# Milton Keynes Council Housing Land Supply Phasing Methodology 2021

August 2021





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#### 1. Introduction

- 1.1 We are required to monitor the progress of housing completions and, as required under Paragraph 74 of the National Planning Policy Framework (NPPF)<sup>1</sup>, to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing<sup>2</sup>. As part of this monitoring we carry out an assessment of when housing, either with planning permission or contained within the Development Plan, is expected to be built and the rates at which each site is expected to be delivered.
- 1.2 We produced this Phasing Methodology to help inform the annual assessment of when housing in the Borough can realistically be expected to be built, which ultimately is used to prepare an annual five-year housing land supply (5YHLS) position. This document sets out the processes we undertake both in terms of housing monitoring and to gain information from landowners, developers and housebuilders, so as to evidence the deliverability of sites. This document also introduces a further element of the assessment for when it has not been possible to gain written detailed information from the development industry and to assist in sense checking information we have received. This process is a set of parameters and assumptions, based on the size of housing site and the stage it is at in its development, which show how we will assess the delivery of new homes.

#### 1.3 This methodology sets out:

- When a site is considered deliverable in the context of the NPPF;
- The land supply assessment undertaken by the Council to determine the deliverability of a site;
- How the capacity of a site has been calculated;
- A set of assumptions related to lead-in times to be used in the land supply assessment, and;
- A set of assumptions related to build-out rates to be used in the land supply assessment.
- 1.4 This methodology and the assumptions set out within are reviewed on an annual basis to ensure it reflects up-to-date monitoring information and advice relating to housing delivery within Milton Keynes gathered throughout each year. This is the third iteration of the Phasing Methodology for Milton Keynes and has been updated to reflect the monitoring year 2020/21 and also to consider further evidence that has been gathered and analysed throughout the year. Specific changes that have occurred in this update will be referenced where applicable throughout the document. Earlier versions of the Phasing Methodology are also available to view on our Planning Policy webpages.

<sup>&</sup>lt;sup>1</sup> An updated version of the NPPF was published in July 2021 whilst we were in the process of undertaking the 2021 5YHLS assessment. Whilst much of the site assessment work was carried out prior to the publication of the 2021 NPPF, this document will reference the relevant paragraphs from the updated 2021 NPPF.

<sup>&</sup>lt;sup>2</sup> We produce an annual five-year housing land supply statement which responds to the requirement of Paragraph 74 of the NPPF (2021). This statement establishes the housing requirement that we need to demonstrate is deliverable and then assesses the land supply available to deliver the requirement over the next five years.

## 2. Purpose of this Document

- 2.1 We publish annually our housing land supply assessment which demonstrates the number of dwellings expected to be built in each year of the Local Plan period. During the production of the assessment we have to reach a conclusion on whether housing sites, from a range of sources, including those which are allocated for development in the Development Plan, or those with a planning permission, can be considered deliverable and whether that will be within the next 5 years or whether they will take longer to develop.
- 2.2 For the purposes of our 2021/22 annual assessment we have assessed the deliverability of housing sites with regard to Paragraphs 68 and 74 of the NPPF (2021), its footnotes and definitions.

#### Paragraph 74 states:

"Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old."

The definition of "deliverable" in the context of the NPPF is set out in its glossary.

**"Deliverable:** To be considered deliverable, sites for housing 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. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."
- 2.3 The definition sets out how types of sites should be considered as deliverable within the five-year supply period depending on their progress towards a fully consented development. It sets out firstly that sites with detailed permission should be considered deliverable within the five-year period unless there is <u>clear evidence</u> that this will not occur. The second part of the definition of 'deliverable' covers sites about which their deliverability should not be automatically assumed as within the five-year period, unless there is <u>clear evidence</u> of a realistic prospect that housing will be delivered on the site within five years.
- 2.4 The revision of the definition to the 2012 NPPF, has an emphasis on clear evidence being needed to assess whether delivery will or will not occur within the five-year period. This focus on obtaining clear evidence reflects the process we have undertaken to inform our annual assessment.

- 2.5 It should be noted that a recent Consent Order by the Secretary of State<sup>3</sup> confirmed that
  - "The proper interpretation of the definition is that any site which can be shown to 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' will meet the definition; and that the examples given in categories (a) and (b) are not exhaustive of all the categories of site which are capable of meeting that definition. Whether a site does or does not meet the definition is a matter of planning judgment on the evidence available."
- 2.6 This therefore provides clarity that the definition of 'deliverable', as outlined in the NPPF, is not to be taken as a 'closed list' and that types of site not listed within the definition (for example; sites with a resolution to grant planning permission subject to the execution of a s.106 agreement, or draft allocations in an emerging plan) are capable of being considered deliverable. As such, we do not restrict our assessment of land supply to only those sites which fall within the examples listed within the NPPF definition of 'deliverable', but instead consider and assesses all sites where evidence suggests it may be deliverable.

#### What constitutes clear evidence?

- 2.7 Neither the NPPF nor the Planning Practice Guidance (PPG) outlines specifically what is considered to constitute clear evidence for the purposes of demonstrating a site, which falls under part b of the NPPF definition of deliverable, has a realistic prospect of delivering housing and can thus be considered for inclusion within the five-year period.
- 2.8 The PPG at paragraph 007 (Reference ID: 68-007-20190722) in its section on 'Housing Supply and Delivery', seeks to provide further guidance on the types of evidence that could be used to demonstrate deliverability of sites that fall under part b of the NPPF definition.

Paragraph 007 states:

"Such evidence, to demonstrate deliverability, may include:

- current planning status for example, on larger scale sites with outline or hybrid permission how
  much progress has been made towards approving reserved matters, or whether these link to a
  planning performance agreement that sets out the timescale for approval of reserved matters
  applications and discharge of conditions;
- firm progress being made towards the submission of an application for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;
- firm progress with site assessment work; or
- clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects."

<sup>&</sup>lt;sup>3</sup> Claim No. CO/917/2020 (issued 12 May 2020) in relation to appeal reference: APP/G2815/W/193232099

- 2.9 Whilst this is not an exhaustive list and is still not clear on what exactly the evidence should be, it provides some assistance as to how a planning judgement could be made and evidenced as to whether a site is deliverable or not. Furthermore, this reflects the type of evidence we gather through our ongoing monitoring and engagement processes and through the preparation of our annual assessment, to maintain up-to-date evidence on each site.
- 2.10 Indeed, recent decision letters for S78 appeals<sup>4</sup> (including a recovered Secretary of State decision) which have tested our 5YHLS position and supporting evidence, have all identified our approach (previously through the use of proforma) as satisfying the requirement of the NPPF/PPG in being sufficient to demonstrate clear evidence.

#### How have we prepared our Annual Assessment and gathered clear evidence?

- 2.11 Over the past 3 to 4 years we have carried out significant work in terms of obtaining site specific data and information in relation to sites within our housing trajectory. Starting with the preparation of the 2017 SHLAA and continuing through the examination stages of Plan:MK, we consulted landowners, developers and agents to obtain up-to-date information on projected start and build out rates, so as to assist in informing the housing trajectory that was included in Plan:MK.
- 2.12 As part of the examination of Plan:MK, the Inspector carried out a thorough site-by-site analysis of the trajectory and, as can be seen from the Inspector's examination correspondence, the proposed modifications and his report, he was satisfied with the approach we had taken in respect of the sites included in our 5YHLS calculation, both in terms of the general methodology and the site specific projections.
- 2.13 Whilst Plan:MK was examined against the 2012 NPPF under transitional arrangements, the trajectory and site-specific projections provide a good starting point for the continual review of ongoing site progress and delivery. However, in preparing our 2019/20 assessment, we took the opportunity to review and improve our processes in assessing the deliverability of sites within the housing land supply to more accurately reflect the changes to the definitions of 'deliverable' and 'developable' contained within the revised versions of the NPPF since 2019.
- 2.14 The changes implemented for the 2019 Assessment were continued throughout the 2019/20 and 2020/21 monitoring years enabling the Council to gather further, up-to-date information and evidence on each site. This data was also further enhanced by extra work that we had carried out to obtain up-to-date information to present at two appeal inquiries that took place in January and February 2020.
- 2.15 For the purposes of preparing our 2021 Assessment we therefore already have available a wealth of site-specific information covering at least a 3-year period which we can utilise for assessing the deliverability of each site. However, in line with the updated approach first undertaken in the 2019 Assessment, we have not only sought to utilise existing data and information but have continued to obtain further up-to-date information and evidence on the progress of each site, specifically to inform the 2021 Assessment.

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<sup>&</sup>lt;sup>4</sup> Land off Castlethorpe Road (Appeal Ref: APP/Y0435/W/18/3214365); Malt Mill Farm (Appeal Ref: APP/Y0435/W/18/3214564); The Globe (Appeal Ref: APP/Y0435/W/19/3220584); Rectory Farm (Appeal Ref: APP/Y0435/W/19/3234204); Land to the east of Newport Road an west of Cranfield Road (Appeal Ref: APP/Y0435/W/17/3169314).

2.16 The following sub-sections therefore outline the stages we undertake in compiling evidence and preparing our annual assessment of land supply, a number of which are processes that are continually ongoing throughout the year.

#### **Quarterly Housing Monitoring**

- 2.17 We undertake quarterly housing monitoring following robust procedures and using a variety of data sources. In summary the housing monitoring involves the following:
  - Continuous monitoring of the planning record database to update the extant planning permission records as new applications are permitted (this includes reviewing progress on planning performance agreements (PPAs) and Discharge of Condition applications) and, inserting these into the housing monitoring database;
  - Every quarter undertaking a site visit to every major residential development site and allocation
    which is registered as under construction or whereby information received has shown there to be
    progress towards development on site;
  - For quarter 4 of the year, undertaking a site visit to all major residential development sites and allocations and all minor residential sites which have a grant of planning permission;
  - The site visits lead to records being made of the number of units that have started, completed or are under construction, as well as noting each individual plot against the approved planning permission and recording any other useful information in relation to the progress of the site;
  - This data is then checked and reconciled with Building Control records and Council Tax records.
- 2.19 The data collected from site visits and housing monitoring enables the progress of each site, or parcel of a site, to be monitored against the current projections and to start to build a picture of the potential projections moving forward. Furthermore, enabling us to recognise sites which may not be progressing as initially intended.

#### Engagement with Site Representatives and other parties involved in delivery

- 2.20 Through our housing monitoring we seek to be proactive in engaging with representatives of all sites within the Borough, so as to gain direct information to inform the annual assessment. This engagement is carried out in a variety of forms throughout the year:
  - For all sites across the Borough which are not subject to a FUL permission of REM approval, an annual Statement of Common Ground (SoCG) is sent to a representative of the landowner, so as to gain direct information on progress towards delivering the site including for example, a programme for taking the site through the planning system, projected start dates and build out rates and any other information which may be useful in understanding the future delivery of the site. The SoCG was new for the 2020 assessment and replaced, for these sites, the pro-forma approach that has been previously used by the Council. Whilst, as outlined in paragraph 2.10, the proforma approach in Milton Keynes has been recognised by inspectors and the Secretary of State as being sufficient to demonstrate deliverability, it is felt that the SoCG allows for more information to be provided by the landowner and enables the Council to continue to make its approach to the 5YHLS assessment even more robust and reliable (a blank copy of the SoCG and proforma templates for 2021, along with a copy of the explanatory letters sent out with both, are included within Appendix 4).

- For sites which have FUL permission or REM approval we continue to utilise the proforma approach so as to seek updated projections from the housebuilders.
- The SoCG are sent out first, prior to the end of the monitoring year, with proforma for sites with detailed permission and those which are under construction being sent out once the end of year monitoring surveys have been undertaken. Officers then follow up via chasing emails and phone calls so as to ensure a maximum response rate.
- Further contact is made with site representatives throughout the year at stages where progress has been made through the planning process, or whereby progress does not appear to have occurred in line with previous information submitted. This can take the form of emails, phone calls, or in some cases the updating of a SoCG or proforma; this enables information on sites to be kept up to date.
- For strategic sites within the Borough which form part of the Milton Keynes Tariff<sup>5</sup>, quarterly contact is also made with the developers/housebuilders so as to ascertain projected completion rates for future quarters.
- Discussions are held with case officers and other internal officers (e.g. housing officers, s106 officers, MK Tariff Officer etc.) to gain in-depth information on site specific issues and progress on any relevant planning applications (e.g. discharge of conditions, pre-application discussions, entering of PPAs).
- Every quarter the information gathered from housing monitoring and through contact with site representatives is presented to the Councils Joint Housing Delivery Team<sup>6</sup> (JHDT), so as to monitor delivery and provide further useful insights/information into the progress on sites.
- 2.21 We continue to carry out both monitoring and engagement throughout the year, so as to ensure as upto-date information as is possible is available on each site within the trajectory and so as the projections used for each site within the annual assessment are not just based on a single response from a site representative at a single point in time, but rather on regular monitoring and engagement via a robust process.

#### **Review and Compilation of Trajectory/Assessment**

- 2.22 Having obtained relevant data and information from housing monitoring and engagement with relevant site representatives, we carry out a range of reviews of this data on a site-by-site basis before compiling a final trajectory. This includes:
  - An initial 'sense check' of all the direct information compiled through monitoring and submitted by site representatives for each site to ensure all data received aligns and, to ensure projected delivery rates are realistic and achievable. The 'sense checking' process is informed by discussions with case officers and other officers across the planning department who have detailed knowledge of

<sup>&</sup>lt;sup>5</sup> The 'Tariff' is an amount of money per residential unit, or per hectare of employment development, that is payable by owners of land in the strategic growth areas. The Tariff money goes towards funding infrastructure and services that are required to support the growth of the City. The Framework Agreement binds the landowners who have signed it to paying the Tariff and to its terms and conditions. The Tariff now only applies to phases that remain on relevant sites including the Western and Eastern Expansion Areas, the Strategic Land Allocation, Kingsmead South and Tattenhoe Park.

<sup>&</sup>lt;sup>6</sup> The Joint Housing Delivery Team (JHDT) is a predominantly Milton Keynes Council internal group which consists of officers from the Planning Department (including representatives from Housing Monitoring, Development Management, Development Plans and the Delivery and Infrastructure Team), Housing Department, Properties Department, Milton Keynes Development Partnership and Homes England. Other Council departments are also invited as and when their input is necessary.

- individual sites, as well as checking each site against known delays and the assumptions and parameters outlined in this phasing methodology.
- The proposed trajectory is then reviewed by the JHDT, both as a whole and on a site-by-site basis, prior to being finalised and published as the updated 5YHLS position.
- 2.23 We will always use up-to-date monitoring information supported, in the first instance, by direct information on the delivery of housing sites and comparison against previous direct information and monitoring data. There are however instances whereby up-to-date, direct information cannot be obtained and/or the information submitted needs to be sense checked. To this end, in 2019, we also produced the first iteration of this phasing methodology so as to outline a set of parameters and assumptions which are used, alongside older site-specific data, to provide a 'sense check' of all the information submitted, to ensure a robust approach to assessing the deliverability of each site.
- 2.24 For the purposes of the 2020 Assessment we further refined the Phasing Methodology, carrying out further detailed analysis of local data and reviewing new national studies to update the assumptions and parameters contained within, so as to ensure they are appropriate for use in Milton Keynes and are based on clear evidence. Furthermore, a draft version of the 2020 Phasing Methodology was distributed to a range of consultees within the development industry, including those involved within Milton Keynes and a number of national bodies, so as to provide an opportunity for them to provide feedback. This feedback was taken into consideration in finalising the 2020 Phasing Methodology; the comments received during this consultation, associated responses from Council officers, and details on how this was used in preparing the final phasing methodology are outlined in Appendix 3 of the 2020 version of the Phasing Methodology, which can be viewed on our website.
- 2.25 Further updates have been made to this 2021 version of the Phasing Methodology where necessary, in response to updated data and information collected since the publication of the 2020 version. These updates are outlined in the relevant chapters of the document.

## 3. Development of the Phasing Methodology

- 3.1 It is well recognised that there is no established methodology for assessing how quickly a site can deliver new homes<sup>7</sup>, predominantly due to the wide range of factors that can influence the progress of sites from allocation to completion.
- 3.2 It is with this in mind that we apply our approach to assessing the delivery of sites on an individual basis, utilising direct information on each site, detailed monitoring processes and the professional expertise of our officers. We do however recognise that formulating a set of assumptions against which we can sense check the data we receive will ensure our processes are as robust and transparent as possible.
- 3.3 In formulating the assumptions and parameters set out in this 2021 version of the Phasing Methodology, we have considered:
  - National Studies;
  - A thorough analysis of lead-in times and build-out rates on sites within Milton Keynes over the past 7 years (all data from the 2020/21 monitoring year has been added to the assessment);
  - A review of the approach and assumptions used by our neighbouring authorities; and
  - The expertise and knowledge of planning professionals within the Council.
- 3.4 With regards to National Studies, there are a number that have assessed lead-in times and build-out rates which are commonly quoted, including, most recently:
  - Start to Finish: How Quickly do Large-Scale Housing Sites Deliver? Lichfields (November 2016);
  - Start to Finish: What Factors affect the build-out rates of large-scale housing sites? Second Edition (February 2020);
  - Urban Extensions Assessment of Delivery Rates Savills (October 2014);
  - Housing Supply Research Parsons Brinkerhoff for CPRE (2014);
  - Independent Review of Build Out Final Report (October 2018) and Draft Analysis (July 2018); regularly referred to as the Letwin Review.
- 3.5 Regard has been given to these studies, both in terms of the findings of their data analysis and the key messages they present in trying to formulate wider conclusions and assumptions. The findings where relevant are referenced in more detail in the sections of this Phasing Methodology on lead-in times and build-out rates.
- 3.6 However, utilising national studies alone does bring with it a number of limitations. Comparing across studies is not always easy due to the range of types of sites assessed by each individual study and the differing period of the development process that has been reviewed; not to mention the different times at which these sites have been developed out and the differing circumstances that surround each site and the area in which they are located. This is highlighted within the *Savills* (2014) report which outlines that, within the data assessed for the report alone, "the individual nature of these sites means it is difficult to identify absolute trends".

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<sup>&</sup>lt;sup>7</sup> Savills: "Spotlight: Planning and Housing Delivery" (15 May 2019)

- 3.7 Some studies also view each stage of the delivery process as discrete, whereas in reality often certain stages, particularly those such as REM permission and discharge of conditions, will overlap resulting in shorter lead-in times. Furthermore, these studies normally do not cover the full time period over which a site has been built out, rather using actual build-out data that is available and then relying on projections for future years. Additionally, the use of average timescales can mask those sites assessed which varied from the rest of the dataset and had lead-in times and build-out rates that were significantly outside the normal range.
- 3.8 The inability of these studies to take full account of local circumstances and conditions is a key issue which particularly impacts upon placing an over reliance on them in Milton Keynes. Both *Lichfield* (2016) and (2020), and *Savills* (2014) highlight Milton Keynes within their assessment as being different. *Lichfield* (2016) states that "it is widely recognised that the planning and delivery of large-scale housing sites in Milton Keynes is distinct from many other areas". Meanwhile, Savills recognise Milton Keynes as an established growth area whereby sites are more likely to progress more quickly through the planning system, whilst also highlighting the Milton Keynes Eastern Expansion Area as a site with very high rates of delivery, despite sites of a similar size not performing so well elsewhere in the Country.
- 3.9 It is therefore essential in formulating assumptions and parameters to assist in assessing delivery in Milton Keynes, that local data and evidence, alongside local professional expertise is also given full consideration. This is why, for the purpose of our Phasing Methodology a more detailed analysis and assessment of historic data specific to Milton Keynes is carried out and used in formulating assumptions.
- 3.10 The assumptions and parameters set out in the remainder of this document have therefore been shaped by no one single source of data or information, albeit reference is made to sources throughout, with the aim that they are specific to, and appropriate for use in Milton Keynes for the purposes of the 2021 assessment.

# 4. Calculating Capacity of a Site

- 4.1 All sites contained within our housing trajectory are either the subject of an extant planning permission, an allocation for residential development within the Development Plan, an application which is awaiting determination or have been assessed by us in work such as the SHLAA or Brownfield Register.
- 4.2 For all sites which have planning permission for residential development, the capacity for the site is that for which it has permission, or a lower figure which has been provided by the developer/housebuilder based on their most up-to-date evidence. For example, Eaton Leys gained Outline permission for 600 units in June 2017. For the Council's 2018/19 trajectory, this was reduced to 500 units following ongoing engagement with the landowners, who had recommended the final number would be significantly less following their further site investigations. This number was then reduced further, for the 2019/20 trajectory, following the submission of an application for detailed permission for 448 units. This also further evidences the nature of our ongoing monitoring and engagement with landowners, developers and housebuilders which results in projections for sites within the trajectory being based on up-to-date evidence and information and, how we use this information to ensure our trajectory is robust.
- 4.3 For sites which are allocated within the Development Plan but do not yet have planning permission, the capacity of the site will be based primarily on the indicative number of units the site is allocated for, unless further evidence from the landowner, through ongoing discussions, pre-application processes, or the submission of an application, suggests that the capacity of the site should be different. For example, Tickford Fields, a site allocated for up to 1200 units which was subsequently reduced to 930 units as a result of feedback from the landowner following their more detailed site investigations and preapplication discussions.
- 4.4 The method used for calculating the capacity of a site for allocation in the Development Plan was taken from the Council's 2017 Strategic Housing Land Availability Assessment, which informed the preparation of Plan:MK. For sites outside the planning process whereby site-specific information was not available, the capacity of a site was based on site densities calculated using the indicative densities set out in the SHLAA methodology and based on existing Local Plan saved policies, policies within 'made' neighbourhood plans and densities of relevant schemes on comparable sites, which were applied as follows:

Area	Dwellings per hectare
CMK	250 dph
Campbell Park	100 dph
The rest of the existing urban area	35 dph
Potential Urban Extensions	35 dph

4.5 To give a realistic interpretation of the housing yield from each site, it was assumed that in the case of the larger sites that not all of the available land could be developed for housing. For example, on the largest sites it was assumed that land will also be required to provide for jobs, open space, schools and so on, as part of sustainable communities. The table below summarises the assumptions about the proportion of individual sites that were assumed to be available for housing.

Site Size	Housing Yield
Small (up to 2 Hectares)	100% available for housing
Medium (2 - 10 Hectares)	75% available for housing
Large (over 10 Hectares)	50% available for housing

- 4.6 Using this approach forms an indicative housing capacity, acknowledging that the true potential of individual sites would have to be determined through a detailed site assessment which considers a number of more detailed factors.
- 4.7 It should also be noted that the adopted Plan:MK now allows for higher densities in some areas of Milton Keynes than are accounted for in the indicative approach outlined above. For example, Policy HN1: *Housing Mix and Density* of Plan:MK allows for development of up to 500 dph in Central Milton Keynes and up to 250 dph in the area covered by the Central Bletchley Prospectus.
- 4.8 For the purposes of the current housing trajectory, indicative capacities for sites in these areas have not been increased to account for this, so as to ensure that the trajectory maintains a conservative approach and does not overestimate the capacity of a site. Once a planning application has been submitted for the site, or following more detailed information being shared with us by the landowner, which outlines a different site capacity is achievable, then the capacity of these sites will be reconsidered through future annual updates to the trajectory.

#### 5. Lead-in Times

- 5.1 As outlined previously, to ensure clear evidence is provided of deliverability for all sites we include within our 5-year housing land supply, site specific information is used as the primary source for applying lead-in times to sites. Furthermore, given the wide range of factors that can influence lead-in times, ongoing engagement and site-specific information provide a much more reliable source of data than utilising a one-size fits all approach. However, where up-to-date direct information cannot be obtained from developers/housebuilders of specific sites, but we deem there to be enough clear evidence that the site will be delivered within the five-year period, a set of assumptions relating to lead-in times, as outlined in Table 5.1, are used. Furthermore, these assumptions are used as part of our 'sense check' of site-specific information submitted by housebuilders and developers, to ensure that lead-in times presented are not unduly unrealistic.
- 5.2 The assumptions, as outlined below in Table 5.1 have been developed taking account of a review of national studies, the assumptions used by neighbouring authorities immediately adjacent to Milton Keynes, and analysis of progress of recent sites through the planning system in Milton Keynes.

#### **National Studies**

- 5.3 As outlined in Section 3, there are a number of limitations with using national studies and their conclusions and the examples of this predominantly relate to the difficulty in outlining trends in lead-in times, as opposed to build-out rates. Furthermore, the large majority of national studies tend to focus on large and strategic sites and do not incorporate figures for small and medium sized sites, which can make up a large percentage of the number of sites within a housing supply.
- 5.4 The review of national studies undertaken has therefore focused on the more recent reports of *Lichfields* (2016 and 2020) and *Savills* (2014) and the key conclusions of each are outlined below.
- 5.5 The *Lichfields* (2020) report outlines that for sites of over 500 dwellings, if the site has an outline permission, on average it delivers its first home between 2-3 years after outline permission is granted. This figure is however greater when taken from the date at which the outline application is validated and can, for some sites over 2,000 units in size, take as long as 8.4 years from validation to first completion.
- 5.6 The *Lichfields (2020)* report is also one of the few that considers smaller sites, albeit covering them all under a bracket of 500 dwellings and less. For sites of this size, first completions on average occur 1.9-2 years from approval of an outline permission.
- 5.7 The *Savills (2014)* report also reviews sites over 500 dwellings and found that construction on the first phase of housing starts on average 4 years after the submission of an outline application, however for sites since 2010 this average drops to under 3 years.
- 5.8 Savills (2014) continues to outline that, following the grant of outline permission it takes on average 3 years to progress to the start of the first phase of housing, with post 2010 data again showing a drop in the average to 18 months 2 years. This however considers the time taken to achieve s106 agreement and the preparation of a REM application as two separate stages, when in reality there will be at least

- some overlap between these two stages, which could lead to a shorter timeframe. Finally, the study outlines the average time taken between submission of a REM application and the start of the first phase of housing as 14 months, or 8 months for sites post 2010.
- 5.9 The Savills (2014) report is however very clear that progression through these stages can be vary variant from these averages, with potential risks at each stage leading to delays, or indeed in parts of the Country which are established growth areas, such as Milton Keynes, progression can be quicker.
- 5.10 Reviewing these two studies alone, outlines the potential limitations of solely utilising national studies with both having outlined average timings which are based on different stages of the process (e.g. Lichfields data is based on first completions date whereas Savills is based on start of first housing phase), both outlining different averages overall, and the Savills report on its own showing quite significant differences for post 2010 sites compared to the other sites it has assessed.
- 5.11 It is therefore essential that local historic evidence is also considered, as is taken into account below, as well as an emphasis being placed on engagement with the landowner and developer of a site to assess the likely delivery timetable for each site on its own.

#### **Neighbouring Authorities**

5.12 As part of the process of establishing appropriate lead-in time assumptions for Milton Keynes, it was a felt a review of the assumptions used by some of our neighbouring authorities may be of use. The previous authority area of Aylesbury Vale District Council (AVDC)<sup>8</sup> and Central Bedfordshire Council (CBC) have been used for the purposes of the 2020 assessment as they form two of the largest of our immediately adjacent neighbouring authorities, have both followed similar paths in terms of recent plan preparation and both propose plans which seek to deliver against similar housing requirements as that of Milton Keynes. As discussed above, there are a range of factors influencing lead-in times and as such differences can occur between neighbouring authorities (for example, the size of the local planning authority and the speed at which they process applications) which means that direct comparisons should not necessarily be drawn. A review of assumptions being used in neighbouring authorities does however still assist in sense checking the assumptions we are proposing.

#### Aylesbury Vale area of Buckinghamshire Council

5.13 The assumptions used for the Aylesbury Vale area are not outlined in their most recent Five Year Housing Land Supply Position Statement and the most recent statement to include them is from April 2019. In this document they are stated as, the assumed time taken between submission of an outline application to first completions on site was between 2 years and 6 months, and 3 years, whilst the assumed time taken from submission of a detailed application to first completions is between 1 year and 18 months.

#### Central Bedfordshire Council

<sup>8</sup> As of 1 April 2020, AVDC now forms part of the new Buckinghamshire Unitary Authority and as such no longer exists as an authority in its own right. Data from AVDC still however provides the most up-to-date source of information for those areas immediately bordering the Borough boundary of Milton Keynes and as such provides the best source of data for comparison purposes with this area.

5.14 The assumptions used by Central Bedfordshire Council are outlined in the *Central Bedfordshire Council Local Plan (2015-2035) Strategic Housing Land Availability Assessment* (April 2018)), and are stated as, the assumed time taken from the registration of an outline application to first completions is 3 years and 6 months, whilst assumed time taken from registration of a detailed application to first completions is 2 years and 2 months. Both of which are longer time frames than those used by AVDC, again showing that consideration of local evidence in setting assumptions is essential.

#### **Local Evidence**

- 5.15 Whilst evidence from national studies and neighbouring authorities can be useful in formulating and checking assumptions on lead-in times, their lack of local focus does mean that the most reliable and useful data to review is that related to Milton Keynes. For the purposes of the Phasing Methodology, we have undertaken more detailed analysis of historic lead-in times for sites within the Borough by analysing the different stages of the delivery process on a large proportion of major residential development sites (and parcels of a site) which have delivered dwellings within the past 7 years (2014/15 2020/21). This has enabled a more detailed and robust understanding of how long sites take to come forward, specific to the Borough.
- 5.16 The full assessment of sites is outlined in Appendix 1, whilst some of the key findings are outlined below. Table 5.1 then outlines the lead-in time assumptions that will be used for the purposes of the 2021 assessment. The assessment sought to look separately at strategic sites, non-strategic sites that had followed the route of obtaining outline permission followed by REM approval, and finally smaller sites which obtained FUL permission. For 2021 we have also reviewed schemes which consisted solely of flatted development separately, as a number of these have now completed in Milton Keynes during the period of time for which data is being reviewed.

#### Strategic Sites (for the purposes of the Phasing Methodology this relates to sites of 2,000+ units)

- 5.17 With regards to strategic sites, the data outlined in Tables 1-3 of Appendix 1 shows that there is no real trend which relates to the time taken once outline permission has been secured through to the first completion. In Milton Keynes this has ranged from 18 months on part of the Strategic Land Allocation (SLA), to 40 months for the Eastern Expansion Area (EEA) and 95 months for the Western Expansion Area (WEA), albeit the timing of the later was significantly impacted by the economic crash in the late 2000's. Given the EEA, WEA and SLA all now have outline permission, parcels with REM approval, and are delivering units, it is not necessary to set an assumption for the period between outline and first completion for these strategic sites.
- 5.18 Within Plan:MK there are only two new strategic site allocations (East of the M1 Motorway and South East Milton Keynes), these will only be included within the five-year supply when there is clear evidence of their deliverability, including evidence relating to the timescales associated with their delivery, and as such expected progress will be informed by site specific information only.
- 5.19 In terms of the time taken for the first completion on a parcel of a strategic site once it has REM approval, Table 7 of Appendix 1 shows the average time in Milton Keynes is approximately 13 months and this is consistent over time and over all currently active strategic sites. Albeit there are examples where this period can be as low as 4 months.

#### Non-Strategic Sites(for the purposes of the Phasing Methodology this relates to sites of less than 2,000 units)

- 5.20 For non-strategic sites which currently only have an allocation, but do not yet have a planning permission approved, no site will be included within the five-year period unless site specific information provides evidence of progress and demonstrates there is a realistic prospect that housing will be delivered on the site within the five-year period. The lead-in times related to these sites will only be based on site specific evidence, if this is not available, then the site will be deemed undeliverable. As such, an assumption for the period of time between allocation and first completion is not provided.
- 5.21 For sites which have achieved outline permission, the assessment outlined in Table 4 of Appendix 1, shows an average of 35 months (up from 31 months in the 2020 Phasing Methodology) from outline approval to first completion. This includes a range of smaller standalone sites, as well as the larger sites of Oakgrove and Newton Leys. This can also be compared with the separate sites which make up the SLA, which average 38 months; the slightly longer period likely being due to the nature of the SLA, whereby each site was under different ownership and a number of equalisation issues had to be resolved as part of the planning process. It should however be noted that the evidence does show this can be achieved in a much shorter time period (e.g. Land of Castlethorpe Road only took 12 months, whilst Oakgrove, a substantial site of 1,105 dwellings only took 19 months).
- 5.22 These average timings also align with the findings of *Lichfields (2016 and 2020)* which showed national averages of 2-3 years and 1.9-2 years, depending on site size, and *Savills (2014)* which outlined averages of 3 years, or 18 months 2 years for sites post 2010. They are also comparable with those of our neighbouring authorities.
- 5.23 From the grant of detailed planning permission (FUL or REM) to first completion, the data outlined in Tables 4 and 5 of Appendix 1, shows that there is very minimal difference in this time period between sites which have achieved FUL permission and those which have followed the route of Outline permission and REM approval. As outlined in Table 7 of Appendix 1 the average across these sites is approximately 15 months, albeit the evidence does show this can be achieved in as little as 5 months. Again, these averages align with those in the *Savills (2014)* report and the assumptions used by our neighbouring authorities.
- 5.24 Finally, it should be noted that despite the range of sites which were assessed little correlation was found to enable any further distinctive assumptions to be made, for example on differences between greenfield and brownfield sites or on further splits in relation to site size.

#### Single Flatted Only Development

- 5.25 In recent years Milton Keynes has seen an increase in the number of residential developments that consist of a single flat or apartment block (this is not including developments which relate to prior notification change of use from office to residential) that are being permitted; a large majority of these schemes are located within Central Milton Keynes. With the first of these developments starting to complete, we decided, for the 2021 assessment, to start reviewing lead-in times and build-out rates of these developments as a separate entity, especially given the different nature of how they are developed compared to those schemes made up of houses and/or smaller apartment blocks.
- 5.26 As completions on developments that consist of one flat block will all be registered at once, as opposed to being delivered in stages across a number of years, this therefore elongates the time between the

- granting of detailed approval and the first completion compared to that seen on developments which predominantly consist of houses; the timescale is essentially the time taken from approval to completion of the whole scheme, rather than the first unit. As such, it is only necessary to review the different lead-in times on these developments to understand their full delivery timetable.
- 5.27 Table 6 of Appendix 1 outlines the lead-in and build-out times for four completed developments of this nature in Milton Keynes in recent years and shows an average time of 38 months taken from the grant of detailed approval to full completion of the scheme; this is however skewed by one result within the data set which appears anomalous and, without its inclusion would reduce the average to only 30 months. The data also does not seem to suggest any correlation between the delivery time and the size of the development, given the largest scheme reviewed did not present the longest build-out time.
- 5.28 Given the sample of developments reviewed remains low and does not necessarily, at this stage, indicate anything more definitive in terms of average delivery times, we have decided not to set an assumption for the delivery times of these types of development for the purposes of the 2021 assessment however, the data analysed will be taken into account when considering projected delivery of these developments within the 2021 5YHLS Assessment. With more of these types of development coming forward in Milton Keynes, we will continue to review them separately and build-on the data and information we have for future reviews of this Phasing Methodology.

#### **Lead-in Time Assumptions for Milton Keynes 2021**

- 5.29 Taking account of the above information, a set of Lead-in Time assumptions have been derived for use in preparing the 2021 5YHLS Assessment and trajectory. The assumptions, as outlined in Table 5.1 draw heavily on the conclusions of our analysis of local delivery evidence, as well as that of national studies and neighbouring authorities, all of which show a good correlation.
- 5.30 Further notes on how these assumptions will be used are outlined below, but It must however be noted that these assumptions will not be applied rigorously, but rather as a broad-brush approach, with site specific information providing the main source of evidence to ensure lead-in times are tailored specifically to each site which is deemed deliverable.

**Table 5.1: Lead-in Time Assumptions** 

Status of Site at 1 April 2019	Lead-in Time to first completion
Strategic Sites	
With REM Approval	13 months
Non-Strategic Sites	
Outline Planning Permission	30 Months
Detailed Planning Permission (FUL or REM)	15 Months

#### Notes on the application of Lead-in Time Assumptions

1. The lead-in time is applied from the date at which the extant permission for the site was granted.

- 2. No lead-in time will be applied to sites which, through recent monitoring, have been recorded as being under construction (i.e. dwellings have been recorded as started). These sites have effectively 'used up' their lead-in time.
- 3. For sites with outline permission, the period of time of 30 months includes the 15 months from REM approval to first completion, this period is not in addition to the 30 months.
- 4. For allocated sites whereby the Council is aware that the site is developable and that progress towards delivery has been made, however the evidence provided suggests it is unlikely or questionable as to whether the site will deliver housing within the five-year period, these sites will have had their lead-in times increased accordingly and will not feature within the five-year period.
- 5. On larger strategic sites which have a large Outline permission and numerous parcels with detailed permission which are already delivering, a wider view of the entire site will be taken when applying assumptions on lead-in times, and when sense checking information provided by developers/housebuilders, for future parcels. For example, the lead-in times for a parcel which has recently received detailed permission may be elongated if it is felt that due to the number of parcels already delivering on the wider site, it is unlikely to come forward within the 13-month period.

#### 6. Build-Out Rates

- 6.1 For all sites within our housing trajectory, the Council seek to obtain regular updates on projected build-out rates through ongoing communication with developers, housebuilders, landowners, and agents. On at least an annual basis, we also request the completion of a site-specific Statement of Common Ground (SoCG) or pro-forma for each site from the relevant body. Where this information is provided we will use this alongside an analysis of recent delivery on the site (or, where delivery is yet to start on the site, analysis of similar sites within the area) and a sense check against our assumptions for build-out rates, to populate the projected annual delivery rate for the site moving forward.
- 6.2 Where site specific information on build-out rates has not been provided for the assessment which is being prepared, but the site is considered deliverable, we will take into account: any previous site-specific information that has been submitted; the number of units under construction at the start of the year; recent build-out rates achieved on the site and performance against previous projections; and, consideration against a set of build-out rate assumptions, specifically derived for the Borough, as set out in Table 6.4
- 6.3 The build-out rate assumptions, as outlined in Table 6.4 have been developed taking into account a range of data sources and evidence including build-out rates that have been achieved in Milton Keynes in recent years (as recorded by our quarterly housing monitoring process), evidence from national studies, and consideration of build-out rate assumptions applied by our immediate neighbours. A review of each of these evidence sources is outlined below.

#### **National Studies**

- 6.4 With regards build-out rates, few of the recognised national studies provide an assessment across the full range of site sizes, instead tending to focus on large scale development; furthermore, the findings of a number of these studies seek to outline an average annual build-out rate which applies across the board to all sizes of sites assessed. For example, *Savills (2014)* assessed 84 sites varying in size from 500 dwellings to 3,000+ dwellings but reports that annual delivery can be anticipated to be around 60 units in first year of construction, picking up to more than 100 units per annum in subsequent years and increasing to around 120 units. This does not however consider differences that may occur across the sites of differing sizes.
- 6.5 Furthermore, the Savills (2014) report goes on to state that "We are aware of many urban extensions in the south of England where recent delivery rates have been substantially in excess of 120 units per annum". Indeed, the report specifically outlines the Milton Keynes Eastern Expansion Area as one of these sites, referencing the competition from multiple developers on site as being a reason behind this. Therefore, whilst the Savills report does not provide much assistance in proving a range of annual build-out rates, its recognition of sites within Milton Keynes which are delivered by multiple housebuilders is useful. This approach is still applied to the Western and Eastern Expansion Areas and the Strategic Land Allocation and will most likely also apply to the more recently allocated sites East of the M1 Motorway and South East Milton Keynes. The recognition that the approach to delivering these larger sites within Milton Keynes leads to higher delivery rates than the average outlined within the Savills (2014) report is also supported by the work of Lichfields (2016 and 2020) and is clearly borne out in the review of local

- evidence, as outlined below in Table 6.3, and therefore must be considered when formulating assumptions for sites of this size in Milton Keynes.
- 6.6 Similarly, the Letwin review (*Independent Review of Build Out Final Report* (October 2018) and *Draft Analysis* (July 2018)), whilst providing some useful discussion and conclusions, does not provide any average annual build-out rates, instead outlining the median percentage of a site built out per year, based on a review of 15 large sites, which included the Western Expansion Area of Milton Keynes. This found that across these sites the average median percentage of a site build out in a year was 6.5%. Applied to Area 10 of the Western Expansion Area, a site of 4,320 dwellings, this would lead to an average annual rate of 281 units. As outlined in the local evidence in Appendix 2, this rate and above has been achieved in the past 3 years but is above the average annual rate for the first 5 years of delivery on the site, which stands at 211dpa.
- 6.7 Reviewing this against Brooklands in the Eastern Expansion Area, a site of 2,501 dwellings which has been delivering for a longer period of time, using the Letwin Review percentage would lead to a build-out rate of 163dpa, whereas local evidence as outlined in Appendix 2 shows the average annual build out rate has been substantially higher at 239dpa.
- 6.8 For the purposes of build-out rates, the Letwin Review also used projected data, alongside actual delivery data, provided by developers and Local Planning Authorities to establish this position. This approach is often criticised as it is not founded upon evidence of actual delivery, with many viewing the build-out percentage as being too high as a result. Local evidence in Milton Keynes however shows that actual historic delivery on large sites in Milton Keynes does vary from the Letwin percentage but not always resulting in a lower figure. Indeed, the only example of a large site that has been developing for a number of years in Milton Keynes, the Eastern Expansion, shows an average median percentage of site build out in a year of 7.1% since first completions were recorded in 2008/09.
- 6.9 Two studies that have looked in more detail at a range of site sizes and have provided a more detailed breakdown of average annual build-out rates are the Colin Buchanan report, 'Housing Delivery on Strategic Sites' (2005) and the two prepared by Lichfield's (2016 and 2020). Whilst the Buchanan report is now 15 years old and provides evidence that pre-dates the recession, the two Lichfield reports provide up-to-date evidence and are well regarded sources of information.
- 6.10 Both Lichfield's reports seek to outline the same information and the 2020 report acts as an update to the original 2016 report, whilst also adding further sites to the assessment. The average annual build-out rates for sites of differing sizes from both reports are outlined in Table 6.1.

Table 6.1: Average Annual Build-Out Rates (taken from Lichfield's 2016 and 2020 reports)

Site Size (Dws)	NLP 2016 (Annual Build-out	NLP 2020 (Annual Build-out
	Rate)	Rate)
Sites less than 100	27	22
Sites 100 to 499	60	55
Sites 500 to 999	70	68
Sites 1,000 to 1,499	117	107
Sites 1,500 to 1,999	129	120
Sites 2,000 +	161	160

- 6.11 As outlined in the 2020 report, whilst the trend is for average annual build-out rates to have dropped between 2016 and 2020, there is little difference observed. Furthermore, as both reports highlight, the figures presented are averages and there are examples of sites which deliver significantly higher and lower than these averages, both overall and in individual years. Indeed, the Eastern Expansion Area in Milton Keynes is highlighted as a key example, whereby both the peak annual build-out rate (473 dwellings) and the average annual build-out rate (268dpa) are significantly above the average identified in the study.
- 6.12 It should also be noted that alongside the Eastern Expansion Area, two further large sites in Milton Keynes formed part of the 2020 assessment. This included 'Oxley Park (East & West)', a site of 1,300 dwellings which was built out over 8 years and delivered at an average of 145dpa; 38 dwellings a year more than the average for a site of this size (107dpa) as outlined in the 2020 report. The second site, 'Broughton (Broughton & Atterbury)', a site of 1,200 dwellings which was built out over 7 years, delivered at an average of 171dpa; 64 dwellings a year more than the average.
- 6.13 The local evidence outlined in Table 6.3 and Appendix 2 also provides further evidence that sites of greater than 2,000 dwellings in Milton Keynes are delivering at a higher annual rate than presented in the Lichfield's reports; an average of 208 units compared to 160 units. Local evidence on smaller sized sites does however generally appear to conform relatively well with Lichfields analysis; for example, large sites up to 2,000 dwellings in Milton Keynes are delivering on average at between 130dpa and 140dpa, compared to 120dpa in the Lichfields 2020 report and 129dpa in their 2016 report.
- 6.14 Similarly, on sites up to 500 dwellings, the highest average in Milton Keynes is 41dpa, compared with 55dpa and 60dpa in the 2020 and 2016 Lichfield reports respectfully. This provides a good sense check for the local Milton Keynes evidence, but also supports the view as outlined in paragraphs 3.6 to 3.9 that it is essential that local evidence on delivery is considered alongside general assumptions from national studies, so as local differences can be recognised.
- 6.15 The Lichfield reports also outline a number of other points which are useful considerations both generally and in relation to Milton Keynes specifically.
- 6.16 In relation to Milton Keynes, both reports and the Savills (2014) report outline that it is widely recognised that the planning and delivery of large-scale housing sites in Milton Keynes is distinct from many other areas. Through the Milton Keynes model, serviced parcels with roads and key infrastructure already provided are delivered so as multiple house builders are able to proceed straight onto the site and commence delivery on different serviced parcels. This has been found to limit the upfront site works required and boost the annual build rates. Most 'large' sites and all 'strategic' sites within the housing supply are being, or will be, delivered by multiple housebuilders across a number of parcels, using this same model; once again enabling a higher than average delivery rate to be realised. For example, during 2019/20, the Western Expansion Area, Area 10 had twelve active parcels under five different housebuilders and delivered 341 dwellings.
- 6.17 The Lichfield reports also outline that where 30% or above affordable housing is proposed on a site the build rates are at the higher end of the national average. Plan:MK requires sites to provide a minimum of 31% affordable housing, whilst the Western and Eastern Expansion Areas and all elements of the Strategic Land Allocation have all been granted outline permission based on the provision of 30% affordable housing.

#### **Neighbouring Authorities**

6.18 As part of the process of establishing appropriate build-out rate assumptions for Milton Keynes, a review of the assumptions used by some of our immediate neighbouring authorities has been undertaken; for the reasons outlined in paragraph 5.12, AVDC and CBC have been reviewed. This allows for both a comparison of delivery performance with Milton Keynes and also a sense check of the assumptions we are proposing.

#### Aylesbury Vale area of Buckinghamshire Council

- 6.19 Whilst the most recent 2019/20 5YHLS assessment for AVDC does refer to build-out rate assumptions used by the Council, there is no document where these are specifically set out.
- 6.20 The January 2017 Housing and Economic Land Availability Assessment which was used for preparing the Vale of Aylesbury Local Plan and submitted for the purposes of its ongoing examination, outlined that build-out rates depended on the location of the site and the settlement size, setting out for example that large sites in Aylesbury and Buckingham are considered to be able to deliver 200dpa, but sites over 50 dwellings in larger villages are considered to deliver more like 20dpa. It states that these are seen as "general conservative assumptions based on past delivery rates".
- 6.21 The 2019/20 5YHLS assessment does however suggest more varied rates, stating that sites in Aylesbury deliver approximately 175dpa, sites in Buckingham 100dpa and sites in villages 30dpa; no details around how these assumptions are applied, or to what size of sites they are applied, are however provided.

#### Central Bedfordshire Council

6.22 For CBC the most up-to-date source of evidence outlining the assumptions they use with regards to build-out rates can be found within the *Central Bedfordshire Council Local Plan (2015-2035) Strategic Housing Land Availability Assessment (April 2018).* The assumptions, as outlined in Table 6.2, are average annual expected completions based on delivery rates from all sites of 10 or more dwellings over the previous three-year period. The figures do however discard the first and last years of a site's delivery as these do not represent a full 12 months.

Table 6.2: Average annual delivery rates on sites in Central Bedfordshire over 3-year period 2015-2018

Site size	Annual average dwellings delivery
10-20	Completed in 1-2 years
21-50	21
51-100	44
101-200	46
201-500	87

#### **Local Evidence**

- 6.23 As outlined previously in this Phasing Methodology, whilst evidence from national studies and neighbouring authorities can be useful in formulating and checking assumptions on build-out rates, the most reliable and useful data is that related to Milton Keynes. For the purposes of the Phasing Methodology, we have therefore undertaken more detailed analysis of historic build-out rates within the Borough by analysing delivery rates on every major residential site (and parcel of a site) which has delivered dwellings, for the past 7 years (2014/15 2020/21). This enables a more detailed and robust understanding of delivery specific to the Borough.
- 6.24 The full assessment of each site can be found in Appendix 2 of this Phasing Methodology, whilst the summary of the average annual build-out rates and average peak annual build-out rates are outlined in Table 6.3. The table is broken down by site size; the site sizes used were chosen due to noticeable trends within the data set. Discussion relating to some of these trends and the data analysed is also outlined below. As the assessment carried out for 2021 Phasing Methodology has included the most recent 2020/21 monitoring data, Table 6.1 also outlines the figures that were presented in the 2020 Phasing methodology, so as a comparison can be made.

Table 6.3: Average Annual Build-Out Rates of all sites within Milton Keynes between 2014/15 and 2019/20

Site Size (Dws)	Average Annual Build-out Rate (dpa) 2020	Average Annual Build-out Rate (dpa) 2021	Average Peak Build-out Rate 2020	Average Peak Build-out Rate 2021
Small: 10-50	14	15	16	18
Medium: 50-200	43	43	56	57
Large: 200-500	48	41	55	54
Extra-Large: 500- 2,000	140	128	200	200
Strategic: 2,000 +	204	208	311	333
Parcels on Extra-Larg	e and Strategic Sites			
Parcels >200	69	68	92	98
Parcels <200	38	38	48	57

#### Notes on analysis of local evidence

1. For this research, all sites that delivered completions within the 7-year period were used in the assessment, including larger sites (or parcels) which may have only shown deliveries in one year. In some of these cases, where it is the first or last year of completions on a site, these most likely do not represent a full year of completions and as such their inclusion does potentially skew the average annual build-out rate, making it more conservative. A number of national studies seek to remove these from their analysis so as to get an average for when the site is delivering at its best. These years have however been left in our analysis so as to ensure the data is as realistic as possible and is not reflected in a manner which would be deemed as overly optimistic.

- 2. The addition of 2020/21 completions data to the assessment has made limited difference to the average annual build-out rates across all site sizes. The largest differences come in the 'Large' and 'Extra-Large' site types which have seen a reduction by 7dpa and 12dpa respectively. The reduction in 'Large' sites is largely due to the inclusion of Eaton Leys for the first time, which has only started delivering in 2020/21 and for which delivery rates are expected to rise; and, due to the Canalside Marina site at Campbell Park delivering no units in 2020/21 this is due to the nature of the site which consists of a number of flat blocks and, as such, will have a staggered delivery timetable as opposed to a consistent delivery of units. It is therefore likely that in the 2022 Phasing Methodology, data will show a rise again in the delivery rates for 'Large sites'. The reduction in rates for 'Extra-Large' sites is almost solely due to the completion of the final 6 units at Oakgrove which, as outlined in the Notes to Table 4 of Appendix 2, has created a skew in the data which would see the data average at 137dpa instead of 128dpa if it were not included, much closer to the average build-out rates for this site type presented last year. It should also be noted that across almost all site sizes, the Average Peak Build-Out rate has risen from that outlined in the 2020 Phasing Methodology.
- 3. With regards to 'Large' sites, the data set analysed does not provide much information on sites of this size which are split into a number of parcels. For those sites of this nature for which data was available during the period analysed (Kingsmead South and NEA Rocla Pipes), it also captures the site at the start or end of its delivery. As such the data does not provide much of a delivery picture for how 'Large' sites split into parcels may come forward. For example, for Kingsmead South in the year 2019/20 when two parcels were fully active, the site delivered 131 dwellings, substantially higher than the average 49.6 dwellings per annum that analysis of the full data set has outlined. The same can be said for the NEA Rocla Pipes site in 2014/15, the only year where more than one parcel was delivering. As such an average annual delivery rate of 41dpa may be considered low for a site of this size which has more than one active parcel.
- 4. Given Milton Keynes' history as a new town, the large majority of sites reviewed (and indeed future development sites within the housing trajectory) are greenfield sites. The completions data reviewed does however contain a range of brownfield sites that have been delivered in recent years and, as there is no discernible difference in the delivery rates between greenfield and brownfield sites analysed, the assessment has not sought to split the data further under these headings.

#### **Build-out Rate Assumptions for Milton Keynes 2020**

- 6.25 Taking account of the above information, a set of build-out rate assumptions have been derived for use in preparing the 2021 5YHLS Assessment and trajectory. The assumptions, as outlined in Table 6.4 draw heavily on the conclusions of our analysis of local delivery evidence, as this provides the best data for understanding how different sites deliver within Milton Keynes. Furthermore, with the exception of those outlined for 'strategic' sites, the assumptions set out in Table 6.4 align well with the average build-out rate data set out in national studies, particularly the *Lichfield (2016 & 2020)* reports, and fall below those used in neighbouring authorities.
- 6.26 With regards to 'strategic' sites, whilst the assumption used here is above the average build-out rate for sites of this size outlined within national studies, these national studies, as discussed in paragraphs 6.11, 6.12 and 6.16, recognise Milton Keynes' ability to deliver at higher rates than the national average on large sites and this is further supported by local evidence of a higher average build-out rate. Indeed,

whilst the build-out rate assumption for 'strategic ' sites set here is slightly above that outlined in the local evidence in Appendix 2, it still remains below the average annual build-out rate seen on the Eastern Expansion Area and is substantially lower than the figure of 300dpa which was used in the 2019 Phasing Methodology. Furthermore, with the addition of 2020/21 completions data to the local data analysed, the average build-out rates for 'strategic sites' showed an increase to 208dpa compared to 204dpa as outlined in the 2020 Phasing Methodology (as highlighted in Table 6.3).

- 6.27 Table 6.4 also displays the Potential Annual Yield Assumptions outlined in the 2020 Phasing Methodology so as to demonstrate where we have made changes to the assumptions to be used for preparing the 2021 5YHLS Assessment and trajectory.
- 6.28 We have made reductions to two site types, 'Large with one parcel' (reduced by 5 to 40dpa), and 'Extra-Large' (reduced by 5 to 135). Both changes have been made to reflect the reduction seen in local data following the addition on 2020/21 completions. Whilst the reduction for 'Large' sites mirrors that seen in Local data, the reduction in 'Extra-Large' sites has only been reduced by 5dpa rather than the 12dpa seen in local data. This is because of the skew it is felt that the final completions from the Oakgrove site had on this data set, as outlined above in Point 2 of the 'Notes on analysis of local evidence'.

**Table 6.4: Build-Out Rate Assumptions** 

Site Size (Dws)	Potential Annual Yield Assumption (dpa) 2021	Potential Annual Yield Assumption (dpa) 2020
Small: 10-50	15	15
Medium: 50-200	40	40
Large: 200-500 with one parcel	40	45
Large: 200-500 with two parcels	70	70
Extra-Large: 500-2,000	135	140
Strategic: 2,000+	220	220
Parcels on Extra-Large and Strategic	Sites	
Parcels >200	70	70
Parcels < 200	35	35

#### Notes on the Application of Build-Out Rate Assumptions

1. The assumptions outline the average annual build-out rate for the development across the entirety of its lifetime. They are not a yearly maximum and, for most sites, particularly those of 'medium' scale and above, the rate will not necessarily be applied uniformly across each year of the sites delivery. Many sites will have lower completions in early and later years to reflect that not every year of a development will see a full year of completions (e.g. a site may provide its first completion halfway through a year). Furthermore, 'Extra-Large' and 'Strategic' sites may also experience peaks and troughs in delivery in relation to the number of outlets delivering, the disposal of parcels, and the stage at which any reserved matters applications are at. Where we have evidence that this could potentially occur, the build-out rates applied will attempt to reflect these delivery cycles.

- 2. For 'Extra-Large' and 'Strategic' sites whereby numerous parcels are projected to be delivering at the same time, the build-out rates of individual parcels may be reduced below the assumed build-out rate for that parcel size, so as the potential annual yield of the wider site does not exceed its build-out rate, unless site specific evidence and monitoring information has been provided that demonstrates this is achievable.
- 3. Projected average annual build-out rates for a specific site that exceed those in Table 6.4, may still be applied in circumstances where evidence has been provided by the housebuilder/developer of the site and, following sense checking by Council officers, the rates are felt to be realistic and deliverable, particularly where recent delivery rates on the site show it to be achievable.
- 4. In applying the assumptions, or using them to sense check information, consideration will also be given to other factors that may influence the build-out rate of a site, for example, on a larger site, how many parcels/outlets are currently active on the site, how many other parcels does the housebuilder have on the same site and how has the wider development, and the relevant parcel and housebuilder, performed in recent years.
- 5. For sites which contain blocks of flats/apartments, whether entirely, or as a part of the development, this will be taken into consideration. As a block of flats/apartments will be completed in its entirety rather than in stages, the projected completions will be shown at the end of the site's delivery period. If the site contains a number of blocks of flats, the Council will seek to obtain phasing data for each block and apply build-out rates that take these into account.

#### **Slippage Discount**

- 6.29 For the purposes of our 5YHLS position, we have, in the past, applied a 10% discount to the housing supply of all sites where completions (of any quantity) were profiled in year 5 of the five-year period. This discount was applied as an allowance for unforeseen potential slippage in the expected delivery of sites.
- 6.30 As outlined in our submitted proofs of evidence for two S78 appeals heard during 2019/20<sup>9</sup>, it is our view that the application of a generic discount to the housing supply is no longer deemed appropriate or necessary as it does not align with the approach required of the NPPF and PPG to provide clear site-specific evidence of delivery. It is our view that where a site is included for delivery within the five-year period it is done so only because there is clear evidence, following an assessment of each individual site, to demonstrate a realistic prospect that housing completions of the level outlined, will be delivered on the site within five years. It was therefore proposed that we would not apply this 10% discount for future 5YHLS assessment.
- 6.31 The Inspectors at both aforementioned appeals concluded that there was no requirement within the NPPF or PPG to apply a discount to the housing supply to account for either potential slippage or lapse, or indeed for optimism bias and, the Inspector at the Cranfield Road appeal went further in his

<sup>&</sup>lt;sup>9</sup> APP/Y0435/W/19/3234204 – Rectory Farm, Bow Brickhill, and; APP/Y0435/W/17/3169314 – Land to east of Newport Road and to the east and west of Cranfield Road, Woburn Sands.

- conclusion that a discount was not required, by outlining that the detailed assessment of sites undertaken by the Council in his view reduces uncertainty within the housing supply.
- 6.32 In light of the Inspectors' conclusions at these appeals, the absence of national policy or guidance requiring the application of a discount, and the detailed site-specific assessment we undertake in preparing our 5YHLS position (as outlined in this phasing methodology), we will not be including a generic discount to the housing supply element of the assessment.

## 7. Conclusions

- 7.1 For the purpose of assessing housing delivery we will continue to implement the robust processes in place to secure direct information on a site-by-site basis, both through continual monitoring and engagement, as our primary source of evidence to demonstrate deliverability.
- 7.2 This phasing methodology adds another layer to this process by providing a set of locally specific, assumptions and parameters to sense check site specific data and to assist in projecting delivery on sites whereby the level of site-specific information is not as detailed. Furthermore, the methodology adds further transparency to the process undertaken by Council officers in preparing our annual assessment of 5YHLS.
- 7.3 The processes and assumptions outlined within this document will continue to be reviewed every year to ensure they are fit for purpose and reflect any changes that impact upon housing delivery at both a national and local level.
- 7.4 As a whole, we consider this approach provides the 'clear evidence' needed to assess housing delivery within the five-year period, as required by the NPPF and PPG.

# **Appendix 1: Milton Keynes Lead-in Times**

- Table 1: Strategic Site Western Expansion Area
- **Table 2:** Strategic Site Eastern Expansion Area (Brooklands)
- **Table 3:** Strategic Site Strategic Land Allocation (SLA)
- Table 4: Non-Strategic Sites with Outline permission
- **Table 5:** Small to Medium sized sites with FUL permission
- Table 6: Single Flatted Only Developments
- **Table 7:** Average lead-in times from grant of detailed permission

Table 1: Strategic Site - Western Expansion Area

Ref	Area and Site Name	Total dws	Green/Brown	OUT Approval	Full Approval	First Comp	Detailed to Comp	
							(Months)	
05/00291/MKPCO	WEA AREA 10 - WHITEHOUSE	4320		Oct-07	Apr-15	Sep-15		OUT to first Comps = 95 months
14/02385/REM	AREA 10.1 PARCEL F	61		Oct-07	Apr-15	Sep-15	5	
14/02383/REM	AREA 10.1 PARCELS A AND B	121	Greenfield	Oct-07	Jul-15	Apr-17	21	
15/00499/REM	WEA 10.3 PARCELS C1 B1 F R J G N AND P	217	Greenfield	Oct-07	Oct-15	May-17	19	
15/01368/REM	WEA PARCEL 10.3A PART 2	85	Greenfield	Oct-07	Nov-15	Jan-17	14	
15/02532/REM	WEA AREA 10.1 PARCEL I	34	Greenfield	Oct-07	Jan-16	Oct-19	45 <sup>1</sup>	
15/02630/REM	WEA AREA 10.3 BELLWAY PHASE 1	230	Greenfield	Oct-07	Feb-16	Jan-17	11	
16/01457/REM	WEA PARCEL 10.1E	114	Greenfield	Oct-07	Aug-16	Dec-17	16	
16/02817/REM	PARCELS 10.1 C AND D	129	Greenfield	Oct-07	Mar-17	May-18	14	
17/00164/REM	WEA PARCEL 10.1G	111	Greenfield	Oct-07	Apr-17	Apr-18	12	
17/00248/REM	WEA PARCEL 10.3A PART 1	50	Greenfield	Oct-07	Jul-17	Oct-18	15	
17/03408/REM	PARCEL 10.1H RE-PLAN	64	Greenfield	Oct-07	Mar-18	Oct-19	18	
18/00726/REM	PARCELS 10.3G PARTS 1 AND 2	146	Greenfield	Oct-07	Jul-18	Oct-19	15	
18/01724/REM	WEA 10.1 TO 10.3	129	Greenfield	Oct-07	Oct-18	Oct-19	12	
19/01330/REM	PARCEL 10.2 A,G & H	152	Greenfield	Oct-07	Sept-19	Dec-20	15	
						Average	17	
06/00123/MKPCO	WEA AREA 11 - FAIRFIELDS	2220	Greenfield	Oct-07	Feb-15	Jun-15		OUT to first Comps = 92 months
,				1100		13 25		=
14/01316/REM	WEA AREA 11 PARCELS 3A 4A AND PART 3B	144	Greenfield	Oct-07	Feb-15	Jun-15	4	
14/01790/REM	WEA AREA 11 PARCELS 4B 5C AND PART 3B	262	Greenfield	Oct-07	Aug-15	Apr-16	8	
15/03045/REM	WEA AREA 11 PARCELS 6A 6B AND 6C	216	Greenfield	Oct-07	Apr-16	Jun-17	14	
16/03133/REM	AREA 11 PARCELS 2B 2C 5A 5B 6D	241	Greenfield	Oct-07	Jan-17	Apr-18	15	
17/01669/REM	FAIRFIELDS PHASE 5	240	Greenfield	Oct-07	Sep-17	Nov-18	14	
19/01494/REM	FAIRFIELDS PHASE 6	317	Greenfield	Oct-07	Sept-19	Sept-20	12	
						Average	11	

1 – 'WEA Area 10.1 Parcel I' is a small parcel which has been used by Abbey Homes as their works compound whilst delivering the units on the adjacent parcels for which they also have control. It is therefore the last of their parcels that they began work on and as such this has led to the extended time between receiving detailed permission and first completion.

Table 2: Strategic Site – Eastern Expansion Area (Brooklands)

		Total		OUT	Full	First	Detailed to	
Ref	Area and Site Name	dws	Green/Brown	Approval	Approval	Comp	Comp (Months)	
06/00220/MKPCO	LAND AT BROOKLANDS	2501	Greenfield	Aug-07	Feb-10	Dec-10	8	OUT to first Comps = 40 months
13/01842/REM	BROOKLANDS BDW PHASE 1	197	Greenfield	Aug-07	Apr-14	Dec-14	9	
14/01069/REM	BROOKLANDS BDW PHASE 1B	427	Greenfield	Aug-07	Oct-14	Jun-15	8	
14/01896/REM	BROOKLANDS BDW PHASE 1C	58	Greenfield	Aug-07	Mar-15	Nov-15	8	
14/02883/REM	BROOKLANDS GATEWAY SITE	48	Greenfield	Aug-07	Jul-15	Jun-16	11	
15/01448/REM	BROOKLANDS BDW PHASE 1E	61	Greenfield	Aug-07	Oct-15	Nov-16	13	
15/01477/REM	BROOKLANDS BDW PHASE 1D	84	Greenfield	Aug-07	Jan-16	Oct-16	9	
16/00086/REM	BROOKLANDS BDW PHASE 2A	225	Greenfield	Aug-07	Jun-16	Jun-17	12	
16/00125/REM	BROOKLANDS SQUARE PHASE B	21	Greenfield	Aug-07	Nov-16	Apr-19	29	*Development entirely flatted
16/02695/REM	BROOKLANDS BDW PHASES 2B 3B 3C AND 4A	276	Greenfield	Aug-07	Dec-16	Oct-17	10	
16/03397/REM	BROOKLANDS BDW PHASE 3A 4B 5A 7A 7B	362	Greenfield	Aug-07	Feb-17	Apr-18	14	
16/02793/REM	BROOKLANDS SQUARE PHASE A & C	55	Greenfield	Aug-07	Feb-17	Apr-19	26	*Development entirely flatted
17/02553/REM	BROOKLANDS SQUARE PHASE D	46	Greenfield	Aug-07	Mar-18	Jun-19	15	
18/02664/REM	LAND AT BROOKLANDS	111	Greenfield	Aug-07	Feb-19	Oct-19	8	
						Average	13	*without two flatted developments = 10 months

1 – Completions on developments that consist of one flat block will all be registered at once as opposed to being delivered in stages across a number of years, this therefore elongates the time between the granting of detailed approval and the first completion (the timescale is essentially the time taken from approval to completion of the whole scheme, rather than the first unit) compared to that seen on developments which predominantly consist of houses. The data above has therefore been presented with and without the two flatted schemes included, so as to be clear on the impact they have on the overall averages. Further work has been done for this 2021 assessment to review lead-in times and build-out rates for flatted developments that come forward as standalone developments, as outlined below in Table 6.

Table 3: Strategic Site – Strategic Land Allocation (SLA)

Ref	Area and Site Name	Total dws	Green/Brown	OUT	Full	First	OUT to	Detailed to
				Approval	Approval	Comp	Comp	Comp (Months)
							(Months)	
HAYNES LAND	14/02167/OUTEIS - 385DWS	385	Greenfield	Apr-15	Jan-18	Mar-19	47	14
18/02183/REM	HAYNES LAND (Phase 3 Parcel B2) (Land West of EFS)	174	Greenfield	Apr-15	Dec-18	Jun-20		18
17/02483/REM	HAYNES LAND (Phase 2 Parcel D1) (Land West of EFS)	200	Greenfield	Apr-15	Jan-18	Mar-19		14
EAGLE FARM	13/02381/OUTEIS - 410DWS	410	Greenfield	Apr-15	Aug-17	May-18	37	9
17/01038/REM	EAGLE FARM (Phase 1 Parcel B1)	259	Greenfield	Apr-15	Aug-17	May-18		9
GLEBE FARM	13/02382/OUT - 1140DWS	1140	Greenfield	Apr-15	Mar-18	Jun-19	50	15
19/01268/REM	GLEBE FARM - Lot 1 Parcel A	198	Greenfield	Apr-15	Oct-19	N/A		N/A
19/01632/REM	GLEBE FARM - Lot 2 Parcel A	168	Greenfield	Apr-15	Sep-19	N/A		N/A
17/02883/REM	LAND AT GLEBE FARM (Phase 1) parcel D	160	Greenfield	Apr-15	Mar-18	Jun-19		15
18/02097/REM	LAND AT GLEBE FARM (Phase 2) Parcel C	225	Greenfield	Apr-15	Nov-18	Dec-19		13
20/00288/REM	GLEBE FARM LOT 1&2 PARCEL B	381	Greenfield	Apr-15	Jun-20	Mar-21		9
LAND SE OF ELMSWELL								
GATE	15/02768/OUT - 240DWS	240	Greenfield	Sep-17	Feb-18	Mar-19	18	13
17/03283/REM	LAND SE OF ELMSWELL GATE	191	Greenfield	Sep-17	Feb-18	Mar-19		13
18/03056/REM	LAND SE OF ELMSWELL GATE PHASE 2	49	Greenfield	Sep-17	Mar-19	N/A		N/A
							Average	13

Table 4: Non-Strategic Sites with Outline permission

Ref	Area and Site Name	Total dws	Green/Brown	OUT Approval	Full Approval	First Comp	OUT to Comp (Months)	Detailed to Comp (Months)
4.5.102.074.1053.4	DETLUCEN 25 AND 20 LONG STREET DOAD	42	6 6 11			5 47	22	10
16/02871/REM	BETWEEN 36 AND 38 LONG STREET ROAD	12	Greenfield	Mar-15	Jan-17	Dec-17	33	10
16/00533/REM	FORMER EMPLOYMENT ALLOCATION PHASE 1 <sup>1</sup>	33	Greenfield	May-14	Jan-17	Oct-19	65	33
17/03236/REM	LAND WEST OF HIGH STREET	36	Greenfield	Mar-16	Aug-18	Apr-19	36	8
15/00171/REM	SITE AT SHERWOOD DRIVE DEPOT	56	Brownfield	Feb-15	Apr-15	Oct-16	20	18
17/03385/REM	LAND OFF CASTLETHORPE ROAD	150	Greenfield	Dec-17	Jun-18	Dec-18	12	6
18/01608/REM	SITE SOUTH OF HALES FOLLY FARM	141	Greenfield	Mar-18	Oct-18	Oct-19	19	12
18/00799/REM	FORMER EMPLOYMENT ALLOCATION PHASE 2 <sup>1</sup>	33	Greenfield	May-16	Jan-19	Mar-21	58	14
19/01345/REM	LAND OFF OLNEY ROAD	95	Greenfield	Aug-16	Sep-19	Dec-20	37	15
18/00581/REM	FORMER LANDSCAPE GARDEN CENTRE	53	Brownfield	Jun-18	Jul-18	Mar-21	33	32
18/01306/REM	KINGS CLOSE	17	Brownfield	Feb-18	Nov-18	Sep-20	31	22
19/01412/REM	EATON LEYS	448	Greenfield	Jun-17	Jan-20	Sep-20	39	8
						Average	35	16
OAKGROVE	09/00618/OUTEIS - 1,105 DWS			Oct-11	Mar-12	May-13	19	14
11/02404/REM	OAKGROVE PHASE 1	231	Greenfield	Oct-11	Mar-12	May-13	19	14
13/01924/REM	OAKGROVE PHASE 2	112	Greenfield	Oct-11	Dec-13	Jan-15		13
14/00207/REM	OAKGROVE PHASE 3	279	Greenfield	Oct-11	May-14	Aug-15		15
12/00733/REM	MIDDLETON - NOON LAYER DRIVE	64	Greenfield	Oct-11	Sep-12	Jun-13		9
14/02178/REM	OAKGROVE PHASE 4	183	Greenfield	Oct-11	Dec-14	Nov-16		23
16/02523/REM	OAKGROVE PHASE 5	73	Greenfield	Oct-11	Dec-16	Apr-19		28
							Average	17
NEWTON LEYS	02/01337/OUT - 1,650 DWS			Jun-05	Jul-07	Jan-09	43	18
08/00233/REM	NEWTON LEYS PHASE 2	394	Greenfield	Jun-05	May-08	Jul-10	43	26
11/00851/REM	NEWTON LETS PHASE 2	75	Greenfield	Jun-05	Dec-11	Jun-12		6
12/02515/REM	NEWTON LETS PHASE 3A AND 3C	259	Greenfield	Jun-05	Jun-13	Apr-14		10
13/00224/REM	NEWTON LEYS PHASE 3B AND 3C  NEWTON LEYS PHASE 2 E2	63	Greenfield	Jun-05	Dec-13	Jun-14		7
12/00887/REM	NEWTON LEYS PHASE 4	194	Greenfield	Jun-05	Oct-14	Aug-15		10 21
16/03407/REM	NEWTON LEYS PHASE 3D	11	Greenfield	Jun-05	Mar-17	Nov-18		
17/01059/REM	PHASE 6 NEWTON LEYS	183	Greenfield	Jun-05	Aug-17	Jan-19		16
17/02143/REM	NEWTON LEYS, PHASE 5	248	Greenfield	Jun-05	Nov-17	Aug-19		21
19/01331/REM	NEWTON LEYS PHASE 7A	80	Greenfield	Jun-05	Sep-19	Dec-20		15
							Average	15

1 – The timescales associated with 'Former Employment Allocation Phase 1' and 'Former Employment Allocation Phase 1' are explained due to issues regarding gaining planning permission for Phase 2 of the scheme. Following approval of outline permission for Phase 1, outline permission was sought for Phase 2. The application for Phase 2 was refused and eventually planning permission was granted via appeal over 18 months later. At this stage, REM approval was submitted and granted for Phase 1, however submission of Phase 2 for REM approval was delayed due to on-site issues relating to flooding and the proximity to an Anglian Water Sewerage works on adjacent land. It is only once permission was granted for Phase 2 that work has begun on Phase 1 and Phase 2 delivery has relied on Phase 1 reaching a certain stage of completion. Overall, this led to a significantly longer time between outline permission, and REM approval, being granted and the first completion than is seen on any other site that has been analysed.

Table 5: Small to Medium sized sites with FUL permission

Ref	Area and Site Name	Total dws	Green/Brown	Full Approval	First Comp	Detailed to Comp (Months)
12/00186/FUL	LAND REAR OF 9 NEWPORT ROAD	10	Greenfield	Oct-12	Apr-14	18
12/00916/FUL	FORMER BT SITE	56	Brownfield	Jun-13	Apr-14	10
13/01117/FUL	GREENS HOTEL	35	Brownfield	Nov-13	Feb-16	27
13/01619/FUL	FORMER FIRST SCHOOL SITE	24	Brownfield	Mar-14	Dec-14	9
13/02328/FUL	LAND AT BEDGEBURY PLACE	40	Greenfield	Apr-14	Dec-14	8
13/00005/FUL	NAMPAK PHASE 4	95	Brownfield	Apr-14	Sep-14	5
15/00825/FUL	OXLEY PARK SITE 4A AND 5	131	Greenfield	Mar-16	Dec-16	9
16/00166/FUL	BLIND POND FARM	24	Brownfield	Jun-16	Feb-17	8
14/02799/FUL	LAND AT NETWORK HOUSE	73	Brownfield	Aug-16	Jun-17	10
16/01348/FUL	7 & 7A AYLESBURY STREET	14	Brownfield	Jan-17	Jan-18	12
16/03118/MKCOD3	18A ST GEORGES ROAD	10	Brownfield	Jan-17	Apr-19	27
16/01100/FUL	LAND WEST OF LILLESHALL AVENUE	24	Greenfield	Jan-17	Dec-17	11
16/02331/FUL	LAND TO THE SOUTH OF PENN ROAD	39	Greenfield	Feb-17	Dec-17	10
14/02425/FUL	LAND AT OUR LADY OF LOURDES CHURCH	11	Brownfield	Mar-17	Jul-18	16
15/02319/FUL	NAMPAK PHASES 5 & 6	81	Brownfield	Apr-17	Oct-18	18
16/00312/FUL	LAND REAR OF 90 EAST STREET	14		Apr-17	Jan-18	9
16/00349/FUL	FORMER ASTON MARTIN SITE	86	Brownfield	Apr-17	Sep-17	5
16/02904/FUL	2 WESTBURY LANE	10	Brownfield	May-17	Jul-18	14
16/01475/FUL	THE SUFFOLK PUNCH	27		Apr-18	Jan-19	9
18/00735/FUL	LAND OFF LADBROKE GROVE	26	Greenfield	Oct-18	Jan-20	15
17/00483/FUL	82-84 NREPORT ROAD	34	Brownfield	Jun-18	Dec-19	18
18/02584/FUL	LAND SOUTH OF MILLAND WAY	23	Greenfield	May-19	Sept-20	16
17/03224/FUL	LAND OFF LOWER END ROAD	14	Brownfield	Nov-18	Sept-20	22
					Average	13

**Table 6: Single Flatted Only Developments** 

Ref	Area and Site Name	Total Dws	Green/Brown	Full Approval	First Comp	Detailed to Comp
						(Months)
15/00670/FUL	ST GILES RESIDENTIAL HOME	52	Brownfield	May-16	Oct-18	29
15/00827/FUL	NORTH SECOND STREET SITE B1.1	24	Brownfield	Jan-16	Mar-21	62
16/03038/FUL	809-811 SILBURY BOLUEVARD	139	Brownfield	Mar-17	Jan-20	34
18/01280/FUL	LAND OFF LICHFIELD DOWN	50	Greenfield	Dec-18	Mar-21	27
					Average	38

Completions on developments that consist of one flat block will all be registered at once as opposed to being delivered in stages across a number of years, this therefore elongates the time between the granting of detailed approval and the first completion (the timescale is essentially the time taken from approval to completion of the whole scheme, rather than the first unit) compared to that seen on developments which predominantly consist of houses. The data for these sites which have been built out in recent years has therefore been displayed separately this year, so as to not to not skew the data for sites which are predominantly housing led and to try and start building a picture of the lead-in and delivery time for these types of development, which are becoming more prominent in Milton Keynes.

Table 7: Average lead-in times from grant of detailed permission

Site	Average time from FUL Permission/REM Approval to First Completion (Months)				
Strategic Sites with REM Approval					
WEA Area 10	17				
WEA Area 11	11				
Brooklands	13 (10 without flatted only developments)				
SLA Average	13				
Overall Average	13.5 (12.75 without flatted only developments)				
Non-Strategic Sites					
Non-Strategic Sites with REM	16				
Oakgrove	17				
Newton Leys	15				
Small to medium sites with FUL permission	13				
Overall Average	15.25				
Flatted Developments	38				

# Appendix 2 – Milton Keynes Build-Out Rates 2014/15 – 2020/21

Table 1: Small Sites 10-50 dwellings

Table 2: Medium Sites 50-200 dwellings

Table 3: Large Sites 200-500 dwellings

Table 4: Extra-Large Sites 500-2000 dwellings

**Strategic Sites: 2000+ dwellings** 

Table 5: Western Expansion Area

Table 6: Eastern Expansion Area

Table 7: Strategic Land Allocation

**Table 8:** Average Annual Build-Out Rates – Strategic Sites

Table 9: Average Annual Build-Out Rates – Parcels >200 Dws, on Extra-Large & Strategic Sites

Table 10: Average Annual Build-Out Rates – Parcels < 200 Dws, on Extra-Large & Strategic Sites

Table 1: Small Sites 10-50	dwellings	1			T	ı		T						
Area	Site	Ref	Total dws	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	Total dws built	No. Yrs	Average annual build- out	peak annual build out
<b>u</b>			-									1101 110		
BLETCHLEY	LAND TO THE SOUTH OF PENN ROAD	16/02331/FUL	39	0	0	0	12	27	0	0	39	2	20	27
BLETCHLEY	25 TO 27 AYLESBURY STREET	15/01872/FUL	14	0	0	0	14	0	0	0	14	1	14	14
BLETCHLEY	7 & 7A AYLESBURY STREET	16/01348/FUL	14	0	0	0	14	0	0	0	14	1	14	14
BLETCHLEY	18A ST GEORGES ROAD	16/03118/MKCOD3	10	0	0	0	0	0	10	0	10	1	10	10
BLETCHLEY	86-96 QUEENSWAY	16/03111/FUL	10	0	0	0	0	10	0	0	10	1	10	10
BOW BRICKHILL	BLIND POND FARM	16/00166/FUL	24	0	0	10	14	0	0	0	24	2	12	14
COFFEE HALL	LAND AT OUR LADY OF LOURDES CHURCH	14/02425/FUL	11	0	0	0	0	11	0	0	11	1	11	11
HANSLOPE/LONG STREET	BETWEEN 36 AND 38 LONG STREET ROAD	16/02871/REM	12	0	0	0	9	3	0	0	12	2	6	9
HANSLOPE/LONG STREET	LAND REAR OF 9 NEWPORT ROAD	12/00186/FUL	10	10	0	0	0	0	0	0	10	1	10	10
HEELANDS	THE SUFFOLK PUNCH	16/01475/FUL	27	0	0	0	0	18	9	0	27	2	14	18
KENTS HILL	LAND AT BEDGEBURY PLACE	13/02328/FUL	40	4	36	0	0	0	0	0	40	2	20	36
MONKSTON	LAND WEST OF LILLESHALL AVENUE	16/01100/FUL	24	0	0	0	2	22	0	0	24	2	12	22
MONKSTON PARK	LAND OFF LADBROKE GROVE	18/00735/FUL	26	0	0	0	0	0	6	20	26	2	13	20
NEWPORT PAGNELL	2 WESTBURY LANE	16/02904/FUL	10	0	0	0	0	10	0	0	10	1	10	10
OLNEY	LAND REAR OF 90 EAST STREET	16/00312/FUL	14	0	0	0	14	0	0	0	14	1	14	14
OLNEY	FORMER EMPLOYMENT ALLOCATION PAHSE 1	16/00533/REM	33	0	0	0	0	0	15	9	24	2	12	15
SHENLEY BROOK END	LAND AT FORMER FIRST SCHOOL SITE	13/01619/FUL	24	10	14	0	0	0	0	0	24	2	12	14
SHERINGTON	LAND WEST OF HIGH STREET	17/03236/REM	36	0	0	0	0	0	24	10	34	2	17	24
STACEY BUSHES	FORMER BRIAR LODGE	12/02258/OUT	13	13	0	0	0	0	0	0	13	1	13	13
WESTCROFT	WESTCROFT SITE 16	12/01179/REM	57	32	0	0	0	0	0	0	32	1	32	32
WOBURN SANDS	GREENS HOTEL	13/01117/FUL	35	0	3	23	9	0	0	0	35	3	12	23
WOLVERTON	FORMER SCRAP YARD MCCONNELL DR	12/00498/FUL	11	11	0	0	0	0	0	0	11	1	11	11
CENTRAL MILTON KEYNES	NORTH SECOND STREET SITE B1.1	15/00827/FUL	24	0	0	0	0	0	0	24	24	1	24	24
NEW BRADWELL	82-84 NEWPORT ROAD	17/00483/FUL	34	0	0	0	0	0	8	15	23	2	12	15
OLNEY	FORMER EMPLOYMENT ALLOCATION PHASE 2	18/00799/REM	33	0	0	0	0	0	0	11	11	1	11	11
OLNEY	LAND OFF LAVENDON ROAD	19/01345/REM	50	0	0	0	0	0	0	15	15	1	15	15
OXLEY PARK	LAND SOUTH OF MILLAND WAY	18/02584/FUL	23	0	0	0	0	0	0	23	23	1	23	23
WALNUT TREE	LAND OFF LICHFIELD DOWN	18/01280/FUL	50	0	0	0	0	0	0	50	50	1	50	50
WAVENDON	LAND OFF LOWER END ROAD	17/03224/FUL	14	0	0	0	0	0	0	14	14	1	14	14
WAVENDON	FORMER LANDSCAPE GARDEN CENTRE	18/00581/REM	53	0	0	0	0	0	0	3	3	1	3	3
WAVENDON	KINGS CLOSE	18/01306/REM	17	0	0	0	0	0	0	17	17	1	17	17
												AVERAGE	15	18

Average Build-Out Rate	15 DPA
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Area	Site	Ref	Total dws	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	Total dws built	No. years	Average annual build- out	Peak annual build- out
BLETCHLEY	SITE AT SHERWOOD DRIVE DEPOT	15/00171/REM	56	0	0	56	0	0	0	0	56	1	56	56
BLETCHLEY	FORMER BT SITE	12/00916/FUL	56	56	0	0	0	0	0	0	56	1	56	56
CAMPBELL PARK	BLOCKS 14A AND 14B	13/01113/REM	169	22	23	84	40	0	0	0	169	4	42	84
CENTRAL MILTON KEYNES	809 TO 811 SILBURY BOULEVARD	16/03038/FUL	139	0	0	0	0	0	139	0	139	1	139¹	139
HANSLOPE/LONG STREET	LAND OFF CASTLETHORPE ROAD	17/03385/REM	150	0	0	0	0	9	49	67	125	3	42	67
HANSLOPE/LONG STREET	SITE SOUTH OF HALES FOLLY FARM	18/01608/REM	141	0	0	0	0	0	7	52	59	2	30	52
LAVENDON	LAND OFF OLNEY ROAD	19/00212/REM	95	0	0	0	0	0	0	13	13	1	13	13
NEWPORT PAGNELL	LAND AT NETWORK HOUSE	14/02799/FUL	73	0	0	0	32	41	0	0	73	2	37	41
NEWPORT PAGNELL	FORMER ASTON MARTIN SITE	16/00349/FUL	86	0	0	0	11	65	10	0	86	3	29	65
OXLEY PARK	OXLEY PARK SITE 4A AND 5	15/00825/FUL	131	0	0	9	41	64	17	0	131	4	33	64
STONY STRATFORD	ST GILES RESIDENTIAL HOME	15/00670/FUL	52	0	0	0	0	52	0	0	52	1	52	52
WOBURN SANDS	NAMPAK PHASE 3	09/01516/FUL	112	23	0	0	0	0	0	0	23	1	23	23
WOBURN SANDS	NAMPAK PHASE 4	13/00005/FUL	95	19	48	14	14	0	0	0	95	4	24	48
WOBURN SANDS	NAMPAK PHASES 5 & 6	15/02319/FUL	81	0	0	0	0	11	44	26	81	3	27	44
												AVERAGE	43	57

Average Build-Out Rate 43 DPA
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1 – '809 to 811 Silbury Boulevard' was an entirely flatted scheme which, as is often the case for flatted schemes, completed all units in one year, hence the high average annual figure.

<b>A</b>	Cina	D.f	Takal daya	2044/45	2015/16	2016/17	2017/10	2010/10	2010/20	2020/24	Total dws	No.	Average annual build-	annual build-
Area	Site	Ref	Total dws	2014/15	2015/16	2016/17	201//18	2018/19	2019/20	2020/21	built	years	out	out
CAMPBELL PARK	CANALSIDE MARINA	17/00850/REM	383	0	0	0	0	0	49	0	49	2	25	49
BLETCHLEY	LEISURE CENTRE PHASE 2	09/01662/REM	211	35	47	36	50	0	0	0	168	4	42	50
EATON LEYS	EATON LEYS PHASE 1&2	19/01412/REM	448	0	0	0	0	0	0	38	38	1	38	38
KINGSMEAD SOUTH	12/01851/MKPCO - 450 DWS													
KINGSMEAD SOUTH	SITES 3 & 4 Part 1	17/00098/REM	107	0	0	0	0	3	48	16	67	3	22 <sup>1</sup>	48
KINGSMEAD SOUTH	SITES 1 & 2	15/00699/REM	206	0	0	7	33	50	83	8	181	5	36	83
												AVERAGE	29	66
			Annual Total	0	0	7	33	53	131	24	248		49.6	
ASHLAND	02/02139/OUT - 400 DWS													
ASHLAND	PHASE 2 AREAS A TO F	08/02023/REM		46	78	13	34	0	0	0	171	4	43	78
NEA ROCLA PIPES SITE	04/01174/MKPCO - 455 DWS													
NEA ROCLA PIPES SITE	NEA - ROCLA SITE 1	10/01274/MKPCR	136	30	0	0	0	0	0	0	30	1	30 <sup>2</sup>	30
NEA ROCLA PIPES SITE	NEA - ROCLA AREA 4	12/02253/MKPC	116	41	56	19	0	0	0	0	116	3	39	56
												AVERAGE	34	43
			Annual Total	71	56	19	0	0	0		146		49	

Average Build-Out Rate 41 DPA	Average Build-Out Rate	41 DPA
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1 – The low average annual build-out for 'Kingsmead South; Sites 3 & 4 Part 1' is skewed due to the site providing its first completions at the very end of 2018/19.

**2** – For 'NEA Rocla Site 1', the data only captures the final year of the site's delivery hence the lower average annual build-out rate.

Area	Site	Ref	Total dws	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	Total dws built	No. years	Average annual build- out	Peak annual build- out
OAKGROVE	09/00618/OUTEIS - 1,105 DWS													
	Parcels > 200 dws													
OAKGROVE	OAKGROVE PHASE 1	11/02404/REM	231	134	0	0	0	0	0	0	134	1	134	134
OAKGROVE	OAKGROVE PHASE 3	14/00207/REM	279	0	86	150	0	0	43	0	279	3 AVERAGE	93 114	150 142
	Parcels < 200 dws											7.721.0.02		
OAKGROVE	MIDDLETON - NOON LAYER DRIVE	12/00733/REM	64	17	0	0	0	0	0	0	17	1	17 <sup>1</sup>	17
OAKGROVE	OAKGROVE PHASE 4	14/02178/REM	183	0	0	21	95	61	6	0	183	4	46	95
OAKGROVE	OAKGROVE PHASE 5	16/02523/REM	73	0	0	0	0	0	67	6	73	2	37	67
OAKGROVE	OAKGROVE PHASE 2	13/01924/REM	112	17	89	6	0	0	0	0	112	3	37	89
												Average	34	67
			ANNUAL TOTAL	168	175	177	95	61	116	6 <sup>2</sup>	798		114	
NEWTON LEYS	02/01337/OUT - 1,650 DWS													
	Parcels > 200 dws													
BLETCHLEY	NEWTON LEYS PHASE 2	08/00233/REM	394	69	2	0	10	56	0	0	137	4	34	69
BLETCHLEY	NEWTON LEYS PHASE 3B AND 3C	12/02515/REM	259	79	64	96	20	0	0	0	259	4	65	96
BLETCHLEY	NEWTON LEYS, PHASE 5	17/02143/REM	248	0	0	0	0	0	49	40	89	2	45	49
												AVERAGE	48	71
	Parcels < 200 dws													
BLETCHLEY	NEWTON LEYS PHASE 2 E2	13/00224/REM	63	63	0	0	0	0	0	0	63	1	63	63
BLETCHLEY	NEWTON LEYS PHASE 4	12/00887/REM	194	0	74	58	39	23	0	0	194	4	49	74
BLETCHLEY	NEWTON LEYS LOCAL CENTRE	15/01695/FUL	34	0	0	0	14	20	0	0	34	2	17 <sup>3</sup>	20
BLETCHLEY	NEWTON LEYS PHASE 3A	11/00851/REM	75	12	0	0	0	0	0	0	12	1	12 <sup>4</sup>	12
BLETCHLEY	NEWTON LEYS PHASE 3D	16/03407/REM	11	0	0	0	5	6	0	0	11	2	6 <sup>3</sup>	6
BLETCHLEY	PHASE 6 NEWTON LEYS	17/01059/REM	183	0	0	0	0	29	99	55	183	3	61	99
BLETCHLEY	PHASE 7A NEWTON LEYS	19/01331/REM	80	0	0	0	0	0	0	8	8	1	8 <sup>4</sup>	8
												AVERAGE	31	40
			1			1	I			İ		1		

Average Build-Out Rate 128 DPA
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- 1 Data only captures the first completions for 'Middleton; Noon Layer Drive' which do not represent a full year's completions, hence the lower average annual build-out and the skew this causes to the average annual build-out for parcels of less than 200 dws on the wider Oakgrove site.
- 2 2020/21 saw the completion of the final 6 dwellings on the wider Oakgrove site; given the 6 completions did not represent a full year's completions for either the parcel they were delivered on, or the wider site, the inclusion of them significantly skews the average annual build-out rate for the site as whole. Without its inclusion the average annual build-out rate for the wider site would be 132dpa, which would also mean that the average annual build-out rate for 'Extra-Large sites' would be 137 as opposed to 128.
- 3 Both 'Newton Leys Local centre' and 'Newton Leys Phase 3D' were very small parcels delivered over two years; their inclusion here will therefore lower the average annual build-out for parcels of less than 200 dws on the wider Newton Leys site.
- 4 The data presented here for 'Newton Leys Phase 3A' and 'Phase 7A Newton Leys' only captures the last year and first year of development respectively; neither therefore represents a full year's completions hence the lower average annual build-out and the skew this causes to the average annual build-out for parcels of less than 200 dws on the wider Newton Leys site.

Table 5: Western Expar	nsion Area													
Area	Site	Ref	Total dws	2014/15	2015/16	2016/17	2018/18	2018/19	2019/20	2020/21	Total dws built	No. Yrs	Average annual build-out	peak annual build out
WHITEHOUSE (Area 10)	05/00291/MKPCO - 4320 DWS													
	Parcels > 200 dws													
WHITEHOUSE	WEA 10.3 PARCELS C1 B1 F R J G N AND P	15/00499/REM	217	0	0	39	34	82	58	4 <sup>1</sup>	217	5	43	82
WHITEHOUSE	WEA AREA 10.3 BELLWAY PHASE 1	15/02630/REM	230	0	0	11	102	76	41	0	230	4	58	
												AVERAGE	50	95
	Parcels < 200 dws													
WHITEHOUSE	PARCELS 10.1 C AND D	16/02817/REM	129	0	0	0	0	24	46	11	81	3	27	46
WHITEHOUSE	WEA PARCEL 10.1G	17/00164/REM	111	0	0	0	0	23	47	13	83	3	28	47
WHITEHOUSE	PARCELS 10.3G PARTS 1 AND 2	18/00726/REM	146	0	0	0	0	0	21	55	76	2	38	55
WHITEHOUSE	AREA 10.1 PARCELS A AND B	14/02383/REM	121	0	0	33	64	9	0	1	107	5	21	64
WHITEHOUSE	WEA PARCEL 10.1E	16/01457/REM	114	0	0	0	12	38	64	0	114	3	38	64
WHITEHOUSE	PARCEL 10.1H RE-PLAN	17/03408/REM	64	0	0	0	0	0	16	29	45	2	23	29
WHITEHOUSE	AREA 10.1 PARCEL F	14/02385/REM	61	0	21	32	8	0	0	0	61	3	20	32
WHITEHOUSE	WEA PARCEL 10.3A PART 2	15/01368/REM	85	0	0	9	50	26	0	0	85	3	28	50
WHITEHOUSE	WEA AREA 10.1 PARCEL I	15/02532/REM	34	0	0	0	0	0	10	24	34	2	17 <sup>2</sup>	24
WHITEHOUSE	WEA PARCEL 10.3A PART 1	17/00248/REM	50	0	0	0	0	19	31	0	50	2	25	31
WHITEHOUSE	PARCELS 10.1 C AND D (partial re-plan)	18/01724/REM	24	0	0	0	0	0	7	12	19	2	10 <sup>2</sup>	12
WHITEHOUSE	PARCEL 10.2 A,G&H	19/01330/REM	152	0	0	0	0	0	0	2	2	1	2 <sup>3</sup>	2
												AVERAGE	23	38
	WEA Area 10 Totals		ANNUAL TOTAL	0	21	124	270	297	341	151	1204		201	
FAIRFIELDS (Area 11)	06/00123/MKPCO - 2220 DWS													
	Parcels > 200 dws													
FAIRFIELDS	WEA AREA 11 PARCELS 4B 5C AND PART 3B	14/01790/REM	262	0	0	135	110	17	0	0	262	3	87	135
FAIRFIELDS	WEA AREA 11 PARCELS 4B 3C AND 1 ANT 3B	15/03045/REM	216	0	0	0	1	59	0	0	216	2	108	
FAIRFIELDS	AREA 11 PARCELS 2B 2C 5A 5B 6D	16/03133/REM	241	0	0	0			23	0	217	2	109	
FAIRFIELDS	FAIRFIELDS PHASE 5	17/01669/REM	240	0	0	0			140	54	212	3	71	
FAIRFIELDS	FAIRFIELDS PHASE 6	19/01494/REM	317	0	0	0			0	51	51	1	51	51
	Parcels < 200 dws											AVERAGE	78	135
FAIRFIELDS	WEA AREA 11 PARCELS 3A 4A AND PART 3B	14/01316/REM	144	0	114	30	0	0	0	0	144	2	72	114
-		,										AVERAGE	72	114
			ANNUAL TOTAL	0	114	165	267	288	163	105	1102		184	

- 1 Data captures the final completions for 'WEA 10.3 Parcels C1 B1 F R J G N and P' in 2020/21 which does not represent a full year's completions and thus skews the annual average build-out rate for this parcel and the average for parcels greater than 200 dws.
- 2 Both 'WEA Area 10.1 Parcel I and 'Parcels 10.1 C and D (Partial re-plan)' are very small parcels which have been delivered over two to three years; their inclusion here will therefore lower the average annual build-out for parcels of less than 200 dws on the wider WEA Area 10 site.
- 3 Data only captures the first completions for 'Parcel 10.2 A, G&H' and does not represent a full year's completions, hence the lower average annual build-out and the skew this causes to the average annual build-out rate for parcels of less than 200 dws on the wider WEA Area 10 site.

Table 6: Easte	rn Expansion Area													
Area	Site	Ref	Total dws	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	Total dws	No. Yrs	Average annual build- out	peak annual build out
BROOKLANDS	06/00220/MKPCO - 2501 UNITS													
	Parcels > 200 dws													
BROOKLANDS	BROOKLANDS BDW PHASE 1B	14/01069/REM	427	0	136	98	12	0	0	0	246	3	82	136
BROOKLANDS	BROOKLANDS BDW PHASE 2A	16/00086/REM	225	0	0	0	84	48	71	22	225	4	56	84
BROOKLANDS	BROOKLANDS BDW PHASES 2B 3B 3C AND 4A	16/02695/REM	276	0	0	0	54	66	76		268	4	67	76
BROOKLANDS	BROOKLANDS BDW PHASE 3A 4B 5A 7A 7B	16/03397/REM	362	0	0	0	0	54	60	57	171	3	57	60
												AVERAGE	66	89
DDCCKI ANDC	Parcels < 200 dws	44 /04 027 / 14 / 17 00	450	0.4	25					0	111		20	0.4
BROOKLANDS	BROOKLANDS PHASE 1B, 17 AND 30	11/01827/MKPCR	150	84	25	5	0		0	0	114	3	38	84
BROOKLANDS	BROOKLANDS BDW PHASE 1	13/01842/REM	197	60	103	37	0		0		200	3	67	103
BROOKLANDS	LAND SW OF FEN STREET	18/02664/REM	111	0	0	0	0	0	22	49	71	2	34	49
BROOKLANDS	BROOKLANDS BDW PHASE 1C	14/01896/REM	58	0	41	17	0		0	0	58	2	29	41
BROOKLANDS	BROOKLANDS BDW PHASE 1D	15/01477/REM	84	0	0	28	37	19	0	0	84	3	28	37
BROOKLANDS	BROOKLANDS BDW PHASE 1E	15/01448/REM	61	0	0	16	45	0	0	0	61	2	31	45
BROOKLANDS	BROOKLANDS GATEWAY SITE	14/02883/REM	48	0	0	38	10	<u> </u>	0	0	48	2	24	38
BROOKLANDS	BROOKLANDS SQUARE PHASE B	16/00125/REM	21	0	0	0	0		21	0	21	1	21 <sup>1</sup>	21
BROOKLANDS	BROOKLANDS SQUARE PHASE A & C	16/02793/REM	55	0	0	0	0		29	26	55	2	28	29
BROOKLANDS	BROOKLANDS SQUARE PARCEL D	17/02553/REM	46	0	0	0	0	0	22	24	46	2	23	24
												AVERAGE	32	47
			ANNUAL TOTAL	144	305	239	242	187	301	250	1672		239	
BROUGHTON	06/00709/MKPC - 1400 UNITS													
BROUGHTON	BROUGHTON GATE PARCEL I1 AND I2	08/00879/MKPCR	191	78	0	0	0	0	0	0	78	1	78	78
BROUGHTON	BROUGHTON GATE PARCEL M2	16/02271/REM	65	0	0	0	5	60	0	0	65	2	33	60
BROUGHTON	BROUGHTON GATE PARCEL M1	16/00541/REM	56	0	0	0	15	41	0	0	56	2	28	41
BROUGHTON	BROUGHTON MANOR BUSINESS PARK	17/02254/REM	62	0	0	0	0	10	36	16	62	3	21	36
BROUGHTON	BROUGHTON GATE RES SITES CM5-CM8	11/02316/MKPC	18	0	0	0	4	14	0	0	18	2	9 <sup>1</sup>	14
BROUGHTON	BROUGHTON RESERVE SITE CM4	15/02678/FUL	23	0	0	0	23	0	0	0	23	1	23 <sup>1</sup>	23
												AVERAGE	32	42
			ANNUAL TOTAL	78	0	0	47	125	36	16	302			

<sup>1 –</sup> All three of these parcels are very small with low overall numbers of units, which have been built out in 12 months; hence the parcels' lower average annual build-out rate and the likely impact this has had on skewing the overall averages for the wider site.

Table 7: Strategic Lar	nd Allocation													
Area	Site	Ref	Total dws	2014/15	2015/16	2016/17	2018/18	2018/19	2019/20	2020/21	Total dws built	No. Yrs	Average annual build- out	peak annual build out
EACLE FARMACOLITIL	Parcels > 200 dws	47/04000/0514	250								404		64	- 64
EAGLE FARM SOUTH	EAGLE FARM PHASE 1 PARCEL B1	17/01038/REM	259	0	0	0	0	62	58	64	184	3	61	64
WAVENDON	HAYNES LAND (PHASE 2 PARCEL D1)	17/02483/REM	200	0	0	0	0	0	74	44	118	2	59	74
GLEBE FARM	LAND AT GLEBE FARM PHASE 2 PARCEL C	18/02097/REM	225	0	0	0	0	0	23	37	60	2	30	37
												AVERAGE	50	58
	Parcels < 200 dws													
GLEBE FARM	LAND AT GLEBE FARM PHASE 1 PARCEL D	17/02883/REM	160	0	0	0	0	0	40	62	102	2	51	62
GLEBE FARM	SITE SOUTH EAST OF ELMSWELL GATE	17/03283/REM	191	0	0	0	0	3	54	83	140	3	47	83
GLEBE FARM	LAND AT THE GABLES	15/01492/FUL	34	0	0	0	34	0	0	0	34	1	34	34
EAGLE FARM SOUTH	PHASE 3	18/02183/REM	174	0	0	0	0	0	0	33	33	1	33	33
GLEBE FARM	LOT 1 PARCEL A	19/01268/REM	198	0	0	0	0	0	0	36	36	1	36	36
GLEBE FARM	LOT 2 PARCEL A	19/01632/REM	168	0	0	0	0	0	0	39	39	1	39	39
												AVERAGE	40	48
			Annual Total	0	0	0	34	65	249	398	746		186.5	

Table 8: Average Annual Build-Out Rates – Strategic Sites	
	Average Annual Build-Out Rate
Western Expansion Area: Area 10	201
Western Expansion Area: Area 11	184
Eastern Expansion Area: Brooklands	239
Average Annual Build-Out Rate Strategic Sites	208

Table 9: Average Annual Build-Out Rates – Parcels >200 Dws, on Extra-Large & Strategic Sites					
	Average Annual Build-Out Rate				
Oakgrove	114				
Newton Leys	48				
Western Expansion Area: Area 10	50				
Western Expansion Area: Area 11	78				
Eastern Expansion Area: Brooklands	66				
Strategic Land Allocation	50				
Average Annual Build-Out Parcels >200 Dws	68				

Table 10: Average Annual Build-Out Rates – Parcels < 200 Dws, on Extra-Large & Strategic Sites				
	Average Annual Build-Out Rate			
Oakgrove	34			
Newton Leys	31			
Western Expansion Area: Area 10	23			
Western Expansion Area: Area 11	72			
Eastern Expansion Area: Brooklands	32			
Eastern Expansion Area: Broughton	32			
Strategic Land Allocation	40			
Average Annual Build-Out Parcels <200 Dws	38			

### **Appendix 3: 2021 SoCG/Proforma Templates**

This appendix contains blank templates of the SoCG and Proforma sent out to landowners/agents/developers/housebuilders etc. to enable them to report on delivery progress of their sites, for the purposes of the 2021 Housing Land Supply Assessment.

Also included is a copy of the explanatory letter that was sent out alongside the SoCG and Proforma so as to inform the respondent of the data we were seeking, how to complete the proforma, the purpose of the proforma and what the Council would be using the data for.

The SoCG were sent out from March 2021, whilst the proforma were sent out from May 2021..

### **Planning Service**

Reply to Monitoring and Implementation Team

E-mail Housing.monitoring@milton-keynes.gov.uk



Dear Sir/Madam,

### Milton Keynes Housing Land Supply; Delivery Update and Statement of Common Ground (2021)

The Development Plans Team is in the process of preparing its 2021 annual housing land supply update as part of our monitoring and forecasting programme. This process is important in terms of assisting our understanding of current and future housing delivery across the Borough, calculating our five-year housing land supply position, and supporting the preparation of future planning documents and evidence.

To aid the robustness of our monitoring and forecasting, we'd appreciate it if you could take a few minutes to complete the attached form which contains the details of a site which you or your company either owns or is the planning agent for.

On the form are details of the site, which is currently either, an allocation or has an outline planning permission, including our current understanding of the housing capacity of the site (these are either those agreed in the planning permission for the site, or the indicative capacity outlined within the site's allocation).

For Part 1 of the form we ask that you provide any information with regards to progress of the site towards delivery. Examples of the type of information we are seeking is outlined on the form, but please feel free to also include any other information which is deemed useful or important. If you are also able to provide details such as dates (e.g. for anticipated submission of applications) or references (e.g. for pre-application advice or Planning Performance Agreements) this would be much appreciated.

For Part 2 of the form we ask that you complete the two tables with the current anticipated timing for the start of construction on-site, and the projected annual delivery rates for each financial year, starting from the 1<sup>st</sup> April 2021.

If you could then please complete the form by adding your signature to Part 3 and returning the completed forms by email to the address at the top of this letter.

Your responses will form part of our evidence in reaching conclusions on the deliverability of each site and its potential annual delivery of homes, and in preparing our updated housing trajectory and annual five-year land supply position. Furthermore, your responses will also be presented as evidence in supporting the Council's five-year land supply position at Section 78 Planning Appeals, should it be required.

If you would like to discuss any of the above in more detail, please feel free to contact me using the details below.

I apologise if you are not the most appropriate person in your company to complete the form. If this is the case please could you ensure that it is passed to the relevant person for a response.

Please could you endeavour to return the completed form to us by the date outlined in the email you received with this letter.

Thank you in advance for your time.

Yours sincerely,

### James Williamson

Monitoring and Implementation Team Leader (Development Plans)

Enc.

## MILTON KEYNES COUNCIL HOUSING LAND SUPPLY

### DELIVERY UPDATE & STATEMENT OF COMMON GROUND March 2021

Planning Status (reference where applicable)	Site Name/Address	<b>Site Capacity</b> (undeveloped homes as at 1 <sup>st</sup> April 2021)

### 1. Progress towards delivery

For the above site, please provide, in the box below, any updates on progress towards the delivery of housing on the site.

For sites with outline permission this may include details of progress towards submission, and anticipated timing, of a reserved matters application, pre-application advice, the discharging of conditions or, links to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions.

For allocated sites this may include details relating to progress of site assessment work, preapplication advice, progress towards submission of a planning application (whether outline or full) or, links to a planning performance agreement that sets out the timescale for approval of applications.

Please also include any other information or details which relate specifically to the delivery of this site (for example, if the site requires disposal, please outline details of site marketing and disposal).

Progress Towards Delivery	

2. Statement of Common Ground	i	
(insert job	title) at(in the tables below are an accurate this site as at 1 April 2021.	sert company name) can
Anticipated Start on Site date:		
Financial Year (1 <sup>st</sup> April - 31 <sup>st</sup> March)	Number of Completions	
2021/22		
2022/23		
2023/24		
2024/25		
2025/26		
2026/27		
2027/28		
2028/29		
2029/30		
2030/31		
(2031 and beyond)		
3. Signatures		
Signed:		
(Developer/Landowner/Agent)		
Date:		
Signed: (Milton Keynes Council)		

Date:

### **Planning Service**

Reply to Monitoring and Implementation Team

E-mail <u>Housing.monitoring@milton-keynes.gov.uk</u>



Dear Sir/Madam,

### Milton Keynes Housing Land Supply; Delivery Update and Proforma (2021)

The Development Plans Team is in the process of preparing its 2021 annual housing land supply update as part of our monitoring and forecasting programme. This process is important in terms of assisting our understanding of current and future housing delivery across the Borough, calculating our five-year housing land supply position, and supporting the preparation of future planning documents and evidence.

To aid the robustness of our monitoring and forecasting, we'd appreciate it if you could take a few minutes to complete the attached proforma which contains the details of a site which you or your company either owns or is the planning agent for.

On the proforma are details of the site, which has an extant FUL permission or REM approval, including our current understanding of the housing capacity of the site (these are either those agreed in the planning permission for the site, or where the site is under construction, the number of units which, according to our monitoring, remain uncompleted as of 1 April 2021).

The proforma also outlines the forecasts currently in place for the future completion of homes on the site; these are based on previous information you have provided us with and/or our own monitoring data. We'd appreciate it if you could review these forecasts and, where necessary, update the projected annual delivery rates for each financial year, starting from the 1<sup>st</sup> April 2021. If construction has not yet started on site, could you please also provide the expected start on site date and if you have any other information with regards to progress towards the delivery of the site please also include this.

If you could then complete the proforma by adding your signature and details and returning it by email to the address at the top of this letter or by replying directly to the email you received with this letter.

Your responses will form part of our evidence in projecting potential annual delivery of homes, and in preparing our updated housing trajectory and annual five-year land supply position. Furthermore, your responses will also be presented as evidence in supporting the Council's five-year land supply position at Section 78 Planning Appeals, should it be required.

We are also currently in the process of preparing a Housing and Economic Land Availability Assessment to support the review of Plan:MK (2019), as such, any data and information submitted will also be used to inform this assessment.

If you would like to discuss any of the above in more detail, please feel free to contact me using the details at the bottom of this letter.

I apologise if you are not the most appropriate person in your company to complete the form. If this is the case please could you ensure that it is passed to the relevant person for a response.

Please could you endeavour to return the completed form to us by the date outlined in the email you received with this letter.

Thank you in advance for your time.

Yours sincerely,

### James Williamson

Monitoring and Implementation Team Leader (Development Plans)

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# MILTON KEYNES COUNCIL MONITORING SURVEY OF OUTSTANDING HOUSING PERMISSIONS 2021

Planning reference	Address	Site Capacity (undeveloped homes as at 1 <sup>st</sup> April 2021)

The table below sets out the current forecasts we have for when the remainder of the above development will be completed. These forecasts are based on information received from yourselves through recent housing monitoring surveys and our own monitoring, also taking into account the number and rate of any completions in recent years.

Please review the below figures and, where your own forecasts vary from those in the table, update the projected annual delivery rates for each financial year, starting from the 1st April 2021. Where the below figures remain correct please sign the proforma and return without amendment.

### The years run from 1<sup>st</sup> April to 31<sup>st</sup> March.

Year	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30
Dwellings									
Year	30/31	Post 2031							
Dwellings									

### Other site-specific questions

If the development has yet to commence, please outline the anticipated date for start on site?	
•	

Is there anything else that we should know about the site which might affect its delivery (e.g. revised/amended application expected, infrastructure needed etc.)? Please include any details in the box overleaf.

Signed:
Name:
Position:
Company:
Date:
Please return to <a href="mailto:housing.monitoring@milton-keynes.gov.uk">housing.monitoring@milton-keynes.gov.uk</a>



### **Contact us**

E: development.plans@milton-keynes.gov.uk

T: 01908 691691

Development Plans, Civic, 1 Saxon Gate East, Central Milton Keynes, MK9 3EJ