

5 Year Housing Land Supply in Redditch Borough

Updated November 2015 (Published December 2015)

HOUSING SUPPLY IN REDDITCH BOROUGH - 1 November 2015 to 31 October 2020

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. The Local Plan Examination is currently ongoing.
- 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 Following the Local Plan Hearing Sessions in June 2015, the Planning Inspector requested the Council to undertake further work, including an update of the five year housing land supply. The Inspector, in his letter to the Council (18 September 2015) specifically advised that the five year housing land supply should be calculated using the 'Sedgefield' method, with the buffer being applied to any shortfall. This report presents the housing land supply position in Redditch Borough at 1 November 2015 and concerns the five year period up to 31 October 2020.
- 2.5 The objectively assessed housing need for Redditch (2011 to 2030) is around 6400 dwellings (net). Deducting completions of 780 dwellings (net) for the period 1 April 2011 to 31 October 2015 leaves a residual requirement of 5620 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.

- The Five Year Supply of Deliverable Housing Land (1.11.2015 to 31.10.2020) 4.
- 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
а	Redditch Housing Requirement 2011 to 2030 (net) (6400 dwellings ÷ 19 years)	6400	337
b	Completions 1.4.2011 to 31.10.2015 (net)	780	
С	Completions shortfall (337 x 4 + 196.5 – 780) (337÷12 x 7 = 196.5)	765 (net)	
d	Commitments at 1.11.2015 (identified in Section 5)	2601	
е	Requirement for 5 years 1.11.2015 to 31.10.2020 5 x 337 + 765 + 5% (1685 + 765 + 5%)	2573	515 (net)
f	Number of years supply (d ÷ 515)	5.05 year	s supply
g	Surplus above 5 year requirement (d - e)	+28	

- 4.2 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 2 details the Council's justification behind the addition of a 5% buffer at row (e).
- 4.3 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.

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

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 (2015-20)	Brownfield/ Greenfield	Not Started	Under Construction
143	Castleditch Lane/ Pheasant Lane	16	G	16	0
153*†	Prospect Hill	71	В	57	14
156	Land at Millfields and the Fire Station	30	B/G	30	0
158*	South of Scout Hut, Oakenshaw Road	21	G	4	17
TOTAL		138		107	31

Sites identified in Redditch SHLAA

No.	Site Name	Capacity for Completions (2015-20)	Brownfield/ Greenfield	Not Started	Under Construction
200*	Land at Wirehill Drive	12	G	12	0
203*†	Former Dingleside Middle School and Auxerre Avenue	86	B/G	58	28
209	Loxley Close	10	В	10	0
210Ω	Land to the rear of the Alexandra Hospital	145	G	145	0
211	A435 ADR	109	G	109	0
212*†	Brockhill (former ADR & GB)	449	G	449	0
213*†Ω	Webheath (former ADR)	285	G	285	0
215*	Birchfield Road	29	G	24	5
216*	Former Hewell Road swimming baths	30	В	0	30
15/036*	Adj. Sandycroft, West Avenue	6	G	6	0
218*∆	RO Windsor Road Gas Works	44	В	44	0
219*	Studley Road/Green Lane	10	G	10	0
CS03	Matchborough District Centre	70	B/G	70	0
Ω	Winyates District Centre	35	B/G	35	0
2010/05	Clifton Close	6	G	6	0
2014/02∆	Conwil, Dagnell End Road	6	G	6	0
2014/096*	Jolly Farmer PH, Woodrow Drive	14	В	14	0
2014/272*	Former ambulance stn, Cedar Park Rd	14	В	14	0
2014/07Ω	Former Youth House, Ipsley Street	10	В	10	0
TOTAL		1370		1307	63

^{*} Sites with valid planning consent

[†] Consent on part of site only

 $[\]Delta$ Application pending outcome

 $[\]Omega$ 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 (2015-20)	Brownfield/ Greenfield	Not Started	Under Construction
205*	Mayfields Works, The Mayfields	23	В	18	5
220*	Park House, Evesham Street	14	В	14	0
12/161*	The Elms, Bromsgrove Road	7	G	0	7
13/327*	Oak House, Herbert Street	9	В	0	9
14/009∆	Land at Moons Moat Drive	14	G	14	0
14/105*	The Paddocks, Feckenham	6	В	6	0
14/169*	Suntrap, Edgioak Lane, Astwood Bank	2	G	0	2
14/237*	3 Plymouth Road	6	G	6	0
14/311*	Headless Cross Methodist Church	9	В	9	0
14/321∆	Unit 2, Millsborough House, Ipsley Street	14	В	14	0
15/043∆	Former night club, Church Road	27	В	27	0
15/044*	White Lion PH, Astwood Bank	7	В	7	0
15/084*	132 Oakly Road, Southcrest	9	В	9	0
15/100*	Threadneedle House, Alcester Street	9	В	9	0
15/143∆	Ashleigh Works, Bromsgrove Road	10	В	10	0
15/151∆	Ipsley Court, Berrington Close, Ipsley	5	G	5	0
Ω	Redditch Trades & Labour Club	24	В	24	0
Ω	Clive Road/ Prospect Hill	40	В	40	0
Ω	Former Church Hill Medical Centre	16	В	16	0
Ω	Millsborough House Ph2	40	В	40	0
TOTAL		291		268	23

^{*} Sites with valid planning consent

Sites to be delivered through the Prior Notification Initiative

No.	Site Name	Capacity for Completions (2015-20)	Brownfield/ Greenfield	Not Started	Under Construction
13/331	2 Ludlow Road, Southcrest	6	В	6	0
14/127	St Stephen's House, Prospect Hill	54	В	54	0
15/087	Springfield Farm, Astwood Lane	1	G	1	0
15/099	Threadneedle House, Alcester Street	37	В	37	0
15/144	Rockhill Farm, Astwood Lane	3	G	3	0
15/197	Adj. Lower Tookeys Farm	1	G	1	0
15/226	5 Alcester Street, Town Centre	4	В	4	0
15/237	1240 Evesham Road, Astwood Bank	10	В	10	0
TOTAL		116		116	0

 $[\]begin{array}{ll} \Delta \text{ Application pending outcome} \\ \Omega \text{ Pre-app} \end{array}$

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

09/086 97 Prospect Road North, Lakeside 1 0 1 B 11/113 7 Morsefield Lane, Matchborough West 1 0 1 B 11/327 166 Mount Pleasant 1 0 1 B 12/099 Adj. 205 Evesham Road, Headless Cross 2 0 2 B 12/251 The Thatchers, Church Road, Webheath 2 2 0 G 12/257 RO 247 Evesham Road, Headless Cross 1 1 0 G 12/268ol Adj. 37F Mason Road, Headless Cross 1 1 0 G	No.	Site Name	Capacity for Completions at 1.4.2015	Not Started	Under Construction	Brownfield Greenfield
11/1131	09/086	97 Prospect Road North, Lakeside	1	0	1	В
12/099 Adj. 205 Evesham Road, Headless Cross 2	11/113	7 Morsefield Lane, Matchborough West	1	0	1	В
12/251 The Thatchers, Church Road, Webheath 2 2 0 G 12/258 RO 247 Evesham Road, Headless Cross 1 1 0 G 12/268ol Adj. 37F Mason Road, Headless Cross 1 1 0 G 12/285 Adj. 101 Holloway Lane, Lakeside 1 1 0 G 12/306 RO 36 Marsden Road, Smallwood 2 0 2 B 12/301 The Thatchers, Church Road, Webheath 2 2 0 G 12/301 The Thatchers, Church Road, Webheath 2 2 0 G 13/003 Adj. 5 The Mayfields, Southcrest 1 1 0 G 13/004 Adj. 34 Birchfield Road, Headless Cross 1 1 0 G 13/005 Phoenix Works, Summer Street, Smallwood 2 0 2 B 13/171 7 Beaufort Street, Southcrest 4 4 0 B 13/189 Barn at Mutton Hall 1 1 0 G 13/254 Uphill, Sambourne Ln, Astwood Bank 1 0 1 B 13/260 325 Evesham Road, Crabbs Cross 3 3 0 B 13/260 325 Evesham Road, Crabbs Cross 1 1 0 B 13/292 Old Yarr stables, Hunt End 2 2 0 G 13/3030 Adj. First House, Lady Harriet's Lane 1 0 G 14/1040 324 Evesham Road, Crabbs Cross 1 1 0 G 14/1050 RO 112 Feckenham Road, Headless Cross 1 1 0 G 14/1203 40A Mason Road, Headless Cross 1 1 0 G 14/1204 Adj. Greenfields, Field Farm Lane 1 0 G 14/1297 1 The Grove, Holloway Drive 1 0 1 G 14/1297 1 The Grove, Holloway Drive 1 0 G 14/1297 1 The Grove, Holloway Drive 1 0 G 14/1325 Adj. Doebank House, Astwood Bank 1 1 0 G 14/1367 Adj. St Weatheroak Close, Webheath 1 0 G 14/1368 Adj. St Weatheroak Close, Webheath 1 0 G 14/1371 171 Mount Pleasant, Southcrest 1 0 B 15/1060 Grand View, Sambourne Lane, AB 1 0 G 15/1012 70 Maisemore Close, Church Hill North 1 0 B 15/1012 70 Maisemore Close, Church Hill North 1 0 G 15/1021 70 Maisemore Close, Church Hill North 1 0 G 15/1031 10 Market Place 1 0 B 15/1031 10 Market Place 1	11/327	166 Mount Pleasant	1	0	1	В
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14/1515 5 Mount Pleasant, Southcrest 1 1 0 B 15/002 Barn at Shurnock Farm 1 1 0 G 15/012 70 Maisemore Close, Church Hill North 1 1 0 B 15/049 78 Ash Tree Road, Batchley 1 1 1 0 B 15/056 Grand View, Sambourne Lane, AB 1 0 1 G 15/065Δ British Mills, Prospect Hill 1 1 0 B 15/086 Adj. Carantac, The Mayfields, Southcrest 1 1 0 G 15/097 RO 173 Mount Pleasant, Southcrest 1 1 0 B 15/108 42 Dagtail Lane, Astwood Bank 1 1 0 G 15/119 RO 52 Bromsgrove Road 2 2 2 0 G 15/123 10 Market Place 1 1 0 B 15/131 Field House, Feckenham Road, Hunt End 1 0 G		-	1	1	0	
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15/056 Grand View, Sambourne Lane, AB 1 0 1 G 15/065∆ British Mills, Prospect Hill 1 1 0 B 15/086 Adj. Carantac, The Mayfields, Southcrest 1 1 0 G 15/097 RO 173 Mount Pleasant, Southcrest 1 1 0 B 15/108 42 Dagtail Lane, Astwood Bank 1 1 0 G 15/119 RO 52 Bromsgrove Road 2 2 0 G 15/123 10 Market Place 1 1 0 B 15/131 Field House, Feckenham Road, Hunt End 1 0 1 G			I 4	I 4	-	
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15/097 RO 173 Mount Pleasant, Southcrest 1 1 0 B 15/108 42 Dagtail Lane, Astwood Bank 1 1 0 G 15/119 RO 52 Bromsgrove Road 2 2 2 0 G 15/123 10 Market Place 1 1 0 B 15/131 Field House, Feckenham Road, Hunt End 1 0 1 G		·	1	1	-	
15/108 42 Dagtail Lane, Astwood Bank 1 1 0 G 15/119 RO 52 Bromsgrove Road 2 2 0 G 15/123 10 Market Place 1 1 0 B 15/131 Field House, Feckenham Road, Hunt End 1 0 1 G		•	1	1	•	
15/119 RO 52 Bromsgrove Road 2 2 0 G 15/123 10 Market Place 1 1 0 B 15/131 Field House, Feckenham Road, Hunt End 1 0 1 G			1	1	-	
15/123 10 Market Place 1 1 0 B 15/131 Field House, Feckenham Road, Hunt End 1 0 1 G		_	1	1	-	
15/131 Field House, Feckenham Road, Hunt End 1 0 1 G		_	2	2	-	
<u> </u>			1	1		
SUB TOTAL 55 41 14	15/131	Field House, Feckenham Road, Hunt End	1	0	1	G
	SUB TOT	AL	55	41	14	

No.	Site Name	Capacity for Completions at 1.4.2015	Not Started	Under Construction	Brownfield/ Greenfield
15/133	Adj. Grand View, Sambourne Lane, AB	1	0	1	G
15/137	RO 123-127 The Meadway, Headless Cross	4	4	0	G
15/178	Adj. 17 Crumpfields Lane, Webheath	1	1	0	G
15/261	Victoria House, Feckenham Road, AB	4	4	0	В
15/274	Adj. 35 Hazel Road, Batchley	1	1	0	G
15/280	Papermill Barn, Brooklands Lane	1	1	0	G
15/294	Adj. 10 Foxlydiate Crescent, Batchley	1	1	0	В
TOTAL		68	53	15	

Δ Application pending

Allowance for lapse: 53 - 9.3% (lapse rate) = 48 + 15 = 63 dwellings

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

No.	Site Name	Capacity for Completions (2015-20)	Brownfield/ Greenfield	Not Started	Under Construction
13/302*	Haversham House, 327 Bromsgrove Road	6	В	6	0
TOTAL		6		6	0

Small Site Windfall Allowance

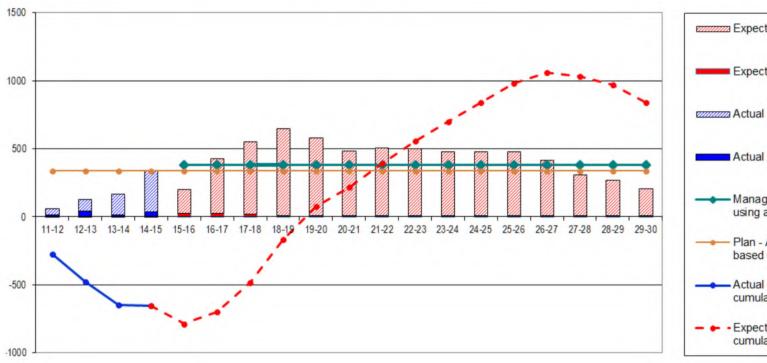
Small site windfall allowance on sites less than 5 dwellings = **22 dwellings** (see Appendix 1)

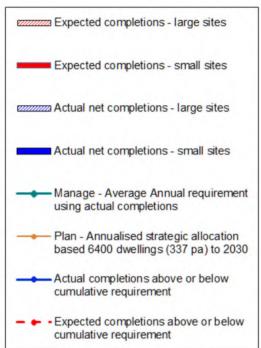
Cross Boundary contributions

No.	Site Name	Capacity for Completions (2015-20)	Brownfield/ Greenfield	Not Started	Under Construction
Site 1	Foxlydiate	595	G	595	0
TOTAL		595		595	0

6. **Housing Trajectory**

Borough of Redditch Housing Trajectory 31.10.2015





Delivery Schedule

Site	Nov 15/16	2016/17	2017/18	2018/19	2019/20	Oct 20
Mayfields Works	5	18				
Castleditch Lane/ Pheasant Lane	0	0	5	11		
Land at Millfields, adjacent the Fire Station	0	0	0	30		
South of Scout Hut	21					
Former Dingleside Middle School	15	51	0	20		
Loxley Close	0	0	0	10		
Clifton Close	0	0	0	6		
Prospect Hill	14	0	14	43		
RO Alexandra Hospital	0	0	45	50	50	
A435 ADR	0	0	0	30	50	29
Brockhill East (ADR)	0	16	65	65	65	38
Brockhill East (Weights Lane)	0	38	45	45	45	27
Webheath ADR	0	20	75	75	75	40
Land adjacent to Sandycroft	0	0	6			
Birchfield Road (GB)	6	12	11			
Former Hewell Road swimming baths	30					
RO Windsor Road Gas Works	0	10	34			
Studley Road/ Green Lane	0	4	6			
Park House	0	6	8			
The Elms	7					
Conwil, Dagnell End Lane	0	0	6			
Former ambulance station, Cedar Park Road	0	4	10			
Former Jolly Farmer PH, Woodrow	0	4	10			
Former Youth Centre, Ipsley Street	0	0	10			
St Stephens House, Town Centre	0	54	10			
Oak House, Herbert Street	0	9				
327 Bromsgrove Road	0	6				
Threadneedle House	0	46				
Land at Moons Moat Drive	0	40	10			
The Paddocks		0	6			
	0	U	0			
Suntrap, Edgioak Lane	2		7			
Headless Cross Methodist Church	0	2	7			
Former night club, Church Road	0	27				
White Lion PH, Astwood Bank	0	7				
132 Oakly Road	4	5				
Ludlow Road	0	6				
Springfield Farm	0	1				
Millsborough House	0	14				
Ashleigh Works, Bromsgrove Rd	0	5	5			
Redditch Trades & Labour Club	0	10	14			
Rockhill Farm	0	3				
Wirehill Drive	0	4	8			
3 Plymouth Road	0	0	6			
Ipsley Court, Berrington Close	0	5				
Adj. Lower Tookeys Farm	0	1				
5 Alcester Street	4					
1240 Evesham Road, Astwood Bank	0	10				
Church Hill Medical Centre	0	0	16			
Clive Road/ Prospect Hill	0	0	10	30		
Millsborough House Ph2	0	0	15	15	10	
Matchborough District Centre	0	0	0	35	35	
Winyates District Centre	0	0	0	5	30	
XBDY - Site 1 Foxlydiate	0	0	83	169	209	134
Sub Total	108	402	530	639		268
Small site completions (windfalls)	100	25	22	11	11	6
oman site completions (windialis)	10	20	LL		- 11	U

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															
12/	11/	10/	09/	08/	07/	06/	05/	04/	03/	02/	01/0	00/	99/	98/	97/	96/
13	12	11	10	09	08	07	06	05	04	03	2	01	00	99	98	97
10	9	12	1	10	8	13	20	9	5	14	10	4	14	22	8	10

	Urban Brownfield Completions on sites of less than 5 dwellings																
13/ 14	14/ 15	15/ 16	16/ 17	17/ 18	18/ 19	19/ 20	20/ 21	21/ 22	22/ 23	23/ 24	24/ 25	25/ 26	26/ 27	27/ 28	28/ 29	29/ 30	Total
10	26	-	- 1	-	-	-	-	-	-	-	-	-	-	-	- 1	-	215

215 divided by 19 = 11.3 (rounded to 11 dwellings)

11 dwellings x 2 years (1 April 18 to 31 March 20) = 22 dwellings

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

Appendix 2: Housing Delivery Performance – assessing an appropriate additional buffer

Redditch Borough Council has applied a buffer of 5% and the following text justifies the adopted approach. It should be noted that a recent Appeal Decision (Hearing held in August 2015) supports the appropriateness of a 5% buffer, which states "... the evidence supports the Council's contention that overall its delivery against the relevant housing requirement has been consistent. Consequently, from the evidence provided I am satisfied that the Council does not have a persistent record of under delivery and that therefore in accordance with the advice set out at paragraph 47 of the Framework it is appropriate to apply only a 5%buffer." (Appeal Ref: APP/Q1825/W/15/3004866, paragraph 27).

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 Council¹ 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 (see table on p.15)

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.

Adopted Regional Spatial Strategy (see table on p.15)

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 x 16.19% = 4242 dwellings up to 2021 (212 dwellings per annum).

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

¹ Joint Bromsgrove District and Redditch Borough Council meeting held 27 April 2012 with K Holland

Borough of Redditch Local Plan No.3 delivery rates

BORLP3 Completions 1996 - 2011																
	96/ 97	97/ 98	98/ 99	99/ 00	00/ 01	01/ 02	02/	03/ 04	04/ 05	05/ 06	06/ 07	07/ 08	08/ 09	09/ 10	10/ 11	Total
Annual completions	262	380	284	472	483	233	284	419	288	262	454	236	100	171	124	4452
Cumulative completions	262	642	926	1398	1881	2114	2398	2817	3105	3367	3821	4057	4157	4328	4452	4452
+/- average annual requirement (300 dpa)	-38	+42	+26	+198	+381	+314	+298	+417	+405	+367	+521	+457	+257	+128	-48	

Adopted Regional Spatial Strategy delivery rates

RSS Completions 2001 - 2014														
	01/	02/	03/	04/	05/	06/	07/	08/	09/	10/	11/	12/	13/	Total
	02	03	04	05	06	07	08	09	10	11	12	13	14	Total
Annual completions	233	284	419	288	262	454	236	100	171	124	63	130	168	2932
Cumulative completions	233	517	936	1224	1486	1940	2176	2276	2447	2571	2634	2764	2932	2932
+/- average annual requirement (212 dpa)	+21	+93	+300	+376	+426	+668	+692	+580	+539	+451	+302	+220	+176	