

- 1.1 The City Council first published a 5 year housing land supply position based on 2023 data in November 2023, which was then updated in March 2024 to reflect the new version of the National Planning Policy Framework (NPPF) and the outcome of the Housing Delivery Test 2022, both of which were issued in December 2023.
- 1.2 Paragraphs 77 and 226 of the new NPPF have introduced a provision for local authorities to demonstrate a four year supply of deliverable housing land where there is an emerging local plan that has either been submitted for examination or has reached Regulation 18 or Regulation 19 (Town and Country Planning (Local Planning) (England) Regulations 2012) stage, including both a policies map and proposed allocations towards meeting housing need
- 1.3 On Monday 8th July 2024 the Birmingham Local Plan Preferred Options Document was published for public consultation. This is a regulation 18 consultation which includes both a Policies Map and allocations towards meeting housing need. The new requirement to demonstrate a four year supply of deliverable housing land therefore now applies in the city and this statement has been issued to reflect this updated position.

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four year housing land supply position has been

3.1 Paragraph 77 of the NPPF states that the starting point for calculating the housing land supply position should be the housing requirement figure set out in an adopted strategic plan or against the standard method for calculating

4.5 The NPPF (paragraph 72) permits a windfall allowance as part of anticipated supply, where there is compelling evidence that they will provide a reliable source of supply. The City has a long track record of delivering windfall sites - and even with the best efforts of the HELAA to identify sites, windfalls continue to come forward and be developed in large numbers, as is inevitable for such a large and extensively developed urban area. The windfall methodology was examined and accepted by the Inspector at the BDP hearings and was tested at a called-in appeal (Former North Worcestershire Golf Club - 2017/02724/PA), the

More recently, the windfall allowance has been reviewed and updated in the new HELAA methodology.

4.6 A windfall allowance of 1,800 dwellings has therefore been added to the housing land The windfall methodology is shown in Appendix 1.

Windfalls	1,800

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requirement and to establish and justify the windfall allowances in the 5 year housing land supply calculation and the 2023 HELAA.

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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

Year	Windfalls Granted Detailed Permission	New Build	Conv ersion	Inside City Centre	Outside City Centre	House	Apart ment	Over 0.06 ha	Under 0.06 ha
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	3773	3505	268	2399	1374	76	3697	3512	261



Year Windfalls New Conv Completed Build
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- 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

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.

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- 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 five 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 economic downturn. Prior to 2007 a significant proportion of windfalls coming forward and being built had been apartments, many of which were in the city centre. The market was reluctant to provide apartments in the difficult economic climate during and this has had a significant impact on new windfall supply coming forward, however the market for -established.
- 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 A4 below. It is assumed that following adoption of the

conversions. While these have not been taken into account in establishing the windfall allowance, they add flexibility to the allowance and the HELAA. The government has recently introduced a further extension of permitted development rights which seek to allow changes from Use Class E (a new Use Class introduced in September 2020 which subsumed a large range of uses previously in A, D and B1 Use Class) to residential use. This adds further flexibility to the windfall allowance and it is likely that the allowance is likely to be exceeded.

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