



**A forensic analysis of building land availability
across Greater Manchester 2018–2037.**

Windfall

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SAVE ROYTON'S GREENBELT COMMUNITY GROUP
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1. Introduction

The Greater Manchester Spatial Framework (GMSF) proposes to release enough land from the Green Belt to build over 29,000 homes. The rationale put forward for this proposal is that there is insufficient land available to build the 201,000 homes that Greater Manchester is committed to delivering across the lifespan of the 19-year plan (2018–2037).

This briefing summary proves that such a conclusion is not supported by the evidence, and furthermore, based on historical yield enough land will become available to fully support the plan. By utilizing planning techniques that are permitted by the National Planning Policy Framework but have not been adopted by the GMSF it will be demonstrated that it is possible for Greater Manchester to meet its building target without having to release land from the Green Belt.

To present the case for releasing land from the Green Belt, the GMSF first has to establish a shortfall in land availability. This requires two pieces of information:

- The number of homes that Greater Manchester **aims** to build
- The number of homes that **can** be built on the available land

The first is addressed using a standardised methodology, imposed on the process by central Government. While concerns have been raised over the housing target, it will not be discussed any further in this summary. This brief will consider only the second criterion, and examine the failure of the GMSF to provide a realistic assessment of the land available for building homes.

We draw to the conclusion that the purported “land shortage” is nothing more than a mathematical conjuring trick that is determined entirely by the timescale of the plan, and that there is no empirical evidence to support the claim that Greater Manchester will run out of land during its implementation. We also show that land will become available throughout the implementation period and demonstrate how this could be factored into the GMSF with the use of “windfall allowances”.

2. Determining the number of allocations located in the Green Belt

All councils are required to undertake a *Strategic Housing Land Availability Assessment* (SHLAA), which is a log of brownfield and greenfield land (but not protected land such as Green Belt) deemed suitable for residential building. The SHLAA is essentially a site register and provides an estimate of the number of homes that each site can be reasonably expected to deliver.

The GMSF calculates land availability by totalling the number of building plots in each district's SHLAA to obtain an overall total for Greater Manchester (see [Greater Manchester's Plan for Homes, Jobs and the Environment, p. 123](#)). Allocations located in the Green Belt (totalling 29,266) are used to make up the shortfall between this figure and the housing target.

7.33 The table below summarises the sources of housing land supply up to 2037.

District	Strategic Housing Land Availability Assessment			Allowances ⁽⁷⁷⁾	GMSF Allocations ⁽⁷⁸⁾	Total land supply 2018-2037
	Brownfield land	Greenfield land	Mix brownfield land and greenfield land			
Bolton	9,628	2,689	0	2,306	0	14,623
Bury	3,336	668	412	280	5,355	10,051
Manchester	45,309	1,737	9,380	1,397	24	57,847
Oldham	7,585	1,174	2,004	367	4,007	15,137
Rochdale	6,463	2,935	751	-892	3,627	12,884
Salford	31,140	1,916	2,769	1,666	2,000	39,491
Stockport	5,180	719	5,105	770	3,700	15,474
Tameside	5,028	800	1,310	798	1,542	9,478
Trafford	8,377	3,653	897	434	7,111	20,472
Wigan	12,223	7,725	110	1,134	1,900	23,092
Greater Manchester	134,269	24,016	22,738	8,260	29,266	218,549

78 Excluding homes identified in baseline supply

77 Allowances are a combination of small sites windfall allowances and demolitions/clearances for four of the districts (Bolton, Manchester, Oldham and Rochdale). Rochdale has a negative allowance figure because the number of dwellings expected to be lost to demolition/clearances is expected to outnumber the number of new dwellings expected to be built on small sites.

3. Strategic Housing Land Availability Assessment

The SHLAA is a “living document”; a log of land available for residential building that is updated in perpetuity. A SHLAA typically operates over a 15-year time period from its point of inception, and was devised to inform local plans. The SHLAA is typically broken down into 5-year timeframes. The example presented here is the [2012 SHLAA for the Metropolitan Borough of Oldham](#).

Table 13 Potential Housing Land Supply by District Partnership

District Partnership	< 5 years	6 to 10 years	11 to 15 years	16+ years	Total	Total (%)
Chadderton	239	536	169	40	984	10.79
Shaw, Crompton and Royton	252	543	107	39	941	10.32
Failsworth and Hollinwood	166	497	286	17	966	10.59
West Oldham	1,081	1,529	345	0	2,955	32.41
East Oldham	580	1,072	614	0	2,266	24.85
Saddleworth and Lees	519	162	230	95	1,006	11.03
Total	2,837	4,339	1,751	191	9,118	

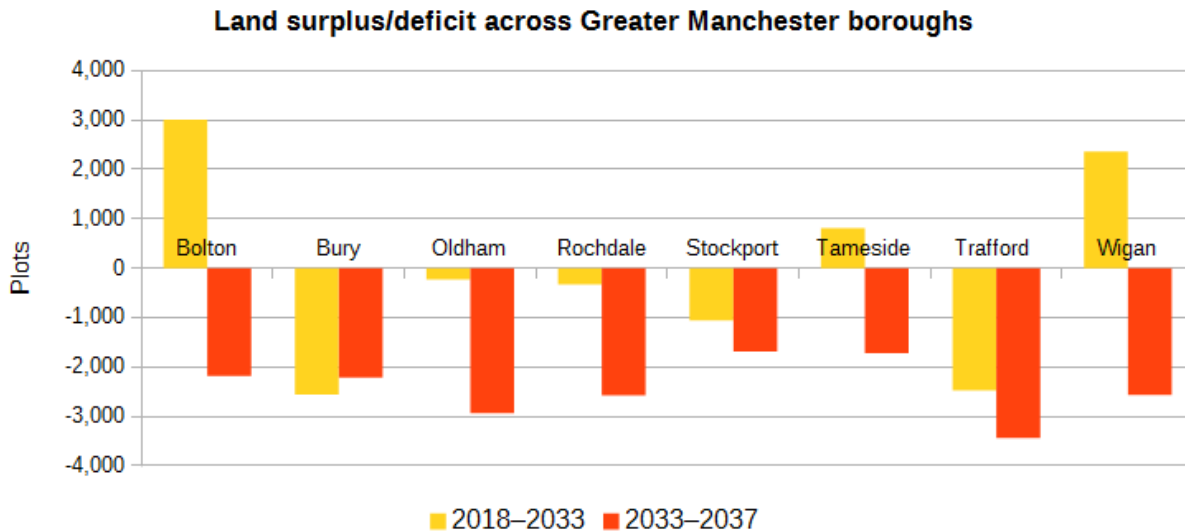
In this example, there are 2,837 building plots that can be delivered in the 2012–2017 frame, 4,339 plots in the 2017–2022 frame, and 1,751 plots in the 2022–2027 frame. Land availability beyond the 15-year mark is highly speculative, but much more land eventually became available in Oldham. The 2018 SHLAAs for Greater Manchester along with the delivery timeframes are summarised by the GMSF [Housing, topic paper \(Appendix A, p. 1\)](#) below.

Table 2: GM Housing Land Supply – trajectory

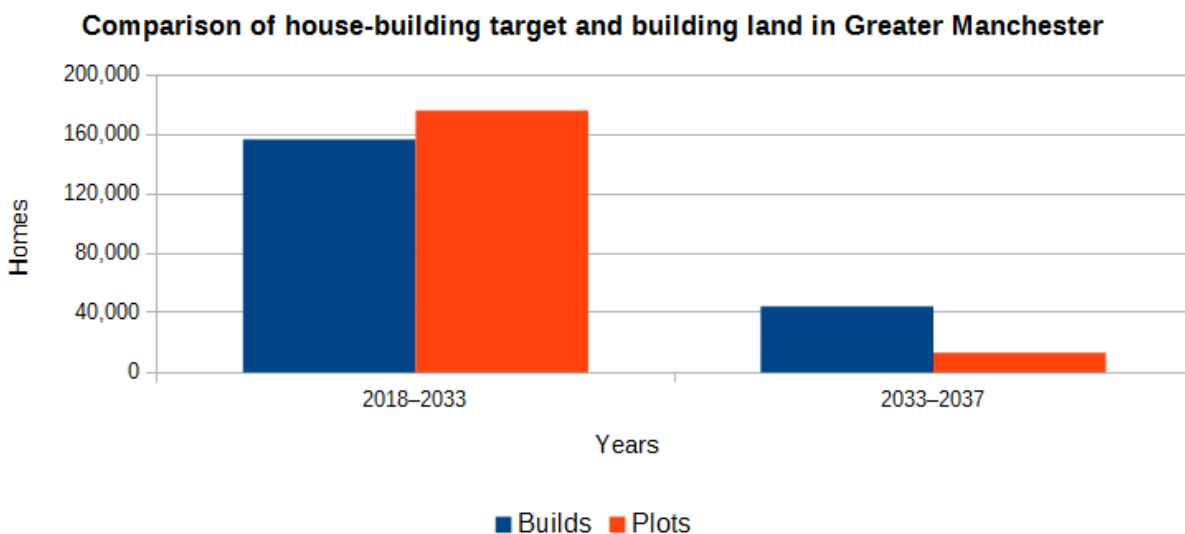
District	2018-2023	2023-2028	2028-2033	2033-2037	Total 2018-2037	Post-2037 identified supply
Bolton	3,257	6,881	3,469	1,016	14,623	0
Bury	1,692	2,411	488	105	4,696	0
Manchester	23,279	17,941	12,159	4,444	57,823	7,778
Oldham	2,700	4,229	3,694	507	11,130	75
Rochdale	3,815	4,432	1,022	-12	9,257	0
Salford	16,931	9,686	8,643	2,231	37,491	0
Stockport	3,649	3,542	2,950	1,633	11,774	200
Tameside	2,312	3,460	1,888	276	7,936	0
Trafford	4,239	5,281	2,804	1,037	13,361	0
Wigan	6,610	8,135	4,417	2,030	21,192	439
GM	68,484	65,998	41,534	13,267	189,283	8,492

4. Land surplus/deficit

It is illuminating to compare the housing land supply trajectories as detailed in the SHLAAs ([Housing, topic paper, Appendix A, p. 1](#)) to the GMSF housing targets ([Housing, topic paper, p.17–18](#)):



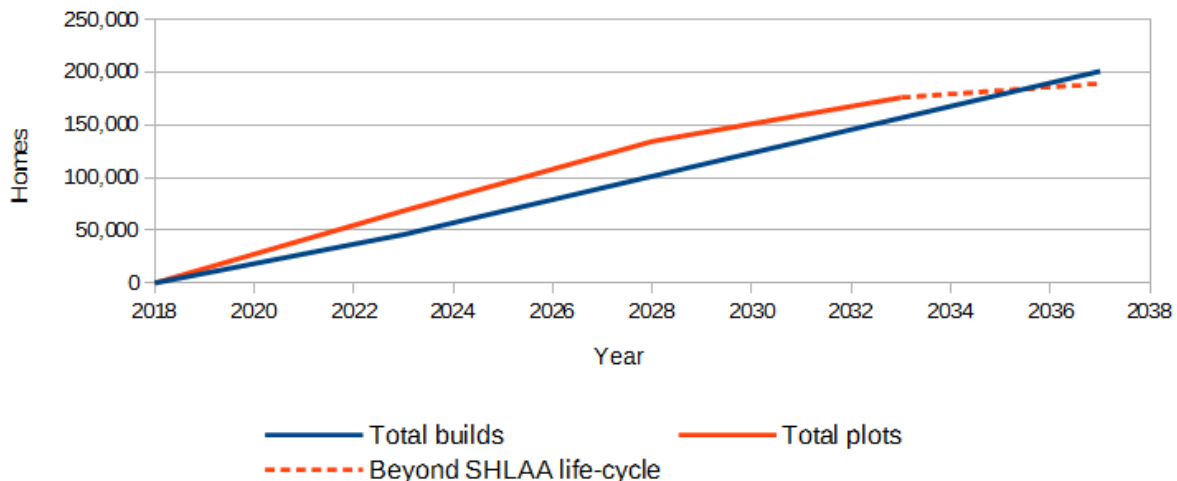
For the first 15 years of the plan there is no projected shortfall for Bolton, Tameside and Wigan, while Oldham and Rochdale are only projected to encounter a shortfall in the 15th year. The City of Manchester and Salford (not shown in the graph) also have a surplus over the first 15 years of the plan. All ten districts have a land deficit in the final 4 years of the plan (2033–2037); however, some of the districts are able to offset part of the deficit in the last 4 years with surplus land from the first 15. Only three boroughs are projected to encounter a significant shortfall in the first 15 years of the plan: Bury, Stockport and Trafford. This in itself is not an immediate problem because the National Planning Policy Framework permits boroughs to offset housing need in neighbouring areas. The table below shows that over the whole of the Greater Manchester area there is no projected shortfall in the first 15 years of the plan.



5. A mismatch between the life-cycles of the GMSF plan and the SHLAAs

There is clearly enough available land in the SHLAAs to collectively and comfortably service Greater Manchester's housing target over the 15-year life-cycles of the SHLAAs. The graph below compares the annual trajectory of home-building to the land supply in the SHLAAs by averaging the number of available plots in each 5-year frame and interpolating the cumulative total. As it currently stands, the 2033–2037 period is mostly unaccounted for at this stage of the SHLAAs life-cycle. The next chapter will demonstrate why care must be taken to not misinterpret a deficit that occurs outside of the SHLAAs life-cycle as a land shortage, as the GMSF does.

Trajectory of house-building target and building land logged in Greater Manchester SHLAAs



It is patently clear now that the deficit between the housing target and the land-supply arises entirely from the mismatch between the length of the plan (19 years) and the life-cycle of the SHLAAs (15 years). It is a misinterpretation or misrepresentation of national policy to insist that the entire land-supply required to service a plan is identified at its inception. The National Planning Policy Framework recognises that it may not be possible to meet all of a plan's land requirements prior to its adoption:

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

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

It is obvious from this chapter and the preceding one that Greater Manchester is able to identify sufficient land-supply to comply with the minimal conditions that are set out without the need for releasing land from the Green Belt.

6. The SHLAA as a “living document”

The previous chapters have illustrated how the land-supply deficit occurs at the end of the plan, beyond the life-cycle of the SHLAA. It is important to not misinterpret the deficit as a land shortage; the deficit at this point is essentially a period that is not yet accounted for by the SHLAA. The SHLAA is a “living document”, a log that is updated in perpetuity as land is built on, and land becomes available.

This chapter will explain the concept and demonstrate the impact it can have on land supplies by examining some older SHLAAs. The SHLAAs were obtained for Bolton, Oldham, Stockport, Tameside, Trafford and the City of Manchester variously dated 2007–2012. Unfortunately, historical SHLAAs for Bury, Rochdale, Wigan and Salford could not be obtained so a complete picture cannot be painted. The data can be viewed in the table below:

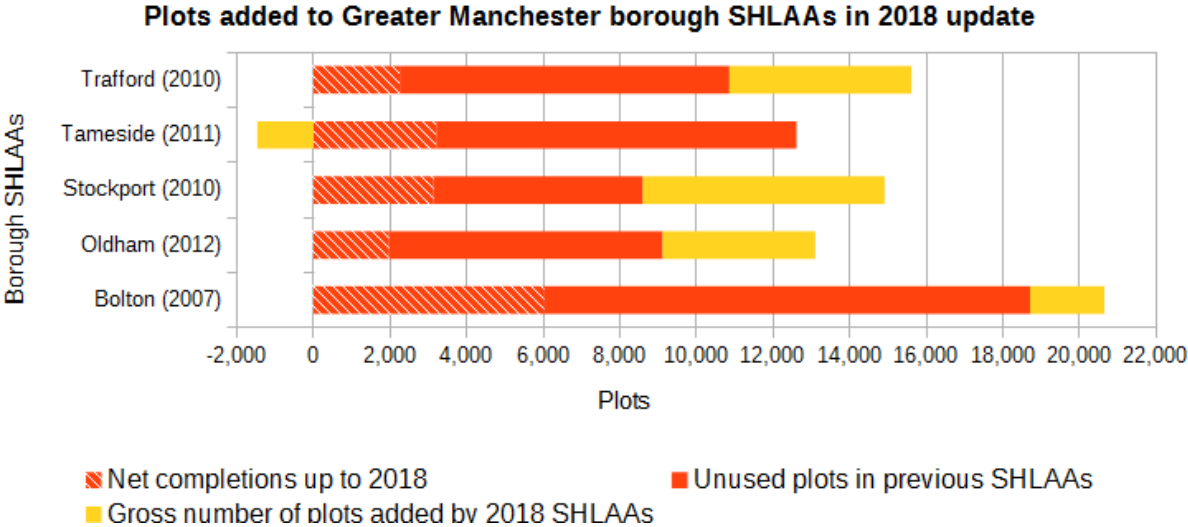
District	Old SHLAA			SHLAA (2018) Total	Change in supply total		
	Year	Completions	Unused		Net	Gross	
Bolton	2007	6,022	12,682	18,704	14,623	-4,081	1,941
Bury							
Manchester	2009	13,821	46,747	60,568	57,823	-2,745	11,076
Oldham	2012	1,970	7,148	9,118	11,130	2,012	3,982
Rochdale							
Salford							
Stockport	2010	3,136	5,463	8,599	11,774	3,175	6,311
Tameside	2011	3,200	9,406	12,606	7,936	-4,670	-1,470
Trafford	2010	2,246	8,609	10,855	13,361	2,506	4,752
Wigan							
Total	<i>2007–2012</i>	30,395	90,055	120,450	116,647	-3,803	26,592

The totals for the historical SHLAAs come from the respective documents, while the totals for the 2018 SHLAAs come from the GMSF [Housing, topic paper \(Appendix A, p. 1\)](#) and are reproduced in chapter 3 of this brief for convenience. The net completions are obtained from the Ministry of Housing, Communities and Local Government ([Table 122: housing supply; net additional dwellings, by local authority district, England 2001-02 to 2017-18](#)). All the other figures are generated from this data.

To explain how to interpret the above table, the Metropolitan Borough of Oldham will be taken as an example. The 2012 edition of the SHLAA for Oldham (detailed in chapter 3) contained a total of 9,118 plots available for the SHLAA’s life-cycle. The 2018 edition of the SHLAA contained a total of 11,130 plots. Despite undertaking building in that time, Oldham’s SHLAA saw a net expansion of 2,012 plots. Therefore, land became available in Oldham at a faster rate than it was built on, increasing the total number of plots in the SHLAA. This figure does not take into account the land that was used for building: over the 2012–2018 period there were 1,970 net completions. If you take the number of completions (1,970) together with the number of plots in the 2018 edition of the SHLAA (11,130), that comes to a total of 13,100 plots that have been available for building since 2012, a considerable increase on the 9,118 plots identified in the 2012 edition. In other words 3,982 extra plots have become available in Oldham since 2012, and 1,970 plots have dropped off the SHLAA after being built on.

This pattern of more land becoming available generally holds true for the other districts in Greater Manchester with the exception of Tameside, which saw a reduction of 1,470 plots between 2011 and 2018. Tameside saw an overall reduction in its land availability in the 2014 edition of its SHLAA after it was obliged to remove 32 sites that were located in the Green Belt.

The graph below illustrates this growth in land-supply for the five boroughs. The red bar represents the sites documented in the earlier SHLAA (with completions on those sites represented by a stripe pattern), and the yellow bar represents the gross number of extra plots added to the SHLAA as of 2018. In Oldham’s case, the total number of plots comes to 13,100 (representing the 9,118 plots in the 2012 edition of the SHLAA and the 3,982 plots sourced since then). Of course, the 2018 edition of the SHLAA only increased to 11,130 because 1,970 plots dropped off the SHLAA due to completions.



Overall, between 2007 and 2018, the City of Manchester and five boroughs saw an extra 26,592 building plots become available during that period. This is an interesting figure taken on its own terms, because it is almost equivalent to the extra 29,266 plots of land that need to be sourced to service the entirety of the GMSF (as detailed in chapter 2 of this brief). If just six districts can recover 26,000 building plots over an 11-year period just through the natural process of land recovery, then the possibility that 29,000 building plots will become available from ten districts over a 19-year period cannot be discounted.

National policy recognises that land will continue to become available for use throughout the duration of a plan. The remaining chapters will discuss the provisions the National Planning Policy Framework makes for land that becomes available during the implementation period, and how it should be calculated and incorporated into plans.

7. Estimating the amount of land that will become available during the plan

It has been shown how land that is not currently recorded in the SHLAAs will become available for building via the natural process of it coming to the end of its usefulness. Sites that become available in this way that are neither already logged in the SHLAA nor previously had a residential purpose are known as “windfalls”.

The National Planning Policy Framework permits a plan to make allowances for such windfalls. These allowances are generally based on the average number of completions on windfall sites over several years. It is simpler to illustrate the calculation with an example. The example presented below is reproduced from the [2018 SHLAA for the Metropolitan Borough of Bury](#):

Table 8 – Annual windfall completions (gross)

Year	Small (below 0.4 Ha.)	Medium (0.4-0.99 Ha)	Large (1 Ha or above)	Total
2008/09	154	90	21	265
2009/10	79	74	53	206
2010/11	66	54	123	243
2011/12	31	96	90	217
2012/13	55	144	75	274
2013/14	77	26	163	266
2014/15	77	25	441	543
2015/16	82	218	36	336
2016/17	100	161	118	379
2017/18	97	16	132	245
TOTAL	818	904	1,252	2,974

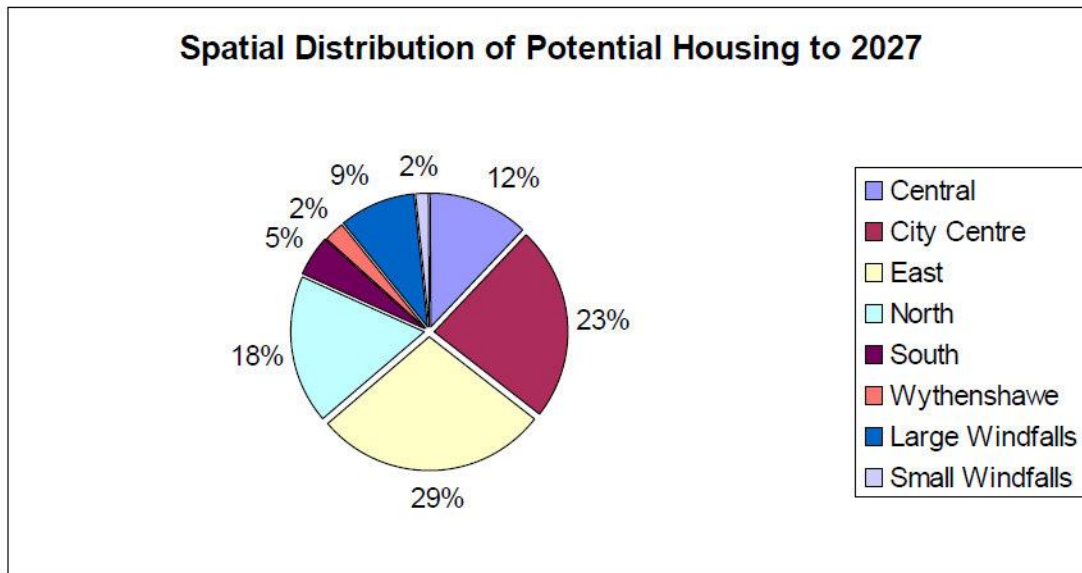
Year	Small (below 0.4 Ha.)	Medium (0.4-0.99 Ha)	Large (1 Ha or above)	Total
Average	82	90	125	297

There has been a “significant amount of completions on windfall sites” between 2008 and 2018, averaging at 297 units per annum. The annual completion rate has fluctuated between a low of 206 and a high of 543 dwellings. Over the 10-year period there have been 2,974 completions on Windfall sites.

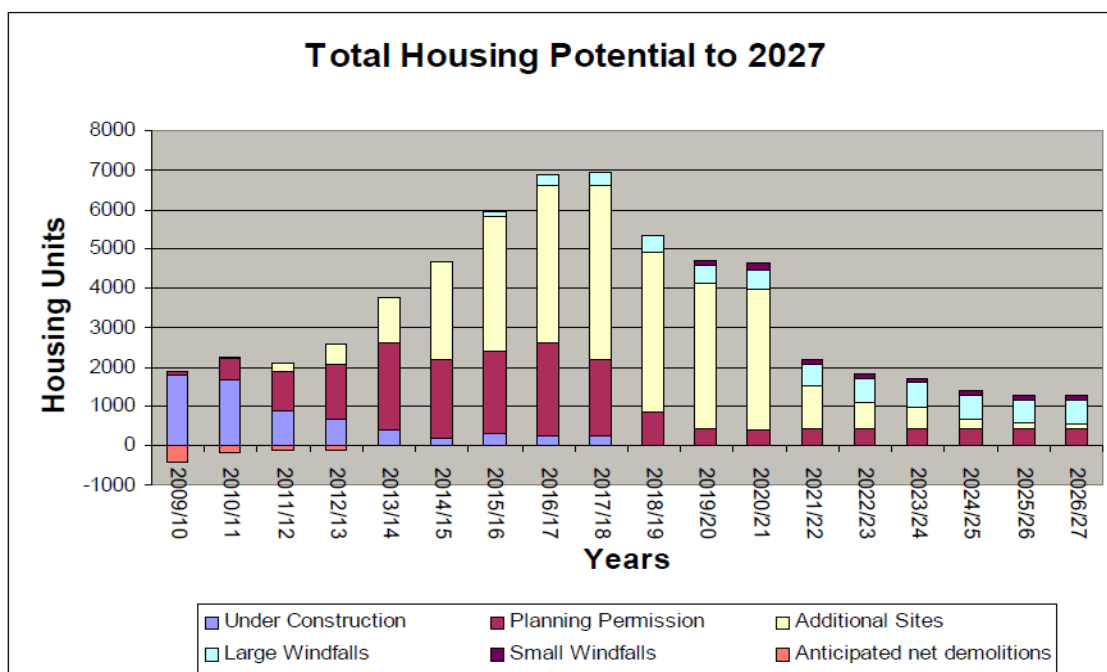
If the current trend of completions on windfall sites were maintained for the duration of the GMSF, then realistically there would be 103–476 completions on windfall sites every year (anything that falls outside of that range would constitute an outlier). This would amount to an extra 1,900–9,000 building plots in Bury over the 2018–2037 period that are not currently documented in the SHLAA. Using the average windfall completion rate of 297 per annum would put the number of windfall completions over a 19-year period at 5,643.

8. Windfall allowances: a case study

Having established that building land will become available during the implementation of a plan, and that the National Planning Policy Framework permits a “windfall allowance” to anticipate future land-supply not identified by the SHLAA, it is illuminating to examine how windfalls are incorporated into a plan. The [2009 SHLAA for the City of Manchester](#) identified 60,568 sites for the 2009–2027 period. The distribution of these sites is reproduced below:



At 6,650 units, windfalls (large and small) accounted for 11 percent of future land-supply. The graph below shows that as identified supply drops in the later stages of the plan the windfall allowance increases. Windfalls as a proportion of land-supply also increase, with them accounting for over half the land-supply in the final years of the plan.



9. The GMSF position on windfalls

The GMSF factors a “small sites” windfall allowance into its land-supply calculations, amounting to 8,260 units (detailed in chapter 2 of this brief). The GMSF does not make any allowance for large or medium site windfalls. This is deeply problematic because small site windfalls make up a minority proportion of windfall completions. Case in point: the previous chapter showed that small windfalls accounted for just 2 percent of the projected land supply in the City of Manchester, while large windfalls accounted for 9 percent. It was a similar story for Bury too, outlined in chapter 7: out of the average 297 windfall completions per annum, just 82 were on small sites. The GMSF grants Bury an annual allowance of just 20. The GMSF [Housing, topic paper \(Appendix A, p. 17\)](#) provides the following rationale for excluding large windfalls from the allowance:

Within their SHLAAs some districts make an allowance for large sites to come forward as windfalls, particularly on employment sites. Many of the GM districts have a significant stock of employment land as a legacy of their industrial past that is still in current use but may not be suitable or viable for employment use should the sites be vacated by the current occupiers. For some districts such sites have been a regular source of windfall development historically, and are likely to continue to come forward over the GMSF plan period.

As these large employment sites are currently in active use and owners have not identified an intention to vacate the site, and only a proportion of sites will come forward for housing, it would not be reasonable to identify such sites within the housing land supply. However, given previous trends and the age, condition, location and suitability of business premises within some areas, the loss of further employment sites to housing is inevitable. Given that the GMSF will allocate new employment sites in locations that are more attractive to the market, this may result in the relocation of existing businesses thereby freeing up existing employment sites for alternative uses, including housing development.

No specific windfall allowance is currently proposed for such sites as part of the GMSF land supply due to the inherent difficulties in calculating what an appropriate allowance would be for all districts due to lack of consistent and comparable data on past trends, however there is clear evidence to demonstrate that such sites have come forward in the past and no reason to believe that this will not continue to be the case.

The GMSF is advancing a fallacious argument. By definition, windfalls are sites that are still currently in use but become available at some point during the plan period. If they were available now they would not be classified as windfall sites, and would be added to the SHLAA. The GMSF is also being selective in its approach to statistical evidence. You cannot predict the future, but trends help us to plan for it. The GMSF readily accepts the statistical trends for housing need, but rejects them for windfall sites. This is a contradictory position that cannot be reconciled with adopting an evidence based strategy.

10. The NPPF position on windfalls

The National Planning Policy Framework (NPPF) permits a plan to make allowances for windfalls provided they are within established trends and provided they take into account historic delivery rates:

70. Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.

The NPPF also establishes strict conditions for altering Green Belt boundaries:

135. The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. Any proposals for new Green Belts should be set out in strategic policies, which should:

a) demonstrate why normal planning and development management policies would not be adequate;

136. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.

137. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.

The NPPF does not give priority to housing need over Green Belt protection. It mandates that the Green Belt boundaries can only be altered when exceptional circumstances exist. The NPPF states that any proposal to alter Green Belt boundaries must “demonstrate why normal planning and development management policies would not be adequate”; however, the GMSF has failed to demonstrate why a windfall allowance could not be used to address some of the land supply requirements, especially when some of the districts in Greater Manchester already incorporate windfall allowances into their local plans as a legitimate source of land-supply without any issue.

11. The legal position

This briefing summary has established that the land deficit is entirely the result of the mismatched life-cycles of the 19-year GMSF and the 15-year SHLAAs. It has also demonstrated that there is enough land currently logged in the SHLAAs to supply Greater Manchester's housing targets throughout their life-cycles. Therefore, the land-supply deficit is a product of the GMSF plan itself, and not any identified land shortage in the SHLAAs.

This adds a troubling dimension to the issue. Since the SHLAAs contain a finite supply of land at any one time (even though they accumulate land perpetually) then it will always be possible to affix a timescale to a plan such that a land deficit is arbitrarily created. If there is enough land-supply for 20 years, then a land deficit can be created by setting the term of the plan to 25 years, and so on. If land can be removed from the Green Belt in this manner then the timescale effectively becomes a variable in a formula for ejecting land from the Green Belt!

It is impossible to envisage that Green Belt protections were designed to be circumvented in this manner, and Mr Justice Hickinbottom's judgement in [Gallagher Estates Ltd v Solihull MBC \[2014\] EWHC 1283 \(Admin\) \(30 April 2014\)](#) established that the process of creating a plan cannot in itself be regarded as an exceptional circumstance:

125.ii.a. ...it is not arguable that the mere process of preparing a new local plan could itself be regarded as an exceptional circumstance justifying an alteration to a Green Belt boundary. National guidance has always dealt with revisions of the Green Belt in the context of reviews of local plans (e.g. paragraph 2.7 of PPG2: paragraph 83 above), and has always required "exceptional circumstances" to justify a revision.

The judgement would appear to confirm that the National Planning Policy Framework does not permit plans to author the exceptional circumstances that would facilitate altering Green Belt boundaries i.e. any exceptional circumstances should be independent of the plan-making process itself, and not be brought about by discretionary choices made during the construction of a plan. This is what the GMSF has done by mismatching the life-cycles of the GMSF and the SHLAAs, and by doing so the plan itself is manufacturing a land shortage.

If the GMSF is permitted to proceed with removing land from the Green Belt simply by the selection of its own timescale, then a loophole exists in the NPPF that can be exploited to annex arbitrary quantities of land from the Green Belt.

12. Summary

This briefing summary has covered a lot of ground, so the main points are summarized here:

- The Strategic Housing Land Availability Assessment (SHLAA) is a log of building land available for residential use, and has approximately a 15-year life-cycle. The GMSF subtracts the total number of plots logged in the Greater Manchester SHLAAs from its housing target to generate a "deficit" figure (29,266), which is the basis for the Green Belt allocations.
- By plotting the trajectory of the SHLAAs, it is evident that the deficit at metropolitan level only occurs in the final 4 years of the 19-year GMSF plan. The SHLAAs can fully service Greater Manchester's housing targets for the first 15 years i.e. throughout their life-cycles. Therefore, the deficit is not evidence of a land shortage, but entirely a product of the mismatched life-cycles of the 19-year plan and the 15-year SHLAAs.
- The National Planning Policy Framework does not require all the land to be identified at the inception of a plan. If land can only be found for the first 15 years at the inception stage the plan will still be in full compliance with national policy.
- The SHLAA is a "living" document and is perpetually updated. Land will drop off the SHLAA when it is built on (or discounted) and will be added when it becomes available. Between 2007 and 2018, an extra 26,592 building plots became available in the City of Manchester and five of the Greater Manchester boroughs.
- National policy permits plans to make allowances for land that is yet to become available, known as a "windfalls". A "windfall allowance" must take account of established trends and historic delivery rates.
- While the GMSF factors in a "small sites" windfall allowance, it omits medium and large sites. Medium and large sites generally account for most of the land that will become available.
- The National Planning Policy Framework mandates that all reasonable options must be examined, and a plan must demonstrate why normal planning and development policies would not be adequate before Green Belt boundaries can be reviewed. The GMSF does not provide a proper explanation as to why a full windfall allowance could not be utilized to address some of the land-supply deficit even though some of the districts in Greater Manchester already include them in their local plans.
- A court judgment found that the process of creating a plan cannot be considered an "exceptional circumstance" for the purposes of altering the Green Belt boundaries. Yet this is what the GMSF is essentially doing by selecting a term for the plan that creates a deficit i.e. the plan itself is manufacturing a land shortage.

If a plan can initiate a review of Green Belt boundaries just by selecting a term that outstrips land-supply identification methodologies, then arbitrary quantities of land can be annexed from the Green Belt simply by timescale selection. It is impossible to envisage that Green Belt protections were designed to be circumvented in this way.