Strategic Planning & Research Unit

For and on behalf of
Templeview developments

Examination of Milton Keynes Council
Site Allocations Plan DPD
Response to Inspectors Questions Matter 2

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Strategic Planning & Research Unit

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MATTER 2 THE ROLE OF THE SAP

Issue – is the SAP consistent with, and does it positively promote, the objectives and spatial policies contained within the Core Strategy?

2. Does the scale, type and distribution of the proposed allocations conform to the stated expectations of, and any relevant policies included within, the Core Strategy?

2.1 No.

2.2 SPRU have undertaken a detailed assessment of the 5 year and supply and this has revealed that some 7 years into the CS the vision for delivering at least 28,000 new homes by 2026 is unlikely to be achieved. This assessment includes the likely contribution from the sites allocated n the SAP.

2.3 Not only has there been a track record of undersupply against the CS objectives in terms of housing delivery but the SAP is seriously late compared to the timescale suggested by Policy CS1 which required the SAP to provide “short term flexibility” for the period up to the adoption of Plan MK i.e. by 2015 (Policy CSD1).

2.4 There is a strong argument that the SAP has failed to meet the expectations of the CS as it is extremely late, however the fact that the Plan MK is even later in its delivery then there is the potential at least for the SAP to actually fulfil a wider purpose in so far as it could make a range of allocations for the remainder of the plan period to 2026.

2.5 The basic point is that the SAP is not in accordance with policy CS1 or CSAD1 and to that extent is unsound.

2.6 SAP Figure 1 clearly demonstrates that the majority of the sites are located in central Milton Keynes or to the south of the centre. Only one site (SAP 14) is allocated to the north.

2.7 The distribution of these smaller sites is important as the objective of the SAP is to improve delivery and as such a wider variety of sites across a wider market is important. The lack of balance in the distribution makes the objective of securing a five year land supply and the increasing of the rate of delivery much more difficult to achieve,

2.8 The introduction of a wider variety of sites in the northern part of the city will clearly widen the market choice and is a positive response to the underperformance of MKC since the adoption of the Core Strategy.

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?

3.1 No.

3.2 MKC give two reasons for the SAP these are:

- the commitment made to the Core Strategy Examination inspector to produce a plan allocating smaller sites to assist meeting the potential shortfall
- the lack of a 5 year land supply in 2015 and 2016

3.3 The evidence base for the SAP is unclear originally proposed to meet the shortfall up to 2015 (CS1 and CSAD1) the purpose is now at best muddled.

3.4 The amount of land that should be allocated is dependent on the housing requirement is this the "interim figure" that the Inspector accepted at the Examination Core Strategy, or the OAN in the recently published a Strategic Housing Market Assessment (February 2017) or a higher figure based on the EEFM projection required to meet employment growth of MK?

3.5 The SHMA 2017 is untested and utilises only a single source of economic data for projecting the level of housing required to meet future economic growth in MK. The SHMA 2017 final OAN figure of 1,766 dpa is based upon the output of the East of England Forecasting Model 2016 (EEFM).

3.6 The EEFM is an integrated model and models a dwelling requirement alongside the economic projection. The EEFM suggests a requirement of 30,240 new dwellings. This represents a requirement for the CS plan period of 1,890 dpa.

3.7 The reason that the SHMA calculates a different requirement is partly due to the different time period, but also because the consultants have selected different assumptions than those contained within the EEFM to convert projected Job growth to dwelling demand. In considering the weight that might be placed on such an approach we would refer to the note by Neil McDonald (April 2017) which discusses how the EEFM can be used to estimate the number of homes needed to support economic growth. In relation to the use of the jobs forecast to calculate future housing requirement, the note states:

'The EEFM is an integrated model, which forecasts both jobs (labour demand) and the population needed to fill those jobs. Users should not make alternative estimates of the population needed to fill the EEFM jobs, based on economic activity/participation rates from another source. To do so is logically inconsistent with the EEFM and the results may be highly misleading.'

3.8 The approach in the SHMA 2017 is clearly incorrect.

3.9 In the choice of the weight that might be attributed to either the SHMA requirement of 1,766 dpa, and the EEFM requirement of 1,890 dpa, we would suggest that the consistency of the EEFM should be preferred over the SHMA approach. In addition, the EEFM figure provides an updated projection for the plan period (2010 to 2026), whereas the SHMA does not (2016 to 2031).

3.10 A further area of considerable concern is that the consultants who have undertaken the SHMA2017 have a track record of arguing for much lower demographic based housing requirements which across the wider HMA would result in meeting the needs of 13% less households than that projected by the DCLG forecasts.

3.11 The second element to determining the level of housing needs that the SAP is to meet is of course the timeframe over which the SAP is proposed to cover. This is completely unclear.

3.12 It is possibly because of the above that the justification of the number of dwellings in the SAP is not justified by reference to any specific calculation. It is difficult to see how it maybe concluded that the SAP can pass the test of soundness as it cannot be considered to be justified by reference to the Councils own evidence base. The unjustified nature of the SAP is given even higher prominence by reference to the Council's statement position that it can demonstrate a five year land supply.

Table 1 Comparison of official DCLG household projections with ORS demographic Household projections across the Milton Keynes and Luton SHMA

	DCLG 2014 Annual rate 2015 to 3035 households (Source table 406)	ORS Demographic projections annual rates	Percentage change	Source
Aylesbury Vale	1,012	847	-16%	ORS HEDNA December 2016
Luton	1,147	833	-27%	ORS SHMA Update 2017
Central Bedfordshire	1,729	1,387	-20%	ORS SHMA Update 2017
Milton Keynes	1,428	1,542	8%	ORS SHMA 2016
Bedford	983	863	-12%	ORS SHMA Update 2016
HMA	**6,299**	**5,471**	**-13%**	

The five year land supply position

3.13 The Councils approach to calculating the 5 year land supply is now substantially different to the approach put to the Core Strategy Examination. The degree to which the housing requirement in the SAP has been derived from this approach it is not consistent with the CS.

3.14 The 5 year land supply has recently been examined in detail over 3 days at the appeal Land to the East of Newport Road Woburn Sands (APP/Y0435/W/17/3169314) and it is pertinent to note that the inspector in his opening remarks stated that his initial review of our evidence he was of the opinion that the Council could not demonstrate a robust five year supply. Clearly there is insufficient time to undertake such a detailed examination of the supply at the SAP examination. This appeal decision may be available by the time of the examination.

3.15 There are two main areas of disagreement:

- Sedgefield vs Liverpool approach to the shortfall
- The ability of the Western and Eastern expansion areas together with the Strategic Reserve to deliver houses at rates which are significantly higher than the average for such sites in England and to exceed the highest recorded average rates of delivery

3.16 The Council accept that there is a need to discount some of the initial assumptions regarding the delivery on specific sites we disagree with regard to the degree to which such rates should be discounted. We would also challenge the continued reliance on the use of the Liverpool method for dealing with the continued shortfall.

Sedgefield vs Liverpool

3.17 The Council suggest in the latest available five-year land supply assessment (2017) that the Liverpool method of spreading the unmet requirement over the remainder of the plan period is appropriate for Milton Keynes. The justification given for this is that most new housing is to be delivered on a number of large strategic sites, which will take many years to build-out.

3.18 Clearly if the SAP is to address this issue then the Liverpool approach is no longer justified. In this case the SAP would not increase the level of housing sufficiently to meet the 5 year land requirement as calculated by the Sedgefield approach.

3.19 The long history of strategic allocations in Milton Keynes means that many of the sites have been allocated and are delivering, so the issue of lead-in times is less relevant, and given the knowledge of past experience the Council should have been addressed the issue in the Core Strategy and a timely produced SAP.

3.20 The use of “Liverpool” method to avoid the shortcomings of sites that the Council have chosen to allocation is incorrect as the inspector in a recent appeal (Land west of 29 Church View, Longhorsley, Morpeth APP/P2935/W/15/3141228) stated:

“The ‘Liverpool’ approach is not a device for manipulating the 5-year housing supply to mask (in this case) relatively short term and temporary forecast deficits due to the particular mix and characteristics of the sites identified; it is not a means to ‘side-step’ the considerations that apply in the absence of being able to identify a 5-year supply of housing land.”

3.21 It is also important to note that at the time of the core strategy examination the inspector considered the application of the Sedgefield approach in the context of a 25% reduction in all forecast completions as part of the Councils “optimism bias”. The Council no longer applies such a high level of discount and only applies a smaller (10%) discount to limited number of sites. The situation is clearly very different form the time of the examination of the core strategy

3.22 Lastly, in 2017 is almost the half way point of the CS plan period and there is clearly an urgent need for an uplift in supply sooner rather than later.

3.23 As a matter of calculation, it should be noted that the application of the Sedgefield rather than the Liverpool method to the Council’s land supply position would result in a lack of a 5 year land supply.

The Need to Discount from Projected Completions

3.24 The Council’s record for overestimating completions is both persistent and substantial.

3.25 Up to 2011 the Council applied it’s a 25% discount to its projected completions referred to as the “optimum bias”. This was based upon the recorded level of under performance against its own forecasts. SPRU research suggests that the more recent forecasts in the Council’s annual monitoring reports are still on average over estimating completions by 25%. This was unchallenged at the recent appeal.

3.26 At the time of the Core Strategy Examination the Council applied a 25% discount referred to as the “Optimism Bias”.

3.27 The Council then reduced this to a 10% discount to all forecast completions based upon research regarding past performance (“Milton Keynes Council – interim assessment of five year land supply” (November 2015) after the Frost appeal appendix 3).

3.28 Just reverting back to the approach adopted at the Core Strategy Examination of a 25% discount or the even later interim assessment of 10% would result in reducing the Housing land supply to under five years.

3.29 We have reviewed the Councils record at forecasting completions over a five year period and on average the MKC has overestimated completions and only 75% of forecast completions have been delivered on time.

3.30 In our assessment of 5 year supply we have adopted a different approach and discounted the Council's forecast completions by reference to an analysis of the evidence of availability and the delivery record of both local and national sites.

Forecasting future completion rates

3.31 SPRU reviewed has the evidence provided by the main players in MK at the Core Strategy Examination notably MKC, Gallagher's, the Homes and Communities Agency (the HCA) to the Core Strategy Examination and all appear to have been over optimistic in terms of the timescale and delivery rates of the sites being promoted. The exception to this is being Broughton Gate and Brooklands.

3.32 The highest annual rate of delivery appears to have been in the Brooklands Quadrant which delivered an average of 176 dpa (Brooklands).

3.33 Over the longer term 2008 to 2017 build rates have reached an average of 263 dpa in Bletchley.

3.34 These build rates are comparable to national research findings including the

- HBF (2016) which suggests an average build out for all sites of over 350 dwellings to be 70 dpa.
- NLP (2017) suggesting a range of build out rates for green field sites from:
    i. Sites of 500 to 999 at 86 dpa
    ii. Sites of 1000 to 1499 at 122 dpa
    iii. Sites of 1500 to 1999 at 142 dpa and
    iv. sites of over 2,000 at 171 dpa

3.35 It is important to note that the NLP research found the highest average annual build-out rates recorded were at Cranbrook in East Devon, where an average of 321 dwellings per annum were delivered between 2012/13 and 2014/15. The 321 dpa relates to just three years of data, and the scheme benefitted from significant government funding to help secure progress and infrastructure.

3.36 It is important to note that the Council are now relying on exceeding these highest past levels of average completions in the next five years in the case of the WEA (607 dpa) and in the Strategic Reserve (379 dpa).

3.37 For the Council to deliver the claimed 5 year supply all of the strategic allocations will need to forecast to deliver above the national average rate of completions when compared to their size for example:

- Brooklands (2,500) forecast 303 dpa against national average of 161 dpa or 171 dpa for greenfield sites

- Tattenhoe Park (1,330 dwgs) forecast at 156 dpa against national average of 122 dpa
- Western Expansion Area (6,600 dwgs) forecast at 607 dpa compared to national average of 171 dpa.
- Eaton Leys (600 dwgs) forecast at 200 dpa against national average of 86 dpa
- Strategic Reserve (1,846 dwgs) forecast 369 dpa against an national average of 142 dpa

3.38 The NLP research highlights that the second highest average build out rates recorded in this analysis comes from the Eastern Expansion Area (Broughton Gate & Brooklands) site in Milton Keynes, achieved an average of 268 dwellings per annum were delivered between 2008/09 and 2013/14. However, the approach of the MKC that all these large sites will substantially outperform both past performance local and nationally appears unrealistic.

3.39 Further detail with regard to the five year land supply is set out in appendix 1 of this response.

3.40 This concludes that the Council cannot demonstrate a five year supply of land.

3.41 Just adopting the Sedgefield would result in **4.53 years supply** on the Council supply figures a **shortfall of 1,347 dwellings**.

3.42 Taking a realistic view of lead in times and build out rates based on local intelligence cross referenced to national research results in a **3.06 years supply** a shortfall of **5,586 dwellings**.

Meeting the longer term Core Strategy housing land requirement.

3.43 The fact that the strategic sites identified by the core strategy have taken longer that assumed to be delivered means that there is now a considerable risk that the Core Strategy Housing Requirement will not be delivered by 2026.

3.44 The further risk to delivering the CS requirement is the Council's persistent track record of over estimating delivery rates.

3.45 The Five Year Land Supply 2017 – 2022 (MKC 2017) provides a trajectory of all sites including the SAP sites plus windfall to the end of the plan period. This suggests that the CS requirement might be exceeded by 83 dwellings. It also signals MKC's acknowledgment that some strategic allocations will not be completed within the CS period.

Table 2 Can MK meet the CS housing requirement with the SAP allocations

	Five Year Land Supply 2017 - 2022	NLP	SPRU
Requirement 2010/11 to 2016/17	28,000	28,000	28,000
Completions 2010/11 to 2016/17	9,065	9,065	9,065
Residual	18,935	18,935	18,935
Assessment of contribution from all identified sites and windfall (Five Year Land Supply 2017 - 2022)	21,418	21,418	21,419
Assessment of all identified sites to be completed after 2026	2,400	7,581	5,425
Assessment of contribution from all identified sites and windfall by 2026	19,018	13,837	15,994
Completions against target	83	-5,098	-2,941

3.46 The table above also includes two other sets of assumptions regarding delivery rates on the strategic sites (further details in appendix 2). First it applies the NLP national average build out rates to these sites as SPRU analysis demonstrates that MK has similar characteristics to the national housing market in terms of costs and affordability. This is a very useful sense check for while some of the sites might deliver more quickly others may not and historic completions in MK demonstrate this fact.

3.47 The second range of assumptions are those developed by SPRU having undertaken a more detailed consideration of the circumstances of the sites and the delivery record of the developers as well as the national research.

3.48 These alternative assumptions suggest that the shortfall at the end of the plan period could be in the region of between 3,238 and 5,098 dwellings. These are not unreasonable sets of assumptions as they have a clear evidential background.

3.49 In both cases the shortfall is due to the rate of delivery in strategic sites and is not determined by an overall limitation in the market to deliver a higher number of dwellings.

3.50 If purpose of the SAP is now to bring forward smaller sites which can be delivered quickly though the system to assist in meeting the overall CS requirement then there would appear to be a clear justification for it to allocation between 3,238 and 5,098 dwellings on small and medium sites which have the potential to be delivered quickly though the system and to extend the range of sites available to the market both in terms of location and size.

4. Should the SAP have a clear and specific timeframe?

4.1 Yes.

4.2 Paragraph 2.4 states that the timeframe "principally concerns the next 5 years" however MKC's evidence on five year land supply is that many of the sites that are proposed as allocations in the SAP are not going to be delivered in the next five years.

4.3 The objectives on page 9 suggest that the purpose is to maintain a five year land supply which appears to be a longer term time frame for the whole of the core strategy period.

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4.4 Given the poor record MKC have in delivering development plans on time it is considered that the SAP timeframe should be extended to cover the whole of the remaining Core Strategy period. This will require the need to allocate additional sites.

5. Is the use of employment land, whether brownfield or otherwise, for housing allocations justified?

5.1 No

5.2 MK is a fats growth economy and no assessment has been undertaken of future employment needs and therefore to remove these sites from the employment land supply without understanding the future needs of the city is contrary to the approach required by the framework.

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APPENDIX 1: SUMMARY OF RECENT UP TO DATE EVIDENCE ON THE FIVE YEAR HOUSING LAND SUPPLY

1.0 INTRODUCTION

1.1 In order to assist the Inspector at the SAP examination, we provide a summary of Mr Bolton's recent up-to-date evidence on the five year land supply for Milton Keynes. This is a summary and the full proof of evidence and rebuttal have been submitted to the Examination Library. This appendix the areas of agreement and differences in the assumptions which will then be explored further in my evidence.

1.2 Mr Bolton's evidence and his rebuttal are based upon the 2 June 2017 data that the Council emailed to the appellant setting out a new trajectory for the 2017/18 to 2021/22 period. This sets out the Councils five year land supply position of 5.16 years supply.

2.0 MATTERS OF AGREEMENT

The Starting Position

2.1 It is agreed that the adopted Core Strategy Policy CS2 provides the basis for the calculation of the five-year housing land requirement.

2.2 Policy CS2 and table 5.2 of the Core Strategy states that there is an interim requirement for 1,750 dwellings in the period April 2010 to March 2026.

2.3 Paragraph 5.18 explains that the interim housing target will be used for the purpose of monitoring housing land supply until such a time that a new housing target is adopted in Plan:MK and that it should be regarded as a minimum figure.

Backlog

2.4 It is agreed that the backlog should be measured against the annualised level of housing requirement of 1,750 dwellings a year.

2.5 It is agreed that there have been 9,019 net completions in MKC since the start of the CS period.

Persistent Under-Delivery

2.6 There is agreement that the Council has persistently under delivered and therefore a 20% buffer should be applied in accordance with paragraph 47 of the Framework. This buffer should also be applied both to the annual requirement and the backlog.

Time Period of the Five-Year Assessment

2.7 It is agreed that the five-year period for the assessment should start in April 2017 and continue to March 2022.

Matters of Disagreement

2.8 As the original assessment was just of 5.03 years supply which represented an over provision of just 74 dwellings then even small corrections to the evidence would have been sufficient to demonstrate a five year land supply shortfall.

2.9 The June 2017 data giving a 5.16 years supply represents an oversupply just of 407 dwellings see table 27.

Net vs Gross Completions – difference 46 dwgs

2.10 It is Mr Bolton's position that completions should be net completions, and that demolitions should be subtracted from the gross level of housing completions. This was subsequently agreed by the Council during the course of the inquiry.

Windfall – difference 30 dwgs

2.11 I consider that the evidence in the Assessment of Five Year Land Supply 2016 -2021 the Council justifies (Appendix 2, paragraph 4.2,) an average of 36 dpa for the rural area and paragraph 4.6 justifies an average of 52 dpa for the urban area for sites of under 10 units. The evidence therefore supports a windfall allowance of 89 dpa (36 + 53). This is 6 dpa lower or 30 dwellings over the five-year period.

The Need to Discount from Projected Completions

2.12 The Council's record for overestimating completions is both persistent and substantial.

2.13 There is a general agreement that there is a need to discount from the Council's initial completion rates derived from responses to their questioning of developers and land owners.

2.14 There is however disagreement as to how this might be done.

2.15 Up to 2011 the Council applied its own 25% discount referred to as the "optimum bias" based upon the recorded level of under performance against its own forecasts. Mr Bolton's research suggests that the more recent forecasts are still on average over estimating completions by 25%. This is demonstrated in the tables below.

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Table 1 Previous Forecasts of Five-Year Land Supply by MKC compared to actual completions

	2007/08	2008/2009	2009/10	2010/11	2011/12	2012/13	201/14	2014/15	2015/16	2016/2017	Total
Actual completions	2,317	1,856	1,422	1,306	1,586	1,315	1,001	1,440	1,202	1,247	14,692
MK AMR March 2007	1,900	2,600	3,100	2,700	2,500	2,700	2,500	2,600	2,600	2,600	25,800
Percentage of forecast actually delivered	122%	71%	46%	48%	63%	49%	40%	55%	46%	48%	57%
Actual completions		1,856	1,422	1,306	1,586	1,315	1,001	1,440	1,202	1,247	12,375
MK AMR March 2008		1,500	1,100	1,400	1,600	1,900	2,100	2,400	2,600	2,500	17,100
Percentage of forecast actually delivered		124%	129%	93%	99%	69%	48%	60%	46%	50%	72%
Actual completions			1,422	1,306	1,586	1,315	1,001	1,440	1,202		9,272
MK AMR March 2009			1,296	1,007	1,541	2,119	2,435	2,450	2,375		13,223
Percentage of forecast actually delivered			110%	130%	103%	62%	41%	59%	51%		70%
Actual completions				1,306	1,586	1,315	1,001	1,440	1,202	1,247	9,097
MK AMR March 2010				1,128	1,694	1,897	2,366	2,028	1,897	1,684	11,010
Percentage of forecast actually delivered				116%	94%	69%	42%	71%	63%	74%	83%
Actual completions					1,586	1,315	1,001	1,440	1,202	1,247	7,791
MK AMR December 2011					1,642	1,492	1,893	2,169	1,969	2,263	9,165
Percentage of forecast actually delivered					97%	88%	53%	66%	61%	55%	85%
Actual completions						1,315	1,001	1,440	1,202	1,247	6,205
MK AMR December 2012						1,596	1,566	2,189	2,105	2,375	9,831
Percentage of forecast actually delivered						82%	64%	66%	57%	53%	63%
Actual completions							1,001	1,440	1,202	1,247	4,890
MK AMR December 2013							1,566	2,189	2,105	2,375	8,235
Percentage of forecast actually delivered							64%	66%	57%	53%	59%
Actual completions								1,440	1,202	1,247	3,889
MK 5 year land supply 01/06/2014								1,792	2,145	2,538	6,475
Percentage of forecast actually delivered								80%	56%	49%	60%
Actual completions									1,202	1,247	2,449
MK 5 year land supply 01/06/2015									1,487	2,259	3,746
Percentage of forecast actually delivered									81%	55%	65%
Actual completions									1,202	1,247	2,449
MK 5 year land supply 01/11/2015									1,379	2,487	3,866
Percentage of forecast actually delivered									87%	50%	63%
Actual completions										1,247	1,247
MK 5 year land supply 01/06/2016										1,644	1,644
Percentage of forecast actually delivered										76%	76%
Percentage of predicted supply constructed in first 5 years of forecast											**69%**

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Table 2 Comparison of MKC's forecast completions against actual over 5 year period

	2007/08	2008/2009	2009/10	2010/11	2011/12	2012/13	201/14	2014/15	2015/16	2016/2017	Total
Actual completions (Historic completions from annual reports)	2,317	1,856	1,422	1,306	1,586						8,487
MK AMR March 2007	1,900	2,600	3,100	2,700	2,500						12,800
Percentage of forecast actually delivered	122%	71%	46%	48%	63%						66%
Actual completions		1,856	1,422	1,306	1,586	1,315					7,485
MK AMR March 2008		1,500	1,100	1,400	1,600	1,900					7,500
Percentage of forecast actually delivered		124%	129%	93%	99%	69%					100%
Actual completions			1,422	1,306	1,586	1,315	1,001				6,630
MK AMR March 2009			1,296	1,007	1,541	2,119	2,435				8,398
Percentage of forecast actually delivered			110%	130%	103%	62%	41%				79%
Actual completions				1,306	1,586	1,315	1,001	1,440			6,648
MK AMR March 2010				1,128	1,694	1,897	2,366	2,028			9,113
Percentage of forecast actually delivered				116%	94%	69%	42%	71%			73%
Actual completions					1,586	1,315	1,001	1,440	1,202		6,544
MK AMR December 2011					1,642	1,492	1,893	2,169	1,969		9,165
Percentage of forecast actually delivered					97%	88%	53%	66%	61%		71%
Actual completions						1,315	1,001	1,440	1,202	1,247	6,205
MK AMR December 2012						1,596	1,566	2,189	2,105	2,375	9,831
Percentage of forecast actually delivered						82%	64%	66%	57%	53%	63%
Percentage of predicted supply constructed in first 5 years of forecast											**75%**

2.16 At the time of the Core Strategy Examination the Council applied a 25% discount referred to as the “Optimism Bias”.

2.17 The Council then reduced this to a 10% discount to all forecast completions based upon research regarding past performance (“Milton Keynes Council – interim assessment of five year land supply” (November 2015) after the Frost appeal appendix 3).

2.18 Just reverting back to the approach adopted at the Core Strategy Examination of a 25% discount or the later interim assessment of 10% would result in reducing the Housing land supply to under five years.

2.19 Having reviewed the Council’s record at forecasting completions over a five year period Mr Bolton concludes that on average the MKC has overestimated completions wand only 75% of forecast completions have been delivered on time.

2.20 Although a 25% discount is still justified against the evidence Mr Bolton adopted a different approach and discounted the Council’s forecast completions by reference to an analysis of the evidence of availability and the delivery record of both local and national sites.

Sedgefield vs Liverpool

2.21 The Council suggest in the latest available five-year land supply assessment (2017) that the Liverpool method of spreading the unmet requirement over the remainder of the plan period is appropriate for Milton Keynes. The Council state that the justification for this is the specific circumstances of Milton Keynes which mean that most new housing is to deliver on a number of large strategic sites, which will take many years to build-out.

2.22 SPRU are of the opinion that the Council do (and have had) a choice of sites, and could allocate a range of sites, including smaller sites that could deliver in a timely manner. This is demonstrated in part by delayed Site Allocation Plan (SAP) that is subject to this examination.

2.23 Mr Bolton’s evidence considered that the long history of strategic allocations in Milton Keynes means that many of the sites have been allocated and are delivering, so the issue of lead-in times is less relevant, and given the knowledge of past experience the Council should have been addressed the issue in the Core Strategy and subsequent SAP.

2.24 It is also important to note that at the time of the core strategy examination the inspector considered the application of the Sedgefield approach in the context of a 25% reduction in all forecast completions as part of the Councils “optimism bias”. The Council no longer applies such a high level of discount and only applies it to limited number of sites. The situation is clearly very different form the time of the examination of the core strategy

2.25 Lastly, now in 2017 we are almost half way through the plan period and there is clearly an urgent need for an uplift in supply sooner rather than later.

2.26 As a matter of calculation, it should be noted that the application of the Sedgefield rather than the Liverpool method to the Council’s land supply position would result in a lack of a 5 year land supply.

Forecasting future completion rates

2.27 Mr Bolton's analysis of past performance of the Council in terms of forecasting is that on average only 75% of forecast completions are actually delivered within the five years (this appendix table 1 and 2).

2.28 Mr Bolton considered the evidence provided by the main players in MK at the Core Strategy Examination notably MKC, Gallagher's, the Homes and Communities Agency (the HCA) and all appear to have been over optimistic in terms of the timescale and delivery rates of the sites being promoted. The exception to this is being Broughton Gate and Brooklands (RGB PoE table 5).

2.29 The highest annual rate of delivery appears to have been in the Brooklands Quadrant which delivered an average of 176 dpa (Brooklands). This compare to the highest forecast average build rate of 273 dpa WEA (Area 11) (RGB PoE table 5).

2.30 Over the longer term 2008 to 2017 build rates have reached an average of 263 dpa in Bletchley (RGB PoE table 6).

2.31 These build rates are comparable to national research findings including the

a. HBF (2016 RGB appendix ?) which suggests an average build out for all sites of over 350 dwellings to be 70 dpa.

b. NLP (2017 RGB Appendix ?) suggesting a range of build out rates for green field sites from:

    i. Sites of 500 to 999 at 86 dpa

    ii. Sites of 1000 to 1499 at 122 dpa

    iii. Sites of 1500 to 1999 at 142 dpa and

    iv. sites of over 2,000 at 171 dpa

2.32 It is important to note that the NLP research found the highest average annual build-out rates recorded were at Cranbrook in East Devon, where an average of 321 dwellings per annum were delivered between 2012/13 and 2014/15. The 321 dpa relates to just three years of data, and the scheme benefitted from significant government funding to help secure progress and infrastructure.

2.33 The evidence highlights that the Council are relying on build rates that exceed the highest past levels of average completions in the case of the WEA (607 dpa RGB PoE Table 10) and in the Strategic Reserve (379 dpa RGB PoE table 21).

2.34 All of the strategic allocations are forecast to deliver above the national average rate of completions when compared to their size for example:

a. Brooklands (2,500) forecast 303 dpa against national average of 161 dpa or 171 dpa for greenfield sites

b. Tattenhoe Park (1,330 dwgs) forecast at 156 dpa against national average of 122 dpa

c. Western Expansion Area (6,600 dwgs) forecast at 607 dpa compared to national average of 171 dpa.

d. Eaton Leys (600 dwgs) forecast at 200 dpa against national average of 86 dpa

e. Strategic Reserve (1,846 dwgs) forecast 369 dpa against an national average of 142 dpa

2.35 The NLP research highlights that the second highest average build out rates recorded in this analysis comes from the Eastern Expansion Area (Broughton Gate & Brooklands) site in Milton Keynes, achieved an average of 268 dwellings per annum were delivered between 2008/09 and 2013/14.

2.36 The assumption by MKC that all these large sites will substantially outperform past performance both locally and nationally appears unrealistic and during cross examination the Councils witness could provide no examples of where such rates had been achieved..

2.37 The analysis in Mr Bolton's evidence suggests that MK market is comparable to the national market and there the application of national average build rates provide a sound starting point for any calculation.

2.38 The analysis in Mr Bolton's illustrates that the local market could deliver more houses as the level of all sales are below past rates and the percentage of all sales made up of new dwellings is also below past rates. Again this was no challenged by the Council at the inquiry.

2.39 As Mr Bolton notes in his evidence that in some (but not all) cases the rate of delivery has been higher than would have been achieved by applying national rates of delivery he has made suitable adjustments. The approach to projecting the each site is explained briefly as follows:

Western Expansion Area - reduction of 1,456 dwellings

2.40 Table 12 (RGB PoE) summarises the differences between the various MKC estimates and Mr Bolton's estimate. What is clear is that for the WEA to achieve the build rates suggested by MKC, it would have to become the highest performing strategic site in England and maintain unprecedented levels in excess of 600 completions a year over the next five years. It would have to outperform the completion rates achieved on the combined eastern expansion area by effectively doubling the rate of delivery.

2.41 Mr Bolton's approach of treating the two elements (Whitehouse (Area 10) 4,400 dwellings and Fairfield's (Area 11) 2,200 dwellings) as separate Strategic Sites and applying the national average rate of completions to both of 171 dpa to both sites which represents an increase in the past rates of delivery across both sites results in the area delivering 342 dpa which would make WEA one of the fastest delivering site in the country according to NLP research.

2.42 The difference is that my forecast would remove some 1,456 dwgs from the 5 year land supply.

2.43 This reduction in future rates to a realistic level based on evidence of actual past completions has the effect of decreasing the contribution this site will make to the Core Strategy Requirement with more of the site being projected to be completed in the period beyond 2026.

Tattenhoe Park – reduction of 424 dwellings

2.44 The site is still in the control of HCA and is reliant upon the 2007 outline consent. The HCA have applied to extend the time on the original outline which expires in August 2017.

2.45 The Council have been predicting completions on this site in their five year land supply assessments since 2005 and these have continually failed to deliver against these projections.

2.46 While the site might be sold to a developer or developers over the next year, and a start maybe made in 2019 as suggested by the HCA, there are unlikely to be any meaningful completions until 2020/21. As a site of below 2000 units, the completion rate would if in accordance with the national average, be below 100 dpa. The previous rate of completion on Phase 1 would also appear to support a rate of around the 100 dpa. While this is slightly lower than the 130 dpa suggested by the HCA in their submission to the Core Strategy Examination, the 100 dpa appears more credible to me given the local and national evidence. It also appears to be considerably over optimistic given the fact that there has been a consistent under performance of the HCA in delivering this site and there is little evidence that anything has actually changed.

Brooklands Eastern Expansion Area - reduction of 658

2.47 The Eastern Expansion Area (EEA) of Milton Keynes includes the residential areas of Broughton Gate with 1,500 homes, now largely complete, and Brooklands 2,500 homes. Originally allocated as a strategic reserve in the Milton Keynes Local Plan, Mr Bolton argued for this site to be included in the plan so as to address the issue of over reliance on the Western Expansion Area to deliver the housing requirement.

2.48 The June 2017 data confirms that the site is now and in ownership of Barratt Homes who are one of the two developers delivering the site up to now. It is further noted that Council expect all RM to be determined by end of 2017/2018.

2.49 The current build out rate for Brooklands has been 173 dpa. The Council are expecting the build out rate to average over 300 a year despite a single builder delivering the scheme.

2.50 There is no example of a single enterprise (even when acting under two flags) ever achieving these levels of completions on such a site over a prolonged period of time. It is our experience is that the company is much more likely to stagger the starts of these sites, rather than go into direct competition with themselves.

2.51 Mr Bolton concludes that this site will not deliver at 300 dpa but instead at the rate of 171 dpa this being a realistic forecast in these circumstances given that this is the national average for this size of site. It is noted that Mr Bolton still considered this to be an ambitious target for a single builder to achieve over a prolonged period.

Central Milton Keynes/ Campbell Park

2.52 The Council have been overoptimistic about the delivery of dwellings in the CMK and Campbell Park area of the city.

2.53 In terms of Campbell Park Remainder the June 2017 data have been provided by Milton Keynes Development Partnership MKDP (April 2017). This suggests 150 dwellings has to be delivered in the last two years of the five-year period.

2.54 While Mr Bolton noted the reserved matters application (December 2016) for the erection of 60 apartments submitted by The Parks Trust and is currently pending and that the Milton Keynes Development Partnership have been seeking

Expressions of Interest for mixed-use development on the north side of Campbell Park since April 2016.

2.55 No further applications have yet been submitted in respect of the remaining parcels. Given the period during which the outline application has been extant and the lack of progress as well as the lack of identifiable schemes the 150 completions included in the housing land supply of this site are in my view unrealistic.

2.56 The only reserved matters application currently submitted is by the Parks Trust, a charity based in Milton Keynes, who are not developers and no other parcels of land have yet come forward. It is also presumed that the site will need to be disposed of to a developer to build out the permission.

2.57 Given the longevity of the outline consent and the lack of a developer, it is not reasonable to expect any delivery from this element of Campbell Park for the 5 year period.

Eaton Leys reduction of 320 dwellings

2.58 The Council suggest that this site will deliver completions by 2019/20 at an average rate of 200 dpa. The Council witness at the inquiry changed the Council's position suggesting a lower average rate than that set out in the MKC June 2017 data, at a 150 dwellings.

2.59 Mr Bolton's forecast was that the first dwellings will be delivered a year later (2020/21) but at a rate similar to that which occurred in the first two years of build at WEA (Area 11).

2.60 This site gained outline planning permission on the 17 June 2017 and the Council are predicting completions of all 600 dwellings covered by the outline by the end of March 2022.

2.61 The application extended across two local authority areas with 600 dwellings in MK and the larger number, 1,200 dwellings, in Aylesbury Vale District Council. The application is for JJ Gallagher Ltd.

2.62 The applicants withdrew the application for the part of the site that was in Aylesbury Vale. The area was designed as an integrated development and there is any reserved matters application will be delayed to allow for a redesign of the scheme to take into account the potential of the southern part of the site not gaining consent.

2.63 The planning permission contains a number of pre commencement conditions that requiring further technical and design work in order to bring this site forward which will include the need for the protected species reports to be reviewed as these were done in 03/07/2015.

2.64 Mr Bolton's evidence drew on the promoters Gallagher's submissions to the CS examination in respect of the WEA, which they predicted to be within two years of the examination i.e. in 20113/14 but these actually occurred in 2015/16 which was 4 years from the examination (RGB PoE table 5 page 39).

2.65 Given the range of outstanding matters that are required prior to commencement on site Mr Bolton concluded that it to be unrealistic to expect completions on this site until 2020/21 that is a year after that proposed by Mr Goodall (Goodall PoE table 10.5 page 66).

2.66 In respect of the level of completions the average level of build out rates for a site of this size (now reduced to 600) is 86 a year (see NLP table 3 page 19 RGB Appendix 23). This should be the starting point of the assessment of delivery in this case. However, recognising the fact that Gallagher's approach has at times led to increased levels of completions compared to the national average Mr Bolton concluded that a build rate of 140 dpa could be achieved in the first two years of build similar to that on the WEA (Area 11).

Strategic Reserve Sites

2.67 The 'Strategic Land Allocation' is subject to a Development Framework approved by the Council in 2013 which sets out the masterplan for the development of about 3,000 homes (RGB Appendix 47).

2.68 While there are approved consents for individual parts of the site, it is realistic to consider these sites as parcels within one larger site (see appendix 1.2).

2.69 In considering the reality of the levels of completions being forecast it is relevant to note that when start dates were given by Gallagher's for the Western Expansion Area, at the Core Strategy Examination these where overoptimistic by 2 years (see table 4 Core strategy evidence compared to actual completions for WEA). They have also been over optimistic with regard to the build rates on WEA.

2.70 The Council suggest that completions rates on the Strategic Reserve will rise to 570 dwellings in the next two years (i.e. by 2019/20). This would far exceed the highest rate of delivery seen on any site in England and be occurring at the same time as Brooklands is predicted to be achieving over 400 dpa, and the Western Expansion Area is delivering 737 dpa. There is nothing to support these levels of completions from either the local or national evidence base.

2.71 The consequence of the Council making individual assumptions on each of the areas is that the delivery rate of the Strategic Reserve will average 369 dpa from 2017/18 (RGB PoE Table 21). This is above the national average rate of annual rate of 171 dpa for this size of site.

2.72 The rate of 153 dpa (RGB PoE Table 23 = 764/5) is considered to be appropriate when compared to other Quarters in terms of the rate of delivery, but nevertheless in my view represents a realistic outlook for both the Strategic Reserve, and Milton Keynes in general, when compared to both national and local evidence on delivery of sites of this size.

Site Allocation Plan

SAP3 – Land off Singleton Drive - remove 22 dwellings

2.73 This is a small site of some 22 dwellings given the number of outstanding objections and the acceptance of the Council that the developable area will need to be reduced I consider that the site cannot at this stage be considered to be available and should be excluded from the five-year land supply.

SAP8 – Land at Bergamot Gardens - remove 15 dwellings

2.74 This is subject to the Walton Neighbourhood Plan (2016), however there is a clawback covenant and while I note the landowners (Walton Community Council) have outlined that, they still intend to progress with the sale of the site for residential purposes (Appendix 57, page 4) there is no guarantee this will proceed if the income will not deliver the required community infrastructure.

SAP14 – remove 27 dwellings

2.75 The proposed allocation describes the previous use of this site as an "unused residential allocation". So, it is clear that it is not the first time this site has been considered for residential use.

2.76 The key principles for the development of the site in policy SAP14 include the criteria that development should not commence until the wider regeneration plan is formalised and the site is confirmed as not being required for other purposes.

2.77 As the regeneration plan has yet to be formalised this site cannot be regarded as being available.

SAP18 – remove 147 dwellings

2.78 This site was previously an employment allocation.

2.79 This site is also identified in the Policy WNP2 of the Walton Neighbourhood Plan. The Council in their submission to the SAP examination explain that the access for the site is still undecided in that the primary access point for this site is to be taken from H9 Groveway, and not Ortensia Drive, although Ortensia Drive will however most likely be required to provide secondary additional access (Appendix 57).

2.80 The Parks Trust comment that they would not grant consent for access to be taken across the land within their ownership (Ortensia Drive).

2.81 There is I understand an outstanding objection to the allocation of this site from David Lock Associates on behalf of Baytree/AXA on the grounds that this is a large employment site which should be retained in light of these outstanding objections I have excluded the site from the five-year land supply.

SAP 19 – remove 25 dwellings

2.82 This is also identified in the Walton Neighbourhood plan which was made in January 2017, and it is presently an employment allocation, but is allocated as a mixed-use employment, housing and open space in the SAP.

2.83 There is an outstanding objection from Natural England to this allocation on the grounds that it impacts on a wildlife corridor:

2.84 At this point, there is some doubt as to the overall land that maybe available, if the Inspector determines that the site should indeed increase open space provision from 10 to 30% top accommodate NE objection then this has the potential to reduce the available land for residential development by 20%.

2.85 Rather than taking the allocation out of the five-year land supply, I am of the opinion that at this stage at least the level of contribution should be calculated at a reduced level of just 80% given the potential impact of this objection.

2.86 This would reduce the number available from 135 to about 110 dwellings.

Other sites

Latham's Buildbase – remove 75 dwellings

2.87 The Council consider the site is capable of delivering 75 dwellings.

2.88 The site has been a housing allocation since the adoption of the Local Plan in 2005.

2.89 The site is also still operating as a company selling building and timber supplies, and given the length of time the site has been allocated, with no interest in the form of planning applications, it is unlikely that the site will be delivered within the five-year supply period.

Lakes Estate Neighbourhood Plan Sites and Water Hall School remove 61

11.1 Land to the south of Water Hall School obtained planning permission under application reference 07/00075/MKCOD3 in March 2007 for the erection of up to 61 dwellings with associated works. An extension of time application was later permitted under application reference 10/00550/MKCOD3 in May 2010, which has since expired. This application was submitted by Milton Keynes Council.

11.2 There are no planning applications associated with any of these sites and Serpentine Court still operates as a mixed-use development in the centre of Lakes Estate.

11.3 Therefore, it is unlikely that any completions will be delivered in 2021/22. Given there are no planning applications, it is more realistic that any completions will be delivered outside the five-year supply period.

3.0 CONCLUSION

3.51 Mr Bolton's evidence concluded that the Council can demonstrate a five-year land supply.

3.52 Simply applying the appropriate approach (Sedgefield) to the past shortfall results in a shortfall.

3.53 The second main area of difference is with respect to the future completion rates on the larger strategic sites. Mr Bolton's experience, which is shared by some inspectors, is that in securing allocations developers and their agents can be over optimistic with regard to both the time it takes to secure all the necessary consents to deliver such sites and the rates of delivery that can be achieved from such sites.

3.54 In order to bring some rigour to this exercise, Mr Bolton considered the empirical evidence on delivery rates both for large sites in general, as well as for the individual housebuilders who are identified as potential developers. I have also considered local market indicators to gain a perspective of any local factors which might suggest sites would perform substantially differently to that observed nationally.

3.55 Mr Bolton's evidence identified no market indicators that suggested sites in Milton Keynes would deliver housing at rates above those experienced nationally. There have been circumstances regarding the delivery of the sites in terms of infrastructure provision on strategic sites that have delivered higher rates of completions and I have taken these into account in my analysis. As such the most recent evidence from research undertaken by the NLP would suggest a build rate of some 171 dpa on the Expansion Areas and the Strategic Reserve as they are greenfield sites. While I have suggested a higher rate of delivery based upon my own analysis, I do not however consider the rates being promoted by the Council represent realistic or evidence based outcomes. There is a lack of critical review of the local or national evidence by the Council.

3.56 The levels of completions assumed by the Council will require the developers to achieve a significantly enhanced performance compared to their national average build out rates and the rates that they have achieved locally. The Council's approach also requires a greater number of housebuilders to be engaged in the delivery of the larger sites than there are at present. There is little to support the contention that the Council's enhanced rates of delivery are possible on these sites.

3.57 Mr Bolton's evidence also considered the contribution from other sites identified in the supply. Some are old allocations that are proposed to be carried over into the SAP and others are newly identified sites. He only discounted those sites which he consider have such barriers to their release for housing that they are unlikely to provide for completions in the next five years. As such, these are discounted from the Five-year housing land supply.

3.58 The tables on the next page summarise the differences between the Council and Mr Bolton's evidence on the five year supply.

3.59 Mr Bolton's conclusion on the actual likely supply was that even applying the Liverpool method for the period 2016/17 to 2021/22 there is likely to be about 4 years' supply. If the Sedgefield approach is used as it should be, then even with the Council's estimated supply there is a deficit in the five-year housing land supply.

Table 3 Summary of discounts

Summary of discounts from base supply	SPRU 2017/18 to 2021/22	MKC adjustment	TROY 2017/18 to 2021/2022
Brooklands	-694	-36	
WEA Area 10 Whitehouse	-948	-92	-138
WEA Area 11 Fairfields	-595	-87	-191
Tattenhoe	-424	-62	
Strategic Reserve	-1,270	-188	-190
MK central	-310	-43	
SAP sites	-239	-29	
Other sites	-136	-160	
Eaton Leys	-320	0	-150
Delivery Adjustment	-4,936	-697	-669

Table 4 Five-year supply

	MKC position (Liverpool)	MKC position (Liverpool) 10% discount	SPRU Supply (Liverpool)	MKC Supply (Sedgefield)	SPRU Supply (Sedgefield)	Troy Supply (Liverpool)
Requirement						
Minimum requirement 2010 to 2026	28,000	28,000	28,000	28,000	28,000	28,000
Annual Minimum requirement	1,750	1,750	1,750	1,750	1,750	1,750
Total built 2010 to 2017 (net)	9,019	9,019	9,019	9,019	9,019	9,019
Requirement (1,750 x 7)	12,250	12,250	12,250	12,250	12,250	12,250
Shortfall	-3,231	-3,231	-3,231	-3,231	-3,231	-3,231
Overall Minimum requirement 2017-2026	18,981	18,981	18,981	18,981	18,981	18,981
Annual Minimum requirement	2,109	2,109	2,109	2,396	2,396	2,109
Add 20%	2,531	2,531	2,531	2,875	2,875	2,531
5 yr requirement	12,654	12,654	12,654	14,377	14,377	12,654
Supply						
Overall supply including additional sites not completed as expected in 2016/17	13,727	13,727	13,727	13,727	13,727	13,727
Windfall Adjustment			-30		-30	
Delivery adjustment	-697	-1,373	-4,936	-697	-4,936	-669
Total supply	13,030	12,354	8,791	13,030	8,791	13,058
Overall supply compared to requirement	376	-300	-3,863	-1,347	-5,586	404
Overall years supply	**5.15**	**4.88**	**3.47**	**4.53**	**3.06**	**5.16**

APPENDIX 2 : SUMMARY OF STRATEGIC SITES CONTRIBUTION TO MEETING CORE STRATEGY REQUIREMENT

Table 1 Contribution of strategic sites to CS requirement based on national average (NLP) and completion rates revised rates based on local performance (SPRU)

NLP	total	remainder	NLP Average completion rates	lead in time	Estimated number of years of build	End date	Beyond plan period
Eastern Expansion Area - Brooklands	2,500	1,549	171	0	9.1	2026.1	10
Eastern Expansion Area - Tattenhoe Park	1,330	1,009	122	3	8.3	2028.3	277
Western Expansion Area	6,600	6,009	171	0	35.1	2052.1	4,470
Eaton Leys	600	600	86	3	7.0	2027.0	84
Strategic Reserve	3,079	3,079	171	0	18.0	2035.0	1,540
Total							6,381

SPRU	total	remainder	SPRU Average completion rates	lead in time	Estimated number of years of build	End date	Beyond plan period
Eastern Expansion Area - Brooklands	2,500	1,549	171	0	9.1	2026.1	10
Eastern Expansion Area - Tattenhoe Park	1,330	1,009	167	3	6.1	2026.1	9
Western Expansion Area	6,600	6,009	342	0	17.6	2034.6	2,931
Eaton Leys	600	600	140	3	4.3	2024.3	0
Strategic Reserve	3,079	3,079	200	0	15.4	2032.4	1,275
Total							4,225

Table 2 Comparison of different assumptions regarding contribution of Strategic Sites to the Core Strategy Requirement

	MKC completions after 2026	NLP completions after 2026	Difference	SPRU completions after 2026	Difference
Eastern Expansion Area - Brooklands	0	10	10	10	10
Eastern Expansion Area - Tattenhoe Park	0	277	277	9	9
Western Expansion Area	1,070	4,470	3,400	2,931	1,861
Eaton Leys	0	84	84	0	0
Strategic Reserve	130	1,540	1,410	1,275	1,145
Campbell Park Remainder	650	650	0	650	0
Tickford Fields	550	550	0	550	0
	2,400	7,581	5,181	5,425	3,025

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