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Mr Ian Kemp
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13th July 2017

Dear Mr Kemp,

Re: Site Allocations Plan Hearing Sessions – Matters, Issues and Questions

Please accept this letter as further David Wilson Homes South Midlands representations related to more up to date information available, concerning the Matters, Issues and Questions.

The further information available relates primarily to Matter 2 – The role of the SAP, Question 3 – Is the amount of land allocated for housing in the SAP sufficient to contribute to meeting the housing needs of the borough over an appropriate timeframe?

Since our last representations submitted as part of the Site Allocations Plan Consultation process, Milton Keynes Council has published its Strategic Housing Market Assessment 2016-2031 (MK SHMA) as part of its Draft Plan:MK consultation. It was advocated by David Wilson Homes in our last Site Allocations Plan representations that this should have formed the basis of the housing target within the proposed Site Allocations Plan (SAP). The MK SHMA can be found at: https://www.milton-keynes.gov.uk/planning-and-building/planning-policy/draft-strategic-housing-market-assessment-november-2016

It is our view that the publication of this document further reinforces our assessment that the SAP is an unsound document which does not sufficiently contribute to meeting the housing needs of the borough, failing the Positively Prepared and Consistent with National Policy tests.

The MK SHMA makes a fundamental error in calculating the Housing Needs as summarized in Figure 2 of the document and then continued throughout. The calculation has only included the Household Projections taking account of local circumstances, Adjustment for suppressed household formation rates and response to balancing jobs and workers giving a total of 26,493. The calculation has failed to include Response to Market Signals and Response to backlog of Housing Provision, which would add an additional 2,122 dwellings and give a total of 28,615 dwellings. Rounding the requirement to 28,750 (in comparison to the 26,500 rounded advocated in the Draft Plan:MK) this would equate to a housing need of 1,917 dwellings per year.

Furthermore, David Wilson Homes South Midlands requested that Bidwells undertake a Full Objectively Assessed Needs Assessment (June 2017). This is an update of the document prepared and submitted previously in response to the SAP Consultation, in light of new up to date information. This disagrees with the calculation of Housing Needs prepared for Milton Keynes. The MK SHMA advocates a higher Demographic starting point (Household Projections and Adjustment for Market Signals) than the Bidwells report being 26,323 against 23,130 dwellings. The starting point of the Demographic calculations is slightly different with Bidwells utilising the Household Projections prepared by DCLG as set out in the PPG. The biggest area of difference is in the adjustment for employment, with the MK SHMA allowing 1,739 dwellings against Bidwells 10,800 dwellings. Both calculations have started from the EEFM 2014, however Bidwells have applied the POPGROUP model under license from the Local Government Association to produce a combined economic-led but demographically inclusive projection.

This would appear more robust than the ORS model, utilising less assumptions and meeting Milton Keynes own economic-led needs and not relying on in-migration to support employment growth – a more sustainable solution.

Taking the findings of the Bidwells Report it is calculated that the Bidwells Fully Objective Assessment of Need (2016-2031) is 34,370 dwellings or 2,291 dwellings per annum. This is calculated on the basis of 23,130 dwellings due to the demographic starting point (Household Projections and Adjustment for Market Signals), 10,800 dwellings due to adjustment for economic trends and 440 dwellings to meet the backlog of housing provision.

Milton Keynes Council is currently claiming a 5.16 year supply of housing based on an overall requirement for 2017-2022 of 12,623 dwellings. This is based on the Liverpool method, with no explanation of how this requirement has been calculated. Utilising the preferred Sedgefield method this would be greater estimated at approximately 14,490 dwellings (giving a 4.74 years; estimated on the limited information available). Indeed an Inspector for a current Appeal (Ref: APP/Y0435/W/17/3169314) stated that they did not consider that the Council's Five Year Housing Land Supply had been correctly calculated during the Appeal Inquiry.

Taking the above Bidwells Objective Assessment of Need this would create a five year housing need utilising the Sedgefield method of:

5 x 2,291 = 11,455
Shortfall 2010/11 – 2016/17 – 3,185 (MKC)
(11,455 + 3,185) x 1.2 = 17,568

This gives a housing requirement of 3,514 per annum (17,568/5).

Milton Keynes Council states that it has a supply for 2017-22 of 13,727 plots.

This would give Milton Keynes Council a 3.9 year housing land supply.

Even taking the Council's own SHMA requirement, this would give a 4.48 year housing land supply (utilising the preferred Sedgefield method).

5 x 1,917 = 9,585
Shortfall 2010/11 – 2016/17 – 3,185 (MKC)
(9,585 + 3,185) x 1.2 = 15,324

As stated in our previous representations, it is considered that a number of the supply sites have been overestimated and it is likely that the true supply will be less. The supply of dwellings includes some of those identified to be included within the SAP, showing that their delivery has already been taken into account in the Council's anticipated supply. This demonstrates clearly that the amount of land allocated for housing in the SAP is not sufficient to contribute to meeting the housing needs of the borough, failing the Positively Prepared and Consistent with National Policy tests.

It will also be pertinent to understand under Matter 2, Question 4 – Should the SAP have a clear and specific timeframe, whether the Council intends for the Plan:MK when adopted to supersede the SAP or whether both documents will form part of the Development Plan? The SAP has not been referred to in the existing Development Plan section of the Draft Plan:MK and its proposed status following the adoption of Plan:MK has not been addressed to the best of our knowledge. This will have a significant impact on the deliverability of sites within the SAP, potentially within a very short space of time (proposed adoption of Plan:MK: Winter 2018). This leads us to believe that the Plan is unsound as it would fail the effective test.

I trust that it is suitable to provide the Inspector this information in advance of the Examination, to enable time to consider all of the information within this letter and in the accompanying Bidwells Report. I would be happy to answer any questions or provide any clarifications as requested.

Yours sincerely,

Ross Blumire
Strategic Planner
David Wilson Homes (South Midlands)
(a trading name of BDW Trading Ltd)

David Wilson Homes South Midlands

June 2017

BIDWELLS

FULL OBJECTIVELY ASSESSED NEEDS
MILTON KEYNES

Quality Assurance

Site name:	Milton Keynes
Client name:	David Wilson Homes South Midlands
Type of report:	Full Objectively Assessed Needs Assessment
Prepared by:	Simon Elliott BSc (Hons) MSc
Signed	
Date	8 June 2017
Reviewed by:	Neil Waterson BA (Hons) DipTP MRTPI AIEMA
Signed	
Date	8 June 2017

SMARTER PLANNING CHAMPION

Executive Summary

Bidwells LLP have been asked to consider the Full Objectively Assessed Needs (FOAN) for housing in Milton Keynes in accordance with the requirements of the National Planning Policy Framework (NPPF).

Milton Keynes Council (MKC) is currently consulting on their draft Plan:MK, which proposes a housing target of 26,500 dwellings between 2016 and 2031. This is derived from the Strategic Housing Market Assessment (SHMA), which has been found to have a number of failings.

Bidwells have reviewed the DCLG 2014-based Household Projections (2014HP) and the data on which it was based. No evidence was found to suggest that the 2014HP should be modified to take account of unattributed population change, longer term migration patterns, or other local circumstances. As such the baseline demographic-led projections found a need for 1,402 dwellings per year.

Further analysis was then undertaken of economic data set out in the East of England Forecasting Model (EEFM). This concluded that it was reasonable to assume that total jobs growth would average 2,129 per year. Analysis undertaken to consider the effect of this on housing need found that it would require a further 720 dwellings per annum.

Consideration was then given to housing market signals and affordable housing need. Overall it was concluded that there was a requirement to make further adjustments to the FOAN of 10%, equating to 140 dwellings per annum.

In total, the FOAN was concluded to be 34,370 dwellings between 2016 and 2031, equating to 2,291 dwellings per year, see below.

COMPONENT	BIDWELLS FOAN		SHMA		SHMA (ALL COMPONENTS)	
	DWELLINGS (ROUNDED TO NEAREST 10)	DWELLINGS PER ANNUM	DWELLINGS	DWELLINGS PER ANNUM	DWELLINGS	DWELLINGS PER ANNUM
Demographic	21,030	1,402	24,744	1,650	24,744	1,650
Economic Trends	10,800	720			1,739	116
Housing Market Signals	2,100	140	1,739	116	1,579	105
Affordable Housing						
Backlog 2015/16	440	29			553	37
TOTAL FOAN	**34,370**	**2,291**	**26,493***	**1,767**	**28,615**	**1,908**

Note: * there appears to be an arithmatic error in the SHMA with the demographic component and single adjustment adding to 26,893 rather than the 26,493 referred to throughout the document.

It does not appear that the SHMA's concluded FOAN of 26,493 dwellings includes the uplift required for housing market signals or backlog. If these were taken into account, it would suggest a FOAN of 28,615 dwellings. This would still be low due to the errors in calculating the economic uplift.

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1.0 Introduction

1.1 Background

1.1.1 Bidwells LLP have been instructed by David Wilson Homes South Midlands (DWHSM) to consider the Full Objectively Assessed Needs (FOAN) for housing in Milton Keynes Borough, in accordance with the requirements of the National Planning Policy Framework (NPPF, March 2012) and its accompanying Planning Practice Guidance (PPG, April 2014). This assessment supports DWHSM's representations on the emerging Milton Keynes local plan, known as Plan:MK[1].

1.2 The Development Plan

1.2.1 The draft Plan:MK is intended to cover the period up to 2031 and will replace the existing development plan documents; most notably the adopted Core Strategy[2]. The draft Plan:MK proposes a minimum of 26,500 dwellings in the Borough between 2016 and 2031, which equates to an average delivery of 1,767 dwellings per annum. Whilst this is comparable to the 1,750dpa set out in the Core Strategy (28,000 dwellings between 2010 and 2026), the Core Strategy housing target was classed as interim only as a result of the rapidly changing national and regional planning policy framework during the time that it was prepared and adopted.

1.2.2 In July 2010, the Government announced the revocation of the Regional Spatial Strategies (RSSs); however, this was successfully challenged in November 2010. The years between the successful legal challenge and the final revocation were subject to considerable uncertainty in terms of the weight that could be applied by the RSS on emerging new local plans; after all, the Government had made clear that the RSSs would ultimately be abolished.

1.2.3 The South-East Plan (SEP) proposed some 41,360 dwellings in Milton Keynes between 2006 and 2026 (2,068dpa), with a further 10,990 in the wider Growth Area, i.e. in neighbouring authorities. The SEP was finally revoked in February 2013, only months before the publication of the Inspector's report and subsequent adoption of the Core Strategy.

1.2.4 In March 2012, the Government published the NPPF, replacing the majority of the national planning policy and associated guidance. Whilst the advent of the NPPF was largely welcomed, there were significant issues in interpreting its intentions without associated guidance. It wasn't until April 2014 that the PPG was published to resolve this issue, after the Core Strategy had been adopted.

1.2.5 Ultimately the Core Strategy Inspector concluded that:

"Taking all of these matters into account, I consider that the current evidence supports a housing target at or around that proposed in the Plan. In the absence of an up-to-date SHMA the target selected is generally in accordance with the demographic and other evidence referred to above. Also it would provide a stimulus for recovery by significantly increasing the supply of housing in the borough. On balance, I conclude that it is a justified target that is consistent with the overall

1 MKC. March 2017. Draft Plan:MK Consultation.
2 MKC. July 2013. Core Strategy Adopted Version.

intent of NPPF and a sound plan. It should however be expressed as a minimum figure since there is no overriding sustainability reason to treat it as a cap.

This target has the support of much of the development sector represented in the examination if it is regarded as an interim one. As the Preamble above indicates, the Plan has come forward in a period of some uncertainty about the wider sub-regional and regional context for the future growth of Milton Keynes. For so long as the legal requirement for general conformity with the SEP remained in force, there has been a fairly wide measure of agreement amongst participants in the examination that the housing target must at least be treated as an interim one. Revocation of the SEP has removed the legal requirement but I do not consider that the matter should be left there. In any event the Council is very firmly of the view that Milton Keynes remains "open for growth".

Having considered all the evidence and views on this matter, I agree that the most significant policy deficits and planning challenges that may arise, following SEP revocation, are related to cross-boundary issues and the ability of the borough to respond to demographic and economic change. This now has added importance since the latest household projections do not extend beyond 2021. The borough sits at the centre of the SEMLEP area and is very well placed as a focus for strategic growth. These issues need to be addressed positively and effectively, applying the duty to co-operate, and joint working should be informed by updated assessments of the housing, economic and other needs of the wider area. The Plan has a limited time horizon and there is a large measure of agreement that its adoption would be in the public interest. But an early review is needed for greater clarity about the role that Milton Keynes and its hinterland will play in the longer term. This will complement initiatives to help deliver growth locally and ensure that the potential for significant uplift in housing and other requirements will be planned in the most sustainable way."

1.2.6 Subsequent to the adoption of the Core Strategy, a full Strategic Housing Market Assessment (SHMA) was published in May 2014[3]. This concluded that 33,000 dwellings would be required between 2011 and 2031, equating to 1,650 dwellings per annum. It however recommended that the same rate as set out in the Core Strategy is continued.

1.2.7 This SHMA was however flawed. It predated the publication of the PPG and, whilst it did acknowledge the presence of the consultation draft PPG, continued to use the guidance documents that were revoked on the publication of the NPPF as a basis. The SHMA appears to have been based on population and household projections produced by MKC. These however no longer appear to be available and thus cannot be reviewed. Given the timing, it is unclear if these projections were based on the latest mid-year population estimates, as those for 2002-2010 were rebased in late 2013. In addition, the most up-to-date projections at the time were the 2011-based population and household projections. These were classed as interim by the Government and were found to be inaccurate in many LPAs. They have subsequently been replaced by the 2012-based and then the 2014-based projections.

1.2.8 A revised SHMA was published in February 2017[4], which is better aligned with the PPG methodology, on which the draft Plan:MK housing target is based. However, it still contains a number of significant flaws, which are explained under the relevant chapters of this assessment.

3 ORS. May 2014. Strategic Housing Market Assessment 2013, Report of Findings.
4 ORS. February 2017. Milton Keynes Strategic Housing Market Assessment 2016-2031.

2.0 National Policy and Guidance

2.1 Introduction

2.1.1 This Chapter sets out the relevant national planning policy and guidance that can be used to interpret it. It is however useful to first consider what is meant by 'housing need'.

2.1.2 PPG Paragraph 2a-003 defines housing need *as "the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period – and should cater for the housing demand of the area and identify the scale of housing supply necessary to meet that demand"*. However, the Planning Advisory Service (PAS) suggests that there are two alternative definitions and that the PPG does not explicitly apply one or the other[5]:

- Need-as-aspiration (i.e. if everyone is to enjoy suitable housing at acceptable cost, as defined by the standards set out in the PPG).
- Need-as-demand (the amount of housing that would be provided if the planning system did not restrict land supply).

2.1.3 PAS conclude that the latter is more consistent with the NPPF and PPG when read as a whole. In particular, the former would risk being undeliverable, contrary to NPPF Paragraph 17. Consequently, PAS suggest a working definition of need as *"the housing that households are willing and able to buy or rent, either from their own resources or with assistance from the State".* However, this definition is not compatible with affordable housing need, which necessarily must focus on the standard of housing people ought to have rather than what they can afford. Consequently, affordable housing need is considered separately.

2.1.4 In a recent High Court judgement, Mr Justice Hickinbottom provided a useful interpretation to the terms most often used in assessing housing need[6]:

- *"Household projections: These are demographic, trend-based projections indicating the likely number and type of future households if the underlying trends and demographic assumptions are realised. They provide useful long-term trajectories, in terms of growth averages throughout the projection period. However, they are not reliable as household growth estimates for particular years: they are subject to the uncertainties inherent in demographic behaviour, and sensitive to factors (such as changing economic and social circumstances) that may affect that behaviour.*
- *Full Objectively Assessed Need (FOAN): This is the objectively assessed need for housing in an area, leaving aside policy considerations. It is therefore closely linked to the relevant household projection; but is not necessarily the same. An objective assessment of housing need may result in a different figure from that based on purely demographics if, for example, the assessor considers that the household projection fails properly to take into account the effects of a major downturn (or upturn) in the economy that will affect future housing needs in an area. Nevertheless, where there are no such factors, objective assessment of need may be – and sometimes is – taken as being the same as the relevant household projection.*

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5 PAS. July 2015. Objectively Assessed Need and Housing Targets: Technical Advice note (2nd Edition), Chapter 3.

6 Gallagher Homes Ltd & Anor v Solihull MBC [2014] EWHC 1283.

- *Housing Requirement: This is the figure which reflects, not only the assessed need for housing, but also any policy considerations that might require that figure to be manipulated to determine the actual housing target for an area. For example, built development in an area might be constrained by the extent of land which is the subject of policy protection, such as Green Belt or Areas of Outstanding Natural Beauty. Or it might be decided, as a matter of policy, to discourage particular migration reflected in demographic trends. Once these policy considerations have been applied to the figure for full objectively assessed need for housing in an area, the result is a 'policy on' figure for housing requirement. Subject to it being determined by a proper process, the housing requirement figure will be the target against which housing supply will normally be measured."*

2.2 Sustainable Development

2.2.1 The NPPF makes clear that *"the purpose of the planning system is to contribute to the achievement of sustainable development"* (paragraph 6) and that there are three dimensions to sustainable development: economic, social and environmental (paragraph 7). Paragraph 7 continues by stating that *"these dimensions give rise to the need for the planning system to perform a number of roles"*. The social is defined as *"supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being"* (emphasis added).

2.2.2 Paragraph 14 indicates that at the heart of the NPPF is *"a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For plan-making this means that:*

- *local planning authorities should positively seek opportunities to meet the development needs of their area*
- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*
  - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole*
  - *specific policies in this Framework indicate development should be restricted" (emphasis added).*

2.2.3 This approach is reiterated in Paragraph 151, which states that *"Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development"*.

2.2.4 Paragraph 17 that *"within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking"*. Twelves principles are set out, including, that planning should *"proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities"* (emphasis added).

2.3 Economic Development

2.3.1 Paragraph 19 makes clear that *"the government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system"* (emphasis added).

2.3.2 Paragraph 21 goes further by stating that *"planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing"* (emphasis added).

2.4 Residential Development

2.4.1 Paragraph 47 states that *"to boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period"* (emphasis added).

2.4.2 Paragraph 50 states that *"to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:*

- *plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)*
- *identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand*
- *where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time".*

2.4.3 Paragraph 156 states that *"local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver the homes and jobs needed in the area…"* (emphasis added). Paragraph 157 notes that *"crucially, Local Plans should plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework…"*.

2.4.4 Paragraph 158 explains that *"each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals".*

2.4.5 In terms of housing, Paragraph 159 makes clear that *"local planning authorities should have a clear understanding of housing needs in their area. They should:*

- *prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries.*
- *The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:*
  - *meets household and population projections, taking account of migration and demographic change*
  - *addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)*
  - *caters for housing demand and the scale of housing supply necessary to meet this demand"* (emphasis added)[7].

2.4.6 In terms of business, Paragraph 106 states that *"local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area. To achieve this, they should:*

- *work together with county and neighbouring authorities and with Local Enterprise Partnerships to prepare and maintain a robust evidence base to understand both existing business needs and likely changes in the market*
- *work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing, infrastructure or viability"* (emphasis added).

2.5 Duty to Cooperate

2.5.1 The Duty to Cooperate is a legal requirement[8] that requires LPAs to engage constructively, actively and on an ongoing basis with one another when preparing a local plan in order to maximise its effectiveness in contributing towards sustainable development. The Duty to Cooperate is most commonly applied where one LPA cannot accommodate its FOAN within its own administrative area and therefore requests that another, usually within the same HMA, takes some of the housing need. However, the Duty to Cooperate is not a duty to agree.

2.5.2 NPPF Paragraph 179 states that *"local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans. Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework"*.

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7 Satnam Millennium Ltd v Warrington BC [2015] EWHC 370 makes clear that whilst the SHMA may cross administrative boundaries, each LPA should have a clear understanding of the housing needs within their own administrative boundaries.

8 Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended).

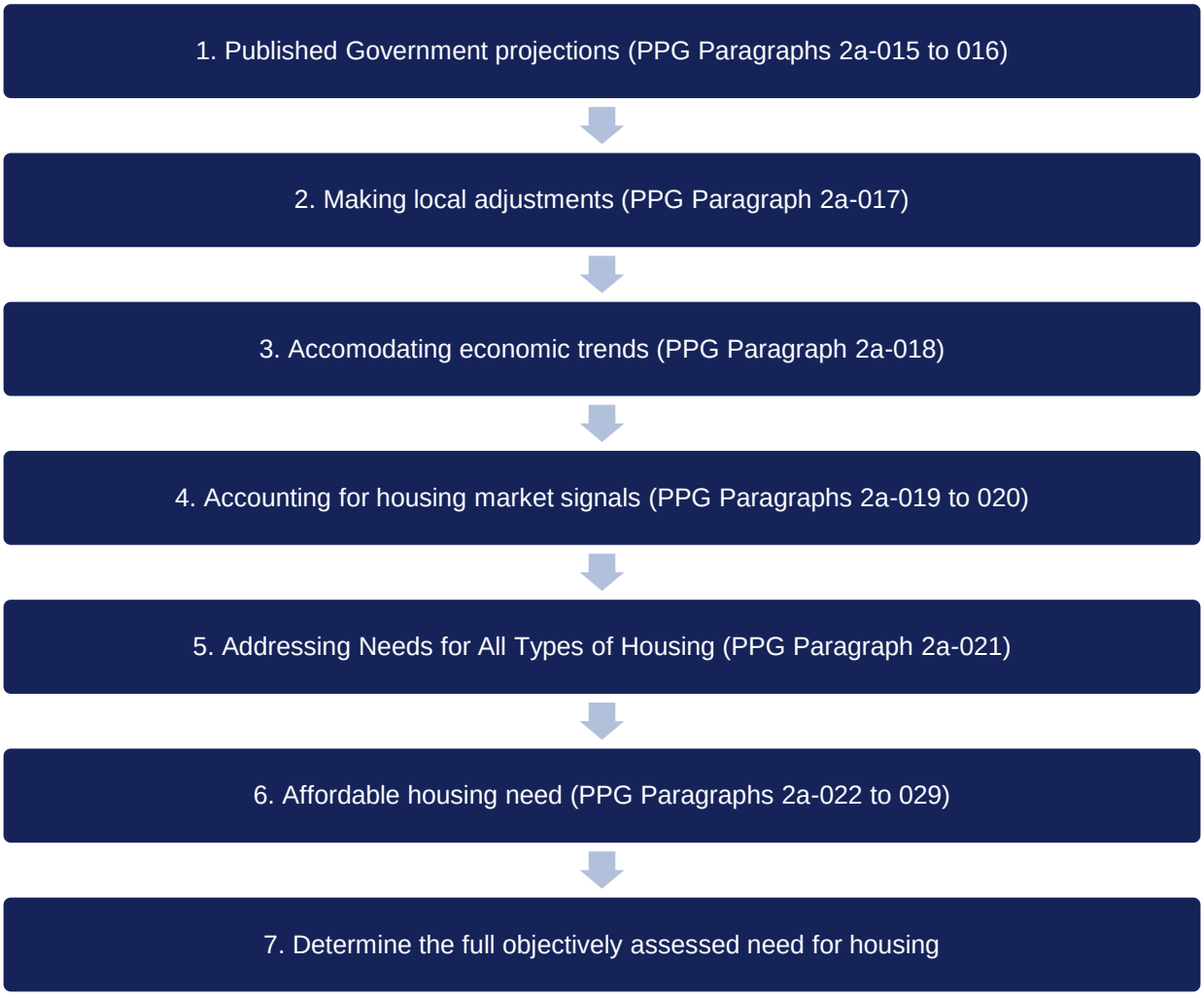
2.5.3 Once the Duty to Cooperate has been resolved, the housing requirement for the local plan can be determined, i.e. the FOAN plus or minus the housing need transferred to another LPA through the Duty to Cooperate.

2.6 Planning Practice Guidance

2.6.1 Whereas the NPPF sets out what is required of a FOAN assessment, the PPG sets out how that assessment should be undertaken, although it also that *"there is no one methodological approach or use of a particular dataset(s) that will provide a definitive assessment of development need. But the use of this standard methodology set out in this guidance is strongly recommended because it will ensure that the assessment findings are transparently prepared. Local planning authorities may consider departing from the methodology, but they should explain why their particular local circumstances have led them to adopt a different approach where this is the case. The assessment should be thorough but proportionate, building where possible on existing information sources outlined within the guidance"* (emphasis added).

2.6.2 For each step in the process (**Figure 2.1**) the PPG sets out the purpose of the step and the likely sources of data necessary to undertake it. The PPG does not however prescribe how each step should be undertaken in detail. However, PPG Paragraph 2a-014 does not that *"Establishing future need for housing is not an exact science. No single approach will provide a definitive answer…"*.

Figure 2.1: The PPG Approach to Determining the FOAN



2.6.3 This process is necessarily undertaken at local authority geographic level at which most population data is available. However, PPG Paragraph 2a-008 does indicate that need should be assessed in relation to the relevant functional area, i.e. the Housing Market Area (HMA).

2.6.4 Determining the FOAN should be based on facts and unbiased evidence. Constraints should not be applied to the assessment of need; these are addressed later in the plan-making process, as set out in PPG Paragraph 2a-004. Constraints include the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints. In reality however, past population trends will have been influenced by past planning policies and rates of housebuilding. As such no projections are strictly 'policy off' but rather 'policy neutral', i.e. a continuation of previous planning policy. This is an important concept when considering factors such as:

- Past population trends will inherently assume a continuation in economic trends. If this is unlikely to occur, for example where the LPA is seeking higher rates of job growth, this should be factored into the FOAN. The High Court has confirmed that commuting can be considered a constraint for the purposes of determining FOAN[9]:

  "For an authority to decide not to accommodate additional workers drawn to its area by increased employment opportunities is clearly a policy on decision which affects adjacent authorities who would be expected to house those additional commuting workers, unless there was evidence (accepted by the inspector or other planning decision-maker) that in fact the increase in employment in the borough would not increase the overall accommodation needs."

- Where previous housing supply constraints have led to overcrowding resulting in suppressed household formation rates, adjustments should be made to the FOAN so as not to exacerbate the under supply.

9 Oadby & Wigston BC v SoSCLG & Anor [2015] EWHC 1879.

3.0 Housing Market Area

3.1 Introduction

3.1.1 The PPG Paragraph 2a-008 makes clear that the housing need should be assessed in relation to the relevant functional area, i.e. the HMA. PPG Paragraph 2a-009 notes that *"no single source of information on needs will be comprehensive in identifying the appropriate assessment area; careful consideration should be given to the appropriateness of each source of information and how they relate to one another…"*.

3.1.2 The PPG Paragraph 2a-009 states that a HMA "*is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. It might be the case that housing market areas overlap. The extent of the housing market areas identified will vary, and many will in practice cut across various local planning authority administrative boundaries"*. However, for all practical purposes, HMAs need to be considered to cover entire LPAs and it is a matter of judgement as to whether one LPA is included and another is omitted.

3.1.3 The PPG Paragraph 2a-011 suggests three different sources of information to define a HMA:

- House prices and rates of change in house prices;
- Household migration and search patterns; and
- Contextual data (e.g. travel to work area boundaries, retail and school catchment areas).

3.1.4 The following analysis considers each in turn.

3.2 House Prices

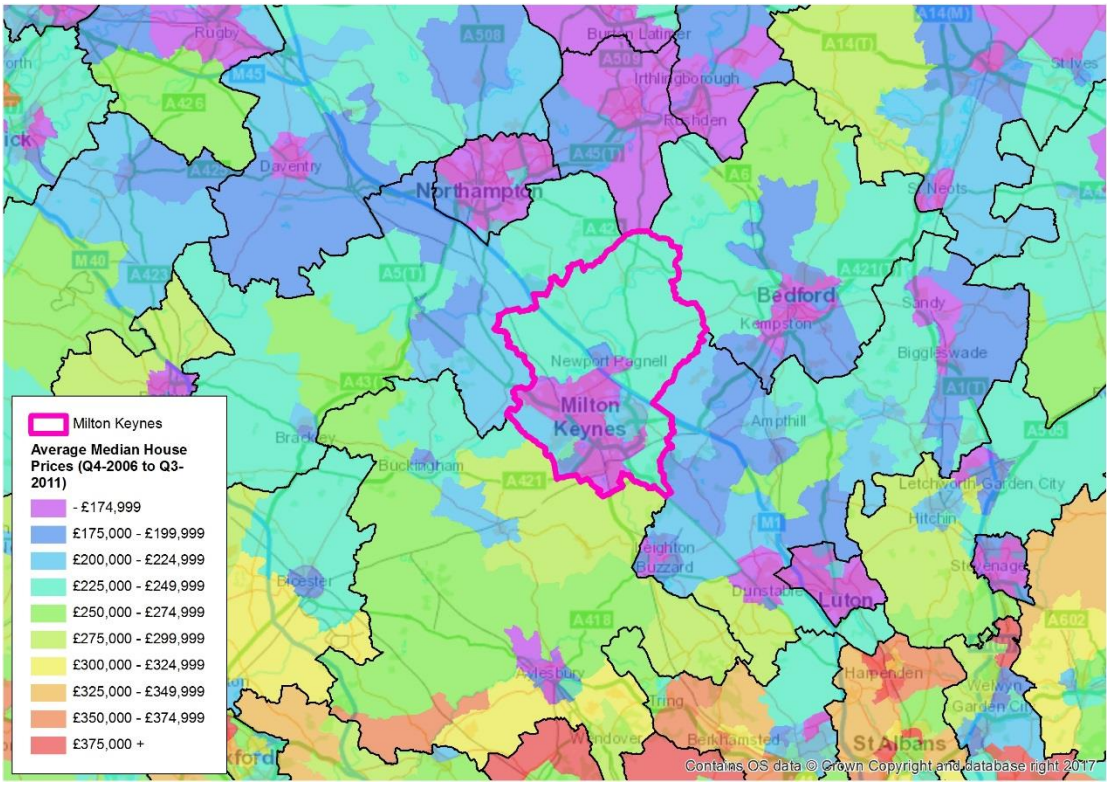
3.2.1 The PPG Paragraph 2a-011 states:

"Housing market areas can be identified by assessing patterns in the relationship between housing demand and supply across different locations. This analysis uses house prices to provide a 'market-based' reflection of housing market area boundaries. It enables the identification of areas which have clearly different price levels compared to surrounding areas. The findings provide information about differences across the area in terms of the price people pay for similar housing, market 'hotspots', low demand areas and volatility."

3.2.2 Figures 3.1 – 3.3 show the median house price data across Milton Keynes and surrounding areas. Figure 3.1 shows the average median house price values between Q4 2006 and Q3 2011 at the Medium Super Output Area (MSOA) level. Data is averaged over the five-year period (or 20 quarters) to ensure that a sufficient sample of transactions is captured to make the analysis reasonably robust. Similarly Figure 3.2 shows the average median house price values between Q4 2011 and Q3 2016 for the same geographies. Figure 3.3 then considers the percentage change in median house prices between the two periods.

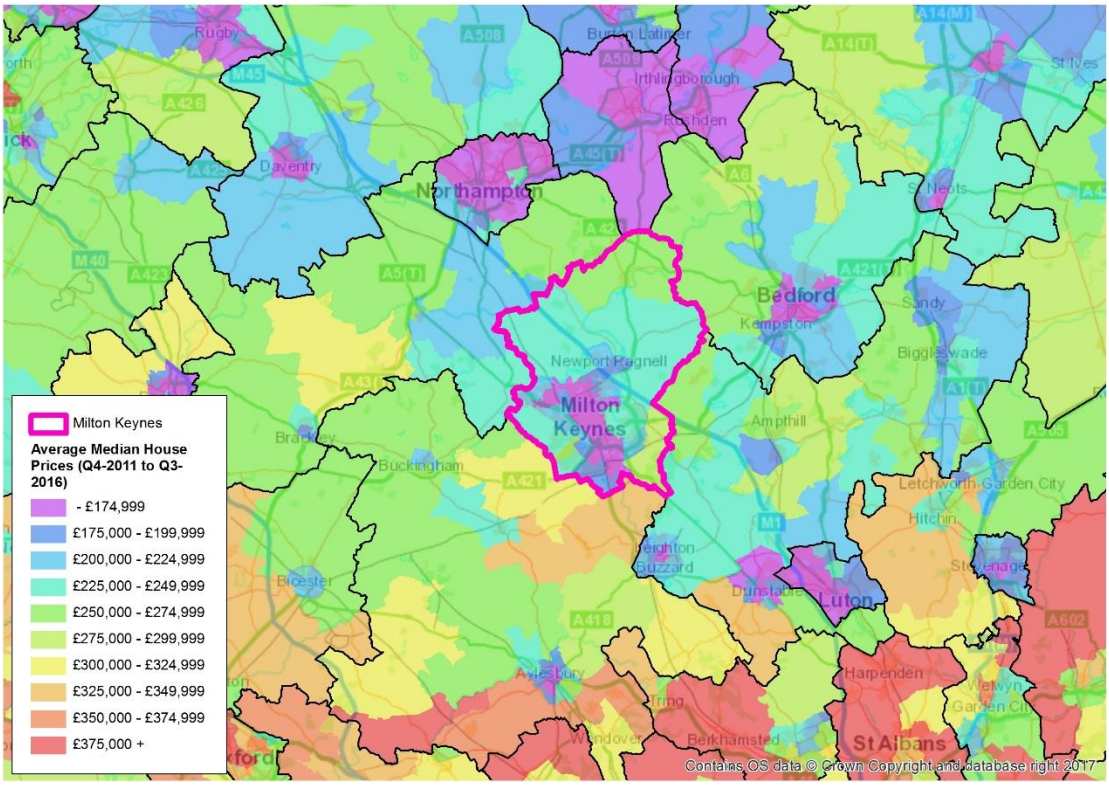
3.2.3 These clearly show that Milton Keynes is located on the border between areas to the south that are influenced by London's housing pressures, and the relatively cheaper areas to the north. Median house prices in Milton Keynes are relatively low in comparison to Aylesbury Vale but appear to be increasing at a greater rate; especially on the periphery of Milton Keynes itself. However, generally it appears that median house prices in Milton Keynes are becoming more characteristic of those seen in Bedford, Central Bedfordshire and Luton.

Figure 3.1: Average Median House Prices (Q4 2006 – Q3 2011)



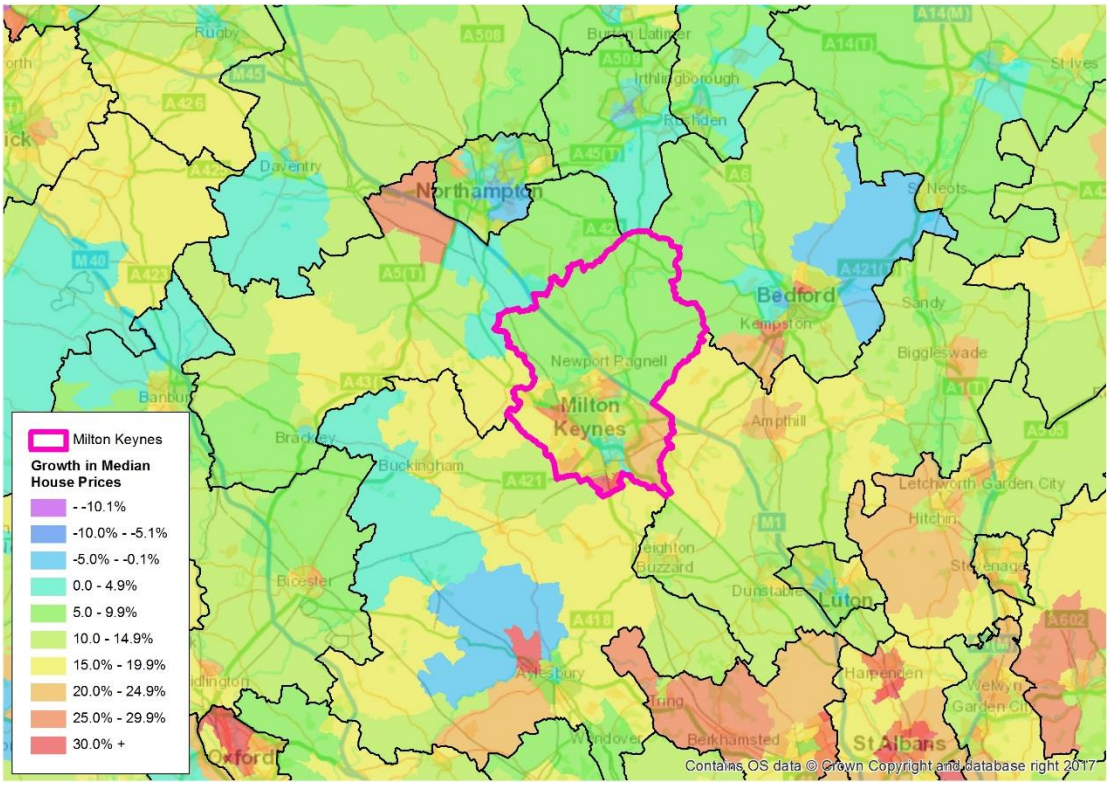
Source: ONS. March 2017. Median House Price by MSOA – HPSSA Dataset 2

Figure 3.2: Average Median House Prices (Q4 2011 – Q3 2016)



Source: ONS. March 2017. Median House Price by MSOA – HPSSA Dataset 2

Figure 3.3: Percentage Growth in Median House Prices (Q4 2006/Q3 2011 and Q4 2011/Q3 2016)



Source: ONS. March 2017. Median House Price by MSOA – HPSSA Dataset 2

3.3 Household Migration

3.3.1 PPG Paragraph 2a-011 states:

"Migration flows and housing search patterns reflect preferences and the trade-offs made when choosing housing with different characteristics. Analysis of migration flow patterns can help to identify these relationships and the extent to which people move house within an area. The findings can identify the areas within which a relatively high proportion of household moves (typically 70 per cent) are contained. This excludes long distance moves (e.g. those due to a change of lifestyle or retirement), reflecting the fact that most people move relatively short distances due to connections to families, friends, jobs, and schools."

3.3.2 Data from the 2011 Census gives detail on the net migration within the UK (**Table 3.1**) [10]. Overall it appears that migration between Milton Keynes and the UK is highly dispersed with the top ten locations for inward migration accounting for just 30.7% of all inward migration and the top ten destinations for outward migration only accounting for 40.8% of all outward migration.

10 Note that the PPG actually refers to household migration patterns while the 2011 Census refers only to population. There is no simple conversion of population to households, as this is dependent on the prevailing reasons for migration to or from a local authority area. Furthermore, some households are inevitably created or combined as a result of migration, which means that household migration as a variable becomes extremely complex. Consequently, the PPG is generally considered to refer to population migration.

3.3.3 It seems probable that the much of the migration with Birmingham, Nottingham and Coventry is associated with students and can be discounted. Milton Keynes has a relatively young population (**Figure 4.5**) but doesn't have a resident university. As such it loses many of its young adults to surrounding university towns and cities. Many will then return given that Milton Keynes has a particularly high job density.

Table 3.1: Net Migration with the UK, 2010/11

INWARD MIGRATION		
MOVING FROM	NO.	%
Central Bedfordshire	512	5.5
Aylesbury Vale	472	5.1
South Northamptonshire	599	6.5
Bedford	365	3.9
Luton	132	1.4
Northampton	383	4.1
Chiltern	28	0.3
Cherwell	52	0.6
Wellingborough	157	1.7
Birmingham	151	1.6
ALL	**9,277**	**100**

OUTWARD MIGRATION		
MOVING TO	NO.	%
South Northamptonshire	487	5.8
Central Bedfordshire	922	10.9
Aylesbury Vale	580	6.9
Northampton	315	3.7
Bedford	341	4.0
Wellingborough	127	1.5
Birmingham	122	1.4
Luton	336	4.0
Nottingham	132	1.6
Coventry	86	1.0
ALL	**8,452**	**100**

Source: ONS 2011 Census Table MM01CUK_ALL.

3.3.4 In addition, there were 18,106 movements within the LPA, which accounts for 50.5% of all movements in that year. Therefore, whilst the relationship with the rest of the UK is particularly dispersed, the LPA is actually very self-contained. **Table 3.2** uses the same information as above to show the area in which the majority of movements occur.

Table 3.2: Net Migration within the UK – All Movements, 2010/11

	MOVEMENTS	
	NO.	%
Central Bedfordshire	1,434	8.1
South Northamptonshire	1,086	6.1
Aylesbury Vale	1,052	5.9
Bedford	706	4.0
Northampton	698	3.9
Luton	468	2.6
ALL	**17,729**	**100.0**

Source: ONS 2011 Census Table MM01CUK_ALL.

3.3.5 To achieve the 70% containment suggested in the PPG, the HMA would need to include at least Central Bedfordshire, South Northamptonshire and Aylesbury Vale.

3.4 Contextual Data

3.4.1 **Figures 3.4** shows the Milton Keynes ONS 2011 Travel to Work Areas (TTWAs). This clearly shows that the greatest relationship is with Aylesbury Vale with only small parts of Central Bedfordshire and South Northamptonshire also included. Care however is needed in interpreting this since many commuting flows will cross these borders. There are actually far larger commuting flows between Milton Keynes and Central Bedfordshire than between Milton Keynes and Aylesbury Vale. Overall, in 2011 Milton Keynes attracted a net 16,336 commuters with inward flows being 58% greater than outward flows.

Figure 3.4: Travel to Work Areas, 2011

Source: ONS. 2011 TTWAs

3.5 Conclusions

3.5.1 The above data shows a number of clear linkages between Milton Keynes and surrounding areas. Migration patterns are clearly dominated with moves within the LPA. House price data clearly shows that Milton Keynes is more comparable with Bedford and Central Bedfordshire. However, the travel to work area shows a strong association between Aylesbury Vale, Central Bedfordshire and South Northamptonshire.

3.5.2 On the basis of the above, the HMA is assumed to comprise:

- Milton Keynes;
- Aylesbury Vale;
- Central Bedfordshire;
- South Northamptonshire;
- Bedford; and
- Northampton

3.5.3 The linkages between Milton Keynes and surrounding areas are however, with the exception of commuting flows, quite weak. Previous work undertaken by Bidwells in neighbouring areas has recognised far stronger relationships are present between neighbouring authorities than between these authorities and Milton Keynes. As such, for the purposes of considering FOAN, it is reasonable to consider Milton Keynes as its own HMA. However, where neighbouring local authorities cannot accommodate their own FOAN and engage in the Duty to Cooperate, it would be entirely reasonable to request that Milton Keynes makes provision to accommodate some of that need, subject to its own capacity constraints.

4.0 Official Projections

4.1 Introduction

4.1.1 The latest official projections are:

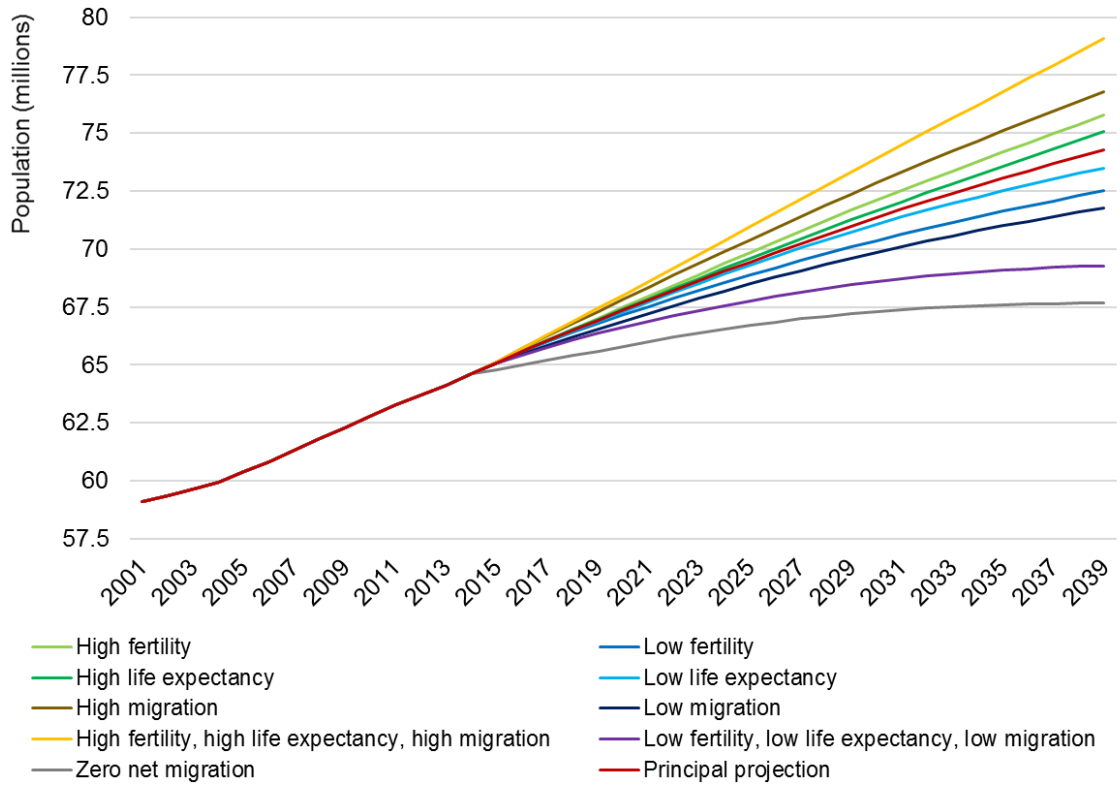
- ONS. 29 October 2015. 2014-based National Population Projections (2014NPP).
- ONS 25 May 2016. 2014-based Sub National Population Projections (2014SNPP).
- DCLG. 12 July 2016. 2014-based Household Projections (2014HP).

4.1.2 These form the starting point of any assessment of housing need and supersede previous versions. Notwithstanding this, previous versions are described below to provide context.

4.2 National Population Projections

4.2.1 The 2014NPP is the primary source of population data and the 2014SNPPs for individual LPAs is constrained to sum to the principal projection. It is worth noting however that the 2014NPP actually comprises ten different projections based on different variables, and resulting is significant differences in population growth over the subsequent 25 years (**Figure 4.1**). While fertility and life expectancy can both have an effect on the level of future population growth, it is international migration that causes the greatest variability.

Figure 4.1: 2014NPP Principal Projection and Variants



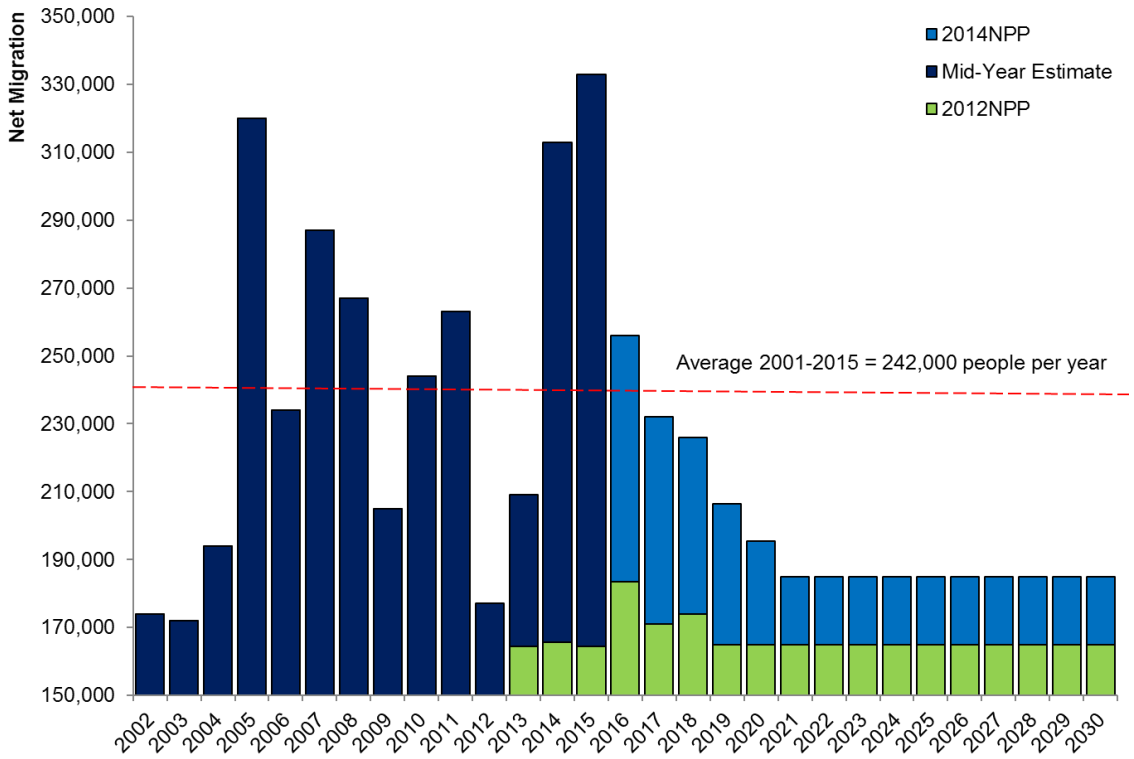
Source: ONS, 2014SNPP

4.2.2 The issue of accommodating net international migration into population projections is well documented. For the UK, as a whole the 2012-based National Population Projections (2012NPP)

were heavily criticised for significantly downplaying future net international migration. This has been partly addressed in the 2014NPP, which have increased the estimated net international migration per year, but it still does not reflect past or current trends (**Figure 4.2**).

4.2.3 It is estimated that over the last three years, the 2014NPP has underestimated international net migration by 360,500 people. Assuming an average household size of 2.6 people, this equates to 138,600 additional households. This suggests that the household projections for England could be out by 9% after just three years[11]. The effect of this will not be felt consistently across the country but will instead be focused in areas that generally see higher levels of international in-migration. These also tend to be areas of higher economic activity and higher housing need. Consequently, the household projections are not always a reliable basis for assessing housing need and adjustments are often necessary.

Figure 4.2: Difference between Estimated and Projected Net International



Source: ONS Mid-Year Population Estimates; 2012-based National Population Projections; 2014-based National Population Projections.

11 An accurate estimate cannot be made at this stage since detailed information is not available on the distribution of migrants across the UK and how many students would be living in student housing.

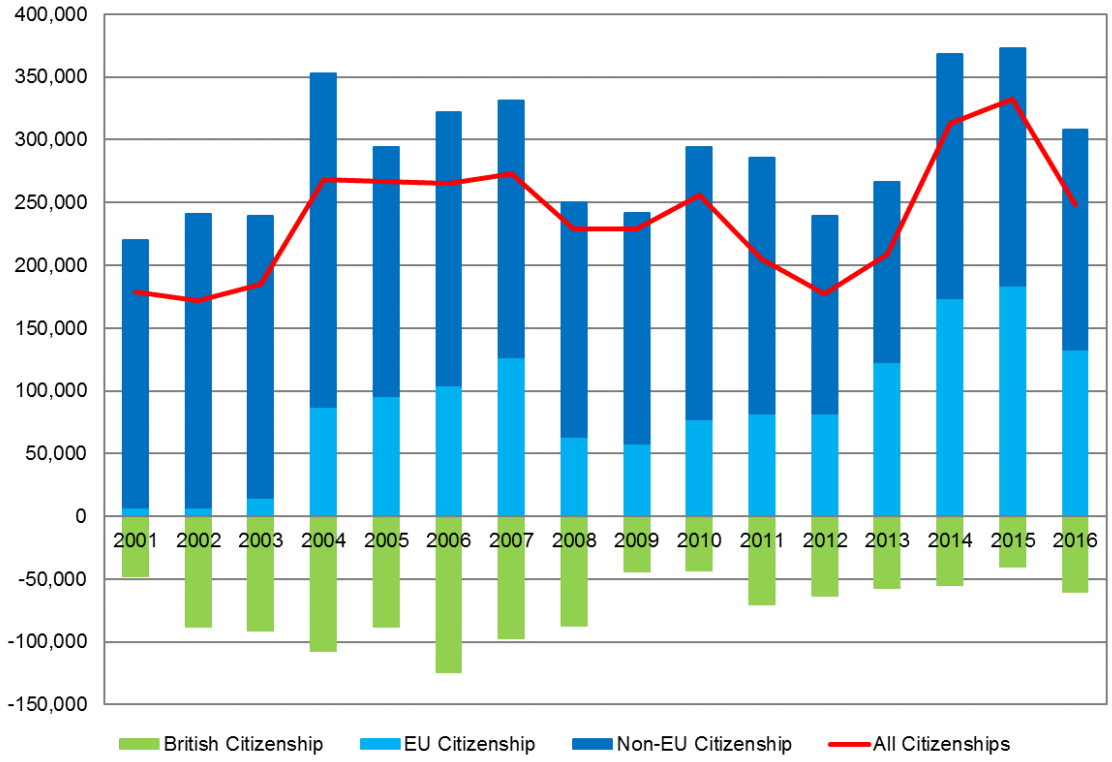
4.3 The Implications of Brexit

4.3.1 Article 50 was triggered in March 2017 and will be followed by two years, at least, of negotiation. It is not known what the result of those negotiations will be in terms of freedom of movement within the European Economic Area (EEA). Some restrictions seem probable but it is equally probable that the EU will not yield on the overall concept of freedom of movement.

4.3.2 Up until Brexit occurs freedom of movement will continue. The most recent provisional estimates of net international migration from ONS suggest that it fell to +248,000 people in 2016, a statistically significant reduction from +332,000 people in 2015. However, such significant fluctuations, both positive and negative, have been common since the enlargement of the EU in 2004 (**Figure 4.3**).

4.3.3 Some of this reduction will be a result of natural fluctuations but inevitably some will be a direct result of Brexit, particularly as the detailed data suggests notable changes in the flows in the third quarter of 2016. However, it is too early to tell if this is the start of a new trend or simply a 'dip' as has occurred at least twice in the last decade in response to macro-economic or geo-political reasons.

Figure 4.3: Long Term International Migration, 2001-2016



Source: ONS. May 2017. Provisional Long-Term International Migration Estimates.

4.3.4 Overall it seems improbable that the uncertainty in the longer term will substantially affect the number of inward migrants looking for work. The UK economy is robust and whilst the uncertainty might make high levels of growth difficult, it seems unlikely that it will result in a sharp decline in employment need. The only factor at present that might affect this is the weakened Pound against the Euro, which will affect European economic migrants that send money home. Notwithstanding this, whilst there is still demand for a labour force, it is likely the migrants will still

come. It is likely that those that arrive before Brexit will be given leave to remain indefinitely so there is unlikely to be significant concerns over what happens after Brexit.

4.3.5 There is some possibility that Brexit may dissuade some from the UK moving to elsewhere in the EU, particularly those doing so for retirement given the weakening of the pound. Therefore, this component of net international migration could actually increase in the short term.

4.3.6 At present, it seems likely that net international migration will continue at the same levels seen in recent years (i.e. the last decade) for at least the next two years, probably longer. Beyond this the impact on net international migration is less clear but it is highly probable that it will continue to be far higher than the tens of thousands envisaged. After all, approximately half of immigrants do not come from the EU, and many of those that do come from the EU would still be allowed into the UK even if freedom of movement was swept away entirely. These would include students and the highly qualified, both of which the UK would not want to dissuade.

4.3.7 In the medium term, therefore it seems possible that there will be a small decline in net international migration but this is by no means certain. The longer term is unclear although it will always be the case that the rate of migration will be linked to economic success.

4.3.8 In terms of household projections, the effect in the short to medium term is likely to be minimal. The national population projections on which the household projections are ultimately based have been regularly criticised for underestimating net international migration, see **Figure 4.2**. Even with Brexit it seems unlikely that net international migration would fall to the level envisaged in these projections without having an adverse effect on the UK economy. Therefore, it will still be necessary to interrogate migration levels when determining the FOAN for housing.

4.3.9 It is also worth pointing out that net international migration is but one component considered when determining FOAN. Migration from elsewhere in the UK will remain the most important component for those areas seeing significant economic growth. Natural change is also likely to be a positive factor with birth rates continuing to be higher than seen in previous decades and the population generally living longer. There is also the issue of backlog with a substantial increase in concealed families seen between the 2001 and 2011 Censuses that needs to be addressed.

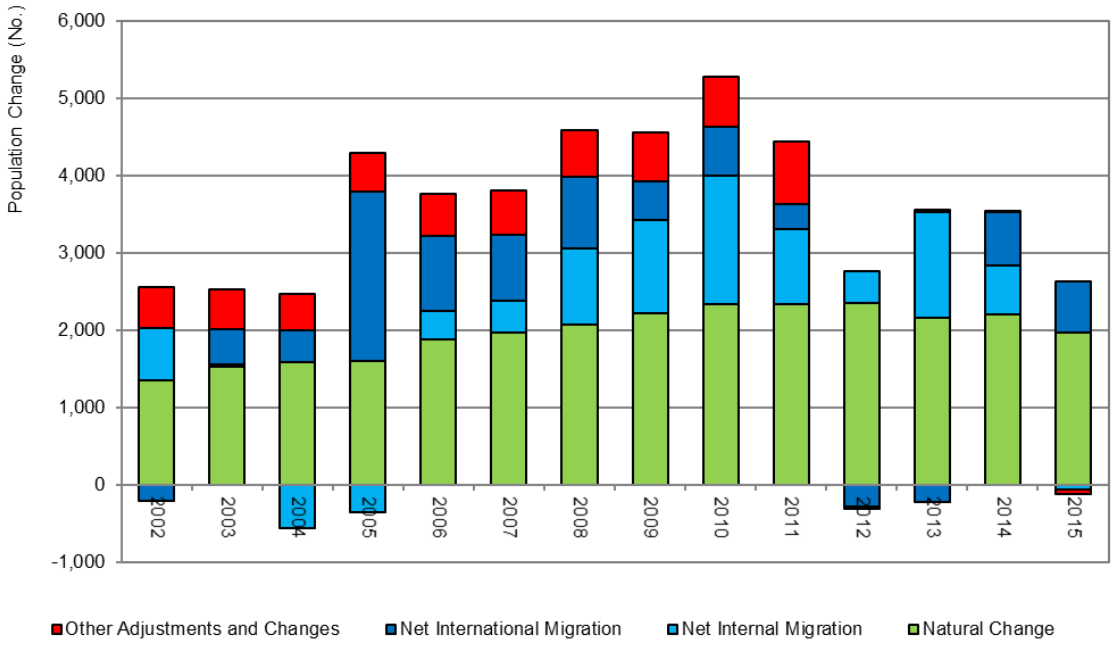
4.3.10 Bidwells position therefore is that in the short to medium term there should be no change in the evidence on which FOAN is based as a result of Brexit. The effect in the longer term is unlikely to result in a significant change in the trajectory of any projections made now. However, should some significant change occur, that will be a matter for consideration during the review of the local plans being adopted now in the period prior to Brexit.

4.4 Mid-Year Population Estimates

4.4.1 The ONS Mid-Year Population Estimates (MYPEs) for 2001 to 2015 provide detailed data on population age/sex and component of change (i.e. births, deaths and migration) [12], see **Figure 4.4**. This clearly shows that in Milton Keynes natural change is the main driver of population growth. Natural change has been relatively balanced throughout the period. The reason for the recent decline in migration is unclear. It could reflect a decline in housing availability relative to surrounding areas.

12 ONS. June 2016. Population Estimates for UK, England and Wales, Scotland and Northern Ireland, Mid-2015.

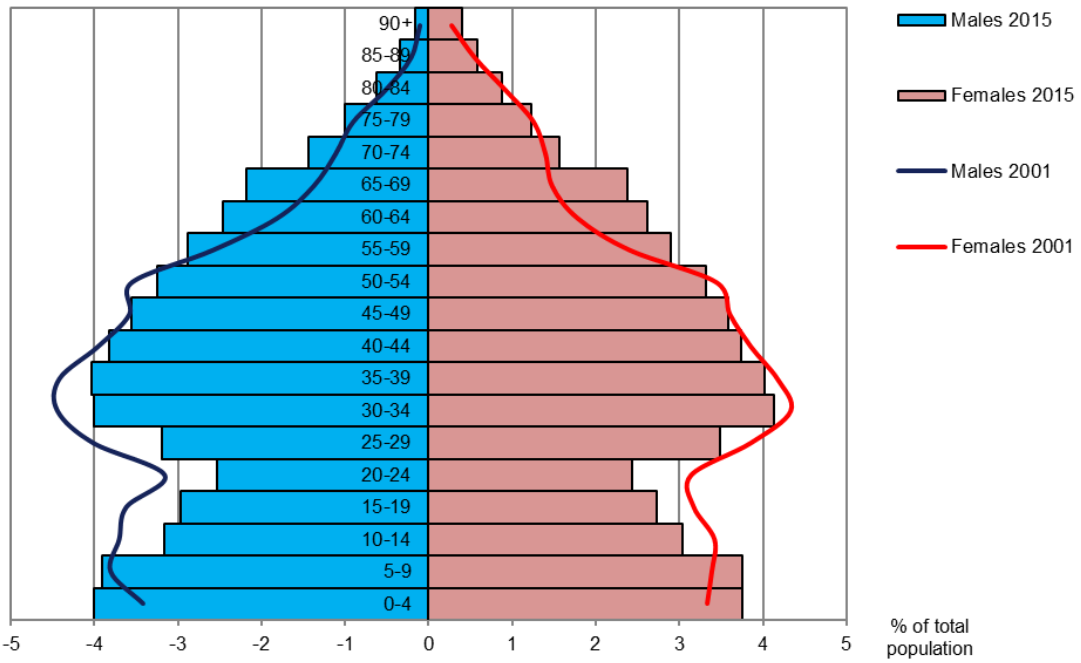
Figure 4.4: Annual Change in Population in Milton Keynes, 2001-2015



Source: ONS Mid-Year Population Estimates, 2015.

4.4.2 **Figure 4.5** shows that Milton Keynes has a young population. However, there is evidence that the population is ageing. Generally, where there is a gap between the lines denoting the 2001 profile and the blocks denoting the 2015 profile there has been a significant proportional reduction in that age group. It can clearly be seen that amongst those aged 20-29 have proportionally declined by a substantial figure over the last fifteen years.

Figure 4.5: Change in Population Profile in Milton Keynes, 2001-2015



Source: ONS Mid-Year Population Estimates, 2015.

4.4.3 The reasons for this ageing process are numerous. There are underlying reasons such as people living longer on average. However, there can also be local issues such as limited job opportunities, lack of affordable housing (in its broadest sense) and no higher education establishments. These issues will be considered later.

4.4.4 Other important 'components' of change are the other adjustments and changes that result from subsequent changes to the MYPEs (known as Unattributable Population Change, UPC); principally those following on from the 2011 Census. When preparing their population projections, ONS do not take account of UPC since they have not been formally attributed to a component of change (i.e. births, deaths and migration) or could relate to errors in the Censuses. However, where there is evidence that the Censuses are sufficiently accurate and that the adjustments most likely can be attributed to migration (the accuracy of births and deaths in the UK is near perfect), there is a clear argument that these should have been included in the projections.

4.4.5 In the case of Milton Keynes, the UPC resulted in an increase in the population of 5,811 people between 2001 and 2011. However, the total population change over this period was 31,377 (37,188 with the UPC included) and so it appears that UPC made a net contribution of +18.5%. It appears that this underestimation was predominantly young families and likely a result of under counting international migration to the District. ONS have since revised their methodology on calculating international migration and distributing it amongst LPAs. As such, UPC is unlikely to be a significant issue from 2012 onwards.

4.5 Sub National Population Projections

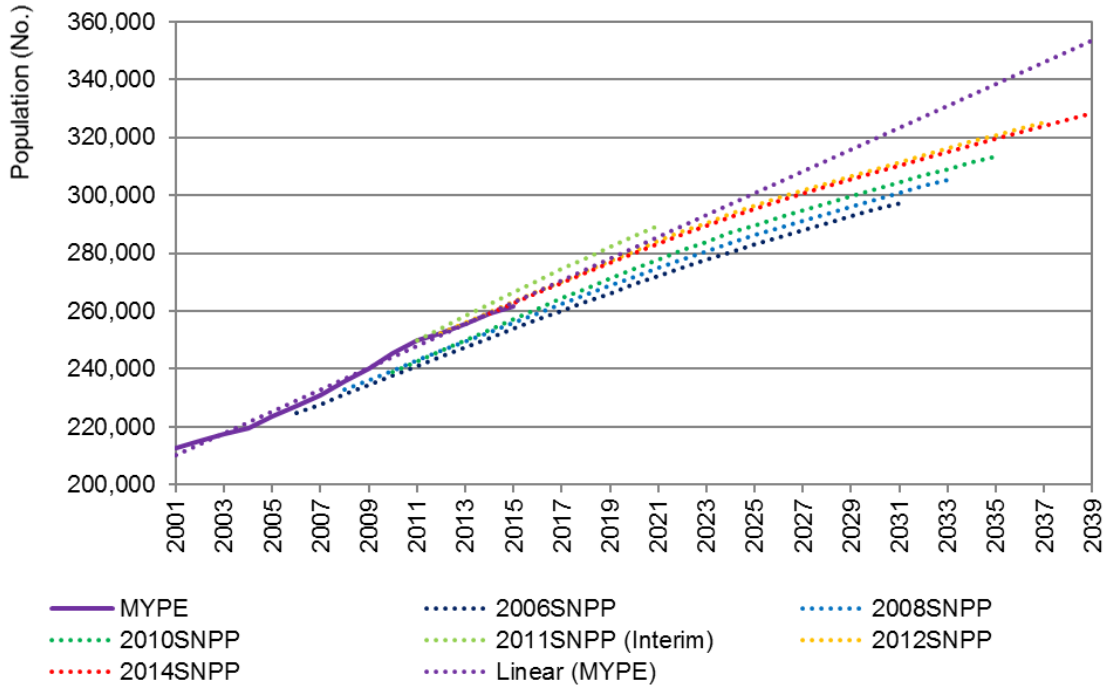
4.5.1 **Figure 4.6** shows the sub national population projections from 2006, 2008, 2010, 2011, 2012 and 2014[13], plus the MYPEs for 2001-2015. Whilst the most recent SNPP technically supersedes all previous versions, it is useful to consider the evolution of the projections over time.

4.5.2 It is very apparent that the SNPPs between 2006 and 2010 underestimated population growth. Indeed, following the 2011 Census the MYPEs were revised to address miscounting that occurred in the inter-censul period which has left the 2006, 2008 and 2010 SNPPs slightly adrift of the MYPEs. Between 2001 and 2015 the population grew by an average of 1.5% per year. This peaked at 2.2% in 2010 but since then growth has declined such that only 1.0% was achieved in 2015.

4.5.3 **Figure 4.7** shows the differences in annual average net migration between 2001 and 2015 compared to the assumptions in the 2014SNPP. This shows that net migration in Milton Keynes has been erratic, particularly in the last few years. Over the last five years it appears that on average net migration has been approximately 1,050 people per year. The 2014SNPP averages 1,080 people per year. Therefore, there is no reason to make adjustments to the 2014SNPP to accommodate longer term migration trends or UPC as the 2014SNPP is already comparable to these.

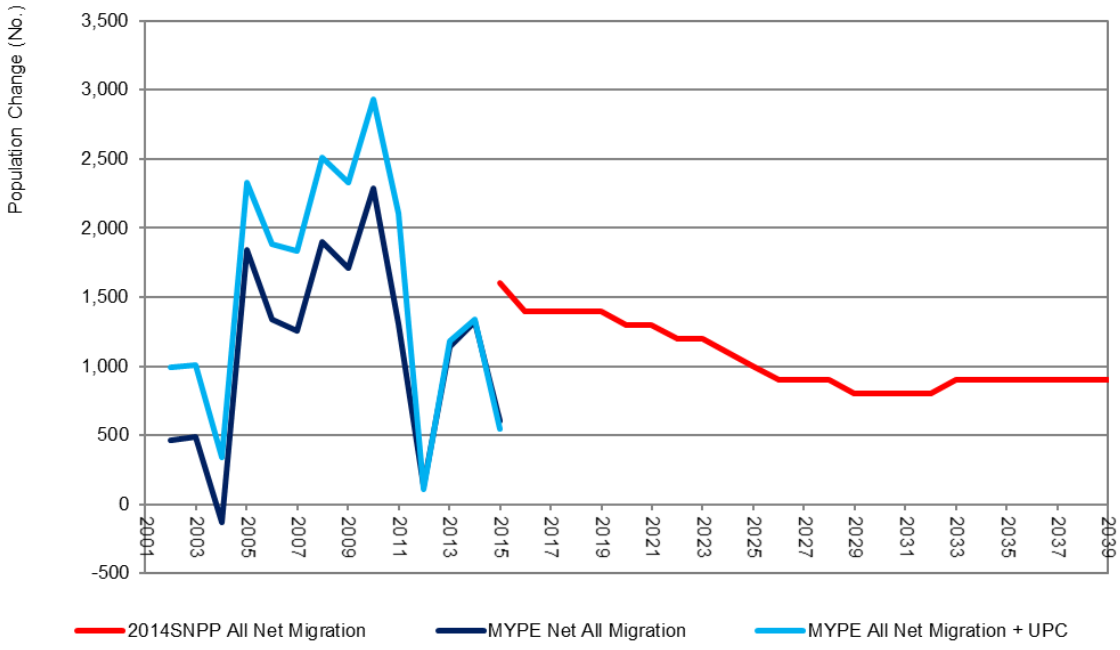
13 ONS Sub National Population Projections.

Figure 4.6: Government Population Projections for Milton Keynes



Source: ONS Sub National Population Projections

Figure 4.7: Differences between MYPE and 2014SNPP for Milton Keynes



Source: ONS Mid-Year Population Estimates; 2014SNPP.

4.6 Household Projections

4.6.1 Household projections published by DCLG should provide the starting point estimate of overall housing need (PPG Paragraph 2a-015). The household projections are produced by applying projected household representative rates (HRRs) to the population projections published by ONS. Projected HRRs are based on trends observed in Census and Labour Force Survey data. The PPG goes onto state that:

"The household projections are trend based, i.e. they provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice. They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.

The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing. The assessment will therefore need to reflect the consequences of past under delivery of housing. As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply."

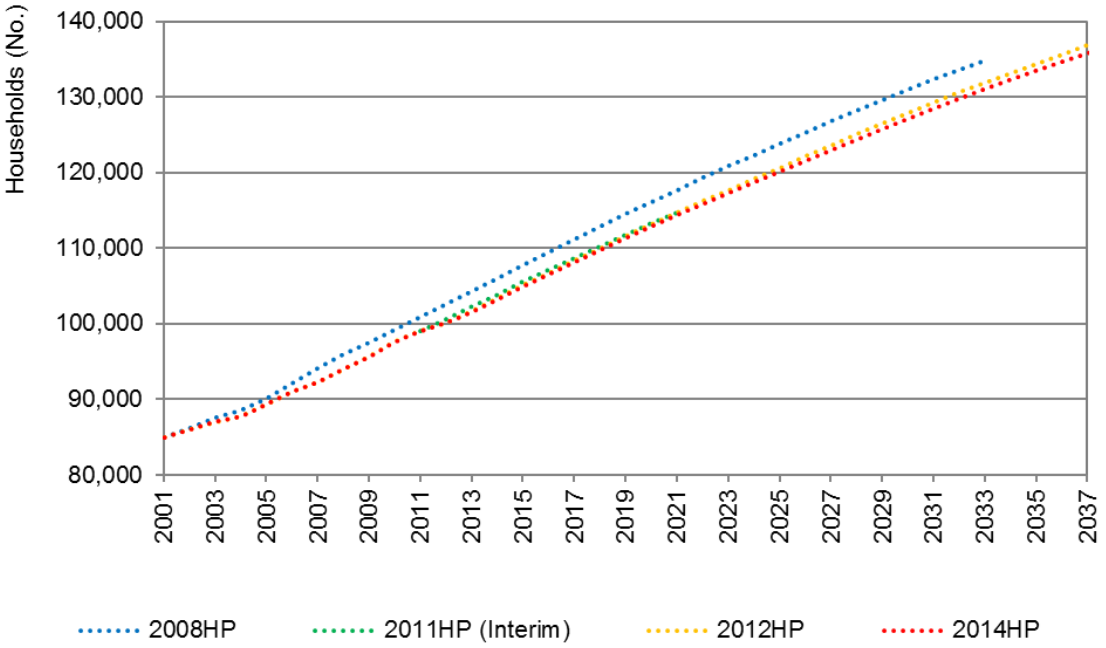
4.6.2 HRRs should only be adjusted after very careful consideration. The 2008-based Household Projections (2008HP) HRRs are likely to be overestimates given that they were derived from inaccurate base data. However, it is also likely that household formation rates have been suppressed since the start of the housing crisis which arguably has its roots in the 1980s/90s[14]. Consequently, there is a danger that the 2014HP HRRs are an underestimate of household formation that could result in an undersupply in future housing.

4.6.3 **Figure 4.8** shows the most recent household projections[15] and indicates how erroneous the 2008HP was. This was likely a result of overestimated HRRs as the population growth was underestimated. The past three household projections are however very well aligned and show a continuation of the trajectory seen in the MYPEs.

4.6.4 The 2011 Census shows evidence of significant overcrowding compared to the national average (**Table 4.1**). This is particularly noticeable amongst families with dependent children and single person households. The 2011 Census doesn't identify significant numbers of concealed families (i.e. two or more families sharing a dwelling, which for most of the 2011 Census would be denoted as a single household) compared to the national average (**Table 4.2**). However, concealed families are a growing concern having increased in number since 2001 by 101.0% (unconcealed families increased by 18.5%).

14 Simpson, L. December 2014. Whiter Household Projections? TCPA.
15 DCLG Household Projections.

Figure 4.8: Government Household Projections for Milton Keynes



Source: DCLG Household Projections

Table 4.1: Occupancy Rating (Rooms) by Household Composition, 2011

HOUSEHOLD COMPOSITION	MILTON KEYNES			ENGLAND
	ALL	-1 OR LESS		-1 OR LESS
	NO.	NO.	%	%
One-person household: Aged 65 and over	8,602	435	4.6	4.3
One-person household: Other	16,944	1,942	20.6	11.0
One family only: All aged 65 and over	5,429	52	0.6	0.7
One family only: Married or same-sex civil partnership couple: No children	12,966	243	2.6	1.6
One family only: Married or same-sex civil partnership couple: Dependent children	18,274	1,505	16.0	8.2
One family only: Married or same-sex civil partnership couple: All children non-dependent	5,289	184	2.0	3.6
One family only: Cohabiting couple: No children	6,017	365	3.9	5.9
One family only: Cohabiting couple: Dependent children	4,839	597	6.3	10.4
One family only: Cohabiting couple: All children non-dependent	493	21	0.2	5.8
One family only: Lone parent: Dependent children	8,166	1,528	16.2	17.5
One family only: Lone parent: All children non-dependent	3,256	290	3.1	8.8
Other household types: With dependent children	3,187	1,034	11.0	32.5
Other household types: Other (including all full-time students and all aged 65 and over)	5,122	1,237	13.1	25.3
ALL CATEGORIES: HOUSEHOLD COMPOSITION	**98,584**	**9,433**	**100.0**	**8.7**

Source: ONS 2011 Census Table DC4104EWla

Table 5.2: Concealed Families, 2011

FAMILY STATUS	MILTON KEYNES		ENGLAND
	NO.	%	%
Concealed family: Total	1,224	1.7	1.9
Concealed family: Lone parent family: Total	489	0.7	0.7
Concealed family: Lone parent family: Dependent children	413	0.6	0.5
Concealed family: Lone parent family: All children non-dependent	76	0.1	0.1
Concealed family: Couple family: Total	735	1.0	1.2
Concealed family: Couple family: No children	553	0.8	0.8
Concealed family: Couple family: Dependent children	148	0.2	0.3
Concealed family: Couple family: All children non-dependent	34	0.0	0.1
Unconcealed family: Total	69,864	98.3	98.1
Unconcealed family: No children	26,229	36.9	40.4
Unconcealed family: Dependent children	33,734	47.5	42.3
Unconcealed family: All children non-dependent	9,901	13.9	15.5
ALL CATEGORIES: ALL FAMILIES	**71,088**	**100.0**	**100.0**

Source: ONS 2011 Census Table DC1110EWla

4.6.5 It is this rate of growth of concealed families that is indicative of the economic pressures on the household formation rather than natural progression. A recent study investigated the effects of changing household formation rates on household projections[16]. Whilst it is accepted that the 2008HP is likely to have overestimated the rate of household formation, it is likely that the 2012HP (and 2014HP) underestimated the rate of household formation by virtue of the increasing number of concealed families.

4.6.6 The effect on household formation is not consistent across household types. Young couples are particularly adversely affected. As discussed previously, some of this will be a result of overestimation in the 2008HP whilst some others will be a result of changing lifestyle choices. However, the rate of change in household formation amongst Household Representative Persons (HRPs) aged 25-34 is particularly significant.

4.6.7 The study accepts that the household formation rates in the 2012HP are the best currently available (now superseded by the 2014HP); however, the degree of change seen in the long term is likely to be a rolling forward of the housing constraints that the process enshrined in the NPPF is intended to resolve. Whilst overcrowding does not currently appear to be a significant issue, without a substantial correction to the housing supply, it is highly likely to become significant by the end of the local plan period. Whilst there are significant declines in the HRRs locally, they do not differ significantly from those seen nationally. Therefore, there is currently no justification to alter the HRRs to reflect local circumstances. The issue of overcrowding will be revisited when considering housing market signals.

16 McDonald, N., Whitehead, C. November 2015. New Estimates of Housing Requirements in England, 2012 to 2037. TCPA.

5.0 Making Local Adjustments

5.1 Background

5.1.1 The need to make local adjustments is explained in PPG Paragraph 2a-017:

"The household projections produced by the Department for Communities and Local Government are statistically robust and are based on nationally consistent assumptions. However, plan makers may consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates. Account should also be taken of the most recent demographic evidence including the latest Office for National Statistics population estimates.

Any local changes would need to be clearly explained and justified on the basis of established sources of robust evidence.

Issues will vary across areas but might include:

- *migration levels that may be affected by changes in employment growth or a one off event such as a large employer moving in or out of an area or a large housing development such as an urban extension in the last 5 years*
- *demographic structure that may be affected by local circumstances or policies eg expansion in education or facilities for older people*

Local housing need surveys may be appropriate to assess the affordable housing requirements specific to the needs of people in rural areas, given the lack of granularity provided by secondary sources of information."

5.2 Adjusting the Population Projections

5.2.1 The review of the MYPEs in the previous chapter suggests that population growth has been slightly suppressed in recent years, primarily due to a decline in net migration with the rest of the country. This might be a result of changes in employment growth or represent the 'new normal' following the recession. The effects resulting from employment growth are better considered under the next stage in the process where all the variables affecting economic trends are considered. As such, at this stage, it is not considered appropriate to adjust the underlying population projections.

5.2.2 Furthermore, the 2015 MYPE does not materially differ from the 2014SNPP prediction for 2015 so there is no need to update the projections to take account of the MYPE.

5.2.3 The 2016 SHMA disagrees with this approach and instead generates its own population projections based on 10-year trends (2005 to 2015) rather than the 5-year trends favoured by ONS in the 2014SNPP. The reasons for this are set out on pages 18-20 of the SHMA. However, all the reasons put forward are methodological rather than reflecting the local circumstances referred to in PPG Paragraph 2a-017 and are therefore not *"clearly explained and justified"*.

5.3 Adjusting the Household Projections

5.3.1 As discussed previously, the official household projections do not need to be adjusted to take account of local concerns relating to HRRs.

5.4 The Demographic-Led Projection

5.4.1 On the basis of the above, the demographic-led projection will reflect the 2014SNPP/2014HP. This is then adjusted to dwellings by assuming that the dwelling vacancy rate in the 2011 Census (3.40%) will remain constant throughout the projection period. **Table 5.1** summarises the results.

Table 5.1: The Demographic-Led Projection

YEAR	POPULATION	HOUSEHOLDS	DWELLINGS
2016	266,360	106,510	110,130
2031	310,240	128,430	132,790
Total (2016-2031)	**40,410**	**20,340**	**21,030**
Annual Average (2016-2031)	**2,694**	**1,356**	**1,402**

6.0 Economic Trends

6.1 Introduction

6.1.1 PPG Paragraph 2a-018 states that:

"Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate and also having regard to the growth of the working age population in the housing market area. Any cross-boundary migration assumptions, particularly where one area decides to assume a lower internal migration figure than the housing market area figures suggest, will need to be agreed with the other relevant local planning authority under the duty to cooperate. Failure to do so will mean that there would be an increase in unmet housing need.

Where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns (depending on public transport accessibility or other sustainable options such as walking or cycling) and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could help address these problems."

6.1.2 While this approach appears sensible, it does cause inherent issues. Commuting for work fluctuates depending on the changing employment needs of an area and the location of the resident population that seeks to access it. The location of employment and population are subject to a range of very different variables that do not always comfortably align and constantly change. However, the PPG makes clear that any a decision to not accommodate the housing needed to support employment growth is a matter of policy that should be agreed with neighbouring LPAs through the duty to cooperate. See Paragraph 2.4.5 for further details.

6.1.3 It follows therefore that changing commuting patterns should not be a factor for consideration in calculating housing need, even if there is an underlying trend. To do so in the absence of agreement with neighbouring LPAs would mean an element of housing need could remain unaccounted for in the calculation. This was considered in the High Courts, where the Judge concluded that[17]:

"For an authority to decide not to accommodate additional workers drawn to its area by increased employment opportunities is clearly a policy on decision which affects adjacent authorities who would be expected to house those additional commuting workers, unless there was evidence (accepted by the inspector or other planning decision-maker) that in fact the increase in employment in the borough would not increase the overall accommodation needs. In the absence of such evidence, or a development plan or any form of agreement between the authorities to the effect that adjacent authorities agree to increase their housing accommodation accordingly, the decision-maker is entitled to allow for provision to house those additional workers. To decide not to do so on the basis that they will be accommodated in adjacent authorities is a policy on decision."

6.1.4 A further complication is the balance of housing and employment when a LPA seeks to promote higher economic growth. This again would be a policy decision and technically therefore falls

17 Oadby & Wigston BC v SoSCLG & Bloor Homes [2015] EWHC 1879 (Admin).

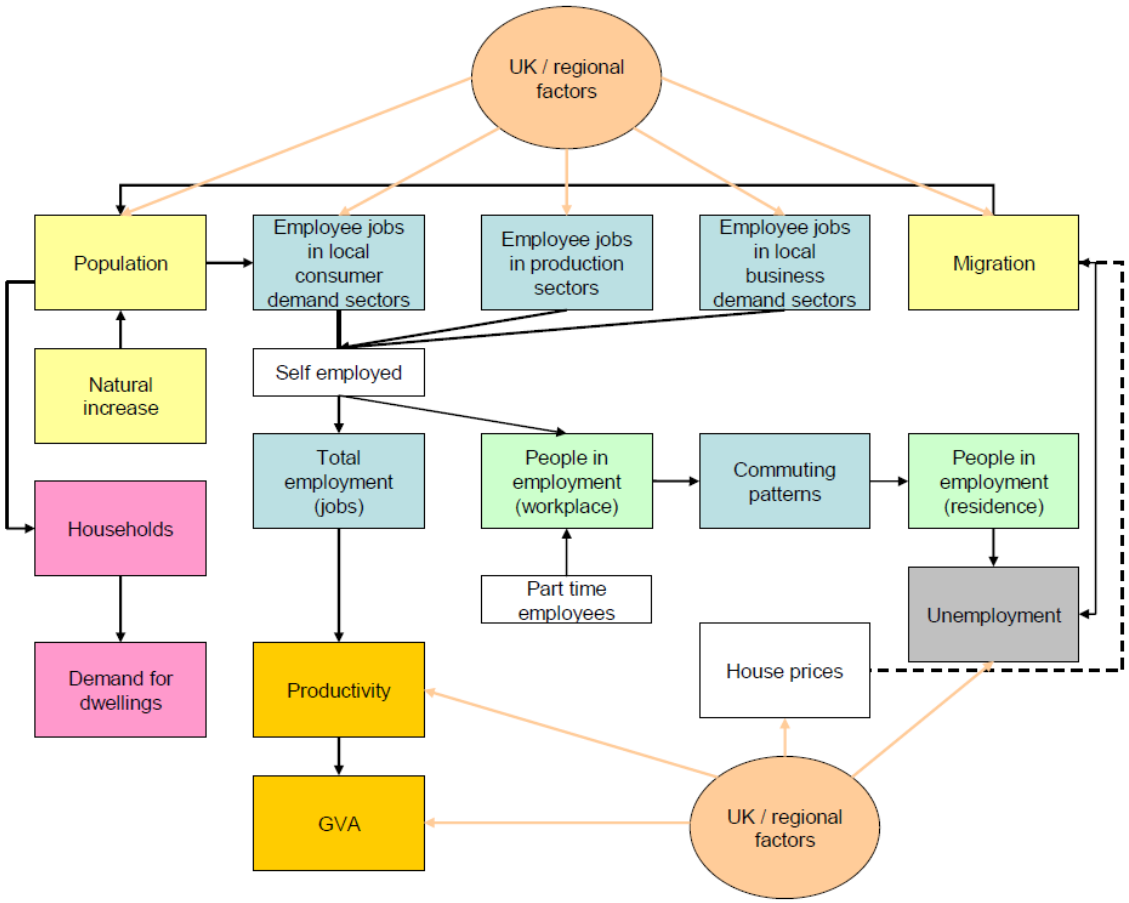
outside the remit of a calculation of housing need. However, for the local plan to be found sound, this balance would need to be considered either through a commensurate uplift in housing or explicit agreement of neighbouring LPAs to accommodate the additional housing. It is therefore prudent for the calculation of housing need to include some sensitivity testing to understand the implications for housing and inform the duty to cooperate.

6.2 Economic Background

6.2.1 Economic needs are considered using the East of England Forecasting Model (EEFM) produced by Cambridge Econometrics using a model created by Oxford Economics. The main relationships between variables in the EEFM Model are set out in **Figure 6.1**. What is notable in the model is that the demographic factors (in yellow) are largely independent of the economic variables. The population for each year in the projection period is derived from trends seen in mid-year population estimates with migration then influenced by house prices, which inevitably constrain migration in areas of high demand.

6.2.2 The population then influences the number of employee jobs in local consumer demand sectors, which are likely to account a very high proportion of all jobs. Therefore, the total number of jobs is influenced by constraints on migration as a result of house prices. Consequently, in areas of high demand, the number of jobs is likely to be suppressed.

Figure 6.1: Main Relationships between Variables in the EEFM Model



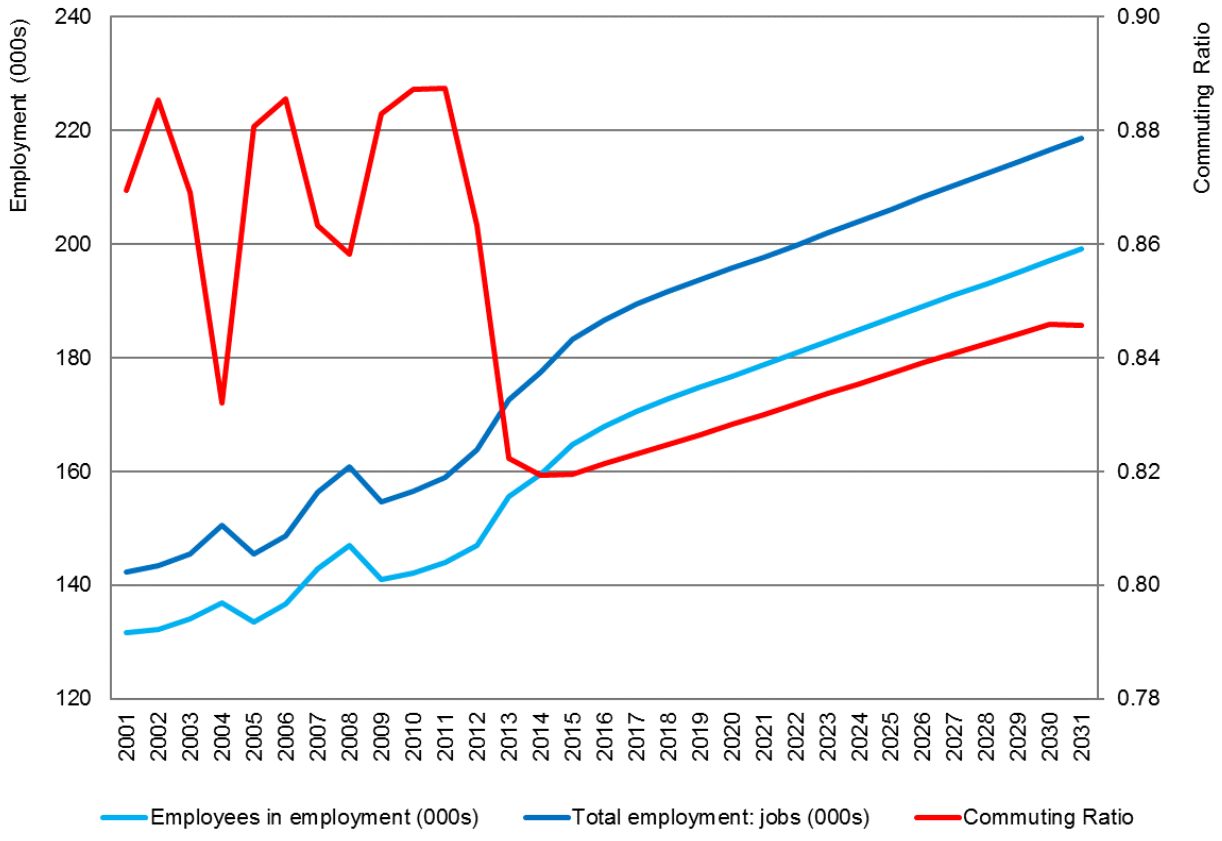
Source: Oxford Economics. January 2015. East of England Forecasting Model Technical Report: Model Description and Data Sources.

6.2.3 It is also worth noting that the commuting ratio is calculated by comparing the number of people in employment in the area with the resident population of that area in employment. This means that in areas where employment is dominated by production and local business sectors, which are not constrained by population, the commuting ratio will likely decrease as there is no function in the model for the housing market to respond to the increased need for housing resulting from economic growth. As a result, the EEFM has the risk of perpetuating current housing market issues by either constraining migration or increasing commuting.

6.2.4 Clearly the decision to modify migration rates or commuting ratios are policy decisions, as explained above and in paragraph 2.4.5. Therefore, the EEFM results should always be used with care. Despite this, the data on which the model is based is comprehensive and can be used as a good starting point to understand historic economic trends.

6.2.5 **Figure 6.2** shows the 2016EEFM results for total jobs, employees in employment and the commuting ratio. The most notable issue is the impact that the model has on the commuting ratio, which in no way reflects the historical trends, particularly those seen between 2001 and 2011. The trend is clearly volatile with the average commuting ratio over this period at 0.873, increasing to 0.855 between 2006 and 2016. For the assessment period to gradually increase to 0.846 by 2031 is clearly unreasonable.

Figure 6.2: Employment and Commuting Trends in Milton Keynes



Cambridge Econometrics. August 2016. East of England Forecasting Model: 2016 Baseline Results.

6.2.6 **Figure 6.2** also shows that the difference between total jobs and employees in employment, as a result of double jobbing, has declined from 0.87 in 2001 to 0.91 in 2016 (where 1.00 would be parity between the two). The model assumes that this will continue to decline, reaching 0.90 by 2031. This does seem reasonable with the dominance of business sectors in Milton Keynes.

6.3 Economic Projections

6.3.1 The first part of the process is to determine the level of job growth that could be supported by the Demographic-Led Projection. This was calculated using the assumptions set out below. It found that this projection would support growth of 15,050 jobs, which equates to 1,050 jobs per annum.

6.3.2 **Table 6.1** sets out the scenarios considered in this assessment. The first is intended to reflect the 2016EEFM anticipated job growth. This is the level of economic growth that appears to be intended in the draft Plan:MK, although paragraph 4.31 appears to refer to the number of employees in employment rather than the total number of jobs required to sustain this level of growth. To consider the validity of this level of economic growth, three other scenarios are also assessed that reflect the historical trends set out in the 2016EEFM. All scenarios are clearly suggesting far higher levels of job growth than would be supported by the Demographic-Led Projection.

Table 6.1: Economic Scenarios

		JOBS 2016-2031		
SCENARIO	2016	2031	GROWTH	PER ANNUM
1. 2016EEFM	186,609	218,541	31,932	2,129
2. 5-Yr Average (2011-2016)		269,706	83,097	5,540
3. 10-Yr Average (2006-2016)		243,564	56,955	3,797
4. 15-Yr Average (2001-2016)		230,919	44,310	2,954

6.3.3 For each scenario tested the following parameters are applied:

Economic Activity

6.3.4 Unfortunately, the 2016EEFM does not include details of the economic rates applied. In any event, the EEFM model only makes provision for those aged 16-64 while those aged 65+ are expected to provide much of the increase in economic activity in future years as a result of the increase state pension age, cost of living and overall health of the older population enabling to continue earning for longer.

6.3.5 Instead, current economic activity rates are derived from the 2011 Census and the Annual Population Survey (APS), and are assumed to follow the same trajectory as shown in the national projections prepared by the Office for Budget Responsibility (OBR)[18]. Largely the same approach has been adopted by ORS in the SHMA. For transparency, these economic activity rates are set out in **Appendix 1**.

Unemployment Rates

6.3.6 The unemployment rates set out in the 2016EEFM seem entirely reasonable and are therefore applied to each scenario. These are set out in **Appendix 1**.

[18] OBR. June 2015. Fiscal Sustainability Report: Supplementary Tables: Labour Market Participation Rates.

Commuting

6.3.7 As discussed above, the commuting assumptions in the 2016EEFM clearly perpetuate short term issues and do not reflect the rate of commuting seen historically. Instead therefore the ratio of 0.855 is used, the average ratio seen between 2006 and 2016.

Double Jobbing

6.3.8 As discussed above, the rates of double-jobbing in the 2016EEFM are entirely reasonable and are therefore applied to each scenario. These are set out in **Appendix 1**.

Possible Criticisms of this Approach

6.3.9 A note has recently been published on the Cambridgeshire Insights website, which hosts the EEFM, explaining how the EEFM should be used to estimate the number of dwellings required to support economic growth. This makes clear that users should not make alternative estimates of population to fill EEFM jobs, based on economic activity rates from another source[19]. However, this appears inconsistent with a recent case where the Judge concluded[20]:

"It is clear in my judgment that as the interested party observed, the methodological inconsistency simply did not arise on Mr Donagh's approach since he took the 887 additional jobs per annum on the basis of it being a conservative figure justified from a number of sources, including in particular evidence of past trends and historic employment growth, both of which were empirical rather than theoretical. On the basis of his evidence neither he, nor the Inspector in accepting his evidence, was bound to endorse, adopt and redeploy any underlying assumptions in the EEFM modelling work. He was entitled to take the 887 additional jobs per annum figure as a conservative starting point and then roll the analysis forward taking, in accordance with the advice and guidance available, what he considered to be a realistic future EAR assumption" (emphasis added).

6.3.10 This is exactly the approach undertaken in this assessment; scenarios have been identified that best reflect the evidence, and have been subject to assumptions that have been considered to be the most appropriate.

6.4 Results of the Economic-Led Projections

6.4.1 **Figure 6.3** and **Tables 6.2 to 6.5** set out the results of the Economic-Led Projections. These show some significant variations in the level of dwellings that might be needed. In summary:

- Scenario 1 assumes the level of jobs growth set out in the 2016EEFM but is corrected to reflect a more appropriate commuting ratio.
- Scenario 2 assumes the level of jobs growth seen in the last five years, i.e. the period following the recession. This level of growth is highly unlikely to be sustainable in the long term but is useful as it explains the response in the commuting ratio as shown in **Figure 6.3**.
- Scenario 3 assumes the level of jobs growth seen in the last 10 years and therefore provides a cross-section of the height of the economy, the recession, and subsequent rebound. This

19 NMSS. April 2017. Using the East of England Forecasting Model (EEFM) to Estimate the Number of Homes Needed to Support Economic Growth.

20 Chelmsford CC v SoSCLG & Gladman Developments [2016] EWHC 3329 (QB).

however is unlikely to be a complete cross-section of the economic cycle and probably does not reflect a sustainable level of growth for the future.

- Scenario 4 assumes the level of jobs growth seen in the last 15 years and probably best reflects the last full economic cycle. However, over much of this period double jobbing was more prevalent and the national economy was far stronger than it currently is or expected to be in the near future. While this level of job growth might be aspirational, it is unlikely to be realistic in the current economic climate.

Figure 6.3: Results of the Economic-Led Projections (Dwellings)

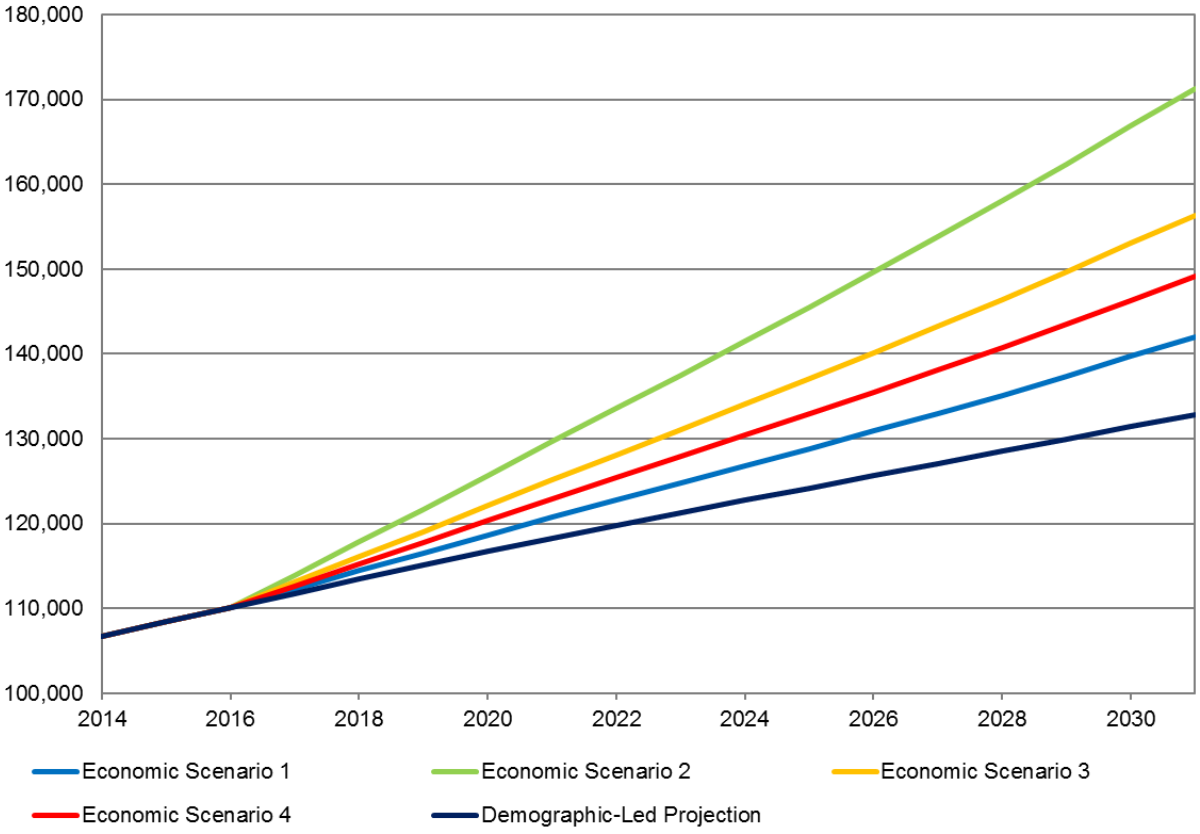


Table 6.2: The Economic-Led Projection Scenario 1: 2016EEFM

YEAR	POPULATION	HOUSEHOLDS	DWELLINGS
2016	266,360	106,508	110,130
2031	334,630	137,293	141,961
Total (2016-2031)	68,270	30,784	31,831
Annual Average (2016-2031)	4,551	2,052	2,122

Table 6.3: The Economic-Led Projection Scenario 2: 5-Year Average

YEAR	POPULATION	HOUSEHOLDS	DWELLINGS
2016	266,360	106,508	110,130
2031	412,590	165,666	171,299
Total (2016-2031)	146,230	59,158	61,169
Annual Average (2016-2031)	9,749	3,944	4,078

Table 6.4: The Economic-Led Projection Scenario 3: 10-Year Average

YEAR	POPULATION	HOUSEHOLDS	DWELLINGS
2016	266,360	106,508	110,130
2031	372,790	151,214	156,355
Total (2016-2031)	106,430	44,705	46,225
Annual Average (2016-2031)	7,095	2,980	3,082

Table 6.5: The Economic-Led Projection Scenario 4: 15-Year Average

YEAR	POPULATION	HOUSEHOLDS	DWELLINGS
2016	266,360	106,508	110,130
2031	353,520	144,191	149,093
Total (2016-2031)	87,160	37,682	38,964
Annual Average (2016-2031)	5,811	2,512	2,598

6.4.2 As a result of this analysis, Scenario 1 is the most reasonable prospect given the current economic circumstances.

6.4.3 It is noted that the SHMA appears to follow a similar methodology but generates significantly different results. Part of this is likely to be due to the selection of a much lower commuting ratio from 2016 onwards; the document does not actually state what ratio is used but refers to a 'current' ratio, which if taken from the 2016EEFM, could well have been 0.82. The remainder of the difference is likely to be the ratio of resident workers per household. The Bidwells model suggests that this was 1.3 workers per household in 2014, declining to 1.2 workers per household in 2031 as a result of the ageing population. The SHMA however appears to apply a flat rate of 1.4 workers per household, which appears exceptionally high.

7.0 Housing Market Signals & Affordable Housing Need

7.1 Introduction

7.1.1 Whilst projecting population, employment and household trends is a useful starting point to understanding FOAN, it is inherently flawed in that it will replicate any historical constraints on the housing market or economy. To understand the degree to which this has occurred it is useful to consider a range of housing market signals. The PPG suggests the following signals may be relevant but does not prevent the use of other signals where appropriate (Paragraph 2a-019):

- Land prices;
- House prices;
- Rents;
- Affordability;
- Rate of development; and
- Overcrowding.

7.1.2 The PPG suggests that prices or rents rising faster than the national or local average may well indicate particular market undersupply relative to demand.

7.1.3 The PPG states that appropriate comparisons of indicators should be made (Paragraph 2a-020). This includes comparison with longer term trends (both in absolute levels and rates of change) in the:

- Housing market area;
- Similar demographic and economic areas; and
- Nationally.

7.1.4 A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections.

7.1.5 In areas where an upward adjustment is required, this should be set at a level that is reasonable. The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be.

7.1.6 Market signals are affected by a number of economic factors, and an attempt should not be made to estimate the precise impact of an increase in housing supply. Rather the adjustment should increase planned supply by an amount that, on reasonable assumptions and consistent with principles of sustainable development, could be expected to improve affordability.

7.1.7 For the purposes of this exercise, the HMA is assumed to be those nearby local authorities with the strongest linkages to Milton Keynes, as set out in Chapter 3.

7.2 Land Prices

7.2.1 The PPG suggests that variations in land prices could be indicative of the relative demand for land. There is a considerable number of factors that are considered in determining the market or sale value of a parcel of land which makes much of the data available difficult to use in comparisons. However, a recent document by the DCLG helps to do this[21]. In calculating the typical residential land value for a local authority area, the DCLG states:

"The valuations have been undertaken using a truncated residual valuation model. This involves valuing the proposed development and deducting the development costs, including allowances for base build cost, developer's profit, marketing costs, fees, and finance to leave a "residual" for the site value.

The purpose of these values is to use in appraising land projects from a social perspective, in line with Green Book principles. The values here assume nil Affordable Housing provision, because the additional benefits to society of policy compliance are assumed to offset the associated reduction in market value. This means that they should not be seen as estimates of market values."

7.2.2 **Table 7.1** shows the residential land value for each LPA in the local housing market area and the difference from the area average. This shows that land values in Milton Keynes are above average, although that average has been significantly influenced by the considerably higher prices across Aylesbury Vale. Since Aylesbury Vale is a predominantly rural district, this is unsurprising. Growth in land values in Milton Keynes has not been as great as elsewhere in the HMA.

Table 7.1: Post Permission Residential Land Value Estimates as of January 2014 & March 2015

	JANUARY 2014		MARCH 2015		
	LAND VALUE PER HECTARE	% DIFFERENCE FROM HMA AVERAGE	LAND VALUE PER HECTARE	% DIFFERENCE FROM AREA AVERAGE	% CHANGE 2014-2015
Aylesbury Vale	£3.635m	49.2	£3.865m	+52.3	+6.3
Bedford	£2.135m	-12.4	£2.255m	-11.1	+5.6
Central Bedfordshire	£2.415m	-0.9	£2.575m	+1.5	+6.6
Milton Keynes	£2.725m	11.9	£2,830m	+11.5	+3.9
Northampton	£1.635m	-32.9	£1.550m	-38.9	-5.2
South Northamptonshire	£2.070m	-15.0	£2,145m	-15.5	+3.6
HMA Average	£2.436m	-	£2.537m	-	4.1

Source: DCLG, March 2015

21 DCLG. December 2015. Land Value Estimates for Policy Appraisal.

7.3 House Prices

7.3.1 Previous DCLG guidance[22] provided a table considering possible comparative benchmarks for assessing growth in house prices, see **Table 7.2**.

7.3.2 With the regional tier of planning abolished the second benchmark is no longer relevant. Instead however it is appropriate to consider house price growth in the context of the HMA. Imbalances within the HMA are clearly likely to be indicative of 'hotspots' of housing need that need to be addressed.

7.3.3 **Figures 7.1 and 7.2** set out median and lower quartile house prices respectively. Both figures show that in Milton Keynes house prices are generally in line with the national average and fall in the mid-range for the HMA.

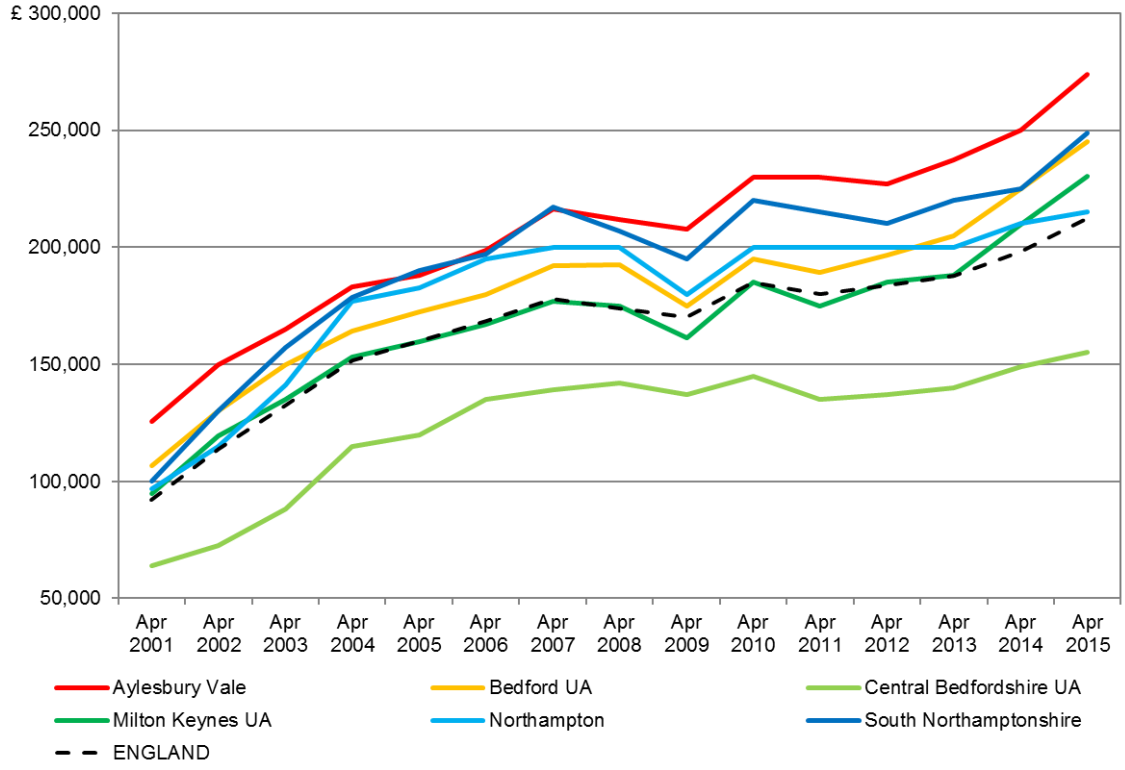
Table 7.2: Possible Comparative Benchmarks for Assessing Growth in House Prices

BENCHMARK	ANALYSIS	INTERPRETATION
1. Historic average	Has the annual growth in median house prices increased significantly above the historic average?	If "yes", then there could be evidence of housing market imbalance
2. Regional average	Has the annual growth in median house prices increased significantly higher than the regional average?	If "yes", then there could be evidence of housing market imbalance
3.Lower quartile house prices growth	How does annual growth in median house prices compare with the annual growth in lower quartile house prices?	Significantly high rises in lower quartile prices (compared to median house prices) could signal affordability issues

Source: DCLG. May 2007. Housing Market Information.

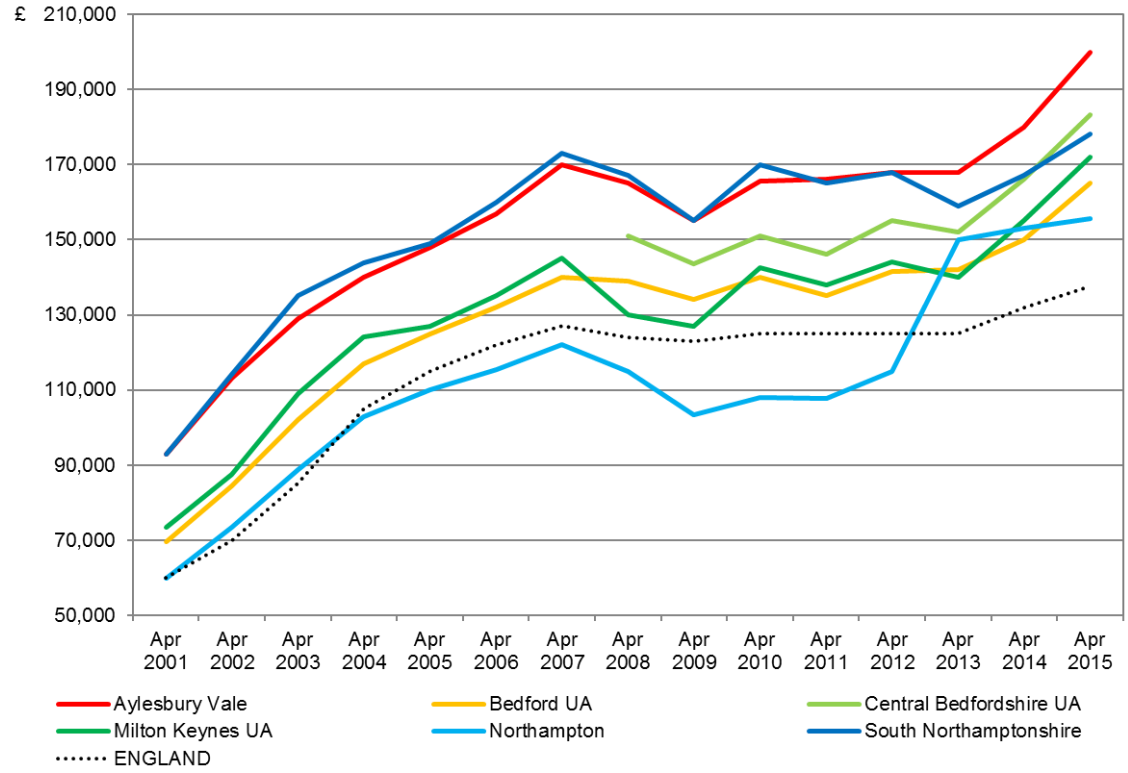
22 DCLG. May 2007. Housing Market Information.

Figure 7.1: Median House Prices



Source: ONS House Price Statistics

Figure 7.2: Lower Quartile House Prices



Source: ONS House Price Statistics

7.4 Affordability

7.4.1 Previous DCLG guidance provided a table considering possible comparative benchmarks for assessing affordability, see **Table 7.3**. As before, the regional tier should be read as meaning the HMA.

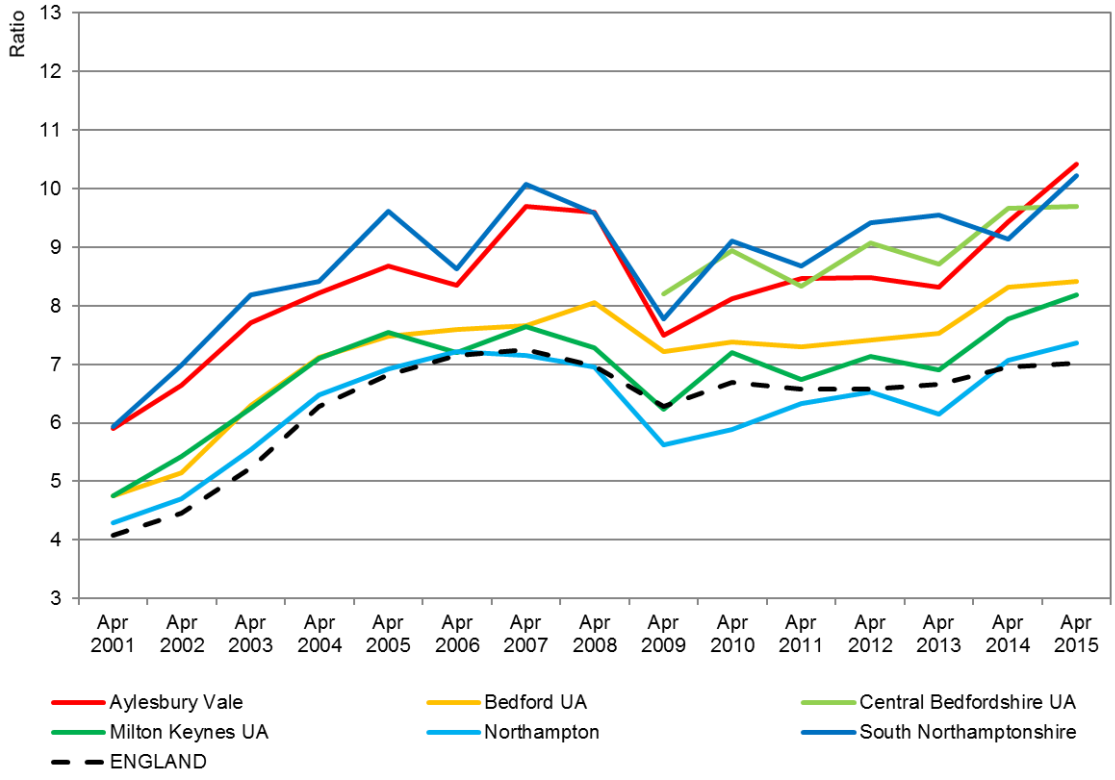
7.4.2 **Figure 7.3** sets out the ratio of lower quartile house prices to lower quartile earnings. This suggests that the HMA is largely comparable with the national average with Milton Keynes again falling with the mid-range. **Figure 7.4** shows the ratio of median house prices to median earnings. This shows very little variability to the lower quartile ratios although it is notable that Milton Keynes is slightly below the national average.

Table 7.3: Possible Comparative Benchmarks for Assessing Affordability

BENCHMARK	ANALYSIS	INTERPRETATION
1. Historic average	Has the affordability ratio worsened over time - is it significantly higher than the historic average?	If "yes", then this could suggest housing market imbalance (i.e. demand for housing is significantly higher than supply).
2. Regional average	Has the affordability ratio worsened over time, relative to regional averages?	If "yes", then this could suggest housing market Imbalance.
3. Ratio of median house prices to median earnings	How does the lower quartile affordability ratio compare with the median affordability ratio?	Comparatively high rises in the lower quartile affordability ratio compared to the median affordability ratio could signal affordability issues and problems for first-time buyers.

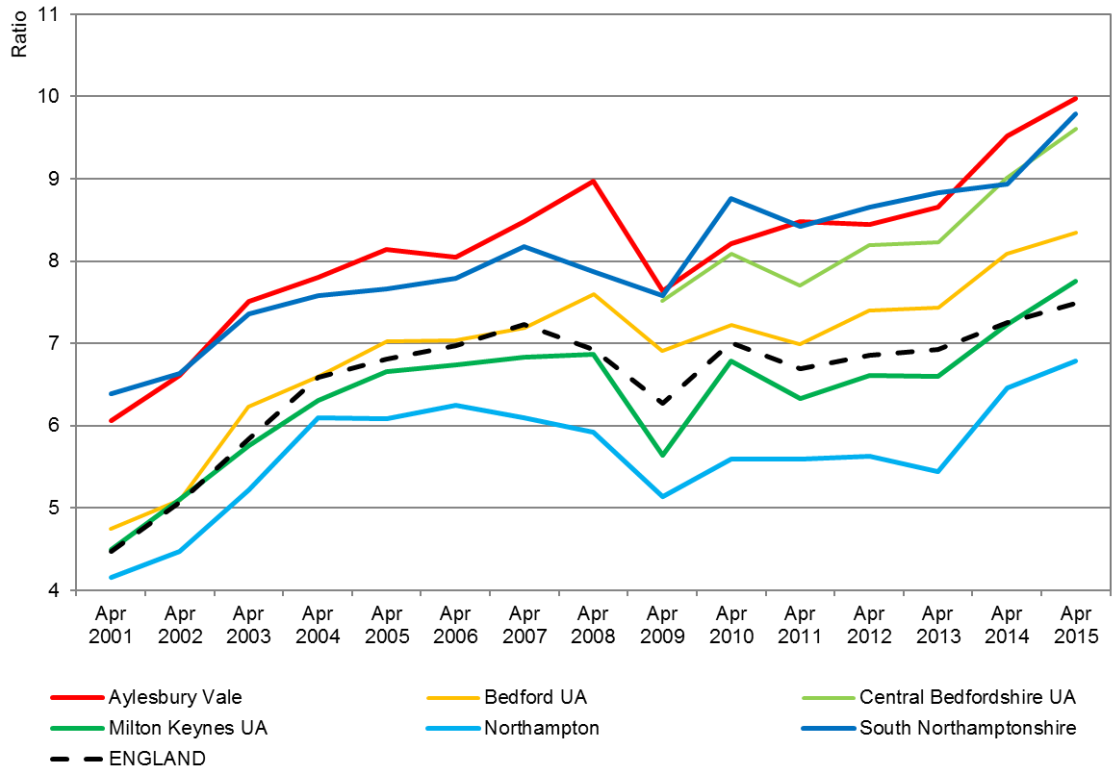
Source: DCLG. May 2007. Housing Market Information.

Figure 7.3: Ratio of Lower Quartile House Prices to Lower Quartile Earnings



Source: DCLG Live Table 576

Figure 7.4: Ratio of Median House Prices to Median Earnings



Source: DCLG Live Table 577

7.5 Overcrowding

7.5.1 As set out in Chapter 5, there is some indication of overcrowding amongst some households and there has been a substantial increase in the number of concealed families since 2001.

7.6 Affordable Housing Need

7.6.1 The SHMA identified a need for 8,200 dwellings; approximately 547 additional affordable dwellings per year. Assuming a requirement that 33% of new dwellings should be affordable housing, as set out in Policy HN2 of the draft Plan:MK, this would suggest an annual housing requirement of 1,658 dwellings. This is below the requirement suggested in the jobs-led forecasts.

7.7 Responding to Housing Market Signals and Affordable Housing Need

7.7.1 The evidence above suggests that Milton Keynes is not affected by significant market stresses when compared to the rest of the HMA or national averages. However, there is some worsening in terms of affordability, which is affecting the entire HMA. There is some concern regarding overcrowding; however, in isolation this measure could simply be indicative of choice rather than necessity.

7.7.2 The data on affordable housing suggests that there is a significant future requirement but that this could be accommodated within the jobs-led projection.

7.7.3 Overall, it is reasonable to apply a relatively small uplift to reflect housing market signals. This would hopefully correct the worsening affordability, and provide some headroom should jobs growth return to longer term trends.

7.7.4 Calculating an uplift is not an exact science and Planning Inspectors to date have generally acted using professional judgement based on the evidence before them rather than a defined formula. There are now four cases that are used to assist in determining the uplift to be applied:

- For the Eastleigh Local Plan the Inspector identified a worsening affordability as the principal issue. He suggested a cautious approach since Eastleigh was only one part of a large housing market area centred on Portsmouth. He then concluded that uplift of 10% would seem compatible with moderate pressure in the housing market.
- For the Uttlesford Local Plan the Inspector considered uplift in terms of housing market signals and affordable housing need combined. He also suggested 10% uplift overall since affordability appeared to be worsening, although house prices were increasing at a slower rate than much of the rest of the housing market area.
- For the Canterbury Local Plan the Inspector highlighted the stark difference in the housing market compared to the national average. In this case the Inspector recommended uplifting the FOAN by 30%. However, this did factor in jobs growth, affordable housing need as well as housing market signals.
- For Mid Sussex the Inspector considered the implications of the above three reports. In this case an uplift of 20% was proposed to take account of affordability issues, the high demand for affordable housing and, to a lesser extent, the need to address economic trends.

7.7.5 On balance an uplift of 10% from the Demographic-Led Projection (2,100 dwellings, 140dpa) is considered appropriate as the affordability issues affecting Milton Keynes are reasonably comparable to Eastleigh and Uttlesford. This is consistent with the SHMA.

7.7.6 In the SHMA however, the recommended uplift of 1,579 dwellings does not seem to have been considered with the final FOAN total being the sum of the demographic and economic needs. There is no explanation for this in the SHMA and seems to be in error.

7.8 Housing Delivery Backlog

7.8.1 The SHMA also includes a further additional 553 dwellings in the calculation to reflect the under delivery of housing in 2015/16; the year preceding the start of the local plan period. This is a somewhat bizarre analysis as the use of the latest data should effectively re-set the model such that backlog in the supply is already accommodated. However, in this instance, it is agreed that the projection data would have started from the date of the most recent MYPE, 2015, i.e. a year before the start of the local plan period.

7.8.2 The SHMA calculates that this backlog should be the difference between the level of housing need suggested in the projections used for that year, some 553 dwellings. The Economic-Led Projections in this assessment conclude that 1,683 dwellings should have been completed in 2015/16 to meet the needs of the time. This does not include a correction for housing market signals, which it possibly should but is probably within the realms of error. Comparing this to the actual number of dwellings completed, 1,248, suggests a backlog of 435 dwellings.

7.8.3 Similar to the housing market signals, the backlog does not seem to have been considered with the final FOAN total being the sum of the demographic and economic needs. There is no explanation for this in the SHMA and seems to be in error.

8.0 Conclusions

8.1 Summary

8.1.1 Overall it is calculated that the FOAN for Milton Keynes is 34,370 additional dwellings between 2016 and 2031 (equating to on average 2,291 dwellings per year). **Table 8.1** summarises the components of the FOAN.

Table 8.1: Summary of the Components of the FOAN

COMPONENT	BIDWELLS FOAN		SHMA		SHMA (ALL COMPONENTS)	
	DWELLINGS (ROUNDED TO NEAREST 10)	DWELLINGS PER ANNUM	DWELLINGS	DWELLINGS PER ANNUM	DWELLINGS	DWELLINGS PER ANNUM
Demographic	21,030	1,402	24,744	1,650	24,744	1,650
Economic Trends	10,800	720	1,739	116	1,739	116
Housing Market Signals	2,100	140			1,579	105
Affordable Housing						
Backlog 2015/16	440	29			553	37
TOTAL FOAN	**34,370**	**2,291**	**26,493***	**1,767**	**28,615**	**1,908**

Note: * there appears to be an arithmatic error in the SHMA with the demographic component and single adjustment adding to 26,893 rather than the 26,493 referred to throughout the document.

8.1.2 As discussed previously and shown in **Table 8.1**, it does not appear that the SHMA's concluded FOAN of 26,493 dwellings includes the uplift required for housing market signals or backlog. If these were taken into account, it would suggest a FOAN of 28,615 dwellings. This would still be low due to the errors in calculating the economic uplift.

8.2 Conclusions

8.2.1 This is a far more robust position than relied upon in the draft Plan:MK as it is based on the latest interpretation of the NPPF as set out in the PPG and recent case law.

8.2.2 It is also notable that it is a comparable rate of delivery as set out in the SEP for Milton Keynes of 2,068 dwellings per annum between 2006 and 2026. The main difference is that the SEP required a further 10,990 in the wider Growth Area, which would have added a further 550 dwellings per annum. This additional housing may still be needed to meet the FOAN of neighbouring authorities but is not required to meet Milton Keynes' needs.

APPENDIX 1
ECONOMIC ASSUMPTIONS

Economic Activity Rates

		MALE					FEMALE				
		16-24	25-34	35-49	50-64	65+	16-24	25-34	35-49	50-64	65+
APS	2014	0.672	0.936	0.938	0.798	0.120	0.566	0.768	0.853	0.681	0.040
	2015	0.626	0.966	0.948	0.847	0.105	0.686	0.744	0.846	0.654	0.06
	2016	0.512	0.947	0.965	0.794	0.096	0.501	0.759	0.803	0.639	0.058
Derived from OBR	2017	0.512	0.942	0.964	0.795	0.098	0.501	0.755	0.802	0.640	0.059
	2018	0.512	0.938	0.962	0.797	0.099	0.501	0.752	0.800	0.641	0.060
	2019	0.511	0.933	0.961	0.799	0.100	0.500	0.748	0.800	0.643	0.061
	2020	0.507	0.930	0.961	0.799	0.101	0.496	0.745	0.799	0.643	0.061
	2021	0.506	0.926	0.960	0.800	0.102	0.496	0.742	0.799	0.644	0.062
	2022	0.506	0.925	0.958	0.801	0.104	0.495	0.741	0.797	0.645	0.063
	2023	0.506	0.923	0.957	0.802	0.105	0.495	0.740	0.796	0.646	0.063
	2024	0.505	0.922	0.955	0.801	0.107	0.494	0.739	0.795	0.645	0.064
	2025	0.506	0.922	0.953	0.801	0.109	0.495	0.739	0.793	0.645	0.066
	2026	0.506	0.922	0.951	0.801	0.112	0.495	0.739	0.791	0.645	0.068
	2027	0.506	0.923	0.947	0.803	0.115	0.495	0.740	0.788	0.646	0.069
	2028	0.505	0.925	0.943	0.804	0.117	0.494	0.741	0.784	0.647	0.071
	2029	0.506	0.926	0.940	0.804	0.119	0.495	0.742	0.782	0.647	0.072
	2030	0.507	0.926	0.937	0.805	0.120	0.496	0.742	0.780	0.648	0.073
	2031	0.507	0.926	0.935	0.805	0.121	0.496	0.742	0.778	0.648	0.073

Unemployment Rates

	%
2014	2.13
2015	1.48
2016	1.52
2017	1.52
2018	1.55
2019	1.56
2020	1.62
2021	1.67
2022	1.69
2023	1.73
2024	1.75
2025	1.79
2026	1.85
2027	1.89
2028	1.92
2029	1.99
2030	2.09
2031	2.08

Double Jobbing per Scenario

	TOTAL EMPLOYMENT JOBS				Double Jobbing	EMPLOYEES IN EMPLOYMENT			
	1	2	3	4		1	2	3	4
2014	177,411	177,411	177,411	177,411	0.910	161,502	161,502	161,502	161,502
2015	183,248	183,248	183,248	183,248	0.911	166,902	166,902	166,902	166,902
2016	186,609	186,609	186,609	186,609	0.910	169,851	169,851	169,851	169,851
2017	188,738	192,149	190,406	189,563	0.910	171,691	174,794	173,209	172,442
2018	190,867	197,689	194,203	192,517	0.909	173,533	179,736	176,567	175,034
2019	192,995	203,228	198,000	195,471	0.909	175,374	184,673	179,922	177,624
2020	195,124	208,768	201,797	198,425	0.908	177,212	189,603	183,272	180,210
2021	197,253	214,308	205,594	201,379	0.908	179,046	194,527	186,617	182,791
2022	199,382	219,848	209,391	204,333	0.907	180,877	199,443	189,957	185,368
2023	201,511	225,388	213,188	207,287	0.907	182,706	204,355	193,293	187,943
2024	203,639	230,927	216,985	210,241	0.906	184,530	209,258	196,624	190,513
2025	205,768	236,467	220,782	213,195	0.906	186,353	214,156	199,951	193,079
2026	207,897	242,007	224,579	216,149	0.905	188,186	219,062	203,286	195,655
2027	210,026	247,547	228,376	219,103	0.905	190,016	223,962	206,618	198,229
2028	212,155	253,087	232,173	222,057	0.904	191,850	228,864	209,952	200,804
2029	214,283	258,626	235,970	225,011	0.904	193,685	233,766	213,287	203,381
2030	216,412	264,166	239,767	227,965	0.903	195,520	238,664	216,621	205,958
2031	218,541	269,706	243,564	230,919	0.903	197,368	243,575	219,966	208,546

Area	Site	Owner_RSL	2017/18 Starts Commissioned	2017/18 Physical Starts	2017/18 Physical Completions	2018/19 Starts Commissioned	2018/19 Physical Starts	2018/19 Physical Completions	2019/20 Starts Commissioned	2019/20 Physical Starts	2019/20 Physical Completions	2020/2021 Starts Commissioned	2020/2021 Physical Starts	2020/2021 Physical Completions	2021/22 Starts Commissioned	2021/22 Physical Starts	2021/22 Physical Completions	2022/23 Starts Commissioned	2022/23 Physical Starts	2022/23 Physical Completions	2023/24 Starts Commissioned	2023/24 Physical Starts	2023/24 Physical Completions	2024/25 Starts Commissioned	2024/25 Physical Starts	2024/25 Physical Completions	2025/26 Starts Commissioned	2025/26 Physical Starts	2025/26 Physical Completions	Future Years Starts Commissioned	Future Years Physical Starts	Future Years Physical Completions	Totals Starts Commissioned	Totals Physical Starts	Totals Physical Completions	Notes on deliverability	Planning Reference	Discounted site? Years 1-5
TARIFF PROJECTS																																						
BROOKLANDS	LAND AT BROOKLANDS 2501 UNITS OUTLINE	PLACES FOR PEOPLE	145	146	**0**	100	95	**45**	46	50	**146**	0	0	**100**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	291	291	**291**	Site is remainder of permitted outline application so is considered suitable. It is available now and in ownership of Barratt Homes. All REM permissions submitted bar one, expected all REM will be determined by end of 2017/2018. Current build-out rate across Brooklands anticipates majority of completions within 5 year period/.	06/00220/MKPCO	0
BROOKLANDS	BDWPHASE 1B		0	80	**110**	0	0	**83**	0	0	**0**	0	0	**0**	0		**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	80	**193**	Site is under construction, and delivered 98dws in 2016/17.	14/01069/REM	0
BROOKLANDS	BDW PHASE 1D		0	0	**56**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**56**	All units on site are now under construction.	15/01477/REM	0
BROOKLANDS	BDW PHASE 1E		0	0	**45**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**45**	All units on site are now under construction.	15/01448/REM	0
BROOKLANDS	BDW PHASE 2A		0	100	**60**	0	100	**100**	0	25	**65**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	225	**225**	Application permitted June 2016, site now under construction. Development rate comparable to other BDW parcels.	16/00086/REM	0
BROOKLANDS	BDW PHASE 2B, 3B, 3C, 4A		0	100	**20**	0	100	**80**	0	76	**80**	0	0	**96**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	276	**276**	Application permitted December 2016.	16/02695/REM	0
BROOKLANDS	BDW PHASE 3A, 4B, 5A, 7A, 7B		362	50	**0**	0	100	**60**	0	100	**100**	0	112	**100**	0	0	**102**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	362	362	**362**	REM application submitted November 2016, currently due determination.	16/03397/REM	362
BROOKLANDS	BROOKLANDS PHASE 1	PLACES FOR PEOPLE	0	0	**0**	0	15	**15**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	15	**15**	Remainder of phase 1 is currently occupied by marketing suite. Refusal against retaining this for a longer period currently subject to appeal. Land is likely to be available at a later point in the 5-year period even if the appeal is upheld.	09/00860/MKPCR	0
BROOKLANDS	GATEWAY SITE	PLACES FOR PEOPLE	0	0	**10**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**10**	All units on site currently under construction following reserved matters application permitted July 2015.	14/02883/REM	0
BROOKLANDS	BROOKLANDS SQUARE PHASE B		0	21	**10**	0	0	**11**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	21	**21**	REM application permitted November 2016.	16/00125/REM	0
BROOKLANDS	BROOKLANDS SQUARE PHASE A & C		0	55	**25**	0	0	**30**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	55	**55**	application submitted Novermber 2016, awaiting determination	16/02793/REM	0
BROOKLANDS SUMMARY			**507**	**552**	**336**	**100**	**410**	**424**	**46**	**251**	**391**	**0**	**112**	**296**	**0**	**0**	**102**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**653**	**1325**	**1549**			
BROUGHTON	BROUGHTON GATE PARCEL M1	COMPENSATION SITES - PLACES FOR PEOPLE	0	40	**18**	0	16	**38**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	56	**56**	REM application approved in September 2016.	16/00541/REM	0
BROUGHTON	BROUGHTON GATE PARCEL M2		0	10	**0**	0	36	**30**	0	19	**35**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	65	**65**	REM application approved in November 2016	16/02271/REM	0
BROUGHTON	BROUGHTON MANOR BUSINESS PARK	PLACES FOR PEOPLE	0	62	**0**	0	0	**62**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	62	**62**	Discrete land parcel in a wider urban expansion area. Revised scheme for 14 dwellings withdrawn. No constraints suggesting development will be beyond 5 year period.	11/01340/MKPCO	0
BROUGHTON	BROUGHTON GATE RES SITES CM5-CM8		0	0	**18**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**18**	Reserve site in developer ownership. Conditions have been discharged and construction of units has begun onsite	11/02316/MKPC	0
BROUGHTON	BROUGHTON GATE RES SITE CM4 (Haven Street)	Taylor Wimpey	0	23	**12**	0	0	**11**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	23	**23**	Taylor Wimpey confirmed (May 2017) construction has started on site and have provided these projected completions.	15/02678/FUL	0
BROUGHTON SUMMARY			**0**	**135**	**48**	**0**	**52**	**141**	**0**	**19**	**35**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**206**	**224**			
KINGSMEAD	KINGSMEAD SOUTH SITES 3 AND 4	HCA	0	50	**4**	0	54	**50**	0	50	**50**	0	0	**50**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	154	**154**	HCA information (April 2017): Start on site expected September 2017.	06/00602/MKPCO	0
KINGSMEAD	KINGSMEAD SOUTH SITES 1 AND 2	TAYLOR WIMPEY	0	60	**45**	0	60	**52**	0	26	**52**	0	0	**50**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	146	**199**	work has begun on site with show house and a number of other dwellings constructed.	15/00699/REM	0
KINGSMEAD SUMMARY			**0**	**110**	**49**	**0**	**114**	**102**	**0**	**76**	**102**	**0**	**0**	**100**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**300**	**353**			
TATTENHOE PARK	TATTENHOE PARK 2 & 7	HCA	0	0	**0**	288	0	**0**	0	70	**24**	0	70	**72**	0	70	**72**	0	78	**72**	0	0	**48**	0	0	**0**	0	0	**0**	0	0	**0**	288	288	**288**	HCA information (April 2017): start on site expected April 2019. Scope for this site to come forward for accelerated delivery, therefore current projections could be brought forward if this occurs.	06/00856/MKPCO	168
TATTENHOE PARK	TATTENHOE PARK 3-6	HCA	0	0	**0**	721	150	**6**	0	200	**108**	0	200	**192**	0	171	**150**	0	0	**150**	0	0	**115**	0	0	**0**	0	0	**0**	0	0	**0**	721	721	**721**	HCA information (April 2017): start on site expected June 2019. Scope for this site to come forward for accelerated delivery, therefore current projections could be brought forward if this occurs.	06/00856/MKPCO	456
TATTENHOE PARK SUMMARY			**0**	**0**	**0**	**1009**	**150**	**6**	**0**	**270**	**132**	**0**	**270**	**264**	**0**	**241**	**222**	**0**	**78**	**222**	**0**	**0**	**163**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**1009**	**1009**	**1009**			
WESTERN EXPANSION AREA	WEA AREA 10.1 -10.3 REMAINDER	GALLAGHER/MKC	400	17	**0**	360	221	**22**	360	283	**221**	360	300	**300**	320	300	**300**	320	340	**300**	300	330	**300**	300	216	**300**	300	216	**300**	0	890	**1070**	3020	3113	**3113**	Remainder of site that has outline planning permission. Multiple development parcels across a range of housebuilders means achievability is high. Development rate in future takes into account additional MKC land holding which is likely to be disposed in the next few years. These will boost development outlets and therefore supply/delivery rates. 300 units per year felt to be realistic once development is fully established on site.	05/00291/MKPCO	843
WESTERN EXPANSION AREA	Bovis - 10.1 a and b	Bovis Homes	0	51	**61**	0	0	**27**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	51	**88**	Site under construction.	14/02383/REM	0
WESTERN EXPANSION AREA	PARCELS 10.1 C & D	Bovis Homes	0	100	**0**	0	29	**50**	0	0	**79**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	129	**129**	REM application approved March 2017		0
WESTERN EXPANSION AREA	Bovis - 10.1 f	Bovis Homes	0	0	**8**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**8**	Site under construction.	14/02385/REM	0
WESTERN EXPANSION AREA	PARCEL 10.1 E	Bovis Homes	0	74	**24**	0	40	**50**	0	0	**40**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	114	**114**	Site under construction	16/01457/REM	0
WESTERN EXPANSION AREA	Parcel 10.1H	Bovis Homes (central) LTD	0	0	**0**	0	64	**34**	0	0	**30**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	64	**64**	REM application approved February 2017	16/02618/REM	0
WESTERN EXPANSION AREA	Abbey 10.3 Parcels C1 B1 F R J G N and P	Abbey	0	50	**61**	0	50	**60**	0	37	**57**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	137	**178**	Site under construction, completions and projections confirmed as correct by developer via phone call on 26/05/2017	15/00499/REM	0
WESTERN EXPANSION AREA	Taylor Wimpey 10.3A Part 2	Taylor Wimpey	0	10	**47**	0	10	**17**	0	0	**0**	0	0	**0**	0	12	**12**	0	0	**0**	0	0	**0**		0	**0**	0	0	**0**	0	0	**0**	0	32	**76**	Taylor Wimpey confirmed work has started on site , completions were achieved in 16/17 and provided forward projections for remainder of parcel (May 2017)	15/01368/REM	76
WESTERN EXPANSION AREA	Taylor Wimpey - 10.3A Part 1	Taylor Wimpey	0	25	**0**	0	25	**50**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	50	**50**	Taylor Wimpey confirmed (May 2017) that dwelling number has reduced from 62 to 50 and that start on site is expected Jan 2018 with completions as outlined here.		0
WESTERN EXPANSION AREA	Abbey 10.1 Parcel I	Abbey	0	0	**0**	0	34	**34**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	34	**34**	completions and projections confirmed by Abbey as being correct via phone call on 26/05/2017	15/02532/REM	0
WESTERN EXPANSION AREA	Bellway - 10.3 Phase 1	Bellway	0	59	**90**	0	30	**89**	0	0	**40**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	89	**219**	under construction, completions and projections confirmed by developer via phonecall on 26/05/2017	15/02630/REM	0
WESTERN EXPANSION AREA	WEA AREA 11 -REMAINDER	GALLAGHER/MKC	238	0	**0**	300	150	**116**	300	288	**200**	270	300	**300**	244	225	**250**	0	200	**230**	0	150	**176**	0	39	**80**	0	0	**0**	0	0	**0**	1352	1352	**1352**	Remainder of outline in area 11. projected completions were provided by Gallaghers (April 2017), however MKC has adjusted these to a more conservative delivery timetable within the 5 year period.	06/00123/MKPCO	866
WESTERN EXPANSION AREA	WEA AREA 11 PARCELS 2B 2C 5A 5B 6D	BDW	0	79	**41**	0	150	**60**	0	12	**60**	0	0	**80**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	241	**241**	Permission granted Jan 2017	16/03133/REM	0
WESTERN EXPANSION AREA	Barratt H2 to H3 (4B 5C and part of 3B)	Barratt	0	0	**90**	0	0	**37**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**127**	Site under construction and all units have been started.	14/01790/REM	0
WESTERN EXPANSION AREA	Barratt Parcels 6a, 6B, 6C	Barratt	0	50	**70**	0	56	**76**	0	0	**70**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	106	**216**	Construction has begun onsite with 110 units having been started in 2016/17.	15/03045/REM	0
WEA SUMMARY			638	515	**492**	660	859	**722**	660	620	**797**	630	600	**680**	564	537	**562**	320	540	**530**	300	480	**476**	300	255	**380**	300	216	**300**	0	890	**1070**	4372	5512	**6009**			
TOTALS FOR TARIFF PROJECTS			**1145**	**1312**	**925**	**1769**	**1585**	**1395**	**706**	**1236**	**1457**	**630**	**982**	**1340**	**564**	**778**	**886**	**320**	**618**	**752**	**300**	**480**	**639**	**300**	**255**	**380**	**300**	**216**	**300**	**0**	**890**	**1070**	**6034**	**8352**	**9144**			
FUTURE TARIFF PROJECTS																																						
STRATEGIC RESERVE	SIBLEY HAULAGE (Land at Gables)		0	0	**34**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**34**	site is under constuction with all 34 units having been started. Agents, DLP Planning have confirmed via phonecall (26/05/2017) that projected completions are correct.	15/01492/FUL	0
STRATEGIC RESERVE	RIPPER LAND	MINTON	120	0	**0**	0	50	**25**	0	50	**65**	0	20	**30**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	120	120	**120**	Small discrete site in the SLA; application submitted February 2017 for 120 units, awaiting decision	17/00303/OUT	0
STRATEGIC RESERVE	HAYNES LAND	BDW	200	40	**0**	185	80	**50**	0	50	**75**	0	50	**75**	0	50	**50**	0	50	**50**	0	50	**50**	0	15	**35**	0	0	**0**	0	0	**0**	385	385	**385**	Outline application permitted, conditions discharged and infrastcruture under construction. REM application for first phase between Haynes Land and Eagle Farm submitted for 259 units (17/01038/REM)	14/02167/OUTEIS	250
STRATEGIC RESERVE	EAGLE FARM	BDW	200	100	**30**	0	100	**100**	0	100	**100**	0	100	**100**	0	10	**80**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	200	410	**410**	Outline consent granted, conditions discharged and infrastrcuture under construction. REM application for first phase between Haynes Land and Eagle Farm submitted for 259 units (17/01038/REM). First completions achievable in 17/18.	13/02381/OUTEIS	410

			2017/18			2018/19			2019/20			2020/2021			2021/22			2022/23			2023/24			2024/25			2025/26			Future Years			Totals					
Area	Site	Owner_RSL	Starts Commissioned	Physical Starts	Physical Completions	Starts Commissioned	Physical Starts	Physical Completions	Starts Commissioned	Physical Starts	Physical Completions	Starts Commissioned	Physical Starts	Physical Completions	Starts Commissioned	Physical Starts	Physical Completions	Starts Commissioned	Physical Starts	Physical Completions	Starts Commissioned	Physical Starts	Physical Completions	Starts Commissioned	Physical Starts	Physical Completions	Starts Commissioned	Physical Starts	Physical Completions	Starts Commissioned	Physical Starts	Physical Completions	Notes on deliverability	Planning Reference	Discounted Sum Year 6 to 15
STRATEGIC RESERVE	GLEBE FARM		300	150	**0**	300	200	**100**	200	200	**230**	200	200	**230**	140	200	**230**	0	190	**230**	0	0	**120**	0	0	**0**	0	0	**0**	0	0	**0**	1140	1140	**1140**	Outline consent granted. Reserved matters applications for access and layout granted permission, other conditions in the process of being discharged. The mitigation measures for the archaeology mean that housing development on certain areas of the site cannot start until 2018/2019, hence the reduced build out rates in the earlier years. Projected completions provided by Gallaghers (April 2017).	13/02382/OUT	790
STRATEGIC RESERVE	GOLF COURSE LAND	DLA - Peter Chambers	200	0	**0**	200	75	**30**	0	75	**50**	0	50	**50**	0	50	**50**	0	50	**50**	0	50	**50**	0	50	**50**	0	0	**40**	0	0	**30**	400	400	**400**	Site is land locked with access needing to be provided from an adjacent site. However the site has outline permission with conditions in the process of being discharged and should show completions within 5 years. Agents provided information in November 2016 which provided the projected completions outlined here.	14/00350/OUTEIS	180
STRATEGIC RESERVE	CHURCH FARM		0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	75	**50**	0	75	**50**	0	50	**50**	0	50	**50**	0	50	**50**	0	50	**100**	0	350	**350**	Information provided by agent (may 2017): The site has outline planning permission granted on appeal in August 2016 which is extant until August 2021. The landowner/developer fully intends to proceed with the consented development of up to 350 homes on the site. The start date and delivery trajectory is yet unconfirmed as it is subject to MKC/MKDP agreement to facilitate the construction of the strategic access road. This agreement is expected to trigger no earlier than 2019-20, following which applications for the approval of the site-wide design code and remaining reserved matters would be submitted to facilitate implementation before the planning permission expires. It is expected that there would be a 6-12 month lead in time for delivery of the access road (which is required by condition to be completed before first occupation). This could enable first occupation on site during the 2021/2022 monitoring year. The anticipated delivery rate is based on a single developer with one sales outlet delivering circa one dwelling a week.	14/01610/OUT	50
STRATEGIC RESERVE	WEST OF STOCKWELL LANE		0	75	**0**	0	75	**50**	0	50	**50**	0	40	**50**	0	0	**50**	0	0	**40**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	240	**240**	site has outline permission but is still awaiting the S106 to be signed. Discussion with agent on 31/05/2017 confirmed that site was out for bid with a deadline of the end of June 2017. Agent felt that following sale the projected completions outlined here were achieveable.	15/02768/OUT	200
TOTALS FOR FUTURE TARIFF PROJECTS			**1020**	**365**	**64**	**685**	**580**	**355**	**200**	**525**	**570**	**200**	**460**	**535**	**140**	**385**	**510**	**0**	**365**	**420**	**0**	**150**	**270**	**0**	**115**	**135**	**0**	**50**	**90**	**0**	**50**	**130**	**2245**	**3045**	**3079**			
NON TARIFF PROJECTS																																				
ASHLAND	ASHLAND PHASE 2 AREA F AND H	PAUL NEWMAN	0	0	**4**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**4**	All units under construction.	08/01811/REM	0
ASHLAND	ASHLAND PHASE 2 AREAS A TO E	PAUL NEWMAN	0	0	**30**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**30**	All units under construction.	08/02025/REM	0
ASHLAND SUMMARY			**0**	**0**	**34**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**34**			
CAMPBELL PARK	CAMPBELL PARK REMAINDER	MKDP	0	0	**0**	0	0	**0**	0	0	**0**	350	100	**50**	400	150	**100**	750	150	**150**	0	250	**150**	0	250	**200**	0	250	**200**	0	350	**650**	1500	1500	**1500**	MKDP marketing entire north side of Campbell Park for a developer partner with the aim of a mixed use, residential led scheme. Projected completions provided by MKDP (April 2017)		150
CAMPBELL PARK	BLOCKS 14A AND 14B	Taylor Wimpey North	0	0	**40**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**40**	entire site under construction	13/01113/REM	0
CAMPBELL PARK	CANALSIDE - MARINA	Crest Nicholson	0	0	**0**	0	200	**0**	0	0	**80**	0	180	**100**	0	0	**100**	0	0	**100**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	380	**380**	Crest Nicholson appointed as preferred bidder to deliver marina and canal-side development. Site has a development brief and outline permission already, planing performance agreement in place with workshops having been undertaken in 2016. REM application submitted March 2017.	17/00850/REM	280
CMK/CAMPBELL PARK SUMMARY			**0**	**0**	**40**	**0**	**200**	**0**	**0**	**0**	**80**	**350**	**280**	**150**	**400**	**150**	**200**	**750**	**150**	**250**	**0**	**250**	**150**	**0**	**250**	**200**	**0**	**250**	**200**	**0**	**350**	**650**	**1500**	**1680**	**1920**			
OAKGROVE	OAKGROVE PHASE 3	Crest Nicholson	0	0	**43**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**43**	All units now under construction, with 16/17 completions having been higher than projected figures for the year.	14/00297/REM	0
OAKGROVE	OAKGROVE PHASE 4	Crest Nicholson	0	34	**91**	0	0	**71**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	34	**162**	All but 34 units now under construction onsite, with 124 starts in 16/17.	14/02178/REM	0
OAKGROVE	OAKGROVE PHASE 5	Crest Nicholson	0	0	**0**	73	30	**30**	0	43	**43**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	73	73	**73**	REM approved December 2016	16/02523/REM	0
OAKGROVE SUMMARY			**0**	**34**	**134**	**73**	**30**	**101**	**0**	**43**	**43**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**73**	**107**	**278**			
OXLEY PARK	OXLEY PARK SITE 4 AND 5	HCA	0	50	**71**	0	12	**51**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	62	**122**	development underway, first completions 16/17; projections based on information provided by Linden Homes April 2017.	15/00825/FUL	0
OXLEY PARK SUMMARY			**0**	**50**	**71**	**0**	**12**	**51**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**62**	**122**			
NEWPORT PAGNELL	TICKFORD FIELDS		600	0	**0**	0	100	**0**	0	100	**50**	600	100	**100**	0	100	**100**	0	100	**100**	0	100	**100**	0	100	**100**	0	100	**100**	0	400	**550**	1200	1200	**1200**	Site is partially covered by strategic reserve in Local Plan and is the main allocation in Newport Pagnell Neighbourhood Plan that has passed referendum and has been made. There are potentially constraints to delivery on parts of the site but there is no reason that unconstrained parcels will not be made available and delivered towards the middle/end of the 5 year period, particularly those that are directly under the control of the Council. Potential 'gateway' to the site (Network House) has permission and is under construction already and could facilitate delivery of wider site in due course. Projected completions have been provided by MKDP (April 2017). There is also potentially scope for this site to come forward for accelerated delivery, therefore current projections could be brought forward if this occurs.		250
BLETCHLEY	EATON LEYS		0	0	**0**	0	0	**0**	0	150	**50**	0	250	**295**	0	200	**255**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	600	**600**	Outline permission granted in November 2016, S106 signed off in June 2017. Projected housing completions provided by Gallaghers in March 2017, based on site being delivered in three phases.	15/01533/OUTEISE	600
TOTAL FOR NON TARIFF PROJECTS			**600**	**84**	**279**	**73**	**342**	**152**	**0**	**293**	**223**	**950**	**630**	**545**	**400**	**450**	**555**	**750**	**250**	**350**	**0**	**350**	**250**	**0**	**350**	**300**	**0**	**350**	**300**	**0**	**750**	**1200**	**2773**	**3849**	**4154**			
PARTNER NON TARIFF																																				
BLETCHLEY	LEISURE CENTRE PHASE 2	GLADEDALE	0	0	**50**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**50**	All units now under construction.	14/00152/FUL	0
BLETCHLEY	OFF PENN ROAD		0	19	**15**	0	20	**24**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	39	**39**	FUL application approved, S106 signed in February 2017. Discharge of consitions applications submitted and in the process of being approved, with developers due to start on site in June 2017.	16/02331/FUL	0
BLETCHLEY	LATHAMS BUILDBASE		0	0	**0**	0	0	**0**	75	0	**0**	0	50	**50**	0	25	**25**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	75	75	**75**	Allocated housing site. Redevelopment now potentially tied into East-West Rail and impact on level crossing/Simpson road. Opposite parcel (also a builders merchants) a potential allocation in Site Allocations Plan. Assuming delivery does mirror East-West Rail, units could be delivered within 5 years.	Allocation	75
BLETCHLEY	NEWTON LEYS	WIMPEY	0	0	**0**	0	100	**64**	0	100	**100**	0	100	**90**	0	90	**60**	0	50	**56**	0	50	**60**	0	0	**60**	0	0	**0**	0	0	**0**	0	490	**490**	updated info provided by Taylor Wimpey (May 2017) with expected start date on site June 2018 and projected completions as shown.	02/01337/OUT	314
BLETCHLEY	NEWTON LEYS PHASE 2 B/C/D		0	5	**4**	0	5	**6**	0	0	**0**	0	0	**0**	0	5	**5**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	15	**15**	Taylor Wimpey confirmed (May 2017) that work has started on site and completions are projected as outlined. Overall number of dwellings has increased from 6 to 15.	08/00233/REM	15
BLETCHLEY	NEWTON LEYS PHASE 2 F3	Taylor Wimpey - Emma Walton	0	20	**9**	0	23	**34**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	43	**43**	Taylor Wimpey confirmed (May 2017) start on site expected September 2017 and projected completions as outlined	08/00233/REM	0
BLETCHLEY	NEWTON LEYS PHASE 3C		0	0	**20**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**20**	All units now under construction.	12/02515/REM	0
BLETCHLEY	NEWTON LEYS PHASE 3CI		0	0	**0**	0	11	**11**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	11	**11**	confirmed as correct by Taylor Wimpey (May 2017)	16/0340/REM	0
BLETCHLEY	NEWTON LEYS PHASE 4		0	8	**42**	0	0	**20**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	8	**62**	Taylor Wimpey confirmed work on site has started and confirmed completion date (May 2017)	12/00887/REM	0
BLETCHLEY	NEWTON LEYS - LOCAL CENTRE		0	10	**0**	0	10	**17**	0	0	**3**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	20	**20**	updated info provided by taylor wimpey (May 2017) reduced number of dwellings from 34 to 20 and expected start on site Jan 2018.	15/01695/FUL	0
NEWTON LEYS SUMMARY			**0**	**43**	**75**	**0**	**149**	**152**	**0**	**100**	**103**	**0**	**100**	**90**	**0**	**95**	**65**	**0**	**50**	**56**	**0**	**50**	**60**	**0**	**0**	**60**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**587**	**661**			
BLETCHLEY	25 to 27 AYLESBURY STREET		0	14	**0**	0	0	**14**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	14	**14**	Permission granted at appeal May 2016.	15/01872/ful	0
BLETCHLEY	7 & 7A AYLESBURY STREET		0	14	**14**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	14	**14**	Permission granted at DCC 03/11/2016. Discussion with architect confirmed likely completion before end of 2017	16/01348/ful	0
BLETCHLEY	LAND AT SKEW BRIDGE COTTAGE, DRAYTON ROAD		10	0	**0**	0	10	**0**	0	0	**10**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	10	10	**10**	Outline permission granted December 2016.	16/02174/OUT	0
BLETCHLEY	SW OF BWMC, DUNCOMBE STREET		0	0	**0**	0	0	**0**	0	12	**12**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	12	**12**	Outline permission granted December 2016.	16/01430/OUT	0
BOW BRICKHILL	LAND EAST OF TILLBROOK FARM		0	0	**0**	0	18	**9**	0	18	**9**	0	0	**18**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	36	**36**	info provided by agent (May 2017): Council resolution to grant outline planning permission on 3rd November 2016, decision notice issued May 2017. Permission contains various pre-commencement conditions that need to be discharged, furthermore, except for the means of access, developers must still prepare and obtain approval of all reserved matters. It is unknown whether further planning conditions will be imposed on any reserved matters approval that also require formal discharge by the Council. Once reserved matters approval and the discharge of all relevant planning conditions has been obtained, the developer may / will be looking to secure finance for the development and this will take time. Once the above is completed, the developer will need to programme the development, securing contracts to enable establishment of on-site infrastructure. This will cause a delay to the first development of any housing. The housing is likely to be phased, although it is not yet known with any certainty what form this will take. Figures provided by agent	16/00762/OUT	0
BOW BRICKHILL	BLIND POND FARM, WOBURN SANDS ROAD		0	0	**14**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**14**	all dwellings are under construction and completions have been in line with previous projections. Site expected to be completed within 17/18.	16/00166/FUL	0
FULLERS SLADE	76 TO 83 SHEARMANS		14	0	**0**	0	14	**0**	0	0	**14**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	14	14	**14**	site granted outline permission at appeal in July 2016. REM yet to be submitted, however development is for apartments above existing retail units so is deemed deliverable within the 5 year period.	15/00268/OUT	0
NEW BRADWELL	82 TO 84 NEWPORT ROAD		34	0	**0**	0	20	**0**	0	14	**20**	0	0	**14**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	34	34	**34**	Vacant brownfield site. With an existing Outline consent granted in 2014 (13/02153/OUT), it appears this is unlikely to cme forward and following pre-application advice, a new FUL application has been submitted by Paul Newman Homes in 2017. The application is for 34 dwellings as opposed to 37. If site is granted planning permission, it is likely it will be able to come forward within the 5 years.	17/00483/FUL	0
NEWPORT PAGNELL	POLICE STATION HOUSES, HIGH STREET		0	0	**0**	0	0	**0**	14	0	**0**	0	14	**14**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	14	14	**14**	Allocated housing site. Vacant buildings adjacent to existing police station, which is to be retained. Land was sold to a developer who had pre-application discussions in Spring 2015.	Allocation	0
OLNEY	FORMER EMPLOYMENT ALLOCATION PHASE 1		0	18	**18**	0	15	**15**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	33	**33**	REM application approved Jan 2017 after 13/02130/OUT	16/00533/REM	0
OLNEY	FORMER EMPLOYMENT ALLOCATION PHASE 2		0	0	**0**	0	15	**15**	0	18	**18**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	33	**33**	Second phase granted outline permission on appeal with expectation that whole site will now be built out once reserved matters are submitted this year.	14/02060/OUT	0
STONY STRATFORD	STRATFORD HOUSE		0	6	**0**	0	7	**6**	0	0	**7**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	13	**13**	Renovation of main house complete and development site to the rear fenced off. OUT was permitted and conditions have been discharged for houses in rear garden. Clayson Country Homes confirmed completion projections April 2017	11/02761/FUL	0
WOBURN SANDS	NAMPAK PHASES 4		0	0	**14**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**14**	All units now under construction.	13/00005/FUL	0
WOBURN SANDS	NAMPAK PHASES 5 AND 6		0	0	**0**	0	51	**5**	0	30	**41**	0	0	**35**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	81	**81**	info from Taylor Wimpey (May 2017) pushed back completions due to Considerable amount of groundworks and remediation to be carried out hence long lead in time from start on site (TW expect Nov 2017) to housing delivery.	15/02319/FUL	0
NAMPAK SUMMARY			**0**	**0**	**14**	**0**	**51**	**5**	**0**	**30**	**41**	**0**	**0**	**35**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**81**	**95**			
WOBURN SANDS	GREENS HOTEL	CONNOLLY HOMES LIMITED	0	0	**9**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**9**	All units now under construction.	13/01117/FUL	0
WAVENDON	FROSTS GARDEN CENTRE, WAIN CLOSE		0	0	**0**	0	25	**15**	0	28	**38**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	53	**53**	Site granted outline permission via appeal. Small scale and relatively unconstrained - should be deliverable within 5 years.	14/00703/OUT	0

			2017/18			2018/19			2019/20			2020/2021			2021/22			2022/23			2023/24			2024/25			2025/26			Future Years			Totals					
Area	Site	Owner_RSL	Starts Commissioned	Physical Starts	Physical Completions	Starts Commissioned	Physical Starts	Physical Completions	Starts Commissioned	Physical Starts	Physical Completions	Starts Commissioned	Physical Starts	Physical Completions	Starts Commissioned	Physical Starts	Physical Completions	Starts Commissioned	Physical Starts	Physical Completions	Starts Commissioned	Physical Starts	Physical Completions	Starts Commissioned	Physical Starts	Physical Completions	Starts Commissioned	Physical Starts	Physical Completions	Starts Commissioned	Physical Starts	Physical Completions	Starts Commissioned	Physical Starts	Physical Completions	Notes on deliverability	Planning Reference	Discounted Sum Year 6 to 20
BLETCHLEY	LAKES ESTATE NEIGHBOURHOOD PLAN SITES		0	0	**0**	0	0	**0**	130	50	**45**	0	40	**45**	0	30	**40**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	130	120	**130**	Lakes Estate Neighbourhood Plan has now been adopted with sites allocated for development indicating suitability and deliverability. Supporting delivery plan indicates that these could accommodate 130 dwellings. Likely to now come forward as part of Your.MK regeneration programme, of which Lakes Estate is the second estate due to come under consideration.		130
WAVENDON	LAND NORTH OF WAVENDON BUSINESS PARK		0	0	**0**	0	50	**50**	0	54	**64**	0	30	**20**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	134	**134**	site granted outline permission in February 2017 and S106 signed. Relatively small scale and mostly greenfield without scale means site will be deliverable within 5 years.	15/02337/OUT	0
HANSLOPE	LAND BETWEEN 36 AND 38 LONG STREET ROAD		0	12	**7**	0	0	**5**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	12	**12**	REM approved jan 2017, agent provided information April 2017: still awaiting public footpath diversion order, start on site expected April 2017 and updated projected completions.	16/02871/REM	0
HANSLOPE	CASTLETHORPE ROAD		0	0	**0**	0	50	**25**	0	75	**50**	0	25	**75**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	150	**150**	Outline permission approved December 2016.	16/02106/OUT	0
SHERINGTON	LAND WEST OF HIGH STREET		0	18	**9**	0	18	**18**	0	0	**9**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	36	**36**	Site granted permission on appeal. Greenfield with limited infrastructure requirements means delivery likely to be achievable within 5 years.	14/02002/OUT	0
OLNEY	LAND OFF EAST ST		0	7	**0**	0	7	**14**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0		**0**	0	0	**0**	0	0	**0**	0	14	**14**	Application approved at DCC 03/11/2016. Discussion with agent suggests completion within 2-3 years. S106 agreed in April 2017	16/00312/FUL	0
OLNEY	OLNEY NEIGHBOURHOOD PLAN SITES		0	0	**0**	0	0	**0**	100	50	**0**	100	100	**50**	50	100	**100**	0	0	**100**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	250	250	**250**	2 further sites allocated in Olney Neighbourhood Plan which is due for referendum in July 2017 (Land south Lavendon Road, covered by planning permission). Developer has carried out consultation with local residents and pre-application with the Council and an application has been submitted in June 2017 (17/00939/OUT)	Allocation	150
OLNEY	LAND SOUTH OF LAVENDON ROAD FARM		0	0	**0**	0	0	**0**	0	30	**25**	0	20	**25**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	50	**50**	Application approved July 2016, s106 signed August 2016; site also one of 3 sites within Olney neighbourhood plan for allocation.	16/00688/OUT	0
CASTLETHORPE	MALTINGS FIELD		0	0	**0**	30	0	**0**	0	30	**30**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	30	30	**30**	Site allocated in Castlethorpe Neighbourhood Plan, which is currently at examination stage. Developers have held pre-application discussions with the Council and met with the Parish Council and are looking to submit an application early summer 2017.	Allocation	0
TOTAL PARTNER NON TARIFF			**58**	**151**	**225**	**30**	**469**	**367**	**319**	**509**	**495**	**100**	**379**	**436**	**50**	**250**	**230**	**0**	**50**	**156**	**0**	**50**	**60**	**0**	**0**	**60**	**0**	**0**	**0**	**0**	**0**	**0**	**557**	**1858**	**2029**			
MIDDLETON	PHEONIX LODGE	MKDP	21	0	**0**	0	21	**21**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	21	21	**21**	Development brief approved January 2015. Pre-application advice currently being sought. Projected completions provided by MKDP April 2017.		0
MEDBOURNE	SITE 4, VERNIER CRESESNT	MKDP	0	0	**0**	0	0	**0**	10	10	**10**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	10	10	**10**	site has been reviewed down from 19 to 10 dws due to constraints plan showing services running across the site. Comepltion projections provided by MKDP (April 2017)		0
BROUGHTON	BROUGHTON ATTERBURY (former employment allocation)	MKDP	0	60	**0**	0	70	**50**	0	0	**50**	0	0	**30**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	130	**130**	projections confirmed by MKDP		0
WESTCROFT	RESERVE SITE 3	MKDP	0	0	**0**	22	0	**0**	0	22	**22**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	22	22	**22**	site has development brief approved (Oct 2014). Projected completions data provided by MKDP (April 2017)		0
CROWNHILL	RESERVE SITE OFF HENDRIX DRIVE	MKDP	0	0	**0**	0	0	**0**	10	10	**10**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	10	10	**10**	info on completion dates provided by MKDP (April 2017)		0
GRANGE FARM	RESERVE SITE (off Nicholson Grove)	MKDP	0	0	**0**	0	0	**0**	19	19	**19**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	19	19	**19**	info on completion dates provided by MKDP (April 2017)		0
MONKSTON	LLLESHALL AVENUE	MKDP	0	24	**20**	0	0	**4**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	24	**24**	Planning permission approved, projections confirmed by MKDP	16/01100/FUL	0
WALNUT TREE	RESERVE SITES A & D HINDHEAD KNOLL	MKDP	0	0	**0**	0	25	**25**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	25	**25**	info on completion dates provided by MKDP (April 2017)		0
TOTAL OTHER MKDP HOUSING SITES			**21**	**84**	**20**	**22**	**116**	**100**	**39**	**61**	**111**	**0**	**0**	**30**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**82**	**261**	**261**			
OTHER LARGE (OVER 10 UNITS) DELIVERABLE BROWNFIELD SITES																																						
CENTRAL MILTON KEYNES	YMCA REDEVELOPMENT		0	0	**0**	0	0	**0**	0	161	**0**	0	100	**261**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	261	**261**	Permission granted at DCC 03/11/2016. Information provided by agent (April 2017): Expected start on site date Q2 2019 subject to viability and completion of YMCA building.	16/01769/FUL	0
CENTRAL MILTON KEYNES	LAND AT 809 TO 811 SILBURY BOULEVARD		0	70	**0**	0	69	**139**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	139	**139**	information provided in early April 2017 by agent that contarctors are ready to go on site in May 2017, once s106 agreed and then anticpated completion on site by end of 2018. S106 has now been agreed and signed off.	16/03038/FUL	0
CENTRAL MILTON KEYNES	SITE B1.1		0	24	**0**	0	0	**0**	0	0	**24**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	24	**24**	Application permitted at appeal October 2016	15/00827/FUL	0
WOLVERTON	AGORA REDEVELOPMENT		0	0	**0**	0	0	**0**	0	100	**50**	0	0	**50**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	100	**100**	Site has full permission.	15/00913/FUL	0
WOLVERTON	RAILCARE MAINTENANCE DEPOT, STRATFORD ROAD		0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	100	**0**	0	100	**75**	0	100	**100**	0	75	**100**	0	0	**100**	0	0	**0**	0	375	**375**	Outline permission granted, but unlikely to provide any completions in 5 years due to need to redevelop for employment site prior to starting on residential units. Plus likely to be issues that need resolving around contamination etc.	15/02030/OUTEIS	0
BLETCHLEY	LAND TO SOUTH OF PRINCES WAY & WEST OF ALBERT STREET		0	0	**0**	184	12	**0**	0	20	**12**	0	38	**20**	0	114	**38**	0	0	**42**	0	0	**72**	0	0	**0**	0	0	**0**	0	0	**0**	184	184	**184**	application approved March 2017. Discussion with agent April 2017: S106 being agreed by July 2017, landowners will then be looking to draw up a detailed design to go out for tender to seek a developer partner. It is intended that the townhouses are built out first and then the development of the blocks of flats will come forward dependant on the market. Given the market in Bletchley is fairly untested for thus type of development, there is less certainty over how quickly this will come forward. Agent however agreed likely sos within 2/3 years.	16/02451/FUL	70
BLETCHLEY	18A ST.GEORGES ROAD		0	10	**0**	0	0	**10**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	10	**10**	Your.MK regeneration scheme, permission granted January 2017. Delivery projections provided by Your.MK.	16/03118/MKCOD3	0
HEELANDS	SUFFOLK PUNCH SITE		0	10	**0**	0	17	**15**	0	0	**12**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	27	**27**	approved at DCC 09/03/2017 - initial discussion with agent recommended that intention is to be started on site before the end of 2017.	16/01475/FUL	0
NEWPORT PAGNELL	NETWORK HOUSE		0	20	**50**	0	0	**23**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	20	**72**	Site under construction, completion projections confirmed by developer via phone on 26/05/2017, only 20 units remain unstarted as of end of 16/17.	14/02799/FUL	0
NEWPORT PAGNELL	FORMER ASTON MARTIN/TESCO SITE		0	86	**10**	0	0	**76**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	86	**86**	Aplication approved at DCC, November 2016 and S106 approved in May 2017.	16/00349/FUL	0
TOTAL DELIVERABLE BROWNFIELD SITES			**0**	**220**	**60**	**184**	**98**	**263**	**0**	**281**	**98**	**0**	**138**	**331**	**0**	**214**	**38**	**0**	**100**	**117**	**0**	**100**	**172**	**0**	**75**	**100**	**0**	**0**	**100**	**0**	**0**	**0**	**184**	**1226**	**1279**			
SAP SITES																																						
COFFE HALL	LAND AT OUR LADY OF LOURDES CHURCH (SAP 1)		0	11	**11**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	11	**11**	site granted planning permission in April 2017, conditions discharged in May 2017 and work has begun on site with existing buildings already demolished.	14/02425/FUL	0
GRANGE FARM	LAND OFF SINGLETON DRIVE (SAP3)	MKDP	0	0	**0**	22	10	**0**	0	12	**22**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	22	22	**22**	info on start/completion dates provided by MKDP (April 2017)		0
MEDBOURNE	LAND NORTH OF VERNIER CRESCENT (SAP5)	MKDP	0	0	**0**	14	14	**0**	0	0	**14**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	14	14	**14**	info on start/completion dates provided by MKDP (April 2017)		0
FISHERMEAD	GURNARDS AVENUE (SAP6)	MKDP	0	0	**0**	0	0	**0**	14	14	**0**	0	0	**14**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	14	14	**14**	info on start/completion dates provided by MKDP (April 2017)		0
WALNUT TREE	LAND AT BERGAMOT GARDENS (SAP8)	WALTON COMMUNITY COUNCIL	0	0	**0**	15	0	**0**	0	15	**15**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	15	15	**15**	discussion with Walton Community Council; currently (April 2017) in process of selling site to a developer; discussion ongoing with WCC's solicitors and deal should be moving ahead asap.		0
BRADWELL COMMON	LAND OFF HANPSTEAD GATE (SAP12)	MKDP	0	0	**0**	16	8	**0**	0	8	**16**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	16	16	**16**	info on start/completion dates provided by MKDP (April 2017)		0
BRADVILLE	LAND OFF HARROWDEN (SAP14)	MKDP	0	0	**0**	0	0	**0**	27	0	**0**	0	27	**27**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	27	27	**27**	info on start/completion dates provided by MKDP (April 2017). The site is part of Regen:MK and therefore delivery will depend on progress with this programme.		0
SHENLEY BROOK END	MANIFOLD LANE (SAP16)	MKDP	0	0	**0**	0	0	**0**	18	10	**0**	0	8	**18**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	18	18	**18**	info on start/completion dates provided by MKDP (April 2017)		0
WAVENDON GATE	LAND AT TOWERGATE, GROVEWAY (SAP18)	HCA	150	0	**0**	0	0	**0**	0	75	**0**	0	50	**84**	0	25	**66**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	150	150	**150**	HCA information (April 2017): outline application being worked up alongside SAP, site to then be marketed under HCA accelerated construction programme, with OUT approved by start of 2018, start on site June 2019 and site to be wholly developed out by Feb 2022.		150
WALTON MANOR	LAND AT WALTON MANOR, GROVEWAY/SIMPSON ROAD (SAP19)	MKDP	0	0	**0**	0	0	**0**	135	0	**0**	0	75	**50**	0	60	**85**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	135	135	**135**	info on start/completion dates provided by MKDP (April 2017). Initial trasnport studies have indicated capacity issues on Groveway and potential upgrade work required. This will need to be delivered ahead of implimentation and therefore the projected completions have been pushed back a year.		135
MONKSTON PARK	LAND OFF LADBROKE GROVE (SAP21)	MKDP	25	0	**0**	0	25	**15**	0	0	**10**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	25	25	**25**	info on start/completion dates provided by MKDP (April 2017)		0
TOTAL SAP SITES			**175**	**11**	**11**	**67**	**57**	**15**	**194**	**134**	**77**	**0**	**160**	**193**	**0**	**85**	**151**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**436**	**447**	**447**			
PRIOR NOTIFICATION (RESIDENTIAL CONVERSION)																																						
CALDECOTTE	5 AND 6 COPPERHOUSE COURT		0	8	**11**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	8	**11**	Site under construction.	13/01649/FUL	0
CENTRAL MILTON KEYNES	TOWERGATE HOUSE, 352 AVEBURY BOULEVARD		32	0	**0**	0	32	**32**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	32	32	**32**			0
CENTRAL MILTON KEYNES	TERNION COURT	Suisse Property Holdings Ltd	0	0	**23**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**23**	All units now under construction.	15/02683/FUL	0
CENTRAL MILTON KEYNES	BRICKHILL HOUSE 1ST & 2ND FLOORS	Mr M Johal	0	0	**10**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**10**	All units now under construction.	16/00615/FUL	0
CENTRAL MILTON KEYNES	GRANT THORNTON HOUSE, 210 SILBURY		0	0	**0**	0	35	**35**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	35	**35**		16/03647/pnbic3	0
BLETCHLEY	QUEENSWAY HOUSE	KBZ	0	0	**28**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**28**	Discussion with agent in October 2017; Project out for tender. Start on site expecetd early 2017 with compltion mid-2017	15/01357/FUL	0
BLETCHLEY	MAYBROOK HOUSE		0	0	**13**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**13**		15/02871/FUL	0
BLETCHLEY	86 TO 90 QUEENSWAY		0	10	**10**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	10	**10**		16/03111/FUL	0
OLDBROOK	MILBURN AVENUE	K&S Buidlings Ltd	0	0	**14**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**14**	All units now under construction.	15/03180/FUL	0
OLDBROOK	CLYDE HOUSE	K&S Buidlings Ltd	0	12	**24**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	12	**24**		16/00790/FUL	0
GRANGE FARM	FIRST AND SECOND FLOOR 134 DUNTHORNE WAY		0	10	**10**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	0	**0**	0	10	**10**		16/02146/FUL	0
TOTAL PRIOR APPROVAL			**32**	**40**	**143**	**0**	**67**	**67**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**32**	**107**	**210**			
SUMMATION OF EACH TARIFF TYPE																																						
TOTAL HOUSING COMMITMENTS - MAJOR SITES (>10 dwellings)			3051	2267	**1727**	2830	3314	**2714**	1458	3039	**3031**	1880	2749	**3410**	1154	2162	**2370**	1070	1383	**1795**	300	1130	**1391**	300	795	**975**	300	616	**790**	0	1690	**2400**	12343	19145	**20603**			
URBAN WINDFALL ALLOWANCE*			60	60	**60**	60	60	**60**	60	60	**60**	60	60	**60**	60	60	**60**	60	60	**60**	60	60	**60**	60	60	**60**	60	60	**60**	**0**	**0**	**0**	540	540	**540**			
RURAL WINDFALL ALLOWANCE*			35	35	**35**	35	35	**35**	35	35	**35**	35	35	**35**	35	35	**35**	35	35	**35**	35	35	**35**	35	35	**35**	35	35	**35**	0	0	**0**	315	315	**315**			
TOTAL HOUSING COMMITMENTS - INCLUDING WINDFALL ALLOWANCE			3146	2362	**1822**	2925	3409	**2809**	1553	3134	**3126**	1975	2844	**3505**	1249	2257	**2465**	1165	1478	**1890**	395	1225	**1486**	395	890	**1070**	395	711	**885**	0	1690	**2400**	13198	20000	**21458**		**DISCOUNT**	**6978**
TOTAL URBAN COMMITMENTS			2511	2166	**1656**	2860	3025	**2504**	1404	2666	**2757**	1240	2520	**3133**	1164	2022	**2230**	1130	1343	**1655**	360	1090	**1351**	360	755	**935**	360	576	**750**	0	1290	**1850**	11389	17453	**18821**			
TOTAL RURAL COMMITMENTS			635	196	**166**	65	384	**305**	149	468	**369**	735	324	**372**	85	235	**235**	35	135	**235**	35	135	**135**	35	135	**135**	35	135	**135**	0	400	**550**	1809	2547	**2637**			
5 YEAR LAND SUPPLY POSITIONS (AS AT START OF EACH YEAR)- URBAN				2017-22	**12280**		2018-23	**12279**		2019-24	**11126**		2020-25	**9304**		2021-26	**6921**																				
5 YEAR LAND SUPPLY POSITIONS (AS AT START OF EACH YEAR)- RURAL					**1447**			**1516**			**1346**			**1112**			**875**																				
5 YEAR LAND SUPPLY POSITIONS (AS AT START OF EACH YEAR)- TOTAL					**13727**			**13795**			**12472**			**10416**			**7796**																				
End of year shortfall					**3113**			**2054**			**678**			**0**			**0**																				
Completions 2010/11 to 2016/17		**9065**																																		
Requirement 2010/11 to 2016/17		**12250**																																		
Shortfall against target		**3185**																																		
Requirement Liverpool				**2017-22**	**12623**		**2018-23**	**12835**		**2019-24**	**12261**		**2020-25**	**11178**		**2021-26**	**10500**																				
Land Supply in years (with discount)					**5.16**																															