

REDDITCH BOROUGH COUNCIL



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5 Year Housing Land Supply in Redditch Borough

Updated April 2014

HOUSING SUPPLY IN REDDITCH BOROUGH – 1 April 2014 to 31 March 2019

1. Introduction

- 1.1 The National Planning Policy Framework (NPPF) (para 47) states that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer to ensure choice and competition in the market for land.
- 1.2 This document sets out an assessment of whether there is a five year supply of deliverable housing land in the Borough of Redditch. This assessment will inform decisions on planning applications for housing development.

2. The Existing Development Plan Position in Relation to Housing Provision

- 2.1 The adopted development plan is the Borough of Redditch Local Plan No.3 (adopted 31 May 2006) (selected policies saved in May 2009). The NPPF (para 215) indicates that the weight applied to these policies will diminish from March 2013 if they are inconsistent with the NPPF. Following the change of Government in May 2010, proposals emerged to abolish Regional Spatial Strategies (RSS) and the housing targets embedded in them and return spatial planning matters and decision making to the local level. The Localism Act (2011) made provision for the abolition of the regional planning tier, and the West Midlands RSS was formally revoked on 20 May 2013. The revocation of the RSS placed the responsibility on Redditch Borough Council to determine its own objectively assessed housing need. The Council submitted its submission draft of the Borough of Redditch Local Plan No.4 for Examination on 12 March 2014, which contains an objectively assessed housing need for the period 2011 to 2030.
- 2.2 The NPPF (para 47) states that local planning authorities should ensure that their Local Plan meets the full, objectively assessed housing needs for market and affordable housing. The strategic requirement for Redditch is derived from the Worcestershire SHMA – Redditch Updated Household Projections Annex, May 2012, and underpinned by subsequent analysis in the North Worcestershire Housing Need, April 2014 (AMION Report). The objectively assessed housing need for Redditch is considered to be 6400 dwellings between 2011 and 2030.
- 2.3 This land supply calculation has been based upon the objectively assessed housing need of 6400 dwellings as described above. The outcome of the Strategic Housing Land Availability Assessment (SHLAA), indicates that Redditch has insufficient capacity within the Borough boundary to meet its needs. It is therefore necessary to rely on land in neighbouring Districts to contribute towards the supply. The Duty to Cooperate has enabled the discussion with neighbouring Districts to be effective. Sites within Bromsgrove District were assessed (Housing Growth Development Study, January 2013) to inform the joint Redditch Housing Growth Consultation (April/May 2013). The Housing Growth Development Study provides site specific information at the same level as the Redditch SHLAA analysis, but in somewhat greater detail. Where cross boundary sites are considered to have capacity for completion within five years, they have been included in this five year land supply calculation.
- 2.4 The objectively assessed housing need for Redditch (2011 to 2030) is around 6400 dwellings (net). Deducting completions of 361 dwellings (net) for the period 1 April 2011 to 31 March 2014 leaves a residual requirement of 6039 dwellings (net) up to 31 March 2030. The calculation of the five year supply of deliverable housing land is detailed in Section 4 of this document.

3. Deliverable Housing Land

- 3.1 The NPPF (footnote 11, p.12) states that for sites to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. To establish whether there is a five year supply of deliverable housing land in the Borough, existing large site permissions (10 or more dwellings), remaining Local Plan allocations, small site commitments and SHLAA sites have been assessed as to whether they are available, suitable and achievable.
- 3.2 For sites to be considered **available** they will:
- be an allocated site in the Borough of Redditch Local Plan No.3 with outstanding development capacity; or
 - have outline, detailed or reserved matters permission; or
 - be specific, unallocated sites that have the potential to make a significant contribution to housing delivery during the five year period; i.e. be identified in the Redditch SHLAA as having potential for development within five years.
- 3.3 For sites to be considered **suitable** the NPPF indicates that they should offer a suitable location for development which would contribute to the creation of sustainable mixed communities. For those sites with planning permission or allocated in the adopted Local Plan this assessment of suitability will have formed part of the decision making process to either grant planning permission or allocate the site. Therefore it is considered that sites with existing planning permission or sites in the adopted Local Plan are suitable.
- 3.4 For sites to be considered **achievable** there should be a reasonable prospect that housing will be delivered on the site within five years. Sites are considered achievable if:
- there are no known ownership constraints; and
 - there are no known physical or environmental constraints; and
 - there are no conditions or section 106 agreements precluding or limiting development within the five year period.
- 3.5 The NPPF (para 48) gives local planning authorities the opportunity to make an allowance for windfall sites in the five year land supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Redditch Borough Council explores this opportunity and findings are detailed at Appendix 1 of this document.
- 3.6 Details of all the sites which contribute to meeting the housing supply for Redditch (row (d) of the calculation in Section 4) can be found in Section 5 of this document.

4. The Five Year Supply of Deliverable Housing Land (2014 to 2019)

4.1 The assessment demonstrates that there is a five year supply of housing land in the Borough and is summarised as follows:

	Calculation with 5% buffer (Sedgefield method)	Dwellings	Average per Annum
a	Redditch Housing Requirement 2011 to 2030 (net) (6400 dwellings ÷ 19 years)	6400	337
b	Completions 2011 to 2014 (net)	361	120
c	Completions shortfall (337 x 3 – 361)	650 (net)	217 (net)
d	Commitments at 1 April 2014 (identified in Section 5)	2492	
e	Requirement for 5 years 2014 to 2019 5 x 337 + 5% + 650 (1685 + 5% + 650)	2419	484 (net)
f	Number of years supply (d ÷ 484)	5.15 years supply	
g	Surplus above 5 year requirement (d - e)	+73	

4.2 With respect to row (e), the residual requirement, including any current under provision (row c) has been included in these five years of the Plan period, adopting the 'Sedgefield method'. Appendix 2 considers this approach.

4.3 With respect to row (e): The NPPF (para 47) states that local planning authorities should include an additional buffer in the land supply figure (moved forward from later in the plan period) to ensure choice and competition in the market for land. The buffer should be an additional 5%, unless the local authority had persistently under delivered against its housing target, in which case a 20% buffer should be added. Appendix 3 details the Council's justification behind the addition of a 5% buffer at row (e).

4.4 This assessment will inform decisions on planning applications for housing in accordance with the NPPF paragraph 49. It indicates that there is a five year supply of deliverable land for housing to meet the currently identified housing requirement for Redditch.

5. Components which contribute to the Five Year Supply of Deliverable Housing Land

5.1 The components which have been included towards the five year land supply (totals in bold) are detailed as follows:

Borough of Redditch Local Plan No.3 - Large Sites which can be drawn upon to meet any shortfall identified through the monitoring process

No.	Site Name	Capacity for Completions (2014-19)	Brownfield/ Greenfield	Not Started	Under Construction
143	Castleditch Lane/ Pheasant Lane	16	G	16	0
155*	Former Claybrook School	36	B	36	0
156	Land at Millfields and the Fire Station	30	B/G	30	0
157*	Former Ipsley School Playing Field	36	G	16	20
158 Δ	South of Scout Hut, Oakenshaw Road	46	G	46	0
TOTAL		164		144	20

Sites identified in Redditch SHLAA

No.	Site Name	Capacity for Completions (2014-19)	Brownfield/ Greenfield	Not Started	Under Construction
153 Δ †	Prospect Hill	71	B	71	0
203*†	Former Dingleside Middle School and Auxerre Avenue	176	B/G	163	13
206*	Church Hill District Centre	51	B	51	0
208	Widney House, Bromsgrove Road	40	B/G	40	0
209	Loxley Close	10	B	10	0
210	Land to the rear of the Alexandra Hospital	145	G	145	0
211	A435 ADR	130	G	130	0
212*†	Brockhill (former ADR & GB)	629	G	561	68
213*†	Webheath (former ADR)	200	G	200	0
215*	Birchfield Road	29	G	29	0
216	Former Hewell Road swimming baths	13	B	13	0
217	Adj. Sandycroft, West Avenue	9	G	9	0
218*	RO Windsor Road Gas Works	39	B	39	0
219	Studley Road/Green Lane	12	G	12	0
2010/05	Clifton Close	6	G	6	0
2014/02 Δ	Conwil, Dagnell End Road	6	G	6	0
2014/05 Ω	Former ambulance stn, Cedar Park Rd	10	B	10	0
2014/06 Δ	Jolly Farmer PH, Woodrow Drive	14	B	14	0
2014/07 Ω	Former Youth House, Ipsley Street	10	B	10	0
TOTAL		1600		1519	81

* Sites with valid planning consent

† Consent on part of site only

Δ Application pending

Ω Pre-app

Windfall sites (5 dwellings or more) identified since the adoption of the Borough of Redditch Local Plan No.3

No.	Site Name	Capacity for Completions (2014-19)	Brownfield/ Greenfield	Not Started	Under Construction
202*	Dorothy Terry House	23	B	0	23
205*	Mayfields Works, The Mayfields	23	B	23	0
220*	Park House, Evesham Street	14	B	14	0
12/161*	The Elms, Bromsgrove Road	7	G	7	0
13/076*	1378-1380 Evesham Road, Astwood Bank	9	G	0	9
13/094*	The Vicarage, Church Road, Webheath	5	G	5	0
13/327 Δ	Oak House, Herbert Street	9	B	9	0
TOTAL		90		58	32

* Sites with valid planning consent

Δ Application pending

Sites to be delivered through the Prior Notification Initiative (10 or more dwellings)

No.	Site Name	Capacity for Completions (2014-19)	Brownfield/ Greenfield	Not Started	Under Construction
13/247	Former Law Society building, Ipsley	38	B	0	38
14/127	St Stephen's House, Prospect Hill	54	B	54	0
13/213	149 Ipsley Street, Smallwood	3	B	1	2
13/331	2 Ludlow Road, Southcrest	6	B	6	0
2014/09	Buildland, Oxleasow Road	6	B	6	0
TOTAL		107		67	40

Inclusion of residential institutions (Class C2) (NPPG ID: 3-037-20140306)

No.	Site Name	Capacity for Completions (2014-19)	Brownfield/ Greenfield	Not Started	Under Construction
11/094*	1-3 Plymouth Road	59	G	59	0
TOTAL		59		59	0

Small Site Commitments (4 dwellings or less) with valid planning consent

No.	Site Name	Capacity for Completions at 1.4.2014	Not Started	Under Construction	Brownfield/ Greenfield
09/086	97 Prospect Road North, Lakeside	1	0	1	B
11/064	Adj. 760 Evesham Road, Crabbs Cross	2	2	0	G
11/086	Adj. The Old Rectory, Icknield Street, Ipsley	1	1	0	G
11/105ol	239 Evesham Road, Headless Cross	1	1	0	B
11/113	7 Morsefield Lane, Matchborough West	1	1	0	B
11/134	144 Paddock Lane, Oakenshaw	1	1	0	B
11/274	74A Lodge Road, Smallwood	1	1	0	B
11/327	166 Mount Pleasant	1	0	1	B
12/019	Rock Hill Farm, Astwood Lane, Feckenham	1	1	0	G
12/060	1 Albert Street, Enfield	1	1	0	B
12/099	Adj. 205 Evesham Road, Headless Cross	2	2	0	B
12/116	Adj. Carantac, The Mayfields, Southcrest	1	1	0	G
12/142	84 Oakly Road, Southcrest	2	2	0	B
12/154	93-95 Bromsgrove Road, Batchley	2	2	0	B
12/197	131 Evesham Road, Headless Cross	2	2	0	B
12/251	The Thatchers, Church Road, Webheath	2	2	0	G
12/253	Grange Works, Bromsgrove Road	4	0	4	B
12/257	RO 247 Evesham Road, Headless Cross	1	1	0	G
12/268ol	Adj. 37F Mason Road, Headless Cross	1	1	0	G
12/270	Priestbridge Farm, Bradley Green	1	1	0	G
12/289	Adj. 246 Birmingham Road, Enfield	1	1	0	G
12/295	Adj. 101 Holloway Lane, Lakeside	1	1	0	G
12/306	RO 36 Marsden Road, Smallwood	2	2	0	B
13/003	Adj. 5 The Mayfields, Southcrest	1	1	0	G
13/064	Adj. 34 Birchfield Road, Headless Cross	1	1	0	G
13/081	The Coach House PH, Astwood Bank	3	0	3	B
13/082	Phoenix Works, Summer Street, Smallwood	2	0	2	B
13/120	Adj. 19 Petton Close, Winyates East	1	0	1	G
13/147	110 Oakly Road, Southcrest	3	0	3	B
13/171	7 Beaufort Street, Southcrest	4	4	0	B
13/231	6-8 Vicarage View, Batchley	1	0	1	B
13/260	325 Evesham Road, Crabbs Cross	3	3	0	B
13/264	325 Evesham Road, Crabbs Cross	1	1	0	B
13/271	Field House, Feckenham Road, Hunt End	1	1	0	G
TOTAL		54	38	16	

Allowance for lapse: $38 - 9.3\%$ (lapse rate) = $34 + 16 = 50$ dwellings

Small Site Windfall Allowance

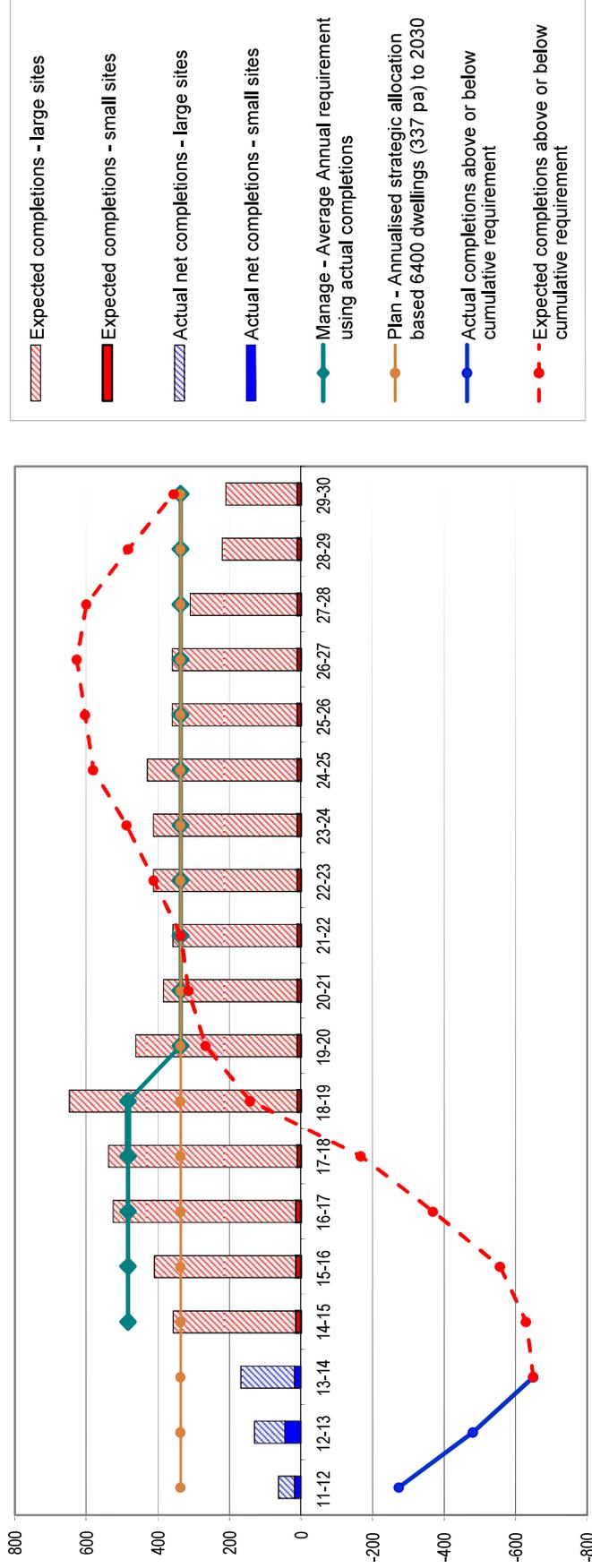
Small site windfall allowance on sites less than 5 dwellings = **22 dwellings** (see Appendix 1)

Cross Boundary contributions

No.	Site Name	Capacity for Completions (2014-19)	Brownfield/ Greenfield	Not Started	Under Construction
Site 1	Foxlydiate	399	G	399	0
TOTAL		399		399	0

6. Housing Trajectory

Borough of Redditch Housing Trajectory 1.4.2014



Appendix 1: Windfall Allowance

The NPPF (para 48) states *“Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to 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, and should not include residential gardens.”*

The Glossary (NPPF, Annex 2), defines windfall sites as, *“Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.”*

It is expected that small sites will continue to come forward and make a contribution to the housing supply. Therefore, Redditch Borough Council has chosen to use a windfall allowance approach to determine an estimate of future small site completions (less than five dwellings) for the housing trajectory within the five year land supply figure and offers the following explanation as justification for this approach:

- Capacity within Redditch Borough to meet its growth needs
 - Evidence of housing need and identified capacity within the urban area indicates that some development will be required beyond the Borough’s administrative boundary on neighbouring authorities’ Green Belt land. Therefore, it is essential that Redditch Borough Council identifies a realistic capacity within its urban area to minimise the impact on surrounding Green Belt land and to make effective and efficient use of the land within the Borough.
- SHLAA threshold
 - The SHLAA has identified as many sites as possible to contribute towards meeting the Borough’s housing needs. However, evidence indicates that potential supply is less than the objectively assessed need. The SHLAA has identified land on sites which have a potential capacity for five dwellings or more. To identify sites below this threshold would mean attempting to identify sites of a scale down to individual housing plots. It was considered that this would be too onerous a task, extremely time consuming and potentially endless. Therefore, as planning applications below the five dwelling threshold are submitted and approved on a regular basis, it is important that these are included in the land supply calculation to maximise the Borough’s potential capacity.
- Completion data
 - The windfall assumption has been based on annual completions data as this represents more reliable delivery data than annual commitments data. Only completions which fall below the five dwelling threshold in the SHLAA have been included in order to avoid any potential double-counting.
 - The completions trend analysis dates back to 1996. It is considered that this timeframe reflects both peaks and troughs in the property development market and presents a strong dataset to support the consistent delivery of windfall sites against market demand.
- Brownfield developments – conversions, COU, redevelopment
 - Conversions generally fall below the SHLAA threshold and are difficult to pin-point. However, analysis of long term completion statistics indicates that Redditch has experienced a consistent trend of dwelling subdivision, especially in its Victorian villas and terraces and in larger former New Town Development Corporation properties. Current small site commitments monitoring suggests that this trend is expected to continue.

- Greenfield developments

- Analysis of long term completion statistics indicates that some greenfield land, other than residential gardens, does come forward for development. However, analysis of greenfield site completion trends has revealed that these have predominantly been barn conversions. Whilst past trends indicate that there have been several barn conversions within the Borough, it is considered that this trend cannot be sustained due to the limited size of the Borough's rural area and a diminishing supply of readily available barns for conversion. Furthermore, other greenfield land that has come forward for development cannot be described as a reliable or regular source of supply and it is therefore inappropriate to include this in an assumption figure.

In summary, the NPPF acknowledges that a windfall allowance in the five year land supply can make a contribution to the housing supply if compelling evidence exists. Redditch Borough Council considers that making effective and efficient use of the land in its Borough is essential given the current need for cross boundary Green Belt development to meet its housing needs. This represents a strong case for including a windfall allowance within the five year land supply. The allowance only takes account of trend-based analysis for sites which currently fall below the SHLAA threshold of five dwellings in order to 'plug the gap' in capacity identification and to avoid double counting with sites identified in the SHLAA. Furthermore, only brownfield completions have been included (excluding residential garden developments which were previously categorised as brownfield) in order to present a realistic approach to small scale completion trends for the purpose of a windfall allowance.

In order to avoid double counting with the small site commitments identified on page 6 of this document, a windfall allowance for years 4 and 5 of the supply period only has been included. This assumes that any current small site commitments will either have been completed or lapsed over the forthcoming three year period.

Urban Brownfield Completions on sites of less than 5 dwellings																		Total
96/97	97/98	98/99	99/00	00/01	01/02	02/03	03/04	04/05	05/06	06/07	07/08	08/09	09/10	10/11	11/12	12/13	13/14	
10	8	22	14	4	10	14	5	9	20	13	8	10	1	12	9	10	18	197

197 divided by 18 = 10.94 (rounded to 11 dwellings)

11 dwellings x 2 years (1 April 17 to 31 March 19) = 22 dwellings

Small site windfall allowance on sites less than 5 dwellings = **22 dwellings**

Appendix 2: Dealing with the shortfall in provision

There are two methods for overcoming the undersupply in provision, commonly referred to as the 'Liverpool' and 'Sedgefield' methods. The Liverpool method disperses the shortfall over the remainder of the Plan period, whilst the Sedgefield method makes up the shortfall within the next five years and is added to the five year target.

Although the purpose of the NPPF (para 47) is to significantly boost the supply of housing, it makes no preference for a particular methodology to overcome undersupply and is silent on the relative merits of the two approaches. The majority of Secretary of State decisions have relied upon the Sedgefield method where the matter has been debated¹. Furthermore, the NPPG (ID: 3-035-20140306), clarifies this matter, stating that local planning authorities should aim to deal with any undersupply within the first five years of the plan period, where possible. This forms the justification for the calculation approach adopted on page 3 of this document.

Recent Appeal Decisions offer the following opposing opinions, however it is acknowledged that they all precede the publication of the NPPG:

*Whilst acknowledging that other colleagues had favoured the Sedgefield approach, the Inspector could see little purpose in aspiring to a target which might be considered to be unrealistic in the current economic climate. Given the severity of the economic downturn since 2008, in his view it was more realistic to anticipate a slow and steady recovery over a protracted period, and preferred the more cautious adoption of the Liverpool method.*² (paragraphs 12 & 13)

*"Cases quoted support both arguments, but in this case I consider that the Liverpool method provides a more realistic trajectory that would reflect housing delivery as market conditions improve over the plan period."*³ (paragraph 16)

*"Ideally it would be desirable to make good past deficiencies as soon as possible. New initiatives and Government schemes to improve access to finance appear to be providing a welcomed stimulus for the housing sector. Even so, there is no guarantee the market would be capable of supporting the 'uplift' in completions on the scale envisaged by the building industry. This would require annual completion rates in excess of any of those achieved in the last quarter century... Having regard to the different timescales I consider the potential to increase delivery to this initial level represents a 'significant boost' in supply and justifies an annualised correction of past deficiencies to be made over the course of the plan period."*⁴ (paragraphs 96 & 98)

The tables below evaluate the housing land supply position under both the Liverpool and Sedgefield methodologies, and with both a 5% and 20% buffer (the appropriate buffer is justified at Appendix 3). It is clear from the tables that Redditch Borough Council can demonstrate a five year supply of housing land under three of the four scenarios. The current economic climate has affected recent delivery rates in Redditch, but is showing signs of recovery. Therefore, a steady and realistic approach to reducing undersupply i.e. the Liverpool approach, could still be considered appropriate for Redditch.

Furthermore, when analysing the delivery trajectory (p.8), it has been demonstrated that the delivery shortfall will be met within five years, irrespective of which shortfall methodology is applied.

¹ P. Cairnes (No.5 Chambers) Seminar Paper (2013) *"Please Release Me – 5 Year Housing Land Supply"*

² A. Pykett (17 May 2013) Land at Shilton Road, Barwell, Leics (Appeal Ref: APP/K2420/A/12/2188915)

³ T.Wood (Oct 2013) Land adjacent to 705 Haslucks Green Road, Majors Green, Shirley, Worcestershire B90 1DW (Appeal Ref: APP/P1805/A/13/2196784)

⁴ P.Crysell (Nov 2013) Report on the Examination into South Gloucestershire Core Strategy

	Calculation with 5% buffer (Liverpool method)	Dwellings	Average per Annum
a	Redditch Housing Requirement 2011 to 2030 (net) (6400 dwellings ÷ 19 years)	6400	337
b	Completions 2011 to 2013 (net)	361	120
c	Residual Requirement 2014 to 2030 (a - b) (residual annual average = 6039 ÷ 16 years)	6039 (net)	377 (net)
d	Commitments at 1 April 2014 (identified in Section 5)	2492	
e	Requirement for 5 years 2014 to 2019 (5 x 377 + 5%)	1979	396 (net)
f	Number of years supply (d ÷ 396)	6.3 years supply	
g	Surplus above 5 year requirement (d - e)	+513	

	Calculation with 5% buffer (Sedgefield method)	Dwellings	Average per Annum
a	Redditch Housing Requirement 2011 to 2030 (net) (6400 dwellings ÷ 19 years)	6400	337
b	Completions 2011 to 2014 (net)	361	120
c	Completions shortfall (337 x 3 – 361)	650 (net)	217 (net)
d	Commitments at 1 April 2014 (identified in Section 5)	2492	
e	Requirement for 5 years 2014 to 2019 5 x 337 + 5% + 650 (1685 + 5% + 650)	2419	484 (net)
f	Number of years supply (d ÷ 484)	5.15 years supply	
g	Surplus above 5 year requirement (d - e)	+73	

	Calculation with 20% buffer (Liverpool method)	Dwellings	Average per Annum
a	Redditch Housing Requirement 2011 to 2030 (net) (6400 dwellings ÷ 19 years)	6400	337
b	Completions 2011 to 2014 (net)	361	120
c	Residual Requirement 2014 to 2030 (a - b) (residual annual average = 6039 ÷ 16 years)	6039 (net)	377 (net)
d	Commitments at 1 April 2014 (identified in Section 5)	2492	
e	Requirement for 5 years 2014 to 2019 (5 x 377 + 20%)	2262	452 (net)
f	Number of years supply (d ÷ 452)	5.5 years supply	
g	Surplus above 5 year requirement (d - e)	+230	

	Calculation with 20% buffer (Sedgefield method)	Dwellings	Average per Annum
a	Redditch Housing Requirement 2011 to 2030 (net) (6400 dwellings ÷ 19 years)	6400	337
b	Completions 2011 to 2014 (net)	361	120
c	Completions shortfall (337 x 3 – 361)	650 (net)	217 (net)
d	Commitments at 1 April 2014 (identified in Section 5)	2492	
e	Requirement for 5 years 2014 to 2019 (5 x 337 + 20% + 650)	2912 <u>2672</u>	582 <u>534</u> (net)
f	Number of years supply (d ÷ 582 <u>534</u>)	4.3 <u>4.6</u> years supply	
g	Shortfall below 5 year requirement (d - e)	-420 <u>180</u>	

Appendix 3: Housing Delivery Performance – assessing an appropriate additional buffer

The NPPF (para 47) states that local planning authorities should include an additional buffer in the land supply figure (moved forward from later in the plan period) to ensure choice and competition in the market for land. The buffer should be an additional 5%, unless the local authority had persistently under delivered against its housing target, in which case a 20% buffer should be added.

PINS advice to the Borough Council⁵ indicated that authorities would need to take into account the peaks and troughs in the property market, potentially over a 6-10 year period, in order that a valued judgement could be made. However, the 2011-30 Plan period only dates back three years and it could be argued that the last three year's completion figure do not present a balanced spectrum of peaks and troughs across the property market. This approach is further substantiated in the NPPG (ID: 3-035-20140306), which states "*The assessment of a local delivery record is likely to be more robust if a longer term view is taken, since this is likely to take account of the peaks and troughs of the housing market cycle.*"

The introduction to this document identifies that the adopted development plan comprises the Borough of Redditch Local Plan No.3, and until recently, the Worcestershire County Structure Plan (the Borough of Redditch Local Plan No.3 target is a derivative of the Worcestershire County Structure Plan target), and the Regional Spatial Strategy for the West Midlands (January 2008). Therefore, it is considered appropriate to test housing delivery performance against the targets embedded within these documents and the timeframes they represent.

Borough of Redditch Local Plan No.3

The Borough of Redditch Local Plan No.3 prepared for the construction and completion of a maximum of 4504 dwellings between 1 April 1996 and 31 March 2011. During this period, 4452 dwellings were completed, which fell well within the +/- 10% parameter usually applied to such targets. As the completions trend dates back to 1996 and covers the whole of the Plan period, it is considered that this timeframe reflects both peaks and troughs in the property development market, and runs consecutively with the current Plan period. It presents a strong dataset to support consistent delivery against the housing requirement. Therefore, it can be concluded that there has been no under delivery against the housing target.

BORLP3 Completions 1996 - 2011															Total
96/ 97	97/ 98	98/ 99	99/ 00	00/ 01	01/ 02	02/ 03	03/ 04	04/ 05	05/ 06	06/ 07	07/ 08	08/ 09	09/ 10	10/ 11	
262	380	284	472	483	233	284	419	288	262	454	236	100	171	124	4452

⁵ Joint Bromsgrove District and Redditch Borough Council meeting held 27 April 2012 with K Holland

Adopted Regional Spatial Strategy

The adopted (and subsequently revoked) Regional Spatial Strategy prepared for the construction and completion of a maximum of 26,200 dwellings in Worcestershire between 1 April 2001 and 31 March 2021. Redditch Borough's proportion of this target was the same proportion which was applied to Redditch in the Worcestershire County Structure Plan i.e. 16.19%. Therefore: $26,200 \times 16.19\% = 4242$ dwellings up to 2021 (212 dwellings per annum).

2932 (completions) \div 13 (years completions) = 226 dwellings per annum. Therefore, it can be concluded that there has been no under delivery against the housing target.

RSS Completions 2001 - 2014													
01/ 02	02/ 03	03/ 04	04/ 05	05/ 06	06/ 07	07/ 08	08/ 09	09/ 10	10/ 11	11/ 12	12/ 13	13/ 14	Total
233	284	419	288	262	454	236	100	171	124	63	130	168	2932