

Strategic Housing Land Availability Assessment Methodology

November 2011



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Executive summary

What is a Strategic Housing Land Availability Assessment (SHLAA)?

- Part of the evidence base for the Milton Keynes Local Development Framework (LDF)
- A technical study required by national planning policy document PPS3
- Assesses potential housing sites in the borough
- An assessment based on the methodology set out in Government Practice Guidance

What will it be used for?

- It is **NOT** an allocations document but will inform the Local Development Framework (specifically the Core Strategy and Site Allocations Development Plan Document)
- Providing evidence of a 5 year supply of developable/deliverable housing sites
- Showing at least a 15 year supply of housing sites/broad areas
- Developing a housing trajectory

What will the Milton Keynes SHLAA do?

- Adapt the Practice Guidance to reflect local circumstances
- Assess both specific sites and, if necessary, broad areas
- Assess sites suggested during both LDF and SHLAA consultations, unless they are obvious non-runners
- Assess the justification for a windfall allowance, if necessary

Who will Milton Keynes work with?

- The SHLAA will be developed with partners, including the Joint Housing Delivery Team (JHDT⁽¹⁾)
- Stakeholders to be consulted include house builders, social landlords, local property agents, planning consultants, Parish Councils, ward members and key community groups
- The JHDT have helped set the scope of the study and will be involved in confirming conclusions of the assessment

How will sites be assessed?

- Sites will be assessed against the assessment criteria set out in this methodology
- Density multipliers and site specific information will be used to estimate the housing capacity of sites
- Site deliverability/developability will be assessed against a range of factors set out in this methodology
- The study will consider how/when constraints to development can be overcome

What will be the end result?

- A Report, containing a list of sites, cross referenced to maps, with an assessment of the availability/deliverability/developability of each site, together with an overall assessment of housing land supply
- A database of sites allowing the SHLAA Report to be updated annually as part of the Annual Monitoring Report

1 The Joint Housing Delivery Team is a partnership between the Council and partners, set up to monitor housing delivery across the borough. It has close links with the development industry and benefits from the input of the Homes and Communities Agency as a major land owner in the city.

Preface

This document sets out the methodology that Milton Keynes Council will use to undertake the Strategic Housing Land Availability Assessment (SHLAA) for the Borough of Milton Keynes.

The methodology sets out main stages for the preparation of the assessment. The stages are based on the standard methodology recommended in the Government's Practice Guidance, amended to reflect local circumstances.

The methodology builds on the approach taken to the 2009 SHLAA, building on lessons learnt. It has also been updated to reflect the changing circumstances around the growth and development of Milton Keynes.

The methodology has been agreed through the JHDT. Amendments to the methodology have been made in light of comments received through the JHDT.

The SHLAA is a technical background document that informs the plan making process. The allocation of sites will happen through the normal plan making procedures, specifically the Site Allocations Development Plan Document and will involve extensive public and stakeholder consultation prior to the allocation of any new sites for development.

It is important to note that the identification of a site in the SHLAA does not mean that it will be allocated for housing in the Local Development Framework or that planning permission for residential development will be granted.

1 Background

1.1 The Strategic Housing Land Availability Assessment (SHLAA) is a requirement of Planning Policy Statement 3: Housing (PPS3) and should provide evidence of the availability of suitable land for housing for a period not less than 15 years of a plan. The SHLAA forms a key part of the evidence base required to support the Local Development Framework (LDF) process and is monitored through a Local Authority's Annual Monitoring Report (AMR). It is considerably different to an Urban Capacity Study, which was previously required under Planning Policy Guidance 3 (PPG3).

1.2 The methodology for producing a SHLAA is set out in detail in the Government's *Strategic Housing Land Availability Assessments: Practice Guidance* which can be found in the following link: [Practice Guidance](#).

1.3 A Local Authority, in conjunction with key stakeholders, is required to identify sites with potential for housing; assess their housing potential and assess when they are likely to be developed. There are five core output indicators the Government's Practice Guidance on SHLAA identifies, as illustrated in the table below.

Table 1.1 Strategic Housing Land Availability Assessment - Core Outputs

1	A list of sites, cross referenced to maps showing locations and boundaries of specific sites (and showing broad locations, where necessary).
2	Assessment of the deliverability/developability of each identified site (i.e. In terms of its suitability, availability and achievability) to determine when an identified site is realistically expected to be developed.
3	Potential quantity of housing that could be delivered on each identified site or within each identified broad location (where necessary) or on windfall sites (where justified)
4	Constraints on the delivery of identified sites.
5	Recommendations on when these constraints could be overcome and how.

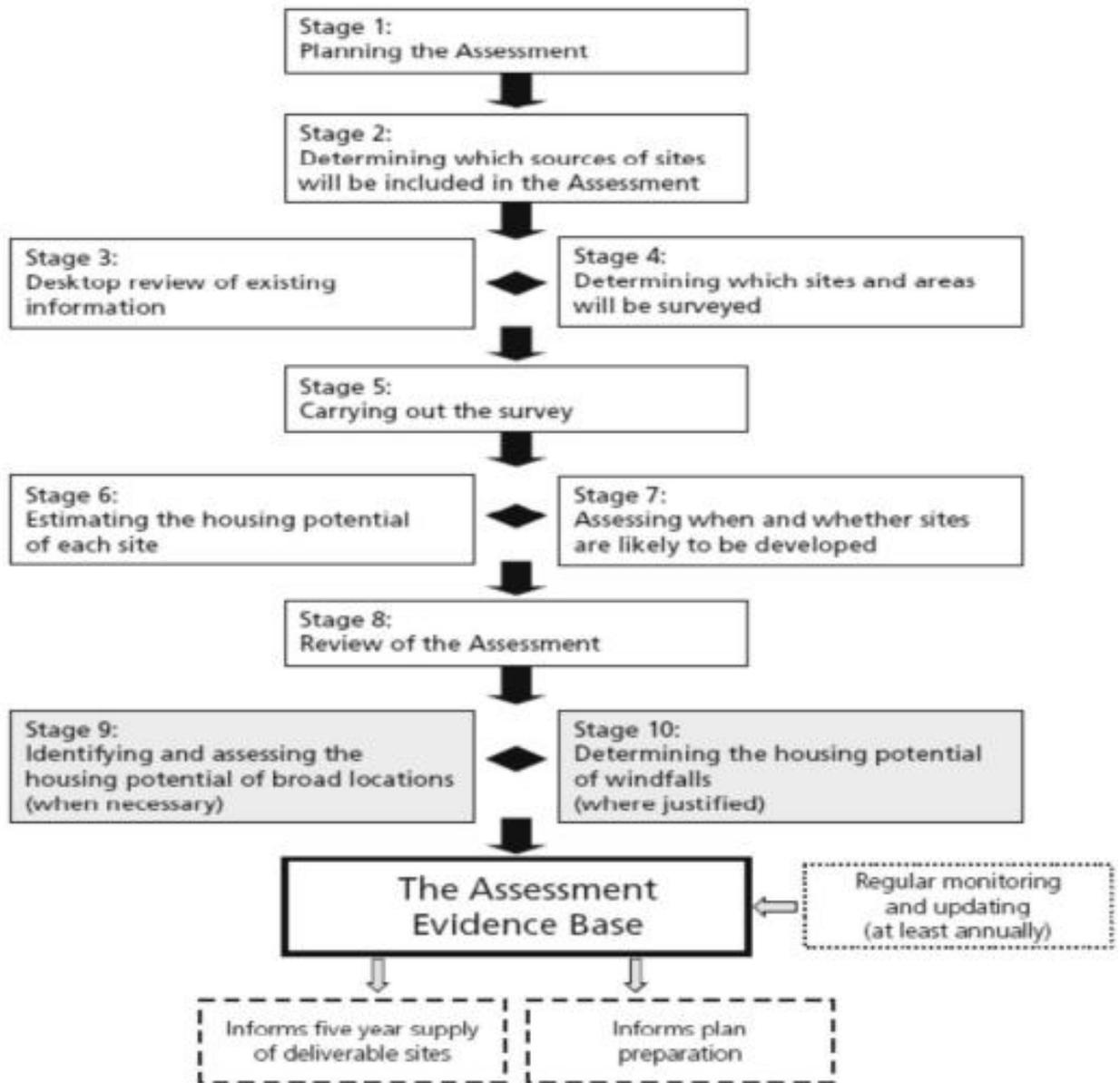
Source: *Strategic Housing Land Availability Assessments: Practice Guidance 2007*

1.4 The preparation of a SHLAA should be carried out through a series of eight main stages which includes surveying sites identified through a desktop study. A Local Authority will be required to justify an alternative methodology.

1.5 Replicated in Diagram 1 below is an extract from the Government's practice guidance identifying the eight main stages for the preparation of a SHLAA, with two further optional stages covering broad locations and windfalls. While the stages should generally be carried out in order, Stages 3 and 4, 6 and 7, and 9 and 10, may be carried out in parallel.

1 . Background

Picture 1 Stages for the Preparation of a SHLAA



Source: *Strategic Housing Land Availability Assessments: Practice Guidance, 2007*

2 Stage 1: Planning the assessment

2.1 The SHLAA will be prepared by the Development Plans Team from Milton Keynes Council. Bob Wilson Development Plans Manager, will be the key contact for the project with other Senior Officers taking responsibility for undertaking the day-to-day preparation of the report.

2.2 In line with the Practice Guidance, the SHLAA will take a partnership approach. The document will be produced through engagement with the JHDT, set up to support and assist the growth of Milton Keynes. The assessment has also been discussed with the Strategic Housing Market Partnership (SHP). Both groups comprises a range of housing experts who will be engaged throughout the preparation of the SHLAA. This has already included feeding into the development of this methodology and setting the parameters of the study.

2.3 Other key contacts will assist the preparation of the SHLAA, particularly specialist teams on environmental and highways issues, which will be key to assessing the suitability of sites for development.

Timeframes

2.4 National policy and guidance requires consideration of a series of timebands covering a 15 year plan period. The SHLAA will therefore have regard to these and look at sites relating to the first 5 years of the emerging Core Strategy (specific, deliverable sites, ready for development), 6-10 years (specific, deliverable sites) and 11-15 years (ideally specific, deliverable sites or broad locations for growth)⁽²⁾. As a minimum the SHLAA should aim to identify sufficient specific sites for at least the first 10 years of the Core Strategy.

2.5 The base date for the study will be 1st April 2011, covering the 15 years to March 2026, the end date of the Core Strategy. Over this period the Core Strategy requires 26,705 new homes to be built (plan target of 28,000 from 2010 to 2026 minus completions of 1,295 in 2010/11), an average of 1,780 per year.

Ensuring quality of the assessment

2.6 The JHDT will ensure that the content of the SHLAA is robust, realistic and fit for purpose.

2.7 It is proposed to hold a 'call for sites' over a 10 week period from 10th November 2011 to 19th January 2012. A 'call for sites' period is not a formal requirement of the process but is considered to be best practice. The call for sites will allow the Council to identify the maximum number of opportunities for housing sites, ensuring the assessment is thorough. Everyone who has previously put forward a site through the SHLAA or Core Strategy process will be informed of the consultation period along with anyone else who has registered an interest in the process.

2.8 Parish and Town Councils will be encouraged to participate in the preparation of the Assessment. Shortly after the call for sites consultation a list of sites that are put forward will be made available and discussed with Parish and Town Councils where necessary. It is hoped that thanks to this approach the assessment process will benefit from local input into the process, primarily in terms of local understanding of the context of sites. It is also recognised that Parish and Town Councils might require more time to provide their comments and suggest any additional sites to those originally identified.

2.9 The SHLAA is not a one off piece of work. It will need to be updated year on year, primarily to inform the 5 year housing supply, and will also be updated when any major new policy document is produced, as in this instance with the findings helping to inform the forthcoming Site Allocations Development Plan Document (DPD).

2 Para 5 of the SHLAA practice guidance

2 . Stage 1: Planning the assessment

2.10 A call for sites period will not be undertaken each year, unless there is a particular shortfall in housing supply that needs to be investigated or it is needed to support production of a new DPD. The annual update will primarily involve updating existing figures to take into account completions and new planning permissions, information which is available through the Council's existing housing monitoring system.

3 . Stage 2: Determining which sources of sites will be included in the assessment

3 Stage 2: Determining which sources of sites will be included in the assessment

3.1 The Practice Guidance identifies examples of the sources of sites that have the potential for housing and which should be covered in the Assessment. These are presented in Table 3.1.

Table 3.1 Sites with potential for housing which should be covered by the assessment

Sites in the planning process
<ul style="list-style-type: none">■ Land allocated (or with permission) for employment or other land uses which are no longer required for those uses■ Existing housing allocations and site development briefs■ Unimplemented/outstanding planning permissions for housing■ Planning permissions for housing that are under construction
Sites not currently in the planning process
Examples: <ul style="list-style-type: none">■ Vacant and derelict land and buildings■ Surplus public sector land■ Land in non-residential use which may be suitable for redevelopment for housing, such as commercial buildings or car parks, including as part of mixed-use development■ Additional housing opportunities in established residential areas, such as under-used garage blocks■ Large scale redevelopment and re-design of existing residential areas■ Sites in rural settlements and rural exception sites■ Urban extensions■ New free standing settlements

3.2 With the exception of new free standing settlements and large scale redevelopment of existing estates, which are not supported by the Council, the assessment will look at these potential sources of sites and identify as many sites with potential for appropriate housing development as possible, to ensure the SHLAA is robust.

Sites in the planning process

3.3 The Council already has records of all sites within the planning process through existing monitoring arrangements. The existing monitoring information will be interrogated to extract:

- Sites with unimplemented permission for housing and those where homes are under construction.
- Sites with planning applications for housing, which are likely to be approved.
- Existing allocations where there is no planning permission or application in place. Work will be undertaken to assess that these are still viable housing sites.

Sites not currently in the planning process

3.4 Sites submitted through the call for sites, will be the major source of sites not currently in the planning process. Through consultation, developers and landowners will have the opportunity to identify sites across the Borough which they feel have housing potential. Added to these will be sites promoted through the early stages of the Core Strategy process.

3.5 Other sources of supply outside the planning process will be investigated through the assessment. These will include any Council and HCA regeneration schemes that may have the potential to yield new housing supply.

3 . Stage 2: Determining which sources of sites will be included in the assessment

3.6 The Practice Guidance, paragraph 21, sets out that particular areas can be excluded from the Assessment when the reasons for doing so are justified and agreed.

3.7 It has been agreed that the 2011 SHLAA will only consider sites which will be able to contribute to the Council's housing target in the future. This means only sites in and adjoining the MK urban area, Newport Pagnell, Olney, Woburn Sands and Sherington, will be included in the assessment, along with sites within other settlements with a development boundary⁽³⁾. All sites in these areas will be considered through the SHLAA as the process should not use existing policy constraints designed to constrain development, such as landscape policies, to determine the suitability of sites.

3.8 Sites where previous applications have been refused are another source of sites not currently classed as being in the planning process. There may be cases where these sites are not suitable for housing, but there may be sites which have previously been refused on issues such as density or design, but where the principle of housing development is accepted. Such sites will be included in the assessment.

3.9 The Practice Guidance highlights numerous other sources of information on sites not currently in the planning process. Below is an indicative list of sources/methods the Council will also use to identify the maximum number of sites for assessment:

- The National Land Use Database
- Sites identified in previous urban capacity studies/SHLAA
- Register of surplus public sector land
- Vacant buildings register
- Latest Employment Land Study
- Through estate agents and property agents
- Milton Keynes Council estates department

3.10 Land in existing housing areas will also be considered where it has not been identified through another source. It should be noted that this will primarily be areas such as old garage courts and other brownfield development opportunities. However, it could also include other infill opportunities where they exist. It is recognised that spaces such as this have local value and are often integral to the character of residential areas, so they will be considered but may be rejected as unsuitable or undeliverable through the assessment process. Such sites will be identified through site visits, desktop work using aerial photography, through the Council's housing department and potentially by Parish and Town Councils, using their local knowledge.

3 See Local Plan Proposals map [Local Plan Proposals Map](#) to see all settlements with development boundaries.

4 Stage 3: Desktop study of existing information

- 4.1** The first stage of the desktop review will be to compile a list of all potential sites from the various sources of information listed under Stage 2. The list will be subject to a sifting process to ensure sites are not duplicated, as they may be identified through a number of sources.
- 4.2** Each site will be mapped and details (location, size, constraints etc...) of the site will be logged initially in a standard proforma. This information will form the basis of the site surveys under stage 4.
- 4.3** The desktop review will involve assessing each site against the Council's mapped constraints information to identify issues, such as flooding and national designations, which may affect the site.
- 4.4** The review will also provide an opportunity to outline some known context to each site, looking at issues such as access to public transport routes, which will affect the ability of the site to provide sustainable housing.

5 . Stage 4: Determining which sites will be surveyed

5 Stage 4: Determining which sites will be surveyed

5.1 All sites identified under stage 3 which fall within the scope of the study and are not assessed as unsuitable through the desktop study will be visited. For sites with permission or under construction this happens quarterly as part of the Council's existing monitoring arrangements. For the purpose of the SHLAA, these site visits will not be duplicated.

Extent of the study

5.2 The study will cover the whole of the Borough of Milton Keynes, focusing on those areas where housing is expected to be delivered up to 2026. The focus will be on existing settlements in the area and have regard to the need to create sustainable communities.

5.3 Site visits to areas where existing sites have been identified will be used as an opportunity to identify other sites with potential for housing.

5.4 In looking at how comprehensive the survey should be in terms of geographical coverage and size of site the following factors have been taken into account:

- Milton Keynes has high housing delivery targets, with the majority of supply to be delivered through large housing sites.
- There is already a significant amount of land identified from the original SHLAA and the housing monitoring records.
- A large proportion of rural housing sites are historically small windfall sites which are difficult to identify.
- The SHLAA will be a key piece of evidence for the upcoming Site Allocations DPD, allocating sites in areas identified through the Core Strategy.

5.5 For this reason the following parameters have been set for the extent of the survey work:

- A site threshold of 5 dwellings will be set for the identification of new sites in the assessment due to the fact that the majority of housing is expected to be delivered on large sites. The inclusion of sites that could accommodate less than 5 dwellings would lead to a large amount of assessment work for a relatively insignificant housing yield.
- Given the level of housing land already identified, the focus will be on surveying sites identified through the call for sites and the desk top survey.
- The focus will remain on the settlements identified for development in the Core Strategy, to support the role of the SHLAA in delivering the Site Allocations DPD.
- Searches for additional sites will be focused on the rural settlements, where there is currently a shortfall in identified sites.

6 Stage 5: Carrying our the survey

6.1 To ensure that the survey is consistent it will be carried out by Milton Keynes Council staff, briefed in the requirements of the survey, using a standard pro-forma.

6.2 Prior to undertaking the surveys workshops will be held for staff to ensure a consistency in the approach to the assessment. All staff will also carry out pilot site visits to again aid consistency of approach.

6.3 The survey pro-forma, which will include details noted through the desktop survey, will include the following information set out in paragraph 29 of the Practice Guidance:

- Site size;
- Site boundaries;
- Current use(s);
- Surrounding land use(s);
- Character of surrounding area;
- Physical constraints, e.g. access, steep slopes, potential for flooding, natural features of significance and location of pylons;
- Development progress, e.g. ground works completed, number of homes started and number of homes completed; and
- Initial assessment of whether the site is suitable for housing or housing as part of a mixed-use development

6.4 The survey will enable factors not identified under Stage 3 (the desktop study) to be analysed. These factors include:

- Sites in an alternative use with no evidence or obvious prospect of being available for housing; and
- Sites where constraints mean they will not be suitable for housing development.

6.5 At this stage, an initial assessment will be made of whether the site is suitable for housing or housing as part of a mixed use development.

7 . Stage 6: Estimating the housing potential of each site

7 Stage 6: Estimating the housing potential of each site

7.1 The estimation of the housing potential of each identified site will be guided by the existing policies of the Local Plan and emerging Core Strategy. The Strategic Housing Land Availability Assessments Practice Guidance suggests that the densities of relevant existing schemes on comparable sites can also be used to aid in the estimation.

7.2 In cases where specific information is available regarding the yield of a site (e.g. for sites with planning permission or development briefs or where a call for sites submission has carried out more detailed masterplanning work), where appropriate, this information will be used as an **estimate** of capacity instead of the density multipliers.

7.3 Density multipliers will be used to **estimate** the potential number of dwellings that could be accommodated on each site⁽⁴⁾. A banding approach to establish the net developable area will be used, grouping sites according to their area and the need to accommodate other uses on the site. Three bands are to be used:

- small (site area up to 2ha) majority of the site will usually be available for development
- medium (between 2ha and 10ha) where up to 75% the site may be available for housing development
- large (above 10ha) where up to 50% the site may be available for housing development

7.4 Density multipliers will be guided by existing Local Plan policy H8 (Housing Density) that states what the average net densities in different locations of the Borough should be (Table 7.1). The net density will include: private gardens; access roads, streets, footpaths and cycleways within the site; car parking areas; incidental open space, amenity space and landscaping, and children's play areas.

7.5 It therefore excludes: major distributor roads; schools; open spaces serving a wider area, facilities serving a wider part of the community (e.g. for leisure or shopping) and other non residential uses, which will obviously only be an issue on larger sites.

7.6 Urban extensions to Milton Keynes will be classed as falling into Zone 3 of the policy H8. Any figures put forward by development briefs for these areas will be assessed against the density multiplier for this area to check it is realistic.

Table 7.1 Housing Density Zones in Milton Keynes Borough

Zone 1	CMK (including CampbellPark)	100 dws/ha
Zone 2	Adjoining grid squares north and south of CMK, Bletchley, Kingston, Stony Stratford, Westcroft and Wolverton:	40 dws/ha
Zone 3	The rest of the City, City Expansion Areas, Newport Pagnell, Olney and Woburn Sands	35 dws/ha
Zone 4	The rest of the Borough	30 dws/ha

4 This is an estimate of housing potential. It is not meant to be a maximum figure or a minimum. If the site does come forward for development, the actual yield will be determined through the planning process where site constraints and opportunities can be assessed in more detail.

8 Stage 7: Assessing when and whether sites are likely to be developed

8.1 Sites assessed will all fall into one of three categories set out in the Practice Guidance:

- Deliverable- a suitable site, available now, with a reasonable prospect of housing being completed within the next 5 years
- Developable- a suitable site, with a reasonable prospect that it will be available for development at a given point
- Not currently developable- when it is not known when a site could be developed (e.g. due to the not knowing when a particular constraint could be over come)

8.2 There are four key stages to assessing whether sites are deliverable and developable. The methodology for these stages is set out in parts a-d below as per the practice guidance.

9 . Stage 7a: Assessing the suitability for housing

9 Stage 7a: Assessing the suitability for housing

9.1 The proformas recording desktop work and site visit notes will include all of the information required to assess the suitability of the sites for housing. As outlined previously, this includes reviews of the relevant policy constraints, planning histories, potential impacts, any physical problems/limitations and environmental conditions, which may constrain development (as set out in para 38 of the Practice Guidance).

9.2 Sites visits will be integral to assess limitations and potential conditions that would be experienced by occupiers (such as noise), in addition to those identified through the desktop study. Issues concerning infrastructure provision will be assessed through the site visits, a review of available data and discussions with experts in particular areas (such as highways) to ascertain whether they will make housing on a site unsuitable.

9.3 Input from experts on particular issues will also enable particular development requirements to be identified, such as upgraded access.

9.4 It is assumed that sites currently in the planning process i.e. with planning permissions and allocated in the Local Plan have been previously assessed in terms of their suitability for development and do not require another evaluation.

9.5 Officers will recommend any sites that they consider to be unsuitable for housing be removed at this stage of the assessment. The JHDT will ultimately confirm this position, or otherwise, on consideration of the relevant information.

9.6 Any sites ruled out of the assessment will be recorded in a list along with the reasons for the judgement. This will include constraints and how, if possible, they could be overcome. This information will be discussed in the review of the assessment towards the end of the SHLAA process.

10 Stage 7b: Assessing the availability for housing

10.1 Sites that are put forward by land owners and developers through the call for sites and that are currently under construction are assumed to be available for housing, as it is obviously the intention of the owner to seek/continue development of the site. Those submitting sites on behalf of landowners will be asked to verify they have the owners consent to do so.

10.2 This is also the case for sites where there has been informal contact with the Council regarding development of a site. To clarify areas of uncertainty the Council will write to the owners of a site where there is an unimplemented permission, an outstanding allocation or a pre-application enquiry has not been followed up to clarify the latest position regarding individual sites.

10.3 The Council will also write to the developers of sites under construction to clarify the assumption that they will continue development and forecasts about the timing of future development (also see stage 7c).

10.4 Sites where developers/landowners state that they do not intend to pursue development will be listed along with an explanation of why the site is unavailable.

10.5 For sites put forward for consideration through the call for sites, information on constraints to development, such as existing tenancies, will be considered in coming to a judgement on the availability of the site, and when the site could potentially be available. Where necessary, Officers may contact site owners to gain more detail of constraints to land availability.

10.6 Where sites have been identified through site surveys or aerial photography, efforts will be made to identify landowners and contact them to seek their views on the potential availability of the site for housing. Where it is not possible to identify or contact owners, a reasoned judgement will need to be made as to the likelihood of development coming forward on individual sites. This will be based on knowledge of the site, including delivery of similar sites and other sites in the locality. Where there is no additional information available from the land owner/developer, sites will not be included in the first 5 year period of housing supply to avoid an unrealistic interpretation of housing supply being given.

10.7 Any sites that are not felt to be available for development at any point in the next 15 years will be added to the list of unavailable sites along with a reason for this judgement.

11 . Stage 7c: Assessing the achievability for housing

11 Stage 7c: Assessing the achievability for housing

11.1 A site is considered to be achievable for development where there is a reasonable prospect that housing will be developed on the site at a particular point in time⁽⁵⁾.

11.2 This will need to have regard to the ability of the developer to deliver and sell the housing over a particular time period, as well as market factors.

11.3 The Practice Guide states that a site is considered to be achievable for development where there is a reasonable prospect that housing will be developed on the site at a particular point in time. It will be affected by:

- Market factors – such as adjacent uses, economic viability of existing, proposed and alternative uses in terms of land values, attractiveness of the locality, level of potential market demand and projected rate of sales (particularly important for larger sites);
- Cost factors – including site preparation costs relating to any physical constraints, any exceptional works necessary, relevant planning standards or obligations, prospect of funding or investment to address identified constraints or assist development; and
- Delivery factors – including the developer’s own phasing, the realistic build-out rates on larger sites (including likely earliest and latest start and completion dates), whether there is a single developer or several developers offering different housing products, and the size and capacity of the developer.

11.4 It is not felt that residual valuation, to test the viability, of all sites is required given the scope and purpose of the study and the resources available. However, the Council will seek expert opinion to examine the achievability of sites, with the views of the development industry feeding into the process.

11.5 To assess achievability of development at a particular point in time, a series of basic assumptions have been developed, enabling a consistent approach to be taken to assessing the achievability and timing of development on particular sites:

- Individual developers will build approximately 50 units per site per year. This figure will only vary when it is agreed that there are reasons for this, such as the specific type of home being/likely to be constructed.
- Appropriate lead in times will need to be allowed for on larger sites where there are significant infrastructure requirements.
- The achievability of development on any site with an existing use will not be assumed until sufficient information is provided by the owner.
- Local planning requirements will not have an adverse affect on the achievability of housing development.
- Several developers will be active on larger development sites at any one time. Forecast completion rates on large sites will be guided by information available from recent local knowledge of development rates on such sites.
- Feedback from developers will be integral to informing future projections.

11.6 For sites already in the planning process, the Council will write to each landowner/developer to check whether assumptions made about the timing of development on individual sites is accurate.

11.7 Proformas submitted through the call for sites will contain details that will allow Officers to make a judgement about the achievability of housing development on individual sites. Information obtained through sites visits, such as neighbouring uses, noise etc... will also be an important part of this assessment, helping to establish if there are any market factors that may affect the marketability of development on a particular site or a particular area of the city.

11 . Stage 7c: Assessing the achievability for housing

11.8 The outcome will be a detailed forecast of the timing of development on each site over the next 15 years. For the purpose of the SHLAA, forecasts will be grouped in the 5 year periods set out earlier in the methodology. More detailed forecasts will be also be available to aid with plan making and monitoring.

11.9 All outcomes will be verified by the JHDT prior to the assessment being finalised.

12 . Stage 7d: Overcoming constraints

12 Stage 7d: Overcoming constraints

12.1 The Guidance advises that the Assessment should identify constraints for development and consider what action would be needed to remove them. Actions might include the need for investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to amend planning policy which is currently constraining housing development. These actions will be noted through the assessment of the sites.

12.2 Through stages 7 a to c, any constraints to development will be identified and discussed with experts in individual fields, including highways, nature conservation and flooding. Where constraints are deemed to be a complete barrier to delivery the site will have been rejected a stage 7a, along for the reasons for this. Where it is felt there is a reasonable chance of the constraint being overcome, the site will continue to be included as a potentially suitable site.

12.3 The outcome of this stage of the assessment will be a note next to each site of any constraint that will need to be addressed to achieve development on a particular site, along with when this constraint could be overcome. Conclusions will be agreed by the JHDT and discussed in the review of the assessment.

13 Stage 8: Review of the assessment

13.1 The Assessment will include a housing trajectory showing which sites are expected to come forward at particular times. The Guidance suggests that an overall risk assessment should be made as to whether sites will come forward as anticipated.

13.2 This risk assessment will be discussed with JHDT and have regard to the current housing market. It will suggest whether the particular housing potential of each site needs to be revisited, or whether additional sites need to be sought.

13.3 It should be noted however that the SHLAA covers a long period of time and simply seeking to increase the supply of land early in the period will not necessarily increase the potential delivery of housing in this period, given limits to the level of realisable demand. The current housing slow down may push back the date at which particular sites will/could be developed, but it is anticipated that they will be still be deliverable if they are found by the SHLAA process to be suitable and developable for housing.

13.4 The review of the assessment will also look at those sites assessed as unsuitable due to constraints that could be overcome, but where it is uncertain when this might occur. Such an example might be where a planning policy position would need to change. Such a constraint could be overcome but it would not be the role of the SHLAA to assume this will happen, however the review of the assessment could comment on the implications of amending planning policy on housing land supply.

13.5 As the assessment is being carried out to support the Local Development Framework process it will be important that the assessment identifies sufficient sites for at least the first 10 years of the plan and ideally for more than 15 years. If the assessment does not achieve this, consideration will be given to stages 9 and 10 of the Practice Guidance.

14 . Stage 9: Broad areas

14 Stage 9: Broad areas

14.1 Broad locations are areas where housing development is considered feasible and will be encouraged, but where specific sites cannot yet be identified. If, when completing the assessment, there appears to be a shortfall in sites to meet the housing requirements, the SHLAA will assess broad locations and/or windfall development (see stage 10) to look for additional areas of housing potential in the 10-15 year period of the plan.

14.2 The advantage of identifying broad locations is that the community will be clear about where future development is likely to be directed and there will be greater certainty for developers about where development will be encouraged.

14.3 In selecting broad locations, the SHLAA will have regard to existing and emerging planning policy at a regional and local level. It will also have regard to the type of housing sites in which there is a shortfall (i.e. rural or urban sites).

14.4 The Local Plan and emerging Core Strategy includes a number of policies that advocate better and more efficient use of land. A broader mix of uses and efficient use of land can encourage more sustainable modes of travel and support local services. Local Plan Policy H7 for instance, allows new housing on unidentified sites, where these would help improve access to jobs, shops and services by means other than the car and are compatible with existing land uses in the surrounding area.

14.5 The Local Plan and the emerging Core Strategy stress that within such areas as Wolverton and Bletchley, which are currently a focus for regeneration activity, there are additional opportunities for revitalisation by re-using redundant or underutilised land. It is possible that further housing opportunities will occur in those two areas as a result of future regeneration projects.

14.6 If there is a need to assess broad locations, these two centres will be two of the primary areas of assessment. Other areas that will be considered as broad locations when required include:

- Development hotspots- where the focus of recent planning permissions suggests there is current market demand
- Principle public transport corridors- based on those routes in the Milton Keynes Bus Strategy
- Other regeneration areas- areas where Neighbourhood Action Plans, emerging in line with the Council's Neighbourhood Regeneration Strategy, identify the potential need for physical improvements to improve the area

14.7 In reviewing the assessment, the approach to assessing broad areas, if necessary, will be agreed through the JHDT.

14.8 Where they need to be identified, broad areas will be assessed in the same way as individual sites and potential housing capacity established. Checks will be made to avoid any double counting in broad areas where an isolated site already included in the SHLAA falls within a wider broad area.

14.9 As with specific sites, views of developers and the market will be sought to confirm that any assumptions made about potential housing numbers in broad areas are realistic.

14.10 It is **not** for the SHLAA to identify the preferred location of additional sites that may be needed across Milton Keynes. As with the identification of specific sites in the report, the broad areas will simply provide evidence to show that there are potential housing sites available to deliver the housing requirements and strategies set out in planning policy documents. Any allocation of sites will be through the planning process and involve the assessment of sites, and their ability to fit into an overall strategy for growth as well as more formal public consultation.

15 Stage 10: Determining the housing potential of windfall (where justified)

15.1 It is expected that the supply of housing sites should be based on a supply of specific sites and, where necessary, broad locations. However, if it is required, and there are genuine local circumstances to justify it, windfall allowance will be taken into account.

15.2 It is more difficult to plan for windfall as, by definition, it is difficult to know when and where it will occur. This makes it difficult to assess deliverability as judgements on restrictions in infrastructure provision and site constraints cannot be accurately assessed.

15.3 However, if necessary, the SHLAA will assess the nature of previous windfall development and completion rates on windfall sites, and come to a judgement as to whether there are genuine local circumstances to justify a windfall allowance and what this allowance should be.

15.4 Taking care to avoid duplication with sites already identified (either through the main assessment or broad areas if this work has been undertaken), work will be undertaken to verify that opportunities such as those that have come forward in the past will still be available in the future. This will involve mapping windfall completions and assessing whether areas where windfall rates have been high still have potential for the future.

15.5 Previous work (see the Core Strategy Housing Technical Paper) has already been undertaken on windfall development. If the review of the SHLAA shows that an assessment of windfall development is necessary, this previous work will form the basis of discussion through JHDT to assess if a windfall allowance can be justified.

16 Outcomes

- 16.1** A draft report will be prepared and agreed by partners once all of the stages of the assessment have been undertaken.
- 16.2** The SHLAA will be added to the evidence base for the LDF and will be a key document in preparing the consultation material for the Site Allocations DPD.
- 16.3** The findings of the report will be used to inform the Council's assessment of 5 Year Land Supply, and to inform the preparation of a revised Housing Trajectory, both of which are updated annually.
- 16.4** In the future, the Council will carry out a general overview of the SHLAA each year. This will normally entail updating information about known sites, such as updating forecasts to take into account any completions in the previous year, adding new planning permissions and so forth.
- 16.5** A full review of the SHLAA (i.e. review of the methodology, call for sites) will be undertaken when the Council is preparing to begin development of a major new planning document, such as the Site Allocations DPD, or when the Council needs to find sites to supplement its 5 year land supply position.

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