CFS Promoted Use</b>	<b>Comments</b>
cf78e5	2711	Land at Hagley Road	Residential	Suitable for residential, added to housing supply.
311da4	2772	Five Ways House and Five Ways Tower	Residential	Included as a proposed site allocation in Preferred Options Document
53f2a9	2773	Newman House, Harrison's Road, Edgbaston	Residential	Suitable for residential, added to housing supply.
b05e3b	2774	Land Between Hermitage Road and Westfield Road, Edgbaston	Residential	Suitable for residential, added to housing supply.
238009	2775	New Garden Square, Edgbaston	Residential, employment, retail	Site previously in HELAA. Now included as a proposed site allocation in Preferred Options Document
f22969	2807	126 Hagley Road, Edgbaston	Residential	Suitable for residential, added to housing supply.
7fa7a3	2807	138-142 Hagley Road, Edgbaston	Residential	Suitable for residential, added to housing supply.
1b3ccc	2776	224-228 Broad Street	Student accommodation	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.
689fd2	2802	Tyseley Energy Park	Employment	Included as a proposed site allocation in Preferred Options Document

<b>CFS Ref</b>	<b>HELAA Ref</b>	<b>Address</b>	<b>CFS Promoted Use</b>	<b>Comments</b>
6d4038	3052	33-35 Adams Street, Nechells	Residential, employment, retail, leisure, health, community use	Included as part of a proposed site allocation in Preferred Options Document
836bdb	N545	Newhall Walk Shopping Centre and adjoining land, Sutton Coldfield	Residential, retail, leisure	Included as a proposed site allocation in Preferred Options Document
4a667e	2780	45 Frederick Street, Jewellery Quarter	Residential, employment, retail, leisure	Suitable for residential, added to housing supply.
a3fdb9	3052	239 Heneage Street, Nechells	Residential	Included as part of a proposed site allocation in Preferred Options Document
7b6b41	3052	194/194A Windsor Street, Nechells	Residential	Included as part of a proposed site allocation in Preferred Options Document
eeeea7	2783	Car Park behind Sheldon Local Centre	Residential, employment, retail, leisure	Suitable for residential, added to housing supply.
ddacf5	2784	Rear of 305-367 Stockfield Road, Yardley	Residential	Suitable for residential, added to housing supply.
27f0af	2785	Rear of 113-119 Glebe Farm Road	Residential	Suitable for residential, added to housing supply.
a782d9	N510A	231 Bridge Street West, Newtown	Residential, Retail	Included as part of a proposed site allocation in Preferred Options Document
348556	3051	29 Hunters Road, Hockley	Residential, Employment, Retail, Health, Community Use	Included as part of a proposed site allocation in Preferred Options Document
6afa7f	2847	Clive Road, Quinton	Residential	Suitable for residential, added to housing supply.

<b>CFS Ref</b>	<b>HELAA Ref</b>	<b>Address</b>	<b>CFS Promoted Use</b>	<b>Comments</b>
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 Preferred Options Document
721ca5	2787	239 Walsall Road, Perry Barr	Residential, Employment, Health	Suitable for residential, added to housing supply.
c90d52	N37	71-77 Lozells Road, Lozells	Residential	Suitable for residential, added to housing supply.
a8ba0a	N510A	228 Bridge Street West, Newtown	Residential	Included as part of a proposed site allocation in Preferred Options Document
6c173f	2788	Land between Camden Street, Camden Grove, Camden Drive and Albion Street, Jewellery Quarter	Residential, Retail	Suitable for residential, added to housing supply.
9ea516	2789	Land between Price Street and Vyse Street, Gun Quarter	Residential	Suitable for residential, added to housing supply.
c74026	3052	33 Proctor Street, Nechells	Residential, Retail	Included as part of a proposed site allocation in Preferred Options Document
296b8a	N510A	260 Summer Lane, Newtown	Residential	Included as part of a proposed site allocation in Preferred Options Document
ee02b1	2791	Cadbury Car Park, Bournville	Residential	Suitable for residential, added to housing supply.
913a9b	N545	Newhall Walk Shopping Centre and adjoining land, Sutton Coldfield	Residential, Leisure, Health, Community Use	Included as a proposed site allocation in Preferred Options Document

<b>CFS Ref</b>	<b>HELAA Ref</b>	<b>Address</b>	<b>CFS Promoted Use</b>	<b>Comments</b>
96abe3	N510A	164 Bridge Street West, Hockley	None	No promoted use, but the site has planning approval for student accommodation and is included as part of a proposed site allocation in Preferred Options Document
1407db	3052	25 Great Lister Street, Nechells	Residential, Employment, Retail, Leisure, Health	Included as part of a proposed site allocation in Preferred Options Document
1b5cbc	3052	41 Great Lister Street, Nechells	Residential, Employment, Retail, Leisure	Included as part of a proposed site allocation in 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 Preferred Options Document
c3bb76	3051	Land at Hunters Road, Hockley	Employment	Included as part of a proposed site allocation in Preferred Options Document
8a2929	3051	Signet Plc Car Park	Employment	Included as part of a proposed site allocation in Preferred Options Document
68a660	3051	Signet Plc Car Park	Employment	Included as part of a proposed site allocation in Preferred Options Document. Different boundary to site above.
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 Preferred Options Document
0bbafb	2792	35 Boldmere Road, Sutton Coldfield Road	Residential, employment, retail, leisure, health	Included as part of a proposed site allocation in Preferred Options Document

<b>CFS Ref</b>	<b>HELAA Ref</b>	<b>Address</b>	<b>CFS Promoted Use</b>	<b>Comments</b>
642369	2793	Former Kingsway Cinema, Kings Heath	Residential, retail, leisure, community use	Suitable for residential, added to housing supply.
94ae23	3052	244-245 Heneage Street, Nechells	None	Included as part of a proposed site allocation in Preferred Options Document
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.
ac3da9	2849	Rear of East End, Aston Cross	None	No promoted use, but adjoins industrial uses. Suitable for industrial, added to employment supply.
f334b6	3051	229-230 New John Street West, Hockley	Residential, retail	Included as part of a proposed site allocation in Preferred Options Document
fe5eef	3051	228 New John Street West, Hockley	Residential, retail	Included as part of a proposed site allocation in Preferred Options Document
4599d1	2807	126-144 Hagley Road, Edgbaston	Residential	Suitable for residential, added to housing supply.
e618e2	2770	306 Hagley Road, Edgbaston	Residential	Suitable for residential, added to housing supply.
N/A (email submission)	2770	300-306 Hagley Road, Edgbaston	Residential	Suitable for residential, added to housing supply. Different boundary to site above.
N/A (email submission)	2829	8 Meadow Road, Edgbaston	Residential	Suitable for residential, added to housing supply.
N/A (email submission)	2830	Oakhill, Edgbaston	Residential	Suitable for residential, added to housing supply.

<b>CFS Ref</b>	<b>HELAA Ref</b>	<b>Address</b>	<b>CFS Promoted Use</b>	<b>Comments</b>
N/A (email submission)	2855	Edgbaston Mill, Edgbaston	Residential	Included as a proposed site allocation in Preferred Options Document
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)	3045	Western Road, Hockley	Residential	Included as part of a proposed site allocation in Preferred Options Document
N/A (email submission)	2841	24-32 Princip Street, Newtown	Residential-led mixed use	Suitable for residential, added to housing supply.
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
N/A (email submission)	2842	Middleway Sites, Digbeth	Residential-led mixed use	Included as a proposed site allocation in Preferred Options Document

## 8.2 HELAA Classification: Suitable – allocated in adopted plan

<b>CFS Ref</b>	<b>HELAA Ref</b>	<b>Address</b>	<b>CFS Promoted Use</b>	<b>Comments</b>
0bcfbd	S224	Former MG Rover Works Bristol Road South	Residential	This site is already in the HELAA residential supply (ref S224), based on the Longbridge AAP allocation. Now has outline planning permission for residential development (2021/06547/PA).



CFS Ref	HELAA Ref	Address	CFS Promoted Use	Comments
965da3	2615 2686 2687	MG Rover Group Site Of West Works Bristol Road South	Employment	This site is already identified within the employment supply as it is located within the Longbridge RIS / Core Employment Area allocation.  Sites 2615 and 2687 have planning approval for employment development and are both under construction (2018/02549/PA and 2022/03915/PA).
949966	N518	Wretham Road/Soho Hill, Hockley	Residential, Retail, Leisure	Existing Area Action Plan allocation. Suitable for residential development.
5b0f69	2803	Doris Road, Bordeseey Green	Employment	Existing Area Action Plan allocation. Suitable for employment development.

### 8.3 HELAA Classification: Potentially suitable – Physical constraints

CFS Ref	Address	CFS Promoted Use	Comments
bd2de3	Perry Barr Greyhound Stadium, Aldridge Road	Leisure	Proposed to redevelop for mixed uses residential, health, leisure, employment. Freehold of site held by BCC, discussions required with Birmingham Property Services.
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.
3e2f11	7 Mole Street, Birmingham	None	Requires land assembly to achieve wider redevelopment. Development of the site in isolation not considered suitable.
ccb51a	R/O 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.
89f7b7	Land off Somery Road, Selly Oak	Residential	Parts of site affected by Flood Zone 3 - needs to be investigated further to ascertain whether development could be achieved.
4a4014	Land off Somery Road, Selly Oak	Residential	Parts of site affected by Flood Zone 3 - needs to be investigated further to ascertain whether development could be achieved.

CFS Ref	Address	CFS Promoted Use	Comments
e1d73c	Land at Ridgeacre Road West, Quinton	Residential	Site constrained by electricity pylon, unusual shape and close proximity to M5. Planning application for residential development (2022/09287/PA) currently being considered on the site. May be added to a future HELAA if the planning application is approved.
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 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	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.

#### 8.4 HELAA Classification: Currently Unsuitable – policy constraints

CFS Ref	Address	CFS Promoted Use	Comments
43f069	Land at Wiggins Hill Road, Minworth	Employment	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site.

CFS Ref	Address	CFS Promoted Use	Comments
5262c4	33 Mayall Drive, Sutton Coldfield	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.
6f7f8b	Land Between Hawfield Grove and New Hall Grange Close, Wylde Green	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.
1b4210	Land South of Kempson Avenue, Sutton Coldfield	Residential	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site. TPO on site.
325620	Land at West Hills, Redhill Road	Residential	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site.
f073b0	Land to the east of Lindridge Road, Sutton Coldfield	Residential	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site.
78b7e4	Land west of Ryknild Close, 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.
555fba	The Mitchell Centre, Weeford Road, Sutton Coldfield	Residential, retail	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site.
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 Mill Road, Sutton Coldfield	Residential, retail, open space, community use	Green Belt adjoining urban area. Potential Site of Wildlife Importance and HER on site.

CFS Ref	Address	CFS Promoted Use	Comments
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	Land Between Hawfield Grove and New Hall Grange Close, Wylde Green	Residential	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site.
4faa2b	Chase Farm, Weeford Road, Roughley	Residential	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site.
05b298	Weeford Road, Roughley	Residential	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site.
6c3314	Fox Hill Road, Roughley	Residential	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site.
a8cc84	Birmingham Wheels Park	Leisure, open space, community use	Not currently suitable for the proposed uses; allocated employment site.
12eaad	Duttons Lane, Roughley	Residential, open space	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site.
a3482b	Weeford Road/Slade Road, Roughley	Residential, community use	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site.
771ab4	Slade Road, Roughley	Residential, open space, community use	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site.
1cbf51	Fox Hill, Roughley	Residential, employment, retail, leisure, health, open space, community use	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site.
db9390	Land at Frankley	Residential	Green Belt adjoining urban area.
1a7016	Grange Lane/Hillwood Road, Roughley	Residential	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site.
81b964	Lichfield Road, Hill Hook	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.
d738f2	Land at Wast Hills, Redhill Road	Residential	Green Belt adjoining urban area. Potential Site of Wildlife Importance on site.

CFS Ref	Address	CFS Promoted Use	Comments
50f381	The Cadbury Club, Bourneville	Residential, Employment, Leisure	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.

### 8.5 HELAA classification – Not suitable

CFS Ref	Address	CFS Promoted Use	Comments
0d5227	Bridge Road, Alum Rock	Residential	Inappropriate boundary which overlaps with another submission.
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	Land between Foxhill Lane and Tamworth Road, Sutton Coldfield	Residential	Isolated site in Green Belt.
549f10	R/O 17-23 Jerry's Lane, Short Heath	Residential	Would likely be considered inappropriate backland development.
311e7d	R/O 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	R/O 8 St Agnes Road, Moseley	Residential	Likely to be considered inappropriate backland development.
cef984	Gildas Avenue, Sisefield Road, Pleck Walk, Glenhill Drive, Barratts Road, Bentmead Grove, Kings Norton	Residential, health, open space	The site area identified includes sites that are already included in the HELAA for redevelopment by BMHT.
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.

CFS Ref	Address	CFS Promoted Use	Comments
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.
N/A (email submission)	Land north of Egghill lane, Frankley	Residential	Green Belt adjoining urban area.

### 8.6 HELAA Classification – not appropriate for HELAA

CFS Ref	Address	CFS Promoted Use	Comments
d7bfe0	940 Stratford Road, Sparkhill	Residential, retail	Duplicate site submission - disregard this submission
b6c919	224 Green Lane, Small Heath	Residential, retail, leisure, health, community use	Duplicate site submission - disregard this submission
b7264c	Nechells Police Station	Residential	Submission withdrawn by the site promoter
0daa03	Birmingham Chamber of Commerce, Harborne Road	Residential, employment	Not appropriate to be considered in HELAA at this time as a planning application for related uses is currently being considered at the site. The submission will be reconsidered in a future HELAA after a decision has been made on the current proposal.
f5fa7f	7 Mole Street, Sparkhill	Retail	Promoted for retail development only. The HELAA can only consider sites for housing and employment development.
8838b5	Land at Bath Walk Industrial Estate, Balsall Heath	Residential	Duplicate site submission - disregard this submission
a636ee	Vesey Close, Four Oaks	Residential	The site is promoted for residential development but it is already an established residential area.
fe0ccc	Beswick Grove, Yardley	Residential	Duplicate site submission - disregard this submission
075552	Eyre Street, Spring Hill	None	Unusual site boundary and no promoted use.
3c1b95	Land between Camden Street, Camden Grove, Camden Drive and Albion Street, Jewellery Quarter	Residential, Retail	Duplicate site submission - disregard this submission

<b>CFS Ref</b>	<b>Address</b>	<b>CFS Promoted Use</b>	<b>Comments</b>
5b484b	Rear of 305-367 Stockfield Road, Yardley	Residential	Duplicate site submission - disregard this submission
9c7d50	Wretham Road/Soho Hill, Hockley	Residential, employment, retail, leisure, health	Duplicate site submission - disregard this submission
468ba7	Wretham Road/Soho Hill, Hockley	Residential, employment, retail, leisure, health	Duplicate site submission - disregard this submission
c74026	33 Proctor Street, Nechells	Residential, Retail	Duplicate site submission - disregard this submission
2592d5	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.
43103a	Corner of Linden Road and Bournville Lane, Bournville	Community Use	Duplicate site submission - disregard this submission
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 at Moor Lan, 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.
e9718f	228 New John Street West, Hockley	Residential, retail	Duplicate site submission - disregard this submission
c4b804	229-230 New John Street West Hockley	Residential, retail	Duplicate site submission - disregard this submission
a77a61	33 Proctor Street, Nechells	Residential, retail	Duplicate site submission - disregard this submission