

# **MILTON KEYNES COUNCIL RESPONSE TO INSPECTOR'S QUESTIONS FOR EXAMINATION HEARINGS – STAGE ONE**

**MATTER THREE: THE OVERALL NEED AND  
REQUIREMENT FOR HOUSING. THE STRATEGY AND  
LAND SUPPLY TO MEET THE REQUIREMENT.  
(PRINCIPALLY POLICY DS2 AND TABLE 4.3)**

**QUESTIONS: Q3.1 – Q3.25**

Issues 1 - Context and potential transformational growth

**Q3.1 What is the status of the MK Futures 2050 and NIC reports? Did they provide a realistic or firm foundation for considering options for alternative, higher housing numbers at the time of preparing and submitting Plan:MK?**

- 3.1.1. The MK Futures 2050 Commission report, "[Making a Great City Greater](#)" ([MK/MIS/001](#)), was prepared by a panel of independent specialists and local champions who engaged closely with the Council and local community throughout their process. It was presented to and unanimously supported by Full Council at their meeting of 6 July 2016. Cabinet were tasked with delivering the recommendations of the Commission's report and asked officers to set up the MK Futures 2050 programme to take that work forward. A [report to Cabinet on 5 June 2018](#) demonstrates recent progress in delivery of the programme.
- 3.1.2. The programme includes the preparation of a non-statutory Strategy for 2050 which will bring the Commission's long term vision for the city, and approaches for how to deliver that, into Council policy. The Strategy will make recommendations for how future iterations of local plans might deliver the spatial elements of the Vision for 2050.
- 3.1.3. In "Making a Great City Greater", the MK Futures 2050 Commission made a case for the city growing to a population of at least 400,000 by 2050 (p.7), based on a sustained delivery of between 1,750 and 2,000 homes per annum (p.36). They also noted that if a higher level of growth could be achieved, it would create a population structure with a greater proportion of working-age residents to support a growing and successful economy. In either scenario, it was recognised that having a long-term vision and an ambition for higher levels of growth, with a framework for how that would be delivered, would help to gain Government backing to provide additional support and infrastructure funding, while giving certainty and clarity for communities and the development industry.
- 3.1.4. As an executive agency of HM Treasury, the National Infrastructure Commission (NIC) was asked to consider how to maximise the potential of the Cambridge-MK-Oxford corridor, including the opportunities for economic and housing growth. The NIC's final report on the growth arc, "[Partnering for Prosperity](#)" ([MK/INF/004](#)) was published in November 2017. It states that "if the arc is to maximise its economic potential, current rates of house building will need to double – delivering up to one million new homes by 2050" (p.8).

- 3.1.5. The NIC's report also identified as a key opportunity "*the re-establishment of Milton Keynes as a development location of national significance, through the intensification and expansion of the town to a population of at least 500,000, in line with local aspirations. This presents an immediate opportunity for growth*" (p.36). It is noted that this point in the NIC's report was not proposed as a formal recommendation.
- 3.1.6. At the time of writing, there has been no formal Government response from the Ministry of Housing, Communities and Local Government (MHCLG) to the NIC's report and recommendations.
- 3.1.7. The proposals for the long-term growth of Milton Keynes by both the MK Futures 2050 Commission and the NIC had not been sufficiently explored or tested at the time of the preparation and submission of Plan:MK to be used as a firm basis for including higher levels of housing delivery in the plan.

**Q3.2 Should the proposed housing numbers in the reports be regarded as: (1) evidence of an objectively assessed housing need; or (2) a policy objective for growth that informs a higher housing requirement; or (3) neither at this stage on grounds of prematurity?**

- 3.2.1. In order to respond to the propositions from both the MK Futures 2050 Commission and the NIC for the future of the city, further research must be undertaken to test the assertion that this level of growth is achievable, and where, when and how that growth should be delivered. This research is currently being prepared through a joint Strategic Growth Study for metropolitan Milton Keynes with Aylesbury Vale District and South Northamptonshire Councils, funded by MHCLG. This study will form the basis of the Strategy for 2050 and can be used to inform future local plans or other statutory plans at a strategic, cross-boundary level. An underlying assumption of the study is that growth proposed in Plan:MK and neighbouring local plans will be delivered as planned, recognising the potential for an early review of plans to respond to the shifting growth agenda.
- 3.2.2. It is anticipated that the joint Strategic Growth Study will be completed in December 2018, with the Strategy for 2050 completed in spring 2019. While the Strategy for 2050 will become Council policy once adopted<sup>1</sup>, it will be prepared outside of the legislative planning regime. Therefore, in order for any proposals for the delivery of ongoing growth through a higher housing requirement to become part of the statutory

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<sup>1</sup> It should be noted that Milton Keynes Council's ambition for growth has been reflected in the Vision for Milton Keynes as "*a thriving, dynamic European Destination City of 500,000 people, and to ensure a fair, hardworking and more equal Milton Keynes for all*" in the refreshed [Council Plan 2016-2020](#) (p.5) due to be adopted by the Council in July 2018.

development plan, it will need to be tested and formalised through the plan-making process for the next local plan.

Issue 2 – Determining the full OAN

**Q3.3 Having regard to NPPF paragraph 159 (first bullet point), for MK is the functional Housing Market Assessment wider than the administrative boundary? If so, is the evidence and approach to the HMA justified in determining the housing numbers for Plan:MK, including the approach of adjoining authorities who may be partially within the ambit of a wider MK housing market? Is it clear there is no unmet need from adjoining authorities?**

3.3.1. The SHMA 2017, Figure 3 on page 14 demonstrates that the function Housing Market Area for Milton Keynes does extend beyond its administrative area. The study concluded that for the purposes of establishing the evidence required and developing local policies the “best fit” to Milton Keynes HMA based on administrative boundaries was Milton Keynes borough.

3.3.2. Of the remaining areas in the Milton Keynes functional housing market area, South Northamptonshire has an adopted Core Strategy as part of the West Northamptonshire joint Core Strategy from 2014, Aylesbury Vale have submitted a new Local Plan, with hearings to run concurrently with the Milton Keynes Local Plan and Central Bedfordshire has also submitted a new Local plan for examination. Both the Aylesbury Vale and Central Bedfordshire SHMAs were undertaken by ORS, have consistent assumptions and place no requirements upon Milton Keynes.

**Q3.4 Has the housing requirement figure of at least 26,500 dwellings (2016-2031) (equivalent to 1766dpa) as set out in Policy DS2 been informed by a robust, credible assessment of the full objectively assessed need (OAN) for housing and is it positively prepared and consistent with national planning policy? In particular:**

**i) Is the February 2017 Strategic Housing Market Assessment (SHMA) an appropriate starting point for setting the requirement in terms of its demographic assumptions (including future trends in household formation and migration), the account taken of market signals and affordability, forecast growth in employment including assumptions on economic activity rates and commuting and any other local circumstances**

**ii) Are the various uplifts from the demographic starting point from the 2014 CLG Household projections of 1,513dpa to 1,766dpa soundly based?**

**iii) Is the SHMA’s estimate of 8,200 affordable dwellings in the Borough robust?**

3.4.1. The Milton Keynes SHMA 2017 discusses the starting point issue at paragraph 2.9 onwards (page 18). It recognises that the DCLG household projections are the starting

point for assessment of housing need (in accordance with PPG paragraph: 015. Reference ID: 2a-015-20140306) but also that the PPG suggests that plan makers may consider sensitivity testing, specific to their local circumstances. (Paragraph: 017 Reference ID: 2a-017-20140306). The PPG states that relevant issues can include migration and demographic structure.

- 3.4.2. The SHMA notes that as demographic projections are trend-based, a critical issue is the period over which the trends are based, and the SHMA contains reasoned and evidence-based consideration of the reliability of the five-year trend period used for the DCLG household projections (the DCLG household projections are based on the Office for National Statistics' population projections, which use a five-year trend period), as against a longer, ten-year trend period for migration. The SHMA concludes, with justification, that five-year trend migration scenarios are less reliable, due to their potential to roll forward short-term trends that are unduly high or low hence it also includes projections based on long-term trends, whilst recognising that no one scenario will provide a definitive assessment of future population.
- 3.4.3. This issue is significant in Milton Keynes because, as shown in Figures 9 and 10 of the SHMA, recent migration trends for Milton Keynes have been lower than their historic rate. Therefore the 5 year migration trend model in the 2014 based SNPP and CLG household projections use migration data which is out of line with past trends and generates a lower level of household growth than the SHMA projections.
- 3.4.4. **The demographically adjusted starting point that the SHMA identifies is fully justified in terms of migration change.**
- 3.4.5. The issues around employment are considered in more detail in subsequent questions.
- 3.4.6. The SHMA proposed a market signals adjustment of 10% for Milton Keynes. This was based on a comprehensive review of the market signals indicators as set out by PPG (ID 2a-019) with the HMA indicators considered in the context of relevant comparisons with other areas of similar demographic and economic characteristics (PPG ID 2a-020).
- 3.4.7. In order to provide a wider benchmarking of market signals and the associated responses, we have considered the OAN informing all Local Plans prepared by LPAs across the Wider South East (i.e. the former East of England and South East Government Office Regions) which have been adopted in the last 2 years. We have also included evidence on the OAN informing Local Plans that are currently under examination where the Inspector's final report or an interim view has been published.

3.4.8. A summary of the household projection-based estimate of housing need, the final OAN and the percentage uplift is provided in the schedule overleaf, together with any further relevant details of the approach taken in each area. Note that these figures relate to the housing need rather than the final housing target included in each Plan (which is sometimes higher and sometimes lower than the identified housing need). The schedule also provides a summary of each of the market signals indicators that are identified by PPG based on information published for 2016, with the exception of overcrowding which has a base date of 2011. Cells highlighted in blue represent market indicators that are better than the equivalent indicator for Milton Keynes, whereas cells highlighted in orange represent indicators that are worse:

- Lower quartile house price and lower quartile affordability based on data published by ONS;
- Average private rent based on data published by VOA;
- Overcrowding based on Census 2011 data;
- Rate of housing delivery 2006-2016 based on data published by CLG.

3.4.9. Across the Wider South East, uplifts applied to the household projection-based estimates of housing need range from 0% up to 138%. The highest proportionate uplifts are all associated with aligning jobs and workers, with the lowest such uplift being 29%.

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Local Authority	Planning	Housing Need			Notes	Market Signals Indicators				
		Household projection-based estimate (dpa)	OAN (dpa)	Overall uplift		Lower quartile house price	Lower quartile affordability	Average market rent	Over-crowding	Rate of delivery 2006-16
Milton Keynes		1,596	171	11%		190,000	8.40	900	9.6%	16.5%
<b>OAN based on household projection without any uplift</b>										
Maldon		260	260 (310)	0% (19%)	Although the OAN did not include any uplift, the housing target was increased from 260 to 310 dpa (an uplift of 19%) to align with the planned target for additional jobs and allow for extra migration in future from London	225,000	11.38	802	3.5%	5.8%
Maidstone		883	883	0%	LPA had proposed a 5% uplift but this was removed by the Inspector given that the household projection-based housing need already represented such a large uplift in housing supply	196,000	9.95	816	6.7%	11.1%
Swale		776	776	0%		167,500	8.38	704	6.1%	10.4%
<b>OAN based on household projection with an adjustment for suppressed household formation</b>										
Lewes		460	520	13%		236,000	11.66	1,005	5.9%	6.6%
Crawley		614	675	10%		220,000	9.52	961	9.8%	8.2%
Basingstoke & Deane		813	850	5%		220,000	9.56	936	5.5%	11.0%
Arun		889	919	3%		200,000	11.69	779	6.7%	7.9%
Horsham		628	650	4%	In both areas, the Inspector concluded that no specific adjustment was needed for market signals, but based the OAN on a household projection that included an adjustment for suppressed household formation	278,000	14.45	1,065	5.3%	10.2%
Great Yarmouth		-	420	-		115,000	5.79	536	6.0%	6.4%
<b>OAN based on a specific uplift to the household projection-based estimate of housing need</b>										
Waverley		396	495	25%	LPA proposed to only uplift in response to suppressed household formation; an uplift from 493 to 519 dpa using 2012-based CLG projections. The 2014-based projections reduced the starting point to 396 dpa; but the Inspector proposed a 25% uplift to this figure	310,000	15.54	1,166	4.7%	5.2%
Mid Sussex		730	876	20%	LPA proposed to only uplift in response to suppressed household formation but the Inspector concluded that a further uplift was justified and his interim views recommended an uplift	260,250	13.17	1,047	5.6%	10.5%

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Local Authority	Planning	Housing Need			Notes	Market Signals Indicators				
		Household projection-based estimate (dpa)	OAN (dpa)	Overall uplift		Lower quartile house price	Lower quartile affordability	Average market rent	Overcrowding	Rate of delivery 2006-16
					of 20%					
Luton		738	890	20%	Uplift proposed by ORS due to market indicators identifying acute overcrowding and homelessness pressures, despite the area being more affordable	170,000	8.48	788	15.4%	4.8%
<b>OAN based on a specific uplift to the household projection-based estimate of housing need (continued)</b>										
East Hertfordshire		736	836	14%	Uplift proposed by ORS due to market indicators identifying high house prices and rents and substantial affordability pressures	275,000	13.10	1,020	6.2%	9.7%
Brighton & Hove		1,373	1,506	10%		244,000	11.51	1,295	17.1%	4.4%
Adur		295	325	10%	LPA did not propose any increase, but a 10% uplift was agreed to be appropriate during the course of the Examination	235,500	12.44	866	5.6%	4.8%
Eastleigh		549	604	10%	The Plan wasn't found sound, but the Inspector's report concluded that an uplift of 10% would have been appropriate	210,000	10.18	834	5.0%	9.0%
South Cambridgeshire		879	967	10%	This is the uplift proposed based on additional work that was requested by the Inspector, but no further views have been given about whether or not the OAN has now been accepted	262,000	11.03	932	3.9%	13.6%
<b>OAN based on an uplift to align jobs and workers with no further uplift for market signals</b>										
Vale of White Horse		432	1,028	138%	The Inspector discussed whether or not the jobs number was realistic, but concluded that it provided a reasonable basis for aligning workers despite it yielding a number that was substantially higher than the household projection-based estimate of housing need	255,000	10.08	1,019	4.9%	10.9%
Cambridge		503	700	39%	A market signals uplift of 30% was proposed based on additional work that was requested by the Inspector, but as this yielded a number that was lower than the jobs based figure it was the jobs number that was taken as the OAN without any further uplift for market signals. No further views have been given by the Inspector about whether or not the OAN has now been accepted	320,000	13.32	1,118	14.1%	13.7%
Test Valley		450	588	31%	No specific market signals uplift proposed, but consider jobs uplift would provide sufficient response	215,000	10.30	975	4.0%	11.4%



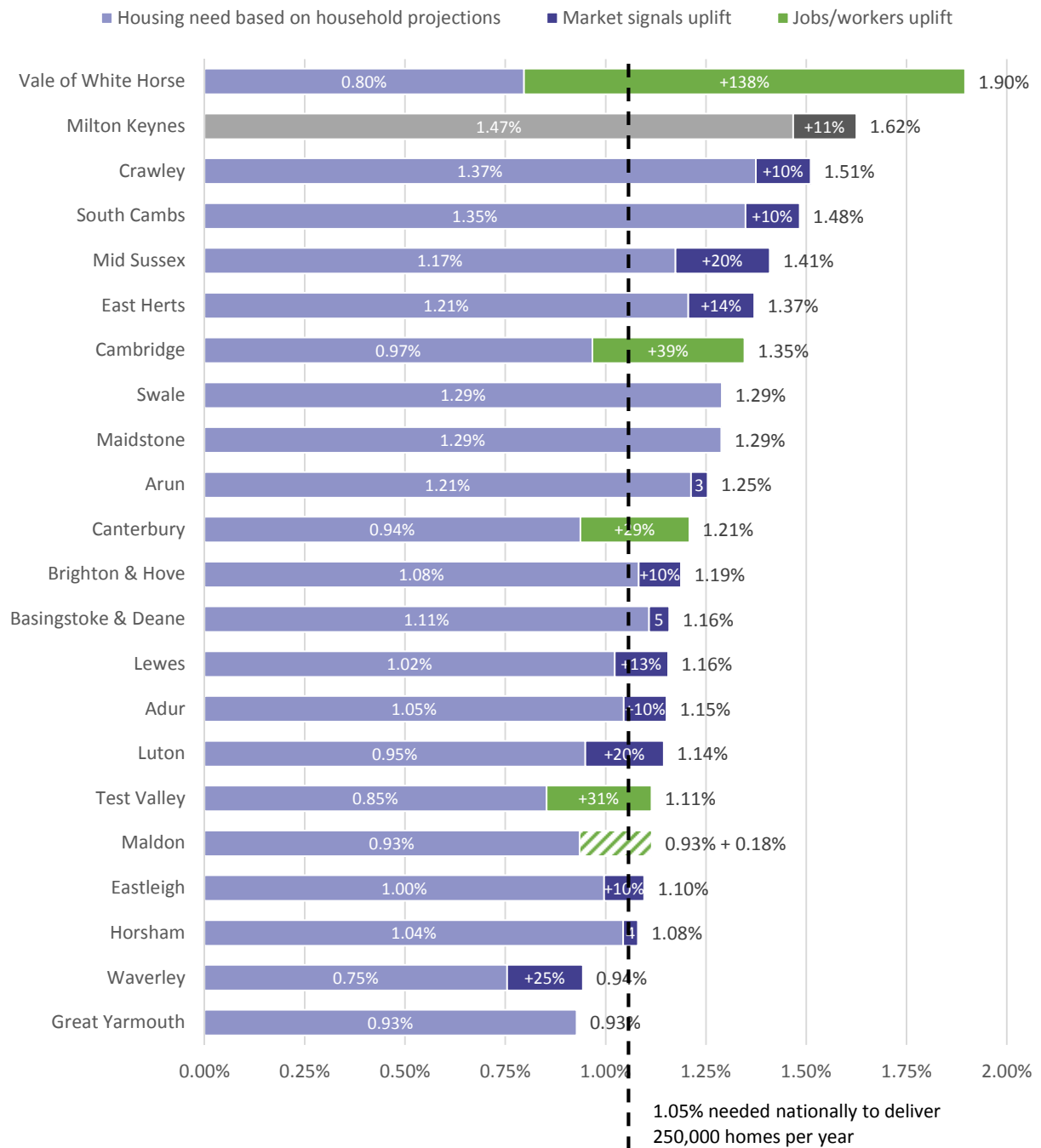
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Local Authority	Planning	Housing Need			Notes	Market Signals Indicators				
		Household projection-based estimate (dpa)	OAN (dpa)	Overall uplift		Lower quartile house price	Lower quartile affordability	Average market rent	Over-crowding	Rate of delivery 2006-16
Canterbury		620	800	29%	Market signals uplift of more than 10% proposed and tested at 20%, but Inspector did not consider it appropriate to apply a market signals uplift cumulative to the jobs uplift	210,000	11.10	968	7.6%	9.3%

3.4.9. The only effective way to compare the OAN across different authorities is to consider the overall rate of growth in relation to the existing dwelling stock. The following chart identifies the rate of growth necessary to meet the housing need based on household projections together with the uplifts applied for market signals (including suppressed household formation) and aligning jobs and workers.

3.4.10. It is clear that the rate of growth identified for Milton Keynes based on the OAN (1.62% per year) is the second highest of all other plans areas the Wider South East, and is more than 50% higher than the 1.05% needed nationally to deliver 250,000 dwellings each year.

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**Q3.5 Has the SHMA given sufficient attention (sensitivity testing) to the potential suppression of household formation rates, particularly in the 25-34 and 35-44 year old cohorts, having regard to the advice at PPG paragraphs 2a-015 and 2a-017?**

3.5.1. In terms of any potential household growth suppression, the “starting point” estimate for OAN is the latest 2014 based household projections published by CLG and is discussed in detail from paragraph 2.53 onwards on page 34 of the SHMA.

3.5.2. The CLG Household Projections 2014-based Methodology Report does confirm that additional weight is given to Labour Force Survey in later years, but this only relates to estimates for the period that post-date the most recent Census and have no impact on the future projection (page 17, emphasis added):

*The LFS is a sample survey and as such subject to a margin of error but the data are far more up-to-date than the Census and some allowance for recent movements in the LFS are considered necessary. The LFS data has been incorporated into the England level projections for the 2012 period. The LFS data is seasonally adjusted and smoother as presented in the previous section. The smoothed LFS household representative rates are spliced onto the 2011 census data points.*

*Adjustments are then made to all age and relationship status groups so that they move towards the smoothed LFS value with:*

- a. **The maximum weight of 50%** to reflect uncertainty over accuracy and*
- b. **the LFS weight is linked to the time since the last census (the longer the time elapsed since the last census, the less time there is for household representative rates to get back on to trend).***

*For example **in the 2014-based projections, the LFS data receives a 15% weight** derived as the maximum weight (50%) multiplied by the time in years elapsed since the 2011 census divided by the maximum years between censuses (3/10). **After 2014, the projections revert to the pre-LFS adjustment trends, reflecting the importance of retaining a view of long term trends.** The post-2014 projections are not affected directly by the 2012 LFS adjustments.*

*The revisions, shown in Figure 5, are extremely small but the largest changes were to the household representative rates for males and females aged 75 to 79 and 85+.*

***The overall impact is small** and reduced the projected number of households in 2039 by 3,000 or **0.01 per cent** compared to what would*

*have been produced using the unadjusted household representative rates.*

3.5.3. It is inappropriate to simply assume that the underlying rate should return to a previous figure when the cause of the change is fundamentally due to societal changes in the trends for when young people will choose to live as a couple. Instead, the SHMA makes a specific adjustment to take account of homeless households and concealed families that would not be captured by the household projections (para 4.26). This is consistent with advice in the PAS Good Plan Making Guide (see SHMA para 4.83).

**The demographically adjusted starting point that the SHMA identifies is fully justified in terms of household formation.**

***Q3.6 Taking into account the SHMA's approach to other adjustments, is a 10% uplift for market signals a reasonable adjustment in light of the evidence on house prices and affordability in the context of the wider HMA?***

3.6.1. The SHMA 2017, Figure 57 considers the market signal indicators set out in PPG (Reference ID: 2a-019-20140306) where there is published data available at a local level. This includes house prices, rents, affordability (in terms of the ratio between lower quartile house prices and earnings), rate of development and overcrowding.

3.6.2. The median workplace affordability ratio in Milton Keynes was 7.54 in 2016 (it rose to 8.65 in 2017) and represent a useful measure to compare with other adopted market signal uplifts across England. The approach to the 10% uplift has had regard to other comparator areas in England, and the accepted approach at their Local Plan examinations includes;

- Cheshire East = 3% uplift (7.36 median workplace affordability ratio)
- South Cambridgeshire = 10% uplift (10.12 median workplace affordability ratio)
- Stevenage = 10% uplift (7.42 median workplace affordability ratio)
- East Hertfordshire = 14% uplift (11.38 median workplace affordability ratio)
- Mid Sussex = 20% uplift (12.54 median workplace affordability ratio)
- Waverley = 20% uplift (14.84 median workplace affordability ratio)
- Cambridge = 30% uplift (12.97 median workplace affordability ratio)

3.6.3. Therefore, while a number of other authorities have seen higher than 10% market signal uplift they have all had significantly worse affordability ratios than Milton Keynes.

**Q3.7 Is the 2016 EEFM a robust starting point to understand past economic trends and assess the likely change in job numbers and working age population? With regard to PPG paragraph 2a-018 should the SHMA give consideration to other models and/or past employment trends?**

3.7.1. The 2016 EEFM (based on data from Cambridge Econometrics) provides a robust starting point to assess likely future jobs numbers. The model identifies an increase of 31,900 jobs and 27,500 workplace employed people working in Milton Keynes over the 15-year period 2016-31.

3.7.2. The 2014 EEFM (based on data from Oxford Economics) identified a similar level of growth, with an increase of 30,000 jobs and 27,400 workplace employed people working in Milton Keynes over the same period. Economic forecasts from Experian also suggest a similar level of growth: an increase of 28,000 jobs over the 15-year period 2016-31.

**Q3.8 How does the EEFM model deal with the following:**

**(i) Commuting ratios;**

**(ii) Economic activity rates, unemployment, double-jobbing and any assumptions on increased economic activity in those aged 65+; In applying the "current (commuting) ratio" taken from the 2016EEFM what commuting figure was used in the SHMA?**

3.8.1. The EEFM does not assume fixed commuting ratios. The model establishes the likely level of jobs growth (based on the existing number of jobs and the anticipated growth in each employment sector) and then seeks to reconcile this with the number of available workers through varying commuting and migration patterns.

3.8.2. The 2016 EEFM suggests a growth of 27,400 resident workers, which aligns closely with the 27,500 increase in workers. There is virtually no change in the number of net commuters (an increase of only 100 commuters in total over 15-years). Consequently, the commuting ratio (based on total resident workers divided by total jobs) increased from 0.748 to 0.764 over the 15-year period.

- 3.8.3. In contrast, whilst the 2014 EEFM identified a comparable level of jobs growth, it suggested less increase in resident workers (21,800) but instead an extra 5,600 workers commuting to work in Milton Keynes. This suggested virtually no change in the commuting ratio. Whilst the underlying models reconcile jobs and workers differently, it is evident that a range of alternative assumptions can support the same jobs growth.
- 3.8.4. The SHMA takes a third approach, based on holding the commuting rates constant (i.e. inward commuters as a percentage of jobs, and outward commuters as a percentage of resident workers). The calculation is set out at paras 4.34-4.35 of the SHMA, which identifies an increase in net in-commuting of around 3,800 workers. This is less than the increase of 5,600 workers identified by the 2014 EEFM but more than the increase of 100 workers identified by the 2016 EEFM.<sup>2</sup> The SHMA projection suggests that the commuting ratio would remain largely unchanged, reducing fractionally from 0.748 to 0.746 over the 15-year period.
- 3.8.5. Neither 2016 EEFM nor 2014 EEFM publish detailed economic activity rates. However, both the 2016 EEFM and the 2014 EEFM suggest that the employment rate for the resident population aged 16-74 will reduce from 72.6% to 72.2% over the 15-year period. The ageing population reduces the overall rate, but this is offset by increased participation. However, whilst the 2014 EEFM forecast unemployment rates being relatively stable (increasing from 3.23% to 3.26% of residents aged 16-64), the 2016 EEFM suggests that unemployment will grow from 2.6% to 4.2% of those aged 16-64. Therefore, when employment and unemployment are combined, the 2016 EEFM suggests that the proportion of residents aged 16-74 that are either employed or unemployed is forecast to remain constant at 74.0% despite the ageing population.
- 3.8.6. The SHMA modelled changes to economic activity rates based on current participation rates in different age/gender groups, with future changes indexed to OBR forecasts. The SHMA projections suggest that the percentage of economically active residents will increase from 72.8% to 73.1% over the 15-year period 2016-31. This is marginally lower than the 2016 EEFM; but given that the 2016 EEFM has assumed a larger growth

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<sup>2</sup> Note that the 4,416 figure quoted in the SHMA report at para 4.35 is an error, as the 4,416 quoted is actually the change in double jobbing. This does not affect the calculation or conclusions.

in resident workers than either the 2014 EEFM or the SHMA, the rate will be influenced by a larger proportion of younger residents (with higher participation rates).

- 3.8.7. Given that the SHMA aligns with the change in “workplace employed people” identified by the 2016 EEFM (i.e. the number of workers rather than the number of jobs), double jobbing is excluded from the calculation.

***Q3.9 The SHMA identifies a positive uplift of 1739 dwellings to balance jobs and workers, contributing towards the submitted OAN of 1766 dpa. What should be made of alternative submissions that the EEFM provides an output for MK of 32,331 dwellings (2,155dpa) for the plan period? Please explain how the SHMA arrives a different figure from the EEFM and what assumptions have been applied. If those assumptions vary from the EEFM, how should I interpret the EEFM advice (April 2017)<sub>2</sub> that it is an integrated model that should not be subjected to “alternative estimates”?***

- 3.9.1. As previously noted, the 2016 EEFM suggests a notably higher growth in resident workers than the 2014 EEFM, but virtually no change in the number of commuters (leading to an increase in the commuting ratio). This increase in resident workers yields a much higher rate of overall population growth and therefore a larger increase in the number of households and higher housing need.

- 3.9.2. The 2016 EEFM identified an overall increase of 68,400 persons over the 15-year period 2016-31. This is notably higher than the growth of 43,800 persons identified by the ONS 2014-based sub-national population projections (SNPP) which provide the basis for the CLG household projection “starting point”. The SHMA projected a growth of 47,200 persons based on 10-year migration trends, however this was increased to a growth 53,900 persons as a consequence of the proposed increase in the OAN to align jobs and workers. This is consistent with the growth of 54,700 persons identified by the 2014 EEFM.

- 3.9.3. On this basis, the SHMA concludes that there will be an increase of 53,900 residents (23% higher than the official projections) with a need to provide 1,767 dwellings each



year. This is based on an increase of around 3,800 additional net in-commuters, but this assumes no change in either the commuting rates or the commuting ratio.

- 3.9.4. In contrast, the 2016 EEFM concludes that there will be an increase of 68,400 residents (56% higher than the official projections) with a need to provide 2,155 dwellings each year. This is based on no change in the number of net commuters, which implies an increase in the commuting ratio.
- 3.9.5. With respect to the EEFM advice, we would endorse the need for consistency in key underlying assumptions. For example, where the economic forecasts take account of changing economic participation rates, it is important that these are also factored into any subsequent analysis when aligning jobs and workers. Nevertheless, as we have demonstrated, there are many different assumptions that have to be taken – in particular in terms of the balance between resident population and commuters – so it would be wrong to suggest that there is a single correct answer.
- 3.9.6. Both the SHMA and the 2016 EEFM align the necessary workers to the same number of additional jobs. The council considers that the SHMA approach (where there is a reasonable uplift to the official projection alongside a growth in net commuting based on existing patterns) is more reasonable than that suggested by the 2016 EEFM (where there is an exceptional uplift to the official projection with no growth in net commuting contrary to existing patterns).
- 3.9.7. It is also important to recognise that outputs from economic forecasts can sometimes be erratic when considered for individual areas in isolation, and outputs across wider geographic areas tend to be more stable. The 2016 EEFM identifies an overall housing need of 166,600 additional dwellings over the 15-year period 2016-31 across the 13 local authorities that comprise the South East Midlands LEP area, equivalent to an average of 11,109 per year. The SEMLEP local authorities have collectively identified a housing need of 11,289 per year; so the overall level of housing growth is consistent with the jobs growth across this wider area, and the level of planned housing should not constrain the potential for economic growth that has been identified.

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Area	Local Assessment of Housing Need (OAN)	Housing Need from EEFM 2016	Difference
Aylesbury Vale	970	1,079	-109
Bedford	950	834	+116
Central Bedfordshire	1,600	1,238	+362
Cherwell	1,142	698	+444
Luton	890	966	-76
Milton Keynes	1,767	2,155	-388
North Northants JPU	1,750	1,803	-53
West Northants JPU	2,220	2,336	-116
<b>TOTAL</b>	<b>11,289</b>	<b>11,109</b>	<b>+180</b>

**Q3.10 Jobs growth has notably out-performed housing delivery in recent years (para 4.33 of Plan:MK) at a ratio of 3.5 jobs per dwelling. The submitted Plan states that the OAN aligns to the more cautious assessment of jobs growth in the Experian model at 1.06 jobs per dwelling and if the EEFM is realised the ratio would be 1.2 jobs per dwelling. Has the SHMA applied or sensitivity tested the Experian model and how is the ratio of 1.2 jobs per dwelling calculated?**

3.10.1. The measure of jobs per dwelling is provided as an indicator and is not an input to the analysis.

3.10.2. The SHMA has aligned jobs growth to the increase forecast by the 2016 EEFM, which is almost identical to that identified by the 2014 EEFM. Given that the Experian model forecasts a lower rate of growth, there would be a need for fewer workers and therefore the SHMA would have recommended a lower uplift. Nevertheless, this would only have had a marginal impact on the OAN given the need to also respond to market signals.

**Q3.11 Does the adjustment of 1739 (116dpa) provide sufficient flexibility to meet forecast employment needs? Is there plausibility to the submissions that the adjustment (and therefore the full OAN) is too cautious?**

3.11.1. The OAN is an objective assessment of need and is informed by the higher of three jobs forecasts. It is not a cautious number.

***Q3.12 The SHMA finds a basis for making a series of adjustments for demographic factors, market signals/affordability and future jobs which cumulatively add up to 28,615 (or 1,908dpa). What justifies an approach of calibrating that adjustment to only the 1,739 for future jobs, so that the OAN is 26,493 (or 26,483)? In this regard is the SHMA consistent with PPG (para 2a-005-20140306) that assessment findings should be “transparently prepared”?***

3.12.1. PPG clearly sets out that it is “*the housing need number suggested by household projections*” that should be adjusted to reflect market signals (ID 2a-019). Providing additional housing to respond to market signals is likely to yield a higher number of residents than projected by the household projections, which will provide more workers. Therefore, it would be wrong to apply both the adjustment for jobs and workers and the uplift for market signals cumulatively and this would introduce double counting. This approach has been accepted by numerous Local Plan Inspectors and endorsed by participants at hearings elsewhere.

3.12.2. The OAN is transparently prepared and all steps of the calculation are clearly set out in figure 58 of the final report as a summary of the more detailed analysis that is presented.

***Q3.13 Have any reasonable alternative OAN figures been assessed as part of sustainability appraisal?***

3.13.1. No, as explained within Section 6.2 of the SA Report, under the ‘Housing quanta’ heading, the SHMA-assigned OAN figure of 26,500 homes was taken as a starting point for the establishment of reasonable spatial strategy alternatives. Whilst the reasonable spatial strategy alternatives would involve provision for between 27,580 and 30,580 homes (before any account is taken of sites allocated or committed sites not delivering), OAN is assumed to be 26,500 under all alternatives.

Issue 3 Translating OAN into a housing requirement/target

**Q3.14 Are there any constraining factors (PPG paragraph 2a-004) that would inhibit consideration of a higher housing requirement/target than the OAN?**

3.14.1. Constraining factors, which weigh against the option of providing for 'above OAHN', are explored through the appraisal of reasonable spatial strategy alternatives within the SA Report (Chapter 7).

3.14.2. Of particular note are the appraisal conclusions reached for spatial strategy options 5, 6, 7 and 8, i.e. the four options that would involve providing for 'higher growth', relative to the Option 4, which is the preferred option.

3.14.3. Relative to Option 4, these higher growth options would involve delivering additional housing either through a strategic allocation to the East of the M1, or through a package of additional allocations within the urban area. The appraisal highlights that:

- Infrastructure and transport issues to the East of M1 site, given the site's relationship with the M1, which acts as a barrier to movement, constrains higher growth from this source.
- Additional growth within the urban area leads to fewer concerns; however, it is recognised that loss of urban open space would impact on the amenity of residents.

3.14.4. More generally the Council's under performance in housing delivery in recent history could be seen as a potential constraint that would inhibit the consideration of a higher housing requirement/target and the ability to deliver it. This is discussed in more detail, alongside the Council's current work to resolve the under-delivery issue and ensure an increased housing requirement is sustainable and deliverable, in our response to Q16.

**Q3.15 Will the housing requirement in Plan:MK significantly boost the supply of housing as sought by paragraph 47 of the NPPF? Does it reflect the objectives to keep the planned growth of MK 'on track'?**

3.15.1. The housing requirement set out in Plan:MK seeks to significantly boost the supply of housing by meeting the objectively assessed needs of the Borough and providing at least a 10% buffer. This is also evidenced in the submitted housing trajectory and the updated trajectory included in response to Q3.32, which demonstrates how the range

of sites allocated within Plan:MK provide a boost to the supply of housing, relative to recent rates of housing delivery in the Borough.

3.15.2. With regards to keeping the planned growth of MK 'on track', perhaps a key point to note is that the housing land supply includes a good range of sites, from strategic urban extensions to smaller greenfield and brownfield sites. Many strategic objectives indicate a preference for relying upon large strategic sites, which will deliver significant infrastructure upgrades; however, it is not possible to rely solely on such sites, given the need to maintain a steady supply of housing, and also given that there is a need to ensure a good geographical spread of new housing across the Borough.

3.15.3. The housing requirement and range of allocations within the plan will therefore; enable the delivery of the objectively assessed needs, help to deliver the strategic objectives of Plan:MK, and provide a solid foundation for a full review as outlined in Paragraph 4.6 of the submitted plan.

***Q3.16 What explains previous under-delivery of housing in MK? If the housing requirement were to increase in the plan period what evidence would indicate that it would be (a) sustainable and (b) deliverable?***

3.16.1. Reasons for previous under delivery in MK are discussed within Section 6.2 of the SA Report, however since its publication, the Council has undertaken further work, with the issue of under-delivery being reported in detail to the Council's Cabinet in January 2018, together with detailed analysis of under delivery in Milton Keynes.

3.16.2. MK has a large number of planning consents granted – 14,840 planning permissions at 1 April 2018 (4,907 Full permissions and 9,964 outline). Unimplemented planning consents is a national as well as a local issue. However the market in Milton Keynes is dominated by a few key landowners and a handful of large house builders on a small amount of large sites.

3.16.3. The evidence shows that 60% of housing delivery over the last 7 years has come from 6 large, strategic sites (e.g. the Northern, Eastern and Western Expansion Areas, Oakgrove, Oakridge Park, and Newton Leys), and a further 20% from other large residential grid squares. A further 15% of new homes have been developed in the urban centres on Bletchley and Wolverton.

3.16.4. Only 5% of homes therefore have come from other much smaller or infill sites in the urban area. Another key statistic of note is that only about 3% of new homes have

been delivered in the city centre area (Campbell Park and Central Milton Keynes combined). This is a key location where a large amount of land is 'publically owned', formerly owned by the Development Corporation and successor bodies, and now Milton Keynes Development Partnership (MKDP).

- 3.16.5. The strong economy and land use pattern in MK means there has been limited conversion of office accommodation to residential, bucking the national trend for conversion, although there is evidence that this is now picking up.
- 3.16.6. The delivery 'pipeline' for large sites relied upon from the Adopted Plan, from the Local Plan process through to the anticipated completion of homes, is long; up to 30 years on the largest sites. The pipeline has also been affected by the Council's own processes in relation to imposing planning conditions and negotiating Section 106 agreements.
- 3.16.7. The housebuilding market has been dominated by a handful of volume developers. Evidence shows that whilst 8,450 homes have been delivered on the largest active sites in MK in the last few years, these have been/ are being constructed by 12 different housebuilders, and three of these (BDW Trading, Crest Nicholson and Taylor Wimpey), have alone delivered/ are delivering over two thirds (67%) of the homes.
- 3.16.8. Furthermore, of seven main sites analysed in detail, BDW Trading and Taylor Wimpey have also been involved across more than one of the sites, with BDW currently the only housebuilder active on Area 11 (Fairfield) in the Western Expansion Area and having built out the large majority of Brooklands in the Eastern Expansion Area.
- 3.16.9. Local parking standards also reduce the amount of homes that can be delivered on otherwise 'constraint free' sites and is often a 'deal breaker' (for both a developer and MKC) when it comes to negotiating individual schemes.
- 3.16.10. In response to the above evidence, Plan:MK has sought to diversify the size and range of sites that have been put forward for delivery of homes. Whilst there are still some large sites allocated or reserved, the Plan also allocates sites of between 11 and 300 homes, which makes up 52% of the new sites allocated by Plan:MK (not taking account of the proposed windfall allowance). Overall this is a total of 11% of the remaining unbuilt housing supply of Plan:MK; however, when added to sites of this size which are considered existing commitments, they account for 23% of the remaining unbuilt housing supply.

3.16.11. The Council is working with the main developers on the two largest sites in Plan:MK (South East SDA and Land East of the M1) to advance Development Frameworks on these sites to help reduce the development pipeline associated with large allocations. Advancement ahead of the outcome of the Local Plan process is intended to help demonstrate delivery. Work with the main landowners is being led by MKC, utilising Planning Performance Agreements, including 'road maps' to demonstrate how the planning process from Development Framework preparation to discharge of planning conditions can be achieved.

3.16.12. The Council has also embarked on a process to identify and design actions to address demand and supply issues in the housing market. An independently facilitated workshop of Service areas, including MKDP, was held in April, including soundings from developers and planning agents operating in the Borough. Three actions have been identified coming out of this based on MKC leveraging its place-leadership and democratic mandate to achieve a change in culture, reaching out beyond its organisational boundaries and the most frequently heard consultees, to the developer and business community and potentially the wider public, creating a shared narrative around housing:

**1. Aligned strategic oversight and management of housing delivery performance:**

Outcome – two new management structures, one internal to MKC, one involving external stakeholders, to oversee housing delivery in MK.

**2. The building of a shared narrative, consensus and culture change for housing growth:**

Outcome - Housing Delivery Guide, to provide an agreed set of targets and the means to achieve them, plus a shared understanding of the entire development and planning process, including the legal and consultative framework.

**3. Specific instruments and tactics to improve delivery:**

Outcome - a range of direct/indirect incentives and disincentives to support housing delivery, including a range of wider engagement activities with younger people in the city who will be most affected by change.

3.16.13. The Corporate Director for Place and his leadership team have been briefed on the suggested way forward and are in the process of engaging with the Council's Leader on next steps.

3.16.14. MKC is also part of a two stage pilot project, working with the Planning Advisory Service (PAS) and MHCLG on the new Housing Delivery Test (HDT) and Action Planning, which will be required from authorities falling below the MHCLG delivery thresholds. As MKC acknowledges the delivery issues locally, the Planning Service has contributed to the Phase 1 pilot by sharing its experience of gathering delivery data and reporting this to Cabinet (something none of the other pilot authorities have done). In Phase 2 MKC are working with PAS to populate and shape a model Action Plan, in advance of the first HDT announcement in November 2018.

***Q3.17 Has SA of the housing requirement in Policy DS2 assessed reasonable alternatives? How has sustainability appraisal been used to support the scale of housing provision in the Plan? [Are there negative (unsustainable) effects of lower or higher housing provision?]***

3.17.1. The SA process has sought to discharge the legal requirement to appraise 'reasonable alternatives' through the appraisal of reasonable spatial strategy alternatives, where 'spatial strategy' is taken to mean the approach to the allocation of land to meet needs. As such, it is not technically true to say that the SA process has involved appraising alternative 'housing requirements' (noting that the submission allocations involve provision for c.10% above the requirement/target). However, clearly the appraisal of reasonable spatial strategy alternatives served to inform a decision on the housing requirement/target.

3.17.2. Specifically, the SA Report presents an appraisal of eight reasonable spatial strategy alternatives, numbered 1 to 8 in ascending order of the quantum of homes provided for. The preferred option is Option 4 (i.e. provide for c.10% above OAN), which is shown to perform well, relative to higher and lower growth options (and Option 3, which would involve the same quantum of homes, but with a different distribution), albeit it is also shown to be associated with certain draw-backs.

3.17.3. The appraisal summary is presented within Chapter 7 of the SA Report, with the appraisal narrative concluding: *"In conclusion, it is clear that all of the spatial strategy alternatives are associated with 'pros and cons'. The Council must consider how best to 'trade-off' between competing objectives."*

3.17.4. The Council's response to the appraisal, i.e. the Council's reasons for supporting the preferred option, on balance, in light of reasonable alternatives, is presented within Chapter 8 of the Report.



***Q3.18 Is the housing requirement in Policy DS2 expressed as a net or gross figure? Has the figure taken into account the effects of estate regeneration? Is there any anticipated loss of existing housing stock?***

3.18.1. The housing requirement in Policy DS2 is expressed as a net figure.

3.18.2. None of the committed sites or proposed allocations are brownfield sites containing existing homes, therefore there is no loss of homes in order to facilitate redevelopment, to take into account.

3.18.3. The figure does not assume any supply from estate regeneration. As outlined in Paragraph 5.6 of the submitted Housing Land Supply Topic Paper, there is no current evidence to provide a justified figure for potential housing supply from this source and, given the sensitives and uncertainties around the regeneration programme, it is not appropriate to attribute an indicative figure. The estate regeneration programme will not however result in any net loss of the existing housing stock.

***Q3.19 Would an adjustment to the housing requirement for affordable housing provision be justified? (PPG para 2a-029-20140306) What overall percentage of affordable housing has been achieved over recent years? Based on the thresholds in Policy HN2 how many affordable housing units are likely to be delivered in the plan period on qualifying sites and from any other sources?***

3.19.1 The annual provision of affordable housing relative to overall housing provision for the period between 1 April 2007 and 31 March 2018 is set out within Table 1 below.

3.19.2 Data has also been provided on extant planning permissions as of August 2017 (Table 2) for committed developments that are set to provide housing in the coming years.

**Table 1 Completions of affordable housing 2007-2018**

Completions			
Year	Housing completions	No. of affordable completions	Percentage
2007/08	2,317	706	30.5%
2008/09	1,856	686	37%
2009/10	1,422	438	30.8%
2010/11	1,306	389	29.8%
2011/12	1,584	464	29.3
2012/13	1,315	305	23.2%
2013/14	1,001	197	19.7%
2014/15	1,440	352	24.5%
2015/16	1,202	354	29.5%
2016/17	1,247	251	20.1%
2017/18	1,527	345	22.6%
<b>TOTAL</b>	<b>16,217</b>	<b>4,487</b>	<b>27.7%</b>

- 3.19.3 The Plan's housing requirement of 26,500 dwellings over the plan period (equating to 1766 dwellings per annum) reflects the recommended Objectively Assessed Need for Housing set out within the Council's SHMA (MK/HOU/004). The need for affordable housing of 8,200 dwellings over the plan period that is identified within the SHMA represents 31% of the Objectively Assessed Need for Housing of 26,500 dwellings. However, as noted in paragraph 6.2.6 of the Council's Sustainability Appraisal (MK/SUB/005), the Council recognises that some proposals for 11 or more dwellings may not be able to provide 31% of units as affordable housing, primarily due to viability. This is illustrated by past provision of affordable housing as set out in Table 1 above.
- 3.19.4 The housing supply set out within Table 7.3 of the 'Proposed Submission Plan:MK, October 2017' (updated to account for the proposed modifications within the 'Schedule of Proposed Additional Modifications, June 2018' and completions data for 2017/18) totals 29,601 dwellings, 3,104 dwellings or 11.7% above the Objectively Assessed Need for Housing. The housing land supply consists of various sources and is diverse in its makeup in terms of location and size of site. A breakdown of these sources along is provided in Table 2. As noted in the Council's Housing Land Supply Topic Paper (MK/TOP/002), and as reiterated in INS1a (Section 8, second and third paragraphs), there is likely to be other sources of housing land supply over the plan period which would contribute net additions to affordable housing. However, as this stage, the Council cannot state with any confidence what those net additions would be.

3.19.5 The Council considers this approach to be a reasonable and positive way of meeting the housing requirement (i.e. the Objectively Assessed Need for Housing) and increasing resilience in the delivery of housing over the plan period that also ensures the vast majority, if not all, of the need for affordable housing would be met. As stated in Section 8, first paragraph of the Council’s response dated 5 June to your preliminary questions (INS1a), the Council considers that a monitoring target of 26,500 dwellings is the most appropriate as this relates to the Objectively Assessed Need for Housing.

**Table 2 Housing and Affordable Housing supply 1 April 2016-31 March 2031 (as per housing trajectory 1 April 2018 (Appendix B of this response))**

Source	Number of Dwellings	Number of Affordable Dwellings	Affordable Housing provision (%)
Completions 2016/17 & 2017/18	2,750	596	21.7%
Permissions	16,251	4,643	28.6%
Existing allocations rolled forward and Plan:MK allocations (AH projected)	9,477	2,938	31%
<b>TOTAL</b>	<b>28,478</b>	<b>8,177</b>	<b>28.7%</b>

Issue 4 Wider Accommodation Needs

Gypsies and Travellers

Further to your letter of 9 May 2018 (INS1), in which you requested a copy of the separate briefing note on interviews with stakeholders and neighbouring authorities in relation to the Gypsy and Traveller Accommodation Assessment, we have included a copy of this in Appendix D of this response.

**Q3.20 Is the 2017 Gypsy & Travellers Accommodation Assessment up-to-date and does it provide a robust and justified evidence base? Is the identified need for 19 pitches justified?**

3.20.1. The SHMA 2017, Chapter 5 from page 108 onwards considers the needs of Gypsies and Travellers. Figure 87 shows a need for 5 pitches (not 19) for households who meet the current planning definition for being a traveller. This includes 2 pitches for current

households who are overcrowded on their existing pitch and 3 pitches for future household formation.

3.20.2. The remaining 14 households with needs over the next 15 years are those who do not meet the planning definition of being a traveller (13 households), or whose planning status is unknown (1 household).

***Q3.21 Is there any evidence that the Plan should make provision for short stay stopping sites (transit sites) in line with Planning Policy for Traveller Sites? The GTAA refers to an Autumn 2018 Review, is there a commitment to undertake this and when would outputs be available?***

3.21.1. The SHMA 2017, Chapter 5 from page 112 onwards considers the need for transit sites. This concluded that no sites were needed, but that the situation should be monitored. For Milton Keynes Council to respond further.

***Q3.22 How will the needs of people who have permanently ceased to travel be addressed? Has consideration been given to a wider assessment of caravan and houseboat needs as required under Section 124 of the Housing and Planning Act 2016?***

3.22.1. As outlined in the SHMA (MK/HOU/005) of the 19 pitches required to meet the full identified need up to 2031, 14 of these pitches were required for 'non travelling' or 'unknown' households. In allocating 19 pitches within Plan:MK, the Council are therefore planning to meet the needs of these households.

3.22.2. Furthermore, as outlined in the Council's response to the Inspector's initial questions (INS1a), Paragraph 5.135 of the SHMA contains a recommendation to the Council to undertake a review of unauthorised transit encampments once there is three years' worth of evidence following the changes to the Government's Planning Policy for Travellers Sites in August 2015. The Council has not yet acted on this recommendation, but it is happy to do so and to undertake a wider assessment of caravan and houseboat need as required by the Housing and Planning Act 2016 at the same time.

Older persons

**Q3.23 Explain how the needs of different groups in the community have been addressed in the SHMA and then the Plan, such as, but not limited to, families with children, older people, people with disabilities and people wishing to build their own homes. What conclusions does the 2017 SHMA reach in terms of the scale and mix of housing type needed, including in terms of tenure and size? (NPPF paragraph 159) How does the Plan reflect the findings?**

Overall Housing Mix

3.23.1. The SHMA recommends a housing mix for market and affordable homes in Figure 63 which is reproduced below:

		Market Housing	Affordable Housing	TOTAL
Flat	1 bedroom	100	800	900
	2+ bedrooms	200	700	900
House	2 bedrooms	2,000	2,700	4,700
	3 bedrooms	10,500	3,100	13,600
	4 bedrooms	4,500	700	5,200
	5+ bedrooms	1,000	200	1,200
<b>TOTAL</b>		<b>18,300</b>	<b>8,200</b>	<b>26,500</b>

3.23.2. As explained at 7.4 within the Plan, the recommended mix indicates that 57% of new market homes should be 3 bedroom houses, and only 14% should be 1-2 bedroom properties (including both flats and houses). This differs markedly to the affordable tenure, where it recommended 38% should be 3 bedroom houses and 51% should be 1-2 bedroom properties (primarily 2 bed houses). It also noted that there will be a need for over 900 large affordable homes (4 and 5+ bedrooms) to be provided over the plan period. Much of this need will be from existing households living in overcrowded accommodation.

3.23.3. The Council considers the recommended housing mix within the affordable tenure to be an entirely robust basis for informing decisions on affordable housing mix when considering future applications due to the quality data and methodology used. For market housing the data is less specific and therefore the SHMA’s methodology is more limited in terms of accounting for changing housing demands amongst certain household types and subsequent occupancy patterns. This is noted and expanded upon in the Plan at 7.5.-7.7. In response, Policy HN1 adopts a more flexible approach to market housing mix than rigidly applying the recommended mix set out within the SHMA, based upon site-specific factors, wider trends, information on households with

specific needs at that time, and the strategic objectives in addition to the recommended market housing mix.

3.23.4. Alongside an assessment of the demographic and household profile to determine recommendations on the general housing mix (tenure and size) within the OAN, the SHMA assesses the needs of the following groups:

- Students: these needs were assessed as part of the overall housing need and will be met via the Plan's housing requirement and allocations.
- Service families: the number of residents employed by the Armed Services in Milton Keynes accounts for 0.1% of the population, and their needs were assessed as part of the overall housing need. These needs will be met via the Plan's housing requirement and allocations.
- People wishing to build their own homes: The Council operates a register for those seeking self-build and custom-build opportunities. As of June 2018, there were 288 unique entries on the register. How the Plan meets these needs will be fully addressed in the Council's response to Q8.5, but in general they will be met by the provision of plots within the Plan's allocated sites.
- Older people: these needs were assessed using demographic projections and the Strategic Housing for Older People resource pack that uses standardised rates for estimating the demand for a range of specialist older person housing products. This identified a total need for around 3,000 supported dwellings and 1,200 C2 bedspaces by 2031. How the Council and the Plan seeks to meet these needs is explained below.
- People and households living with disabilities: this assessed those accessing Disabled Facilities Grants, those using a wheelchair, vulnerable households and the demographic profile of the projected population to derive the need for properties of a specific standard in terms of accessibility and to provide projections on the number of households with supported or specific housing needs over the plan period. How the Council and the Plan seeks to meet these needs is explained below.
- Gypsies and Travellers and Travelling Showpeople: See Q3.2-3.22 above and Q3.38. This will also be addressed in the Council's response to Q8.4

3.23.5. With regard to older people, the Plan does not set a target for the provision of Sheltered Housing, Extra Care Housing or C2 bedspaces housing, and instead will seek provision on a case by case basis through allocations and other development proposals. As noted in the Plan at 7.29-7.31 and in the Council's response to your preliminary questions (INS1a), identifying and making suitable provision for these needs is highly complex which is why the Council intends to take a flexible policy

approach to meet these needs, albeit the Council will undertake further work to understand whether setting a site threshold for seeking provision should be established in Policy HN3.

- 3.23.6. As also noted in the Plan and the SHMA, the Council's overarching strategy is to enable people to live and receive care within their own homes for as long as is appropriate. Therefore, the need to make specific provision for specialist and supported housing is closely linked to the adequacy of general housing (both market and affordable), and particularly with regard to the accessibility and adaptability of homes. On this basis, the Plan sets out requirements for the provision of homes that meet the higher standard for accessibility and adaptability within Building Regulations Approved Document Part M. Specifically, on proposals for 11 or more dwellings the Plan requires 60% of all new homes to meet the enhanced building regulations standard on accessibility, 5% of market homes to be capable of adaptation to wheelchair accessible standard, and 10% of affordable homes to be fully wheelchair accessible. The provision of homes to these higher standards not only addresses the identified needs of those living with disabilities, but also enables those who would have historically moved into supported and specialist housing to otherwise stay within their own home.

***Q3.24 Is there evidence for the Plan to make specific provision for accommodation for elderly persons either as part of the housing mix (Policy HN3) or specific allocations for sheltered and supported accommodation? (See also PPG para 12-006-20150320).***

- 3.24.1. As noted above, the SHMA recommends that provision should be made for 3,000 supported dwellings (sheltered or extra care type housing) and 1,200 C2 bedspaces by 2031. It also recommends that certain proportions of market and affordable homes should be designed to higher accessibility and adaptability standards reflecting the growth of households that are over 65, as well as evidence on households living with disabilities.
- 3.24.2. The Plan does not set specific targets for the provision of sheltered or supported housing, or C2 bedspaces. Section 5.88 of the SHMA outlines the complexities identifying needs, as well as in delivering specific schemes and the wider public policy context and challenges around managing the housing needs of an ageing population. The Plan, at 7.27-7.31, expands on this further as part of the reasoned justification for not setting specific targets and adopting a more flexible and responsive policy approach. The key points of this are that:

- Many people prefer to stay in their own homes for as long as possible and receive care in the home, and this could involve moving to a home that is more suitable (e.g. bungalows or specially adapted homes) or move in with relatives.
- The need for sheltered or supported homes does not entirely derive from an ageing population with age groups requiring specialist housing, for example those living with physical or mental health issues, who are not factored into the identified need within the Strategic Housing Market Assessment.
- The recommended 1,200 C2 bed spaces is primarily based on demographic trends and does not take into account public policies and strategies that seek to enable people to live and receive care in their own home, rather than move into an institutional care setting.
- The complex nature in which households with specific needs present themselves, and the changing needs of individuals and families over time make it difficult to project with any certainty the precise housing needs over the plan period.
- The delivery of supported and specialist housing is complex, requiring both land in the right place, buildings of the right form, sustainable arrangements in place for the operation of the particular care model that fits into that location and form of development, and the availability of public funding to support their establishment and operation.

3.24.3. In short, the Council's view is that the difficulties in projecting with certainty the need for supported and specialist housing within Milton Keynes, and the complexities involved in delivering such schemes, means that it would not be justified or effective to set a fixed target for such provision. Instead, Policy HN3 adopts a more flexible approach to provision, with implementation of the policy being supported by Council-led initiatives to better link housing and adult social care with the planning process so that, on a case by case basis, appropriate provision over the plan period can be made.

#### Conclusion on Housing Requirement

#### **Q3.25 Overall, is the housing requirement in the plan justified? If not, what should it be?**

3.25.1. Yes, on balance the housing requirement of 26,500 net new homes is justified. Equally, the proposed approach of allocating land sufficient to deliver 10% above this, to account for the risk of one or more sites not delivering (within the plan period) as anticipated, is also justified.



3.25.2. A lower housing requirement is seemingly unreasonable, and a lower contingency figure would represent a high risk strategy, given the MK context, namely a track-record of recent delivery issues. There are arguments in support of a higher housing requirement and/or a higher contingency; however, there are also arguments against, as explained within the SA Report. The Council believes the submission approach to be justified *on balance*.

**MATTER THREE: ISSUE 5 - HOUSING LAND SUPPLY**

**ISSUES NUMBERS: Q3.26 – Q3.41**

***Q3.26 Overall, will the submitted allocations in Plan:MK provide sufficient flexibility to help deliver the spatial strategy?***

3.26.1. The proposed housing supply provides for flexibility in two ways.

3.26.2. Firstly, the proposed land supply has the potential to deliver c.10% above the housing target, such that the housing target will still be achieved (and, hopefully, a five year housing land supply maintained) even under a scenario whereby one or more sites do not deliver as anticipated.

3.26.3. Secondly, the proposed land supply (after having taken account the very large number of commitments) includes a diverse mix of sites, in respect of size, type and location, such that there should be a good degree of resilience to unforeseen delivery issues, e.g. issues at a certain location within the Borough, or an issue with a particular house-builder.

3.26.4. Furthermore, as outlined in paragraphs 5.6 – 5.8 of the Housing Land Supply Topic Paper, the 1,000 dwellings (to be increased to 1,068) to be delivered within the existing urban area of Milton Keynes (not including CMK and Campbell Park) is highly conservative once account is taken of the fact that regeneration schemes (estate regeneration and Bletchley Town Centre regeneration) will deliver additional housing within the plan period, albeit an unquantified amount at that this time. This will provide further flexibility to the supply, both in terms of amount of housing and diversity of source.

**Q3.27 Having regard to the Housing Supply Topic Paper (MK/TOP/002) and proposed trajectory and accompanying spreadsheet of sites submitted in the schedule of proposed modifications (SUB/MK/004), is the housing implementation strategy in Policy DS2 sufficiently clear? In particular is the submitted Plan clear on:**

***i) What comprises and justifies the housing trajectory?***

***ii) What is the anticipated deliverable and developable supply of housing land over the plan period, including any contingency for resilience (for example: the submitted 9.7% buffer)?***

***iii) How decision makers should calculate a five year deliverable supply?***

***iv) What contingency measures would be called upon were monitoring to identify a deficiency in the deliverable supply prior to a plan review?***

3.27.1. On a general point, if the Inspector feels it would assist the plan, Policy DS2 could be reformatted so as it is clearer and better aligns with the elements of housing land supply as outlined in Table 4.3.

3.27.2. Taking each question in turn:

- i) The submitted housing trajectory reflects: A) completions in the 2016/17 monitoring year; and B) projected completions (from commitments, allocations and windfall) for the remaining monitoring years. This has now been updated and a trajectory with the start date 1 April 2018 has been submitted in Appendix B of this response. This incorporates completions from 2017/18 and any updates to future projected completions based on new information.

**The projected completion rates are justified on the basis of:**

- Analysis presented within the SHLAA;
  - Information provided by landowners and agents;
  - Annual monitoring carried out by the Council, which includes feedback from landowners, developers and agents on their projected completion rates; and
  - Quarterly delivery and projection reviews carried out by the Council's Joint Housing Monitoring Team.
- ii) The requirement for the plan period, against which the Council proposes it should be monitored, is 26,500 net new homes. The deliverable and developable supply, as of the 1 April 2018, for the plan period is 29,713 (this is demonstrated in the updated housing schedule/trajectory in Appendix B of this response). This includes 2,750 completions for the years 2016/17 and 2017/18 and the remaining windfall allowance of 1,235 for years 3 – 15 of the plan period. This is also inclusive of the (submitted 9.7%) buffer.

- iii) The starting point for calculating five year housing land supply will be the housing target (26,500) annualised (i.e. divided by 15), which comes to 1,767 dwellings per annum (dpa). This, in turn, implies a need to maintain a supply of deliverable sites sufficient to deliver 8,833 homes (1,767 x 5). Additionally, there will be a need to make provision for any shortfall in supply accrued across previous monitoring years, from the beginning of the plan period. This should be done utilising the Sedgefield method of providing for any undersupply within the 5 year period. Furthermore, given Milton Keynes' recent historic under performance in delivery, a 20% buffer should be added to both the requirement and the undersupply. This will then provide the housing target for the 5 year period.

To calculate the 5 year position, the amount of dwellings projected to be completed within the 5 year period, minus a 10% discount for slippage or under delivery (MKC applies a 10% buffer to any site which has completions projected for year 5 of the trajectory) is then divided by the target and multiplied by 5.

- iv) The Council believes that the nature of the proposed land supply - in particular the 10% contingency and the good mix of sites - should ensure that a five year supply of housing land is maintained across the plan period. This confidence is supported on the basis of: the Whole Plan Viability Assessment; the Infrastructure Delivery Plan; the requirement to prepare Development Frameworks for strategic allocations, and work that has already been completed on such Frameworks.

3.27.3. Furthermore, added confidence comes with the knowledge that the East of M1 strategic site can and will deliver housing within the plan period if funding is made available for major infrastructure upgrades and, further housing supply can be provided through both estate regeneration and the regeneration of Bletchley Town Centre.

3.27.3. As outlined in our response to Q3.16, the Council is also undertaking wide-ranging work to review the recent issues associated with housing delivery and are looking to implement initiatives to support increased and speedier housing delivery, so as to avoid a position where contingency measures are required.

3.27.3. However, should it transpire that there is a lack of five year housing land supply, at any point within the plan period, then the 'presumption in favour of sustainable development' will apply, which in turn will serve to boost the supply of housing.

**Q3.28 Should Plan:MK include a policy to ensure that sufficient housing land is delivered if monitoring identifies that any of the strategic sites would be appreciably delayed? If so, what action would be appropriate and how and when would it be triggered?**

3.28.1. The proposal is to commence a review of Plan:MK immediately, such that the Council will already be 'ahead of the game', should it transpire that delivery at any of the strategic sites will be appreciably delayed. However, we appreciate that the immediate review of Plan:MK will likely be focused more on responding to 'Corridor' related strategic growth opportunities, more so than putting in place additional allocations to boost housing supply in the short term.

3.28.2. Should the Inspector have significant concerns regarding the ability to deliver the housing target, then it could prove appropriate to identify one or more reserve sites - i.e. sites where permission will be granted only if monitoring serves to highlight a grave undersupply against the target - however, the view of the Council is that the proposed housing land supply is robust, for the reasons given elsewhere in this response.

**Q3.29 Is there robust evidence underpinning the calculation of the land supply for the Plan Period? In particular:**

**i) are the allowances for total existing commitments clear? To what extent, if any, does it include allocated sites from the un-adopted Site Allocations DPD? Do any allowances from SADPD allocations take into account proposed main modifications to that plan?**

**ii) Is the capacity from estate regeneration and urban intensification (for example Campbell Park) justified?**

**iii) Is the windfall allowance adequately justified?**

**iv) Has appropriate consideration been given to lapse rates for planning permissions?**

**v) Is there any dispute that a 20% buffer should be added to the deliverable supply to address persistent under-delivery?**

**vi) Having regard to the PPG (3-035-20140306), and the preference for Sedgefield, what would be the justified approach to make good the shortfall in delivery since 2016?**

3.29.1. Taking each question in turn –

- i) Existing commitments and the allowances for remaining completions are listed in the SHLAA and within table 18.1 of Appendix 1 of the submitted plan. These sources use the base date of 1 April 2017. At this stage a number of sites from the, as-then, un-adopted Site Allocations Plan were included within the existing commitments, these included:

- Land at Our Lady of Lourdes Church
- Land off Singleton Drive
- Land North of Vernier Crescent
- Gurnards Avenue
- Land at Bergamot Gardens
- Land off Lilleshall Avenue
- Land off Hampstead Gate
- Land off Harrowden
- Manifold Lane
- Land at Towergate
- Land at Walton Manor, Groveway/Simpson Road
- Land off Ladbroke Grove

3.29.2. These sites were included as existing commitments in the submitted Plan:MK because, whilst they were not part of an adopted SADPD, they had either been granted planning permission for residential use post submission of the SADPD, had an existing designation which supported an element of residential use, or following Regulation 19 consultation on the SADPD did not have any major outstanding objections. All other SAP sites for which the Council still wished to take forward were included within table 18.2 as sites for which the Council wished to allocate through Plan:MK should the SADPD not be found sound.

3.29.3. Only one SADPD site was subject to modifications in relation to its capacity (Independent School Site, Daubeney Gate, Shenley Church End) and this was reflected in the Plan:MK schedule of modifications.

3.29.4. With the Council having now received the Inspector's Report for the SADPD (MK/HOU/010), which concludes the Plan is sound, all of the sites within the SADPD with the proposed modifications, can now be considered as existing commitments. It is the intention that the Council adopt the SADPD at its meeting of the 18 July 2018.

3.29.5. Given it is likely that the list of existing commitments that will come forward during the Plan:MK period is likely to change whilst the plan is at examination (due to new planning permissions etc. being granted), the Council propose that, should Plan:MK be found sound, the list of existing commitments would be updated so as it reflects the position at adoption.

3.29.6. Currently the most up-to-date position is provided in the housing schedule/trajectory submitted as Appendix B to this response.

- ii) There is currently no allowance within the Plan:MK land supply for estate regeneration. Whilst the Council would ideally like to make an additional allowance for housing to be delivered through estate regeneration, it is not clear on what basis a particular allowance could be justified, given the uncertainties that exist. The Council would be pleased to explore, with the Inspector and other Examination participants, the potential to include at least a small, notional allowance, recognising that the supply through estate regeneration is potentially quite large (see discussion within the housing land supply topic paper).

3.29.7. With regards to urban intensification (e.g. Campbell Park), the Council believes the housing supply figures to be justified, for the reasons given in the Housing Land Supply Topic Paper. Specifically, the Topic Paper explains that supply figures reflect *“established design principles and in some cases the findings of detailed site-specific investigations.”* This is also outlined within the SHLAA which provides further detail and reasoning behind the capacities detailed for individual sites.

- iii) The Council believes the windfall allowance to be adequately justified, for the reasons presented within the Housing Land Supply Topic Paper. The windfall allowance only accounts for sites of fewer than 10 dwellings and is based on past trends which currently show an average of 186 completions per annum from sites of this nature over the past 10 years.
- iv) Yes, appropriate consideration has been given to lapse rates for planning permissions. Lapse rates served as part of the reasoning to influence the decision to provide for a land supply of 10% above the housing target.

3.29.8. Furthermore in calculating the 5 year land supply, the Council applies a 10% discount to all sites which are showing completions within year 5; whilst this is predominantly to account for slippage, it also incorporates consideration for potential lapsed permissions within the 5 year period. This discount has been applied in the housing schedule and 5 year land supply position submitted in Appendix B of this response.

- v) No, there is no dispute that a 20% buffer should be added, and this is already incorporated in both the housing schedule for 1 April 2017 and the updated housing schedule for 1 April 2018 (Appendix B).

- vi) The shortfall since 2016 (i.e. the shortfall, against the annualised housing target, seen in both the 2016/17 and 2017/18 monitoring years) should be made good in the first five years following plan implementation, in accordance with the Sedgefield method. This method has been used in the updated housing schedule and 5 year land supply position submitted in Appendix B of this response and shows the Council can demonstrate a 5.67 years deliverable land supply as of 1 April 2018, on the assumption that Plan:MK is adopted.

***Q3.30 Does the evidence indicate that reasonable conclusions have been drawn about site capacities, having regard to density assumptions and any specific viability, infrastructure or other barriers to delivery? [Please note: the specifics of individual strategic sites will be considered separately under Matter 5].***

3.30.1. As stated within the Housing Land Supply Topic Paper, site capacities reflect *“established design principles and in some cases the findings of detailed site-specific investigations.”*

3.30.2. For sites within the planning process, the figures associated with a planning permission or a previous allocation have been used. Where a site is currently under construction, the remaining capacity of the sites has been used. In the case of the submitted Plan:MK, this is based on capacity as of April 2017.

3.30.3. For sites proposed for allocation within Plan:MK, the assessment carried out within the SHLAA has been used as a starting point to estimate the capacity for the allocation. As outlined in Section 3 of the SHLAA (MK/HOU/004) this included applying a density calculation which considered existing Local Plan saved policies, policies within ‘made’ neighbourhood plans and densities of relevant schemes on comparable sites. Furthermore, consideration was also made for the need to provide space on sites for infrastructure, open space and other uses, therefore densities have incorporated assumptions about the proportion of the site which is assumed as available for housing. Similarly, where a proportion of a site is impacted by a constraint which cannot be overcome, for example flood risk, the amount of space available for any development has been reduced accordingly.

3.30.4. Where more detailed information is available, whether it be from more detailed site work carried out as part of the SHLAA or in preparing a development brief, or via information submitted through planning applications or pre-application discussions, these have also been taken into consideration and preferred as a starting point.

3.30.5. Similarly, for larger, strategic sites, capacities submitted by the landowners/developers as part of their submissions to Plan:MK, has been used as the starting point whereby sufficient evidence has also been submitted to justify this as an appropriate capacity.

3.30.6. It is therefore felt that the capacities for sites outlined within Plan:MK are reasonable taking account of relevant constraints, densities, housing yields and any other barriers to development.

***Q3.31 What lead-in times and delivery rates (including number of developers/outlets per site) have been used to underpin the assumptions regarding the deliverability of strategic sites (in particular SD6, 7, 8, 9, 13, 15)? What is this based on? Where is it set-out? Are the projected delivery rates, particularly in the next five years, on some of the established strategic sites (notably SD6, 7 and 8) reasonable given past performance?***

3.31.1. Note: Updated projections on delivery are provided in the updated housing trajectory/schedule included within Appendix B of this response; this provides projections based on a 1 April 2018 base date.

3.31.2. In projecting lead-in times to use within housing projections the Council will communicate with the landowner/developer as part of its annual monitoring, or often on large strategic sites on a more regular basis, and utilise information provided by them to influence our assumptions. As a starting point, the Council would normally expect lead in times of three years from Outline permission and 12 months from REM permission; most sites should be able to achieve this and a lot, particularly smaller sites, will do better than this.

3.31.3. Taking the SLA as the most recent example, outline permissions were granted in April 2015, the first residential REM at Eagle Farm in the SLA was granted in April 2017 and development started on site in February 2018. This provides a working example of the above assumptions.

3.31.4. With regards to delivery rates for major strategic sites (including number of developers/outlets per site), the Council utilises phasing plans which are submitted by the lead developers and disposal strategies which are also often shared with the Council, to assist with its projections. The Council does look to limit forecasts to a maximum sales, per quarter, per outlet ratio, but this is only ever used as a guideline and where there is a current record of delivery on a site we will usually use the most recent performance to guide forecasts.



3.31.5. The Council carries out quarterly monitoring of starts, units under construction, and completions and, through a Joint Housing Monitoring Team utilises this monitoring data alongside up-to-date information from across a range of Council departments to review forecasts every quarter. This assists in ensuring annual forecasts are formulated on the most recent information available.

3.31.6. The projected delivery rates on established strategic sites, as outlined in the housing schedule in Appendix B of this response are considered to be reasonable given recent rates of completions and starts on these sites and the number of parcels that are active on the sites. Taking each of the noted sites in turn:

- **SD6 EEA:** All parcels now either have REM approved or currently have REM applications being considered by the Council (The last remaining two REM applications were submitted in early 2018, one for 260 dws and one for 33 dws). Furthermore, all parcels with REM approval, with the exception of two (which have recently had minor amendments approved) are under construction and showed completions in monitoring year 2017/18, whilst as of 1 April 2018, 286 units were under construction across the site.

Whilst the projected completions are slightly above those achieved in recent years the Council considers them justified given the above.

- **SD7 WEA:** The WEA has been an active site providing completions for 3 years. Over this three year period the annual completions have consistently increased on an annual basis with monitoring year 2017/18 showing 537 completions. Given the number of parcels currently active across the WEA it is expected that rates akin to those of 2017/18 will at least continue. This is supported by recent data provided by the landowners and developers, which has been used to inform the Housing Schedule/trajectory in Appendix B.
- **SD9 SLA:** The SLA is a more recent strategic allocation (allocated in the 2013 Core Strategy) than both the EEA and WEA and as such outline permission for the majority of the site was only granted in 2015. With the first REM approvals being granted in 2017, the site does not have any data for which to assess recent performance. As of 1 April 2018 there were 3 parcels with REM approval and 31 units under construction, the Council is therefore confident that its projection of 90 completions in 2018/19 is achievable. With information provided by developers in terms of their phasing plans and disposals to date and with a further three REM applications expected to be submitted shortly (the Council has already had pre-application discussions on these three parcels)

the number of parcels active on the SLA in future years should see rates of completions continue to increase; the Council therefore feel the current projections are reasonable.

***Q3.32 As of 1 April 2018 (or 1 April 2017 if 2018 data not available) what would the five year requirement be, for both the 'Sedgefield' and 'Liverpool' methodologies, assuming a 20% buffer for under-delivery against an annualised, flat trajectory?***

3.32.1. The 5 year requirement as of 1 April 2018, taking into account under delivery against the annual target during years 1 (2016/17) and 2 (2017/18) of the plan period, and including a 20% buffer on both the requirement and the undersupply, would be:

- **Sedgefield Method** = 11,543
- **Liverpool Method** = 10,964

***Q3.33 Is there robust, credible evidence demonstrating the capacity of the development sector to complete and sell this quantity of housing in the Borough in the next 5 or so years?***

3.33.1. The housing completions projected for the next five years shows a reasonably significant uplift from the performance of the last five years and therefore recent evidence cannot be said to robustly demonstrate with any certainty that the projected uplift will be equally as well absorbed by the market. However, as outlined in our response to Q3.31, the Council's projections included within the Housing Trajectory are based not only on recent quarterly completions and starts monitoring, but also on consultation with key developers and housebuilders and the information/projections that they have provided for their sites. This should provide some justification that the development sector has confidence in completing and selling this quantity of housing. Based on the experience of major housebuilders who have been active in Milton Keynes in recent years and their view of the forward market, the demand for land for housebuilding in Milton Keynes remains strong and they have a very positive view of the short and medium term Milton Keynes market.

3.33.2. There are also a number of other considerations that provide justification for the projected completions:

- There is no significant new build stock currently lying unsold anywhere within the Borough.
- Milton Keynes is still a significant net importer of labour (2011 census data indicated around one-third of all jobs within the Borough were filled by in-

commuters) which provides a good indicator of likely current and future demand for housing.

- The latest OAN also indicates strongly that Milton Keynes has not been reaching the sustainable long term housing demand level in recent years, on that evidence it would be reasonable to expect a degree of pent up demand that will help to absorb the higher delivery rates projected over the next five years.

***Q3.34 What has inhibited the achievement of comparable annual housing delivery targets in the 2013 Core Strategy? Is Plan:MK's approach to strategic sites at risk of repeating a similar performance? If so, what measures have been considered to de-risk delivery of the Plan?***

3.34.1. This is covered within our response to Q3.16.

***Q3.35 Is there a sufficient range of housing supply sources (and sites) in Plan:MK to bolster delivery? To achieve significant growth in a sustainable way (including critical mass to support infrastructure) are there realistic, reasonable and sustainable alternatives in a MK context other than sustainable urban extensions? How have the SHLAA and SA processes considered small and medium sized housing sites?***

3.35.1. Yes, the Council believes that the nature of the proposed land supply - and in particular, the 10% contingency and the good mix of sites - should ensure that a five year supply of housing land is maintained across the plan period. Furthermore, there is confidence in the housing land supply on the basis of: the Whole Plan Viability Assessment; the Infrastructure Delivery Plan; the requirement to prepare Development Frameworks for strategic allocations, and work that has already been completed on such Frameworks; and wide-ranging Council initiatives in support of timely decision-making (i.e. full planning permission) and housing delivery, including through estate regeneration and the regeneration of Bletchley Town Centre. Furthermore, added confidence comes with the knowledge that the East of M1 strategic site can and will deliver housing within the plan period if funding is made available for major infrastructure upgrades.

3.35.2. With regards to reasonable spatial strategy alternatives, these are explored through the SA Report. Of particular note, given the question posed, are spatial strategy options 2 and 5, which would involve decreased reliance on the SE MK strategic allocation, and increased reliance on sites within the urban area, relative to the preferred option (Option 4). The appraisal of Options 2 and 5 (Chapter 7 of the SA

Report) finds Options 2 and 5 to perform poorly, relative to Option 4, in terms of several sustainability objectives. However, the appraisal conclusion does highlight a degree of uncertainty, stating:

*“... it is recognised that loss of urban open space would impact on the amenity of residents. This issue/impact has a bearing on the ranking of the alternatives (i.e. Options 2, 5 and 6 perform poorly in terms of several objectives); however, it is difficult to conclude on impact significance.”*

3.35.3. With regards to the question of how the SHLAA considered small and medium sized housing site options, the answer is that the SHLAA gave full consideration to such sites where within or abutting the MK urban area, with the large majority of sites considered within the SHLAA being small to medium. A list of the sources from which sites assessed in the SHLAA were obtained and details of how these sites were considered/assessed is outlined within the SHLAA Methodology (2017) (viewable at: [MKC SHLAA](#)) and the SHLAA itself (MK/HOU/004).

3.35.4. With regards to the question of how the SA process gave consideration to small and medium sized housing site options, a full and detailed explanation is presented within the Council’s response to the Inspector’s preliminary questions (INS1a). In summary:

- Urban site options were not subjected to appraisal in isolation, but two alternative strategic approaches (namely a lower growth strategy and a higher growth strategy) were considered, as part of the appraisal of reasonable spatial strategy alternatives.
- Site options on the MK urban edge were considered as part of the process of arriving at reasonable spatial strategy alternatives.
- Site options within the rural area were not given explicit consideration, in light of the strategic context, namely the strong arguments against making allocations within the rural area, or allocating a quantum of housing to be delivered via one or more neighbourhood plans.

***Q3.36 Is the proposed buffer in the housing land supply (29,000 homes to meet the need for 26,500 homes equivalent to 9.7%) justified and positively prepared? Does this provide a sufficient and robust approach for potential uncertainties over capacity at South East MK? Would a 9.7% buffer in supply provide reasonable resilience?***

3.36.1. Careful consideration was given to the need for a buffer in late 2017, with the involvement of elected Councillors, and also AECOM specialists. The outcome of

discussions was that there was a need to substantially increase the 3% buffer proposed at the Draft Plan MK stage. A view was reached that an increase to 10% would be broadly appropriate, and this scale of buffer was also arrived at on the basis that it reflects an assumption that SE MK will deliver to its full capacity (3,000 homes) within the plan period (as opposed to the majority of delivery occurring post 2031, as proposed by Draft Plan:MK).

3.36.2. The plan outlines a number of reasons (Paragraphs 4.1 – 4.6) for the Council’s decision to apply this buffer, all of which provide justification and show the decision to apply it ensures the plan is positively prepared. These include consideration of the Council’s recent record of under-delivery, delivery of the majority of our affordable housing needs, the balancing of housing and job provision, and to provide flexibility of sites to ensure delivery of the OAN.

3.36.3. With regards to the South East MK site, the Council recognised its potential delivery uncertainties and this formed a key part of the reasoning for the plan to deliver a larger buffer than originally proposed at the draft plan stage. The Council are confident that even if the site is impacted upon, either in terms of capacity or timing of delivery, the proposed buffer is sufficient to still enable the delivery of the OAN; this is further discussed within the Housing Land Supply Topic Paper (MK/TOP/002). Furthermore, given the Council are committing to a review of Plan:MK within 5 years, this would provide an early opportunity to review the delivery of the South East MK site in light of any delivery issues that may arise and to take any necessary action.

3.36.4. Whilst the Council are confident that the proposed buffer in supply does provide reasonable resilience, it should also be noted that, as discussed elsewhere in this response, there is potential for a further increase in housing supply within the plan period from a number of other sources including; estate regeneration, Bletchley Town Centre regeneration, and development of East of M1 site. Housing supply from any of these sites would act to further increase the proposed buffer and provide more resilience.

### Housing Land Supply Conclusions

#### **Q3.37 Will there be a five year supply of deliverable housing land on adoption of Plan:MK?**

3.37.1. Yes. The 5 Year housing land supply (5YHLS) position for Plan:MK as of 1 April 2017 was outlined in the Council’s response to the Inspector’s Preliminary Questions (INS1a).

There was however a minor error in this calculation, the correct position, including the proposed modifications, is as follows:

- **Sedgefield Method** = 6.04 years
- **Liverpool Method** = 6.27 years.

3.37.2. An updated housing schedule from 1 April 2017, with the correct calculation, has been attached to this response as Appendix A.

3.37.3. The 5YHLS position for Plan:MK as of 1 April 2018, taking account of undersupply from both 2016/17 and 2017/18, is outlined in the updated housing schedule attached to this response as Appendix B. This outlines that the Council can demonstrate the following position:

- **Sedgefield Method** = 5.67 years
- **Liverpool Method** = 5.97 years

3.37.4. It should be noted that within this updated schedule, whilst all the delivery data for Plan:MK allocations remains the same as per the housing schedule from April 2017 (inclusive of proposed modifications) the housing schedule outlined in Appendix B does contain new sites that have been granted planning permission during 2017/18 and changes to delivery projections on some existing commitments.

***Q3.38 Will there be a five year supply of deliverable pitch provision for gypsies and travellers?***

3.38.1. The SHMA (2017) identifies a total of 19 new gypsy and travellers' pitches being required over the plan period. In light of the identified need, the Council reviewed a number of potential sites, and is proposing to allocate all the required number of pitches across three sites, please refer to policy HN11. The Council considers, by allocating pitches over three sites, rather than one site, this is a more robust approach to safeguard achieving the identified need.

3.38.2. Two of the three proposed sites (Calverton Lane and Newton Leys) are either existing or committed sites, and have been brought forward from the existing Local Plan (adopted in 2005) for Milton Keynes. A total of 12 pitches will be provided at these sites. A further 7 pitches will be delivered at the proposed strategic site allocation at South East Milton Keynes (please refer to Policy SD13). The intended completion date for this site is by the end of the plan period i.e. by 2031.

- 3.38.3. As an annualised figure, the recommended number of pitches is between 6 and 7 sites every 5 years. The SHMA provides more detail in identifying a requirement to deliver 10 pitches by 2021 and a further four pitches by 2026 (see pages 111 and 113). The majority of these pitches can be delivered at Calverton Lane or Newton Leys. The remaining five pitches, required by 2031, will be provided as part of the South East Milton Keynes strategic site allocation.
- 3.38.4. The Calverton Lane allocation is for an additional 4 pitches to be added to the existing 12 pitches. The land for the additional 4 pitches is in the ownership of the Council, has existing access and is to be delivered by the Council, it is therefore considered to be deliverable.
- 3.38.5. It is also intended that the Council will deliver the 8 new pitches allocated at Newton Leys. The site is identified and is available to the Council once it has been transferred from the Developers currently developing the rest of the Newton Leys site. The Council can therefore deliver this site when need requires.
- 3.38.6. The Calverton Lane and Newton Leys sites therefore ensure that there is a deliverable 5 year supply of sites and with the addition of the proposed allocated site in the SEMK growth area, for which it is also the intention that the Council will deliver, the full need over the plan period can be met.
- 3.38.7. Based on the above, the Council considers the approach taken complies with the requirements outlined in paragraph 9 of the Government's planning policy for traveller sites and the plan provides adequate provision for achieving the identified need for travellers.

***Q3.39 Is there likely to be a sufficient supply of developable housing land throughout the lifetime of the Plan?***

- 3.39.1. Yes, as demonstrated in the housing schedule in Appendix B to this response, there are currently a total of 29,713 homes considered developable during the plan period, this is sufficient to deliver the plan housing target of 26,500 homes.
- 3.39.2. The updated housing trajectory graph included as Appendix C to this response shows that there is projected to be a concentration of housing delivery in years 4 – 8 of the plan period and that housing delivery will be above the annual target up to year 11 (2026/27). Whilst the final years of the plan currently show projected delivery rates

below the annualised target, it is expected that more sites will have been allocated through the update to Plan:MK, which will provide further housing supply in these later years.

***Q3.40 Is there appropriate consistency and totalling between the figures for various sources of supply within Chapter 4 of Plan MK (Tables 4.1 and 4.2) and between figures in Chapter 4 and Appendix A of the Plan (Table 18.2)?***

- 3.40.1. As noted within our response to the Inspector's initial questions (INS1a), some confusion was caused in the submission version of the plan by using rounded figures within the main sections of the plan, compared to the exact figures used within Appendix A. Proposed modifications were included with the submission plan to update tables 18.1 and 18.2 of Appendix A and Tables 4.1 and 4.3 of the plan to remove any rounding, ensure consistency across the plan, and to incorporate any updates so as the submission version of the plan provides an up-to-date position based on a 1 April 2017 base date.
- 3.40.2. Furthermore, sections 2 – 8 of the Housing Land Supply Topic paper (MK/TOP/002) provide a more detailed outline of the figures that should be in table 4.3, so as to align exactly with Tables 18.1 and 18.2 of Appendix A, including the proposed modifications.
- 3.40.3. It is therefore felt that with the proposed modifications, there is consistency between all figures and tables within Chapter 4 and Appendix A of the plan.
- 3.40.4. Attached to this response is an updated housing schedule/trajectory (Appendix B) providing a base date of 1 April 2018, as requested by the Inspector. It should be noted that this schedule provides updates on completions (taking account of monitoring year 2017/18) and projections for existing commitments and Plan:MK allocations and, also includes new sites which have been granted permission during 2017/18 and are therefore now considered commitments. No changes have however been made to the capacity of Plan:MK allocations, therefore Table 18.2, inclusive of proposed modifications, remains correct.
- 3.40.5. Whilst it is acknowledged that the updated housing schedule will lead to changes to the existing commitments element of the land supply, it is not proposed at this stage to further update Table 18.1 or the corresponding rows of Tables 4.1 and 4.3, beyond the proposed modifications submitted. As the situation regarding commitments is naturally changeable, as planning applications are being constantly determined, it is



proposed that, should Plan:MK be found sound, the existing commitments elements of the supply will be updated to reflect the position at the time of adoption.

3.40.6. The Council can however provide updates during the examination period if and when requested by the Inspector.

***Q3.41 For those who submit the Plan would be unsound in terms of housing delivery, how should Plan:MK be changed to ensure that it is deliverable and therefore effective?***

3.41.1. The Council does not submit that the Plan would be unsound in terms of housing delivery.

Attached:

Appendix A: Plan:MK Housing Trajectory 1 April 2017 Revised

Appendix B: Plan:MK Housing Trajectory 1 April 2018

Appendix C: Plan:MK Housing Trajectory Graph 1 April 2018

Appendix D: Milton Keynes GTAA Stakeholder Engagement

Area	Site	STATUS	2017/18		2018/19		2019/20		2020/21		2021/22		2022/23		2023/24		2024/25		2025/26		2026/27		2027/28		2028/29		2029/30		2030/31		Totals	Physical Completions	Planning Reference	OUT	FUL	REM	OTHER	Deductions from Net GVA			
			Starts Commissioned	Physical Completions	Starts Commissioned	Physical Completions	Starts Commissioned	Physical Completions	Starts Commissioned	Physical Completions	Starts Commissioned	Physical Completions	Starts Commissioned	Physical Completions	Starts Commissioned	Physical Completions	Starts Commissioned	Physical Completions	Starts Commissioned	Physical Completions	Starts Commissioned	Physical Completions	Starts Commissioned	Physical Completions	Starts Commissioned	Physical Completions	Starts Commissioned	Physical Completions	Starts Commissioned	Physical Completions											
<b>STRATEGIC GROWTH SITES AND CITY COMPLETION</b>																																									
BROOKLANDS	LAND AT BROOKLANDS 2501 UNITS OUTLINE	OUT PERMISSION	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	291	291	291	06/02/20 MKPCO	291	0	0			
BROOKLANDS	BOWPHASE 1B	REM PERMISSION	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	80	193	14/01/06 REM	193	0	0					
BROOKLANDS	BOW PHASE 1D	REM PERMISSION	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	56	15/01/77 REM	56	0	0						
BROOKLANDS	BOW PHASE 1E	REM PERMISSION	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	45	15/01/44 REM	45	0	0						
BROOKLANDS	BOW PHASE 2A	REM PERMISSION	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	225	225	16/00/86 REM	225	0	0						
BROOKLANDS	BOW PHASE 2B, 3B, 3C, 4A	REM PERMISSION	0	100	20	0	100	80	0	76	89	0	0	96	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	276	276	16/02/95 REM	276	0	0					
BROOKLANDS	BOW PHASE 3A, 4B, 5A, 7A, 7B	REM PERMISSION	362	50	0	0	100	60	0	100	0	0	112	100	0	0	102	0	0	0	0	0	0	0	0	0	0	0	0	362	362	16/03/97 REM	362	0	0						
BROOKLANDS	BROOKLANDS PHASE 1	REM PERMISSION	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	15	15	09/00/80 MKPCO	15	0	0							
BROOKLANDS	GATEWAY SITE	REM PERMISSION	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	10	14/02/83 REM	10	0	0							
BROOKLANDS	BROOKLANDS SQUARE PHASE B	REM PERMISSION	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	21	21	16/01/25 REM	21	0	0						
BROOKLANDS	BROOKLANDS SQUARE PHASE A & C	REM PERMISSION	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	55	55	16/02/93 REM	55	0	0						
<b>BROOKLANDS SUMMARY</b>			<b>507</b>	<b>552</b>	<b>336</b>	<b>100</b>	<b>410</b>	<b>424</b>	<b>46</b>	<b>251</b>	<b>391</b>	<b>0</b>	<b>112</b>	<b>296</b>	<b>0</b>	<b>102</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>653</b>	<b>1325</b>	<b>1549</b>									
BROUGHTON	BROUGHTON GATE PARCEL M1	REM PERMISSION	0	40	16	0	16	38	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	56	56	16/05/41 REM	56	0	0						
BROUGHTON	BROUGHTON GATE PARCEL M2	REM PERMISSION	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	65	65	16/02/71 REM	65	0	0						
BROUGHTON	BROUGHTON MANOR BUSINESS PARK	OUT PERMISSION	0	62	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	62	62	11/01/34 MKPCO	62	0	0						
BROUGHTON	BROUGHTON GATE RES SITES CMB-CMB	REM PERMISSION	0	0	16	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	18	11/03/16 MKPCO	18	0	0						
BROUGHTON	BROUGHTON GATE RES SITE CM (Haven Street)	FUL PERMISSION	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	23	23	15/02/78 FUL	23	0	0							
<b>BROUGHTON SUMMARY</b>			<b>0</b>	<b>135</b>	<b>46</b>	<b>0</b>	<b>52</b>	<b>141</b>	<b>0</b>	<b>19</b>	<b>35</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>206</b>	<b>224</b>										
KINGSMEAD	KINGSMEAD SOUTH SITES 3 AND 4	OUT PERMISSION	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	154	154	06/06/02 MKPCO	154	0	0						
KINGSMEAD	KINGSMEAD SOUTH SITES 1 AND 2	REM PERMISSION	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	146	199	15/09/99 REM	199	0	0						
<b>KINGSMEAD SUMMARY</b>			<b>0</b>	<b>110</b>	<b>49</b>	<b>0</b>	<b>114</b>	<b>102</b>	<b>0</b>	<b>76</b>	<b>102</b>	<b>0</b>	<b>0</b>	<b>100</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>300</b>	<b>353</b>										
TATTENHOE PARK	TATTENHOE PARK 2 & 7	OUT PERMISSION	0	0	0	288	0	0	70	24	0	70	72	0	70	72	0	78	72	0	48	0	0	0	0	0	0	0	0	288	288	06/03/95 MKPCO	288	0	0						
TATTENHOE PARK	TATTENHOE PARK 3-6	OUT PERMISSION	0	0	0	721	150	6	200	108	0	200	192	0	171	150	0	150	0	0	115	0	0	0	0	0	0	0	0	721	721	06/03/95 MKPCO	721	0	0						
<b>TATTENHOE PARK SUMMARY</b>			<b>0</b>	<b>0</b>	<b>0</b>	<b>1009</b>	<b>150</b>	<b>6</b>	<b>270</b>	<b>132</b>	<b>0</b>	<b>270</b>	<b>264</b>	<b>0</b>	<b>241</b>	<b>222</b>	<b>0</b>	<b>78</b>	<b>222</b>	<b>0</b>	<b>163</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1009</b>	<b>1009</b>	<b>1009</b>									
WESTERN EXPANSION AREA	WEA AREA 10.1 - 10.3 REMANDER	OUT PERMISSION	400	17	0	380	221	22	360	283	221	360	300	320	340	300	300	330	300	216	300	300	216	300	0	220	300	0	220	250	0	200	200	0	50	70	3020	3113	05/02/91 MKPCO	3113	843
WESTERN EXPANSION AREA	Bovis - 10.1 a and b	REM PERMISSION	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	51	88	14/02/83 REM	88	0	0						
WESTERN EXPANSION AREA	PARCELS 10.1 C & D	REM PERMISSION	0	100	0	0	29	50	0	79	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	129	129		129	0	0							
WESTERN EXPANSION AREA	Bovis - 10.1 f	REM PERMISSION	0	0	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	6	8	14/02/85 REM	8	0	0						
WESTERN EXPANSION AREA	PARCEL 10.1 E	REM PERMISSION	0	74	24	0	40	50	0	40	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	114	114	16/01/47 REM	114	0	0							
WESTERN EXPANSION AREA	Parcel 10.1H	REM PERMISSION	0	0	0	64	34	0	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	64	64	16/02/16 REM	64	0	0							
WESTERN EXPANSION AREA	Abbey 10.3 Parcels C1 B1 F B J G N and P	REM PERMISSION	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	137	178	15/04/99 REM	178	0	0							
WESTERN EXPANSION AREA	Taylor Wingley - 10.3A Part 2	REM PERMISSION	0	10	47	0	10	17	0	0	0	0	0	12	12	0	0	0	0	0	0	0	0	0	0	0	0	0	32	76	15/01/98 REM	76	0	0							
WESTERN EXPANSION AREA	Taylor Wingley - 10.3A Part 1	REM PERMISSION	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	50	50		50	0	0							
WESTERN EXPANSION AREA	Abbey 10.1 Parcel 1	REM PERMISSION	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	34	34	15/02/53 REM	34	0	0								
WESTERN EXPANSION AREA	Selwey - 10.3 Phase 1	REM PERMISSION	0	59	90	0	30	89	0	40	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	89	219	19/02/00 REM	219	0	0							
WESTERN EXPANSION AREA	WEA AREA 11 - REMANDER	OUT PERMISSION	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	1352	1352	06/01/23 MKPCO	1352	865	0	0						
WESTERN EXPANSION AREA	WEA AREA 11 PARCELS 2B 2C 5A 5B 6D	REM PERMISSION	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	241	241	16/01/33 REM	241	0	0							
WESTERN EXPANSION AREA	Barratt H2 to H3 (4B 5C and part of 3B)	REM PERMISSION	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	127	127	14/01/79 REM	127	0	0							
WESTERN EXPANSION AREA	Barratt Parcels 6a, 6b, 6c	REM PERMISSION	0	50	70	0	56	76	0	76	0	0	0																												

Area	Site	STATUS	2017/18		2018/19		2019/20		2020/21		2021/22		2022/23		2023/24		2024/25		2025/26		2026/27		2027/28		2028/29		2029/30		2030/31		Totals		Planning Reference	OUT	FUL-REM	OTHER	Known or Potential Sites										
			Physical Starts	Physical Completions	Physical Starts	Physical Completions	Physical Starts	Physical Completions	Physical Starts	Physical Completions	Physical Starts	Physical Completions	Physical Starts	Physical Completions	Physical Starts	Physical Completions	Physical Starts	Physical Completions	Physical Starts	Physical Completions	Physical Starts	Physical Completions	Physical Starts	Physical Completions	Physical Starts	Physical Completions	Physical Starts	Physical Completions	Physical Starts	Physical Completions	Physical Starts	Physical Completions															
ASHLAND	ASHLAND PHASE 3 AREAS A TO E	REM PERMISSION	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	30	08/2023-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	34				0										
OAKGROVE	OAKGROVE PHASE 3	REM PERMISSION	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	43	14/02/27-REM			43	0									
OAKGROVE	OAKGROVE PHASE 4	REM PERMISSION	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	34	14/02/17-REM			162	0									
OAKGROVE	OAKGROVE PHASE 5	REM PERMISSION	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	16/02/23-REM			73	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	0									
OxLEY PARK	OxLEY PARK SITE 4 AND 5	FUL PERMISSION	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	62	122	15/08/25-FUL		122	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	62	122			0										
BLETCHLEY	NEWTON LEYS	OUT PERMISSION	0	0	0	0	100	64	0	100	100	0	100	90	0	90	60	0	50	56	0	50	60	0	60	0	0	0	0	0	0	0	0	0	0	490	03/01/337-OUT	490		314							
BLETCHLEY	NEWTON LEYS PHASE 2 B/C/D	REM PERMISSION	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	0	0	0	0	15	08/02/23-REM		15						
BLETCHLEY	NEWTON LEYS PHASE 2 F3	REM PERMISSION	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	08/02/23-REM		43	0									
BLETCHLEY	NEWTON LEYS PHASE 3C	REM PERMISSION	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	0	0	20	12/05/16-REM		20							
BLETCHLEY	NEWTON LEYS PHASE 3CI	REM PERMISSION	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	0	0	11	16/03/40-REM		11								
BLETCHLEY	NEWTON LEYS PHASE 4	REM PERMISSION	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	12/08/87-REM		62									
BLETCHLEY	NEWTON LEYS - LOCAL CENTRE	FUL PERMISSION	0	10	0	0	10	17	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	15/01/69/5-FUL		20										
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	60	0	0	0	0	0	0	0	0	0	0	587	661			0							
CAMPBELL PARK	CAMPBELL PARK REMAINDER (NORTHSIDE)	LOCAL PLAN ALLOCATION	0	0	0	0	0	0	0	1500	50	0	150	150	0	150	0	250	200	0	250	200	0	150	200	0	100	200	0	100	150	0	1500	1500	1500		1500										
CAMPBELL PARK	BLOCKS 14A AND 14B	REM PERMISSION	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	40	13/01/13-REM		40	0									
CAMPBELL PARK	DANSLIDE - MARINA	REM PERMISSION	0	0	0	0	100	0	0	100	100	0	180	150	0	0	0	0	130	0	0	0	0	0	0	0	0	0	0	0	0	0	0	380	17/08/50-REM		380	0									
CAMPBELL PARK	F4.4	NEIGHBOURHOOD PLAN ALLOCATION	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	51	0	0	0	0	0	0	0	0	0	0	0	0	0	51	51		51									
CAMPBELL PARK	S4.1	PLANMK ALLOCATION	0	0	0	0	0	0	0	0	0	0	0	0	0	141	25	0	50	50	0	50	50	0	16	41	0	0	0	0	0	0	0	141	141	141		0									
CAMPBELL PARK	S4.2	PLANMK ALLOCATION	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	202	25	0	50	50	0	75	50	0	50	50	0	2	52	0	202	202	202		0									
CAMPBELL PARK	S4.3	PLANMK ALLOCATION	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	166	25	0	0	50	50	0	50	50	0	41	66	166	166						
CAMPBELL PARK	LAND TO NORTH OF GLEBE ROUNDABOUT - OVERGATE	PLANMK ALLOCATION	0	0	0	0	0	60	0	0	0	0	60	30	0	0	0	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	60	60	60		60									
CENTRAL MILTON KEYNES	C3.2	PLANMK ALLOCATION	0	0	0	0	0	0	0	135	0	0	30	0	0	70	67	0	35	68	0	0	0	0	0	0	0	0	0	0	0	0	135	135	135		135										
CENTRAL MILTON KEYNES	C3.3	PLANMK ALLOCATION	0	0	0	0	0	0	0	0	113	20	0	50	60	0	43	53	0	0	0	0	0	0	0	0	0	0	0	0	0	0	113	113	113		113										
CMK/CAMPBELL PARK SUMMARY			0	0	40	0	100	0	60	100	100	1535	230	150	113	260	310	0	270	307	192	353	271	262	350	250	0	376	351	0	241	291	166	175	250	0	152	252	0	100	150	0	41	66	2368	2748	2788
CENTRAL MILTON KEYNES	SOUTH EAST MILTON KEYNES GROWTH AREA	PLANMK ALLOCATION	0	0	0	0	0	0	0	0	0	0	0	0	75	50	0	200	175	0	300	275	0	400	350	0	400	400	0	400	450	0	425	450	3000	3000	3000		0								
TOTAL STRATEGIC GROWTH SITES AND CITY COMPLETION			2165	1804	1343	2527	2456	2054	966	2004	2273	2465	1772	2115	3817	1516	1771	320	1378	1585	492	1233	1415	562	1020	1100	300	1042	1091	0	911	1071	166	795	950	0	752	952	0	700	800	0	516	586	13720	17901	19106
OTHER LARGE (OVER 10 UNITS) DELIVERABLE BROWNFIELD SITES																																															
BLETCHLEY	LAND TO SOUTH OF PRINCES WAY & WEST OF ALBERT STREET	FUL PERMISSION	0	0	0	184	12	0	20	12	0	38	20	0	114	38	0	0	42	0	0	72	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	184	184	184	184			
BLETCHLEY	18A ST GEORGES ROAD	OUT PERMISSION	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	0	0	0	0	0	10	10	10	10					
BLETCHLEY	LEISURE CENTRE PHASE 2	FUL PERMISSION	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	0	0	0	0	0	50	50	50	50				
BLETCHLEY	LATHAMS BUILDING	LOCAL PLAN ALLOCATION	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	0	0	0	0	0	0	0	75	75	75	75					
BLETCHLEY	25 TO 27 AYLESBURY STREET	FUL PERMISSION	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	0	0	0	0	0	14	14	14	14					
BLETCHLEY	FORMER MFI BUILDING	PLANMK ALLOCATION	0	0	0	0	0	0	0	0	0	0	0	0	28	0	0	28	14	0	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	28	28	28	28						
BLETCHLEY	7 & 7A AYLESBURY STREET	FUL PERMISSION	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	0	0	14	14	14	14								
BLETCHLEY	BERWICK DRIVE	PLANMK ALLOCATION	0	0	0	0	0	0	0	0	0	0	16	0	0	0	16	16	0	0	0																										

Area	Site	STATUS	2017/18		2018/19		2019/20		2020/21		2021/22		2022/23		2023/24		2024/25		2025/26		2026/27		2027/28		2028/29		2029/30		2030/31		Totals	Physical Commitment	Planning Reference	OUT	FUL-REM	OTHER	Known Landbank (M2)		
			Starts	Physical Commitment	Starts	Physical Commitment	Starts	Physical Commitment	Starts	Physical Commitment	Starts	Physical Commitment	Starts	Physical Commitment	Starts	Physical Commitment	Starts	Physical Commitment	Starts	Physical Commitment	Starts	Physical Commitment	Starts	Physical Commitment	Starts	Physical Commitment	Starts	Physical Commitment	Starts	Physical Commitment									
WOLVERTON	RALCARE MAINTENANCE DEPOT, STRATFORD ROAD	OUT PERMISSION	0	0	0	0	0	0	0	0	100	0	100	75	100	0	75	100	0	100	0	0	0	0	0	0	0	0	0	0	0	375	375	15/02030/OUT/SE	375		0		
<b>TOTAL OTHER LARGE (OVER 10 UNITS) DELIVERABLE BROWNFIELD SITES</b>			<b>48</b>	<b>153</b>	<b>75</b>	<b>184</b>	<b>132</b>	<b>178</b>	<b>99</b>	<b>295</b>	<b>132</b>	<b>208</b>	<b>405</b>	<b>432</b>	<b>293</b>	<b>77</b>	<b>65</b>	<b>509</b>	<b>393</b>	<b>178</b>	<b>158</b>	<b>399</b>	<b>298</b>	<b>203</b>	<b>154</b>	<b>250</b>	<b>50</b>	<b>238</b>	<b>98</b>	<b>200</b>	<b>125</b>	<b>0</b>	<b>1672</b>	<b>2647</b>	<b>2697</b>				
<b>RESERVE SITES/URBAN GREENFIELD</b>																																							
BLETCHLEY	EATON LEYS	OUT PERMISSION	0	0	0	0	0	100	0	0	250	255	0	200	205	0	50	140	0	0	0	0	0	0	0	0	0	0	0	0	0	0	600	600	15/01533/OUT/SE	600		460	
BLETCHLEY	OFF PENN ROAD	FUL PERMISSION	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	39	39	16/02251/FUL	39	36	0	
BLETCHLEY	LAND AT SHEEP BRIDGE COTTAGE, DRAYTON ROAD	OUT PERMISSION	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	10	10	16/0174/OUT	10	10	0		
BLETCHLEY	SW OF BMW, DUNCUMBE STREET	OUT PERMISSION	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	16/01430/OUT	12		0	
BLETCHLEY	LAKES ESTATE NEIGHBOURHOOD PLAN SITES	NEIGHBOURHOOD PLAN ALLOCATION	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	0	130	120	130			130	130
BLETCHLEY	PHELPS ROAD	NEIGHBOURHOOD PLAN ALLOCATION	0	0	0	0	0	0	0	0	0	0	0	0	11	11	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11	11	11			0	
BLETCHLEY	CHEPSTOW DRIVE	PLAN/MK ALLOCATION	0	0	0	0	0	0	0	0	0	11	11	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11	11	11			0	
BRADWELL COMMON	LAND OFF HAMPSTEAD GATE (SAP12)	SAP ALLOCATION	0	0	0	0	0	30	0	0	0	20	15	0	10	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	30	30	30			16	30
BRADVILLE	LAND OFF HARROWDEN (SAP14)	SAP ALLOCATION	0	0	0	0	0	0	0	25	10	0	15	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	25	25	25			27	25
BROUGHTON	BROUGHTON ATTREBURY (former employment allocation)	SAP ALLOCATION	0	0	130	0	0	80	50	0	50	50	0	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	130	130	130			130	130
CALDECOTTE	SITE C	PLAN/MK ALLOCATION	0	0	0	0	0	67	0	0	37	35	0	30	32	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	67	67	67			67	67
CONNIBURROW	COLTSFOOT PLACE	FUL PERMISSION	18	0	0	0	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	18	18	18			18	18	
CROWNHILL	RESERVE SITE OFF HENDRIX DRIVE	RESERVE SITE	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			10	10
FISHMEAD	GUPHARDS AVENUE (SAP8)	SAP ALLOCATION	0	0	0	0	0	37	17	0	20	37	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	37	37	37			14	37
FISHERMEAD	KELAN DRIVE 1	PLAN/MK ALLOCATION	0	0	0	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	10	10	10			10	10	
FULLERS SLADE	CAVENDISH SITE	PLAN/MK ALLOCATION	0	0	0	0	0	0	0	0	0	37	0	0	0	27	17	0	10	20	0	0	0	0	0	0	0	0	0	0	0	0	37	37	37			22	37
GRANGE FARM	LAND OFF SINGLETON DRIVE (SAP5)	SAP ALLOCATION	0	0	0	0	0	22	10	0	12	22	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	22	22	22			22	22	
GREENLEYS	FORMER MILTON KEYNES RUGBY CLUB	PLAN/MK ALLOCATION	0	0	0	0	0	0	0	0	35	0	0	50	25	0	50	50	0	25	50	0	0	0	0	0	0	0	0	0	0	0	125	125	125			22	125
KENTS HILL PARK	TIMBOLD DRIVE	SAP ALLOCATION	0	0	150	0	0	0	0	0	50	30	0	50	50	0	50	50	0	20	0	0	0	0	0	0	0	0	0	0	0	0	150	150	150			80	150
LAKES ESTATE	SOUTHERN WINDMERE DRIVE	PLAN/MK ALLOCATION	0	0	0	0	0	0	11	11	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11	11	11			14	11
MEDBOURNE	LAND NORTH OF VERNER CRESCENT (SAP5)	SAP ALLOCATION	0	0	0	0	0	14	14	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			14	14
MEDBOURNE	S OF VERNER CRESCENT	PLAN/MK ALLOCATION	0	0	0	0	0	18	18	18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	18	18	18			14	18
MEDBOURNE	SITE 4, VERNER CRESENT	RESERVE SITE	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	0	10	10	10			10	10
MIDDLETON	PHOENIX LODGE	RESERVE SITE	0	0	21	11	0	0	21	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			21	21
MONKSTON	LILLESALL AVENUE	FUL PERMISSION	0	24	20	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	16/01100/FUL	24	24	0	
MONKSTON	LINDSFARNE DRIVE	PLAN/MK ALLOCATION	0	0	0	0	0	0	0	20	0	0	20	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	20	20	20			20	20
MONKSTON	WACHURST LANE	PLAN/MK ALLOCATION	0	0	0	0	0	0	0	0	17	0	0	17	17	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	17	17	17			17	17
MONKSTON PARK	LAND OFF LADBROKE GROVE (SAP2)	SAP ALLOCATION	0	0	25	0	0	25	10	0	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	25	25	25			25	25	
OLD FARM PARK	BYRDE CRESCENT	PLAN/MK ALLOCATION	0	0	0	0	0	25	0	25	25	0	0	25	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	25	25	25			25	25	
REDHOUSE PARK	THE WALNUTS	PLAN/MK ALLOCATION	0	0	0	0	0	0	0	0	0	0	0	0	0	125	0	0	50	25	0	50	50	0	25	50	0	0	0	0	0	125	125	125			18	125	
SHENLEY BROOK END	MANFOLD LANE (SAP16)	SAP ALLOCATION	0	0	0	0	0	30	0	0	20	15	0	15	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	30	35	30			18	35	
SHENLEY CHURCH END	LAND AT DAUBENEY GATE	SAP/PLAN/MK ALLOCATION	0	0	0	0	0	0	90	0	0	30	30	0	60	30	0	0	30	0	0	0	0	0	0	0	0	0	0	0	0	90	90	90			30	90	
SPRINGFIELD	SPRINGFIELD BOULEVARD 1	NEIGHBOURHOOD PLAN ALLOCATION	0	0	0	0	0	0	0	0	15	15	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15	15	15			15	15	
STONY STRATFORD	STRATFORD HOUSE	FUL PERMISSION	0	6	0	0	7	6	0	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	13	13	11/02761/FUL	13		13	0	
TATTENHOE	HOWE ROCK PLACE	PLAN/MK ALLOCATION	0	0	0	0	0	0	0	0	17	17	17	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	17	17	17			17	17	
TATTENHOE	WINFOLD LANE	PLAN/MK ALLOCATION	0	0	0	0	0	0	0	0	24	24	24	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	24	24	24			24	24	
TATTENHOE																																							





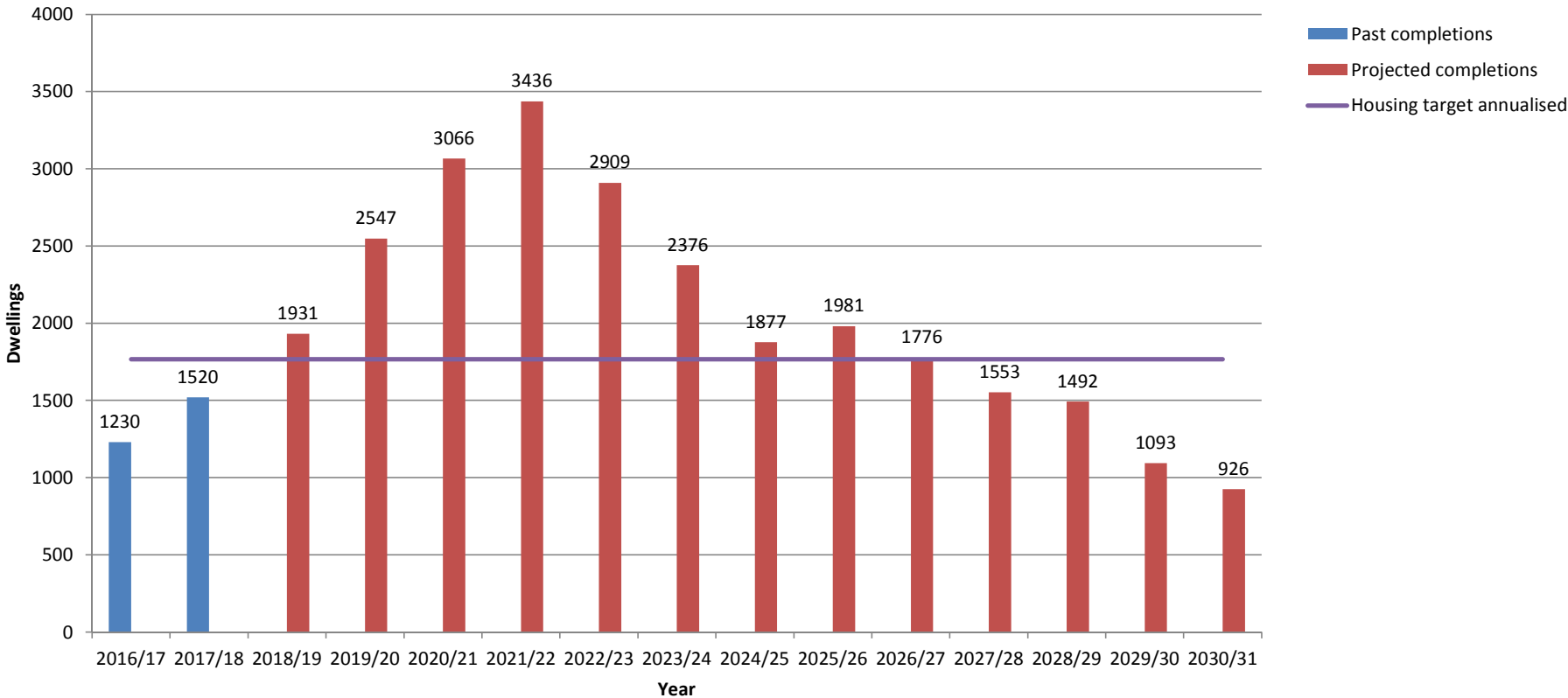


Area	Site	STATUS	2018/19		2019/20		2020/21		2021/22		2022/23		2023/24		2024/25		2025/26		2026/27		2027/28		2028/29		2029/30		2030/31		Totals		Planning Reference	OUT	FUL-REM	OTHER	Discounted Value 1st Year	Total									
			Physical Commenced	Starts	Physical Commenced	Starts	Physical Commenced	Starts	Physical Commenced	Starts	Physical Commenced	Starts	Physical Commenced	Starts	Physical Commenced	Starts	Physical Commenced	Starts	Physical Commenced	Starts	Physical Commenced	Starts	Physical Commenced	Starts	Physical Commenced	Starts	Physical Commenced	Starts	Physical Commenced	Starts							Physical Commenced	Starts	Physical Commenced	Starts					
STANTONBURY	REDBRIDGE	PLANMK ALLOCATION	0	0	0	0	0	0	0	0	19	19	19	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	19	19	19				19	19									
STANTONBURY	ROWLE CLOSE	PLANMK ALLOCATION	0	0	0	0	0	0	0	0	18	18	18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	18	18	18				18	18									
STONY STRATFORD	HIGH STREET (FORMER GAS WORKS SITE)	PLANMK ALLOCATION	0	0	0	24	0	0	0	20	10	0	4	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	24	24	24				24	0									
WOLVERTON	AGORA REDEVELOPMENT	FUL PERMISSION	0	0	0	140	0	0	0	60	40	0	80	60	0	0	40	0	0	0	0	0	0	0	0	0	0	0	140	140	140	15/09/13/FUL	140		140	140									
WOLVERTON	RALCARE MAINTENANCE DEPOT, STRATFORD ROAD	OUT PERMISSION	0	0	0	0	0	0	0	0	0	100	0	0	100	75	0	100	100	0	75	100	0	0	0	0	0	0	375	375	375	15/03/03/OUT/RES	375		0	75									
TOTAL OTHER LARGE (OVER 10 UNITS) DELIVERABLE BROWNFIELD SITES			218	134	48	164	295	207	0	218	174	452	362	262	65	509	468	253	158	399	298	228	154	250	100	268	98	200	170	0	260	223	0	186	225	0	73	0	0	1798	2650	2671			
RESERVE SITES/URBAN GREENFIELD																																													
BLETCHLEY	BATON LEYS	OUT PERMISSION	0	0	0	100	0	0	150	90	0	150	90	0	100	90	0	0	90	0	75	0	65	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	500	500	15/15/03/OUT/RES	900		0	270
BLETCHLEY	OFF PENN ROAD	FUL PERMISSION	0	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	27	27	27	16/02/21/FUL		27		0	0							
BLETCHLEY	LAND AT SKEN BRIDGE COTTAGE, DRAYTON ROAD	OUT PERMISSION	10	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	10	10	10	16/01/14/OUT	10		0	0	0								
BLETCHLEY	BW OF BMM, DUNCOMBE STREET	OUT PERMISSION	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	12	12	12	16/01/20/OUT	12		0	0	0								
BLETCHLEY	LAKES ESTATE NEIGHBOURHOOD PLAN SITES	NEIGHBOURHOOD PLAN ALLOCATION	0	0	0	130	25	0	0	40	45	0	30	40	0	25	45	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	130	130		130	130			
BLETCHLEY	PHILIPS ROAD	NEIGHBOURHOOD PLAN ALLOCATION	0	0	0	0	0	0	0	0	0	0	0	11	11	11	0	0	0	0	0	0	0	0	0	0	0	0	0	11	11	11				11	11		11	11					
BLETCHLEY	CHEPSTOW DRIVE	PLANMK ALLOCATION	0	0	0	0	0	0	0	0	11	11	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11	11	11				11	11		11	11						
BRADWELL COMMON	LAND OFF HAMPTON GATE (SAP12)	SAP ALLOCATION	0	0	0	16	0	0	0	0	0	16	16	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	16	16	16				16	16		16	16						
BRADVILLE	LAND OFF HARROWDEN (SAP14)	SAP ALLOCATION	0	0	0	0	0	0	25	10	0	15	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	25	25	25				25	25		25	25						
BROUGHTON	BROUGHTON ATTEBURY (former employment allocation)	SAP ALLOCATION	130	0	0	0	0	0	80	50	0	50	50	0	30	0	0	0	0	0	0	0	0	0	0	0	0	0	130	130	130				130	130		130	130						
CALDECOTTE	CALDECOTTE SITE C	PLANMK ALLOCATION	0	0	0	67	0	0	37	35	0	30	32	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	67	67	67				67	67		67	67						
CONNORBORO	LAND TO N OF 2 COLTSFOOT PLACE	FUL PERMISSION	0	18	0	0	0	18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	18	18	18	17/02/16/FUL/R3		18		0	0									
CROWNHILL	RESERVE SITE OFF HENDRIX DRIVE	RESERVE SITE	0	0	0	0	0	0	10	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10	10	10				10	10		10	10							
FISHERMEAD	GUPHARD AVENUE (SAP16)	SAP ALLOCATION	0	0	0	50	40	0	20	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	70	70	17/01/20/FUL	70	10			
FISHERMEAD	WELLS DRIVE 1	PLANMK ALLOCATION	0	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	10	10	10				10	10		10	10						
FULLERS SLADE	CAVENDISH SITE	PLANMK ALLOCATION	0	0	0	0	0	0	0	37	0	0	0	27	17	0	10	20	0	0	0	0	0	0	0	0	0	0	37	37	37				37	37		37	37						
GRANGE FARM	LAND OFF SINGLETON DRIVE (SAP15)	SAP ALLOCATION	0	0	0	22	0	0	22	22	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	22	22	22				22	22		22	22							
GREENLEYS	FORMER MILTON KEYNES RUGBY CLUB	PLANMK ALLOCATION	0	0	0	0	0	0	0	125	0	0	50	25	0	50	50	0	25	50	0	25	50	0	0	0	0	0	125	125	125				125	125		125	125						
KENTS HILL PARK	TIMBOLD DRIVE	OUT PERMISSION	0	0	0	148	0	0	50	30	0	50	50	0	48	50	0	18	0	0	0	0	0	0	0	0	0	0	148	148	148	17/08/16/OUT	148		0	130	130		148	148					
LAKES ESTATE	SOUTHERN WINDMERE DRIVE	PLANMK ALLOCATION	0	0	0	0	0	11	11	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11	11	11				11	11		11	11							
MEDBOURNE	LAND NORTH OF VERNER CRESENT (SAP15)	SAP ALLOCATION	0	0	0	14	14	0	0	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	14	14	14				14	14		14	14							
MEDBOURNE	S OF VERNER CRESENT	PLANMK ALLOCATION	0	0	0	18	18	18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	18	18	18				18	18		18	18						
MEDBOURNE	SITE 4, VERNER CRESENT	RESERVE SITE	0	0	0	10	0	0	10	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10	10	10				10	10		10	10							
MIDDLETON	PHOENIX LODGE	RESERVE SITE	21	11	0	0	10	21	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	21	21	21				21	21		21	21							
MONKSTON	LILLESFALL AVENUE	FUL PERMISSION	0	0	22	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	22	22	22	16/11/00/FUL		22		0	0								
MONKSTON	LINDSFAIRNE DRIVE	PLANMK ALLOCATION	0	0	0	0	0	0	20	0	0	20	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	20	20	20				20	20		20	20						
MONKSTON	WADHURST DRIVE	PLANMK ALLOCATION	0	0	0	0	0	0	0	17	0	0	17	17	0	0	0	0	0	0	0	0	0	0	0	0	0	17	17	17				17	17		17	17							
MONKSTON PARK	LAND OFF LADBOROUGH GROVE (SAP13)	SAP ALLOCATION	26	0	0	0	26	10	0	16	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	26	26	26	16/07/05/FUL		26		0	0									
OLD FARM PARK	BYRD CRESENT	PLANMK ALLOCATION	0	0	0	0	0	25	0	0	25	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	25	25	25				25	25		25	25							
REDBOURNE	THE WALNUTS	PLANMK ALLOCATION	0	0	0	0	0	0	0	125	0	0	50	25	0	50	50	0	25	50	0	25	50	0	0	0	0	125	125	125				125	125		125	125							
SHENLEY BROOK END	MANFOLD LANE (SAP18)	SAP ALLOCATION	0	0	0	18	0	0	18	18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	18	18	18				18	18		18	18							
SHENLEY CHURCH END	LAND AT DAUBENEY GATE	SAP ALLOCATION	0	0	0	0	0	90	0	0	30	30	0	60	30	0	30	0	0	0	0	0	0	0	0	0	0	90	90	90				90	90		90	90							
SPRINGFIELD	SPRINGFIELD BOULEVARD 1	NEIGHBOURHOOD PLAN ALLOCATION	0	0	0	0	0	0	0	15	15	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15	15	15				15	15		15	15							
STONY STRATFORD	STRATFORD HOUSE	FUL PERMISSION	0	3	0	0	6	8	0	4	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	13	13	13	16/05/07/FUL		13		0	0									
TATTENHOE	HOWE ROCK PLACE	PLANMK ALLOCATION	0	0	0	0	0	0	0	17	17	17	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	17	17	17				17	17		17	17							
TATTENHOE	WINFOLD LANE	PLANMK ALLOCATION	0	0	0	0	0	0	0	24	24	24	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	24	24	24				24	24		24	24							
TATTENHOE	HOLBORN CRESENT	PLANMK ALLOCATION	0	0	0	0	0	12	12	12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	12	12	12				12	12		12	12							
WALNUT TREE	LAND AT BERGMOT GARDENS (SAP1)	SAP ALLOCATION	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	15				15	15		15	15							
WALNUT TREE	RESERVE SITE HINDHEAD KNOLL	RESERVE SITE	0	0	0	30	0	0	15	5	0	15	25	0	0	0	0																												





Appendix C - Plan:MK Housing Trajectory Graph 1 April 2018



# 1. Stakeholder Engagement

## Introduction

- <sup>3.1</sup> To be consistent with the guidance set out in Planning Policy for Traveller Sites and the methodology used in other GTAA studies, ORS undertook a stakeholder engagement programme to complement the information gathered through interviews with members of the Travelling Community. This consultation took the form of telephone interviews which were tailored to the role of the individual.
- <sup>3.2</sup> The aim of these interviews was to provide an understanding of: current provision and possible future need; short-term encampments and transit provision; and cross-border issues. Importantly, stakeholders who are in contact with members of the travelling community (who are in bricks and mortar or who are not known to the Council) were asked if they could inform them that the study is taking place and provide details about how they could participate in a confidential telephone interview with a member of the ORS research team.
- <sup>3.3</sup> Three interviews were undertaken with council officers from the study area.
- <sup>3.4</sup> As stated in the Planning Policy for Traveller Sites, Local Authorities have a duty to cooperate on strategic planning issues that cross administrative boundaries (S.110 Localism Act 2011). In order to explore issues relating to cross boundary working, ORS interviewed a planning officer from three local authorities that neighbour Milton Keynes:
- » Aylesbury Vale District Council
  - » Central Bedfordshire Council
  - » South Northamptonshire Council.
- <sup>3.5</sup> Bedford Council failed to respond to invites to take part in an interview.
- <sup>3.6</sup> Due to issues surrounding data protection, and in order to protect the anonymity of those who took part, this section presents a summary of the views expressed by interviewees and verbatim comments have not been used.
- <sup>3.7</sup> The first section provides the response from key stakeholders and council officers from the study area and neighbouring authorities. The views expressed in this section of the report represent a balanced summary of the views expressed by stakeholders, and on the views of the individuals concerned, rather than the official policy of their Council or organisation.

## Views of Key Stakeholders and Council Officers in Milton Keynes

### Accommodation for Gypsies and Travellers

3.8 With regard to overall accommodation need in accommodation, the views of the officers interviewed were as follows:

- There is a very low turnover of pitches on both sites and there are overcrowding issues, which are particularly prevalent on the Willen site. Therefore, many caravans on a pitch are located too close to each other and this can make adhering to health and safety regulations difficult.
- There are occasional tensions between site residents which can lead to applications being made to live on the other site. These disputes are often resolved and residents will not wish to move. The Council Lettings Policy clearly states that the Willen site is exclusively for Irish Travellers and the Calverton site English Traveller, therefore in reality Travellers would not be allowed to move between sites.
- In terms of meeting needs on existing sites, the Calverton site has already been extended to capacity. There is potential to increase the size of the pitches at the Willen site, however, only some of the pitches can be extended so it would not benefit all the site residents. There is currently no funding available to undertake this work.
- Willen site is said to be in desperate need of refurbishment and, although this issue has been discussed, nothing has changed and residents feel let down.
- One officer was of the view that the community is frustrated with the lack of accommodation and referred to the proposed site at Fenny Lock which was halted after site construction had begun. It was felt that this had led to frustration and apathy amongst the community who as a result, feel marginalised. The officer was of the view that the housed community will be reluctant to take part in any further consultation because they feel that despite the clear messages that there is a need for additional site provision, nothing actually happens.

### Short-term Roadside Encampments

- Milton Keynes operates a no toleration policy, and will use police and local authority powers and bailiffs to move Travellers on as and when unauthorised encampments occur. For a fee the Local Authority will also work with private landowners to assist them if encampments occur on their land. This approach is said to have contributed to a significant reduction in the numbers of encampments which have reduced from 90 in 2013/14 to 40 in 2015/16. There have been 24 since January and the officer predicted that 40-50 encampments will occur per year.
- The majority of encampments occur during the summer holidays. An officer felt it was difficult to ascertain the reasons for travelling, but said that Travellers frequently say they are in the area for work opportunities (landscaping and scrap metal) and some say they are on holiday. The officer was not aware of anyone looking for permanent provision in the area and recalled only one incidence of a family who were rehoused in Milton Keynes, who subsequently moved to Essex.
- It was argued that due to a lack of resources it would not be appropriate to provide a formal transit site, and it was also felt that Travellers would not want to use it.

- A tolerated stopping place was considered to be a good idea in principle, and an officer explained that in the past Travellers have been given a choice to move to two areas which were 'tucked' away. However, those places are not available anymore and this officer could not identify any areas that would be suitable for an agreed stopping place.

#### Cross-border Issues

- There are considered to be no significant cross-border issues in relation to neighbouring local authorities that affect the Council's area.

## Neighbouring Authorities

### Aylesbury Vale Council

<sup>3.9</sup> With regard to overall accommodation need in Aylesbury Vale, the views of the officer interviewed were as follows:

- The District Council carried out a GTAA in 2013, an update in 2014 and has commissioned a further update in 2015 in response to the revised definition; the research was undertaken by ORS and included all the Buckinghamshire authorities.
- The 2014 Assessment has been used to inform the emerging Vale of Aylesbury Local Plan.
- The Study identified a need in Aylesbury Vale of 57 pitches (2013-28) which included 17 unauthorised encampments and 21 sites with temporary planning permission. No additional need was identified for Travelling Showpeople.
- There are no public sites in the area. There are around 120 private pitches for Gypsy and Travellers and three plots for Travelling Showpeople.
- The numbers of short term encampments are small and the representative felt this was mainly due to the fact that the area is not on a traditional travelling route, as a result there was no need identified for transit provision in the previous GTAA.

<sup>3.10</sup> With regard to the subject of cross border issues and the Duty to Cooperate, the views of the officer interviewed were as follows:

- There are currently considered to be no significant cross-border issues in relation to neighbouring local authorities that affect Aylesbury Vale. The draft Local Plan (which was recently consulted on) contained a site allocation table for Gypsy and Traveller sites. Some options were listed if more capacity is needed to contain some plots within the large urban extensions, one of these (Whaddon Chase WHA001) is on the edge of Milton Keynes.
- In terms of cross border working and meeting the Duty to Cooperate, Aylesbury Vale worked with the other Buckinghamshire authorities to produce a joint GTAA and there have been discussions around the options and how to take it forward.
- There is also a Gypsy Liaison Officer who works across Buckinghamshire and Oxfordshire and this is said to be useful in terms of cross border working.

### Central Bedfordshire Council

<sup>3.11</sup> With regard to overall accommodation in Central Bedfordshire, the views of the officer interviewed were as follows:

- Central Bedfordshire has one of the larger Gypsy and Traveller populations in the country (as indicated by the Caravan Count). They currently have approximately 300 authorised Gypsy and Traveller pitches and eight unauthorised. There are also a significant number of Travelling Showpeople pitches. There are a number of ongoing planning applications and appeals with around 60 pitches currently going through the planning process.

- There are three council sites. One is situated in Pottton (close to the Cambridgeshire border) with approximately 16 pitches, one is in the south (outside Dunstable) with 27 pitches and there is a smaller site south of Luton with six pitches which has recently been refurbished. There is currently an application for a proposed site of 10 Gypsy and Traveller pitches and two transit pitches to the east of Biggleswade.
- There are some overcrowding issues in Pottton and they are currently expanding the site to add two pitches.
- There are two concentrations of private provision in the south of the authority. The one south of Dunstable on the A5 is said to have significant issues with overcrowding as a result of additional caravans, beyond what has been authorised for the site. That site has applied for an expansion of approximately 20 pitches to meet the need. This may prove difficult insofar as the site is situated in the green belt, although the authority is undertaking a review of the greenbelt and it may be the case that the boundaries could be altered in the vicinity to allow an expansion of the site.
- The other site is in the south of Leighton Buzzard and is also said to be overcrowded, and in addition there is said to be further issues including the sub-letting of pitches. The Council is considering how to deal with the aforementioned issues.
- In terms of why the area is so popular, the representative explained that there are traditional routes which are linked to the A1 corridor (which runs through the authority). In the north-eastern part of the authority close to the Cambridgeshire border, there is a concentration of sites, particularly those belonging to Travelling Showpeople around Biggleswade. There are a further two applications in the area for council provision. There are also very well-established families in the area with a long history and many sites were first developed in the early 70s.
- Central Bedfordshire undertook accommodation needs assessments in 2013 and another shortly after in January 2014 in order to inform the Gypsy and Traveller Local Plan which contained specific proposals for meeting the need for Gypsies, Travellers and Travelling Showpeople including site allocations. However, due to a number of issues the plan was withdrawn in September 2014 which resulted in the loss of the allocated sites to meet the need.
- In December 2014, ORS was commissioned to undertake an needs update in order to provide an evidence base for a new Local Plan and consultants will be employed to undertake a site study to meet the identified need. A call for sites had been conducted shortly before the interview with the representative who was awaiting its results.
- The officer explained that in the past 12 months the numbers of unauthorised encampments has increased compared to previous years and they are no longer seasonal but occur on a continual basis. Encampments are dealt with by the Assets Team who are not collating data on where they are coming from as their priority has been to establish the numbers of people and the length of stay. Thus, they don't have information to establish why this has occurred, although the officer explained that Bedfordshire also borders Hertfordshire, which due to its proximity to London is also an area of high demand.
- The increase has led the Council to consider transit provision and emergency stopping areas in more detail. The authority has its own application for a site containing two transit pitches, and they have also had applications for private sites with transit provision. The latter is more difficult because of the management issues – with the council site, they can guarantee that it will be

managed by them and there will be an on-site manager there at all times, because it also houses permanent provision. It is more difficult with private provision, so the members have been a bit more cautious about it. One was just refused due to neighbouring residential properties.

<sup>3.12</sup> With regard to the subject of cross border issues and the Duty to Cooperate, the views of the officer interviewed were as follows:

- The officer was not aware of any cross border issues with regard to permanent provision but did refer to an issue with South Cambridgeshire and explained that when Central Bedfordshire was putting together its Local Plan before the examination (Summer 2014), there was an issue over a proposed site which was close to the boundary with South Cambridgeshire which resulted in the site being withdrawn.
- In terms of meeting need in surrounding areas, the officer was of the view that Luton and Bedford have already met the need identified in their assessments and went onto explain that Central Bedfordshire is not under any obligation to provide extra provision for neighbouring authorities and they have not received any requests to do so.
- As the previous Local Plan was withdrawn for not being able to demonstrate meeting the Duty to Cooperate, the Authority has set up a number of different approaches to deal with housing and cross boundary issues through memorandums of understanding and the like. There is some joint-working, around the greenbelt review, for example.
- The officer suggested that there needs to be more cross-border working to understand migration patterns and meet the needs of Travellers in transit, particularly as Central Bedfordshire is a large area and shares borders with nine other authorities and requires transit provision to cover the north and south of the area. However, there are problems associated with the provision of a transit site, particularly if it is close to a border with a neighbouring authority. Therefore, it is felt that once Central Bedfordshire have completed the site identification process, communication with any affected neighbouring authority should be clear and open.

### South Northamptonshire Council

<sup>3.13</sup> With regard to overall accommodation need in South Northamptonshire, the views of the officer interviewed were as follows:

- South Northamptonshire completed a joint GTAA assessment with Cherwell and West Oxfordshire Districts in 2013. The study identified a need in South Northamptonshire for 18 pitches for Gypsy and Travellers, 1 transit pitch and no provision for Travelling Showpeople over the period 2012/13 to 2032/33.
- The Council does have a Joint Core Strategy and a Local Plan (part 1) which was adopted in December 2014 which was prepared jointly between Northampton Borough Council, Daventry District and South Northamptonshire and this was informed by the GTAA (2013). However, this only included a general Development Management Plan for Gypsies and Travellers; it doesn't include detailed site allocations for the need identified in the GTAA. Since then the criteria has changed so (at the time of interview) the Council had commissioned ORS to update the GTAA with Daventry District and Northampton Borough Councils, the other two authorities to come up with an up to date need figure.



- Within the area there is one authorised site for three pitches and there is a long standing unauthorised site. The Council will assess planning applications as and when they arise using the Criteria Based Policy which is set out in the Joint Core Strategy. There have been few recent planning applications.
- Going forward, through the Local Development Scheme the Council are doing two separate Local Plans. The first is Local Plan part 2(a) which is looking at Housing and Employment which covers everything except Gypsy and Traveller Accommodation and then doing a part 2(b) which will be looking at accommodation for Gypsy and Travellers which will be submitted after the first part which will not be until 2018.
- There are very few short-term roadside encampments and these are not said to cause any issues.

<sup>3.14</sup> With regard to the subject of cross border issues and the Duty to Cooperate, the views of the officer interviewed were as follows:

- There are considered to be no significant cross-border issues in relation to neighbouring local authorities and the officer felt that South Northamptonshire regularly liaises with its neighbours, including Milton Keynes.
- The M1 corridor runs through Milton Keynes and then through South Northamptonshire along an alignment which is close to the Northampton administrative boundary. This is the most sensitive area in terms of movement as it is the main transport link. However, in South Northamptonshire this doesn't appear to cause an issue.
- The officer explained that the Council has shared services, including at Senior Officer level, with Cherwell and as a result there is close working between the two authorities. The Council also works closely with Daventry and Northampton and will work collectively across the West Northamptonshire area. There is less requirement or need for the Council to work with Milton Keynes; however the officer felt they keep in touch and will liaise if required.
- Going forward, the officer felt the main priority is for the Council to meet the accommodation need in the forthcoming GTAA and other authorities should also do the same and meet the need arising in their own areas.