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# 1 . Introduction: Purpose and Context

## 1 Introduction: Purpose and Context

**1.1** The Strategic Housing Land Availability Assessment (SHLAA) is a key part of the evidence base to support the ongoing preparation of Plan:MK, the new Local Plan for the Borough of Milton Keynes. Its primary function, at this stage, is to verify that there is sufficient land across Milton Keynes to meet the housing targets that will be required of Plan:MK and to provide an evidence base for future policy decisions and the site selection process that will be undertaken as part of the preparation of Plan:MK.

**1.2** The Government's guidance, in the form of the National Planning Policy Framework (NPPF), requires that local planning authorities boost significantly the supply of housing. The preparation of Local Plans should be used to meet the full and objectively assessed needs of their area for market and affordable housing, as well as identify land in the form of specific deliverable sites which will meet those needs.

**1.3** The NPPF places an emphasis on the importance of the delivery of housing sites, advising that sites should only be included as part of local authorities housing land supply where there is genuine evidence that a site is deliverable within the timeframe envisaged. For sites to be considered deliverable, they must be 'available, suitable and achievable'. SHLAA assessments provide one of the principal mechanisms by which potential housing sites are assessed for 'deliverability' in a comprehensive and methodical manner. As such, SHLAAs represent a key part of the evidence base which support the proper development of a Local Plan.

**1.4** This SHLAA has been prepared in accordance with the methodology set out in the Government's *Planning Practice Guidance (PPG)* and the Council's own SHLAA Methodology which was updated in early 2017. To this end the assessment:

- Identifies sites and broad locations with potential for development;
- Assesses their development potential; and
- Assesses their suitability for development and the likelihood of development coming forward (the availability and achievability)

**1.5** The outputs of the SHLAA will assist the Council in identifying the choices available to meet the need and demand for more housing and provide a basis for making decisions about how to shape places in the future. Furthermore it will identify whether action would need to be taken to ensure sites will become deliverable or whether plan policies need to be reviewed to enable identified sites to be developed for housing.

**1.6** Given the timing of the SHLAA report and the policy documents it is being prepared to support, the focus of the report has been on identifying potential housing sites that could support the delivery of the housing targets that will form part of Plan:MK.

**1.7** The SHLAA itself is not policy and is not an expression of the council's vision for the Borough. **It should be noted that the inclusion of sites in this assessment does not mean that they will actually be allocated for development or permission granted for housing. Indeed, sites suitable for housing may also be suitable for, and allocated for, other high-priority needs such as schools, health and other community facilities, and green space.**

# 1 . Introduction: Purpose and Context

**1.8** For a site to be considered suitable for housing development, or other any other development, it will need to be considered through the normal planning process which includes the preparation of a local plan (Plan:MK) and/or determination of planning applications. This SHLAA report is simply a technical piece of work that forms part of the plan making evidence base. Any sites identified should be seen as part of a list of land that could form part of the housing land supply for Milton Keynes over the Plan:MK period.

**1.9** Conversely, sites not seen as being suitable for housing development in the SHLAA could still be considered for allocation through Plan:MK or be granted planning consent for development if it was deemed suitable after more detailed consideration.

**1.10** The NPPF and PPG state that Local Planning Authorities should identify a supply of specific, developable sites or broad locations for growth, where possible, for 15 years. As discussed later, within the housing requirements section, the current adopted Core Strategy only runs until 2026, a further 9 years.

**1.11** In the context of the NPPF requiring a SHLAA to cover the availability of land over the plan period, this SHLAA therefore covers the forthcoming Plan:MK period (2016 - 2031) taking April 2016 as the base date, so as to cover as close to 15 years as possible. The details of the housing requirement that needs to be demonstrated for Milton Keynes are set out later in the Policy Context and Housing Requirements section.

## 2 . Policy Context and Housing Requirements

### 2 Policy Context and Housing Requirements

#### National Policy

##### National Planning Policy Framework (NPPG)

**2.1** The NPPF requires local planning authorities to maintain an adequate supply of housing sites in their areas. As part of this process, Councils must consider where housing development would be best located and assess all potential opportunities for development locations. The SHLAA is the process of gathering together this information to create a portfolio of sites which may be selectable as future housing locations in forthcoming planning documents, such as Plan:MK. The assessment will assist the Council in identifying potential locations for housing.

**2.2** Paragraph 159 of the NPPF states that "Local Planning Authorities should have a clear understanding of housing needs in their area, They should":

" Prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period."

**2.3** The NPPG and PPG together outline the core methodology for carrying out a SHLAA, the most important part of this being the need to test potential sites in order to assess how the sites might make up a reliable housing supply in terms of timing and certainty.

**2.4** This SHLAA sets specific tests for sites to be considered 'deliverable' (the tests for sites within the 5 year supply) and 'developable' (the tests for sites from year 6 onwards). The NPPF introduces to the 'deliverable' definition an assumption that sites with planning permission will be deliverable unless clearly evidenced to the contrary. This is expanded further under footnote 11 and 12 of the NPPF.

Footnotes 11 and 12 from the NPPF:

11. To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

12. To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.

**2.5** For sites to be considered deliverable, they must be 'suitable, available and achievable'.

## 2 . Policy Context and Housing Requirements

### Planning Practice Guidance (PPG)

**2.6** The department for Communities and Local Government (DCLG) published the PPG to accompany the NPPF and to replace and consolidate previous practice guidance.

**2.7** This expands on the purpose of the land availability assessment, its relationship to the development plan process and Government's approach to alternative methodologies.

**2.8** The PPG states that an assessment should:

- Identify sites and broad locations with potential for development;
- Assess their development potential; and
- Assess their suitability for development and the likelihood of development coming forward (the availability and achievability)

**2.9** This approach ensures that all land is assessed together as part of plan preparation to identify which sites or broad locations are the most suitable and deliverable for a particular use (in this case residential).

### Local Policy

#### Core Strategy

**2.10** The Development Plan for the Borough currently consists of the adopted Core Strategy (2013), the saved policies of the Local Plan (2005) and a number of 'made' neighbourhood plans.

**2.11** The current housing requirement for the Borough is set out in the Core Strategy (2013) which sets a target for a 16 year period from April 2010 to March 2026. The target is to deliver an average of 1,750 dwellings per year across the Borough; a total of 28,000 over the plan period.

**2.12** As of the end of March 2017, seven years into the Core Strategy period, there have been 9,065 completions, an under supply of 3,185 dwellings. With nine years remaining of the Core Strategy period the total requirement, including shortfall, to be provided is therefore 18,935 dwellings.

**2.13** As outlined in Tables 1 and 2 of Appendix 1 the Council can currently demonstrate a total of 20,603 existing commitments across the Borough, of which at least 18,203 are expected to be delivered before March 2026. When the annual windfall allowance, adopted as part of the Core Strategy, is included within these figures, the total supply up to March 2026 is 19,058 dwellings. This shows more than enough commitments to meet the overall Core Strategy requirement.

**2.14** As the NPPF requires SHLAAs to cover, where possible, a period of 15 years and because the Council can already demonstrate enough existing commitments to meet the requirements of its existing development plan, the SHLAA has instead used the housing requirements set out in the Council's latest Strategic Housing Market Assessment (2017) which covers the period 2016 to 2031. This 15 year period is also the plan period that will be covered by Plan:MK, the new local plan currently being prepared by the Council.

## 2 . Policy Context and Housing Requirements

### Plan:MK

**2.15** Plan:MK, once adopted, will be the new local plan for the Borough for the period 2016 to 2031, replacing both the Core Strategy (2013) and saved Local Plan (2005) policies. It will set a new housing target for the Borough, will set a new development strategy and will outline allocations for the delivery of housing and other uses.

**2.16** Following consultation on the draft version of Plan:MK between March and June 2017, the Council are now preparing the Proposed Submission version of the plan for consultation in late 2017, prior to submission in Spring 2018.

**2.17** The housing requirement for the Plan:MK period has been informed by the SHMA (2017) which outlines a minimum target of 26,500 dwellings to be delivered between 2016 and 2031, an annual target of 1,766 dwellings. As the SHLAA will form part of the evidence base for Plan:MK and assist in decision making on the allocation of sites for housing, the housing requirement outlined in the draft Plan:MK, as proposed by the SHMA (2017), will be used as the target for the SHLAA and the assessment will cover the remaining 14 years of the Plan:MK period.

**2.18** Furthermore, in setting the parameters for the SHLAA, work carried out to-date on Plan:MK, particularly in relation to the development strategy, has been taken into account. Whereas previous Local Plans and the Core Strategy have set housing requirements and site allocations for the rural area of the Borough, it is not the intention of Plan:MK to do so.

**2.19** A number of settlements within the rural area of the Borough, including the key settlements of Newport Pagnell, Olney and Woburn Sands, have recently 'made' neighbourhood plans, some of which contain significant allocations for housing sites. This is exemplified, as shown in Table 2 of Appendix 1, by the number of existing commitments, close to 2,500 dwellings, within the rural area of the Borough, which are expected to be delivered over the Plan:MK period. There are also further rural settlements currently in the process of preparing a neighbourhood plan with the aim of delivering sites for local housing.

**2.20** To this end, Plan:MK will look to neighbourhood plans to deliver housing within the rural area and will focus new site allocations within the existing urban area and on strategic sites adjacent to the urban area where required.

**2.21** Therefore the SHLAA has also focused its assessment on sites located within the existing urban area and on sites that have been put forward as potential urban extensions adjacent to the existing urban area.

**2.22** Where sites have been submitted in the rural area of the Borough, either during previous consultations or via the SHLAA Call for Sites, these sites have not been assessed here but have been passed to local town and parish councils for assessment and consideration for allocation as part of the neighbourhood plan preparation process.

## 2 . Policy Context and Housing Requirements

### Existing Commitments

**2.23** There have already been housing completions towards the Plan:MK target between April 2016 and March 2017. There are also a significant number of dwellings either already under construction, with planning permission or allocated for development. These sites are outlined in Tables 1 and 2 of Appendix 1 whilst the totals are summarised in the table below:

**Table 2.1 Completions, planning permissions and allocations (as at 1st April 2017)**

Site Status	Number of Homes
Completions	1,247
Full Permissions	4,789
Outline Permissions	11,910
Allocated/Briefed	3,904
Total	21,850

**2.24** The sites which make up the above totals can be considered suitable for housing development under the requirements of the NPPF. This SHLAA report assesses their availability and deliverability to give a true reflection of land availability across Milton Keynes (This can be seen in Tables 1 and 2 of Appendix 1).

**2.25** It is important for the SHLAA not just to focus on these existing commitments but to assess which other sites could potentially come forward for development over the plan period. This is particularly important given that despite the large number of existing commitments, Plan:MK will still be required to find suitable sites for at least a further 4,650 dwellings to be delivered over the remaining 14 years of the plan period if it is to meet its housing requirement.

### Specific SHLAA outcome requirements

**2.26** As set out above, in light of the context provided by the NPPF, the SHLAA covers the remaining 14 years of the Plan:MK Housing target. This means the assessment is required to identify the following:

- Specific sites for a total of 26,500 dwellings between 2016 and 2031.
- Specific deliverable sites for 7,064 dwellings in years 2 to 5.
- Specific developable sites for 17,660 dwellings in years 6 to 15.

## 3 . Overview of Methodology

### 3 Overview of Methodology

**3.1** The SHLAA has been undertaken in accordance with the staged approach set out within the Council's SHLAA methodology and with reference to the guidance outlined within the PPG "Strategic Housing and Economic Land Availability Assessment". A detailed methodology flow chart as set out in the PPG can be viewed at: [SHLAA Methodology Flow Chart](#).

**3.2** Each stage below corresponds with the relevant stage outlined in the Council's updated SHLAA methodology (2017).

#### Stage 1 - Site Identification

**3.3** As agreed within the SHLAA methodology, sites which fall below the minimum threshold of 5 dwellings were removed from the assessment.

**3.4** Once a list of all applicable sites had been compiled, each site was mapped and a standard site pro-forma produced. For sites already within the planning system existing information was ratified and an up-to-date view on the development progress was sought from the landowner, agent or developer. Where this was not possible the latest data available to the Council's Joint Housing Monitoring Team was used.

**3.5** For all sites not in the planning system a desktop review was carried out to provide context to each site and to outline any issues which would affect the ability of the site to provide sustainable housing. Where further information or assessment was required, a site survey was carried out by Council officers.

**3.6** All sites were then appraised and assessed on the basis of its suitability, availability and achievability for housing development.

#### Stage 2 - Site Assessment

##### Estimating the development potential of each site

**3.7** Given the methods employed, the information available, and the limitations of such it is not always possible to calculate a definitive capacity for dwellings on each site. As such, dwelling figures for sites should be understood to be provided with varying degrees of certainty.

**3.8** For sites within the planning process, the figures associated with a planning permission or an allocation have been used. Where a site is under construction, the remaining capacity of the sites as of April 2017 have been taken forward in the assessment.

**3.9** For sites outside of the planning process, in many cases the information will be indicative and based on the methodologies described below, however where more detail has been made available through planning applications or pre-application discussions, more detailed site work, such as via a development brief, or via information submitted by a landowner, developer or agent, dwelling figures from these sources have been preferred.



## 3 . Overview of Methodology

**3.10** Where this information was not available, site densities were calculated using the indicative densities set out in the SHLAA methodology and based on existing Local Plan saved policies, policies within 'made' neighbourhood plans and densities of relevant schemes on comparable sites. These were applied as follows:

**Table 3.1 SHLAA housing densities**

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

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

**Table 3.2 Housing yields by site size**

Site size	Housing yield
Small (up to 2 hectares)	100% available for housing
Medium (2-10ha)	75% available for housing
Large (over 10ha)	50% available for housing

**3.12** The housing potential of each site that has been calculated at this stage is only indicative for the purpose of the SHLAA (unless a planning permission has already been granted). It should not be assumed that planning permission would be granted for the figures quoted in this report. The true potential of individual sites would have to be determined through a detailed site assessment which takes into account a number of more detailed factors than are considered in this assessment.

**3.13** The estimated housing potentials can be seen in the tables in Appendix A.

### Assessing suitability of each site

**3.14** In considering suitability for housing development, sites were assessed on the basis of whether or not the site was situated in a suitable location for housing and whether or not the development of the site for housing would contribute to the creation of a sustainable mixed community.

**3.15** It is assumed that all sites with planning permission are suitable for housing as their suitability has been assessed through the planning application process.

## 3 . Overview of Methodology

**3.16** For other potential sites a series of factors which affect suitability and constrain development were considered, these covered:

- **Policy restrictions**- such as designations, protected areas, existing planning policy and corporate, or community strategy policy that would need to be amended before a site could come forward for development
- **Physical problems or limitations**- such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination, which may prevent a site being developed or challenge the viability of development
- **Potential Impacts**- including effect upon landscape features and conservation, that may make a site unsuitable, and
- **The environmental conditions**- which would be experienced by prospective residents, which may make a site inappropriate for people to live or unmarketable for development.

**3.17** In terms of sustainability, all sites that have been included in the assessment parameters are deemed to be sustainable. The focus of development is the Milton Keynes urban area and all sites within this area are deemed to have reasonable access to the required day-to-day services and public transport.

**3.18** Where a site had a clear physical limitation which impacts upon its suitability to achieve any housing development (e.g. Flooding) it was ruled out of the assessment as unsuitable and no further analysis of the site was made.

**3.19** Where a site had a constraint, whether it be physical or policy based, but there is reasonable evidence of how it could be overcome, or the constraint does not completely rule out all development on the site at some stage, these sites were fully assessed but were deemed as undeliverable and undevelopable.

**3.20** For sites within the existing urban area, this included sites with policy constraints which could either be overcome through the provision of additional evidence or through consideration of the site in the preparation/review of a relevant policy document.

**3.21** However, for potential urban extension sites, these have not been assessed as undeliverable and undevelopable purely because of a policy constraint, as all of these sites are currently outside of existing policy and would need to be assessed for allocation as part of a development plan document. These sites have therefore effectively been assessed on a 'policy-off' basis.

**3.22** The SHLAA process has not included a detailed assessment of all issues that may affect a site and its ability to be developed successfully. If sites were to be considered for development, issues relating to assessing and mitigating the impact on protected species and habitats, for example, would need to be considered in much more detail to ascertain whether development would be suitable and what measures would need to be introduced to mitigate the impact of development. The scope of the SHLAA does not allow this level of detail to be assessed.

**3.23** In the case of potential future expansion sites, general constraints to development have been assessed and noted, but if allocations and development were to actually be pursued, far more detailed transport, landscape and other assessments, which are outside the scope of the SHLAA, would need to be carried out to assess their suitability. Such studies may provide additional detail that would render a site(s) unsuitable for development.

## 3 . Overview of Methodology

**3.24** The SHLAA also does not compare the relative suitability of potential expansion sites. Therefore even though a site could be classed as being generally suitable for development, there could be several other more suitable sites that would be preferred before it is considered for development. It is not the role of the SHLAA to make these distinctions, but to comment on the availability of individual pieces of land. Such decisions would be made through the formal plan making process, at the appropriate time.

**3.25** Ultimately for a site to progress through to development it will also need to be considered in far more detail through the formal planning process, either via consideration for allocation in a policy document or through consideration of a planning application.

**3.26** This is also relevant for potential future expansion sites, when a full assessment on the capacity of Milton Keynes to absorb further growth would need significant investigation. This is outside of the scope of the SHLAA assessment.

**3.27** It should be stressed that the conclusion that a site is suitable for housing does not mean that planning permission for housing development would be granted or that the site will be allocated for housing development at any point in the future. This is still the role of the planning process and will be determined through the plan making and Development Management processes. The SHLAA is an evidence based piece of work which will help to inform any site selection/allocation process- not replicate or replace it.

### Assessing availability of each site

**3.28** The availability of each of the suitable sites needs to be established to check that there is a reasonable prospect of development occurring on site at a particular time. The PPG states that

‘a site can be considered available for development when on best information available, there is confidence that there are no legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements of landowners’.

**3.29** A site should be controlled by a landowner who has expressed an intention to develop, or the land owner has expressed an intention to sell.

### 3.30 Sites in the Planning System:

**3.31** For sites with planning permission or an existing housing allocation it has not simply been assumed that an active planning permission means that a site is definitely available for development, as the planning permission has not necessarily been made by the person who currently controls the land.

**3.32** For each site with an active planning permission, the land owner (where known) or their agent was sent a proforma requesting up-to-date information on the future of the site. This asked:

- If there was an intention not to proceed with development;
- If there are any constraints to development; and
- What the current time scales for development are.

## 3 . Overview of Methodology

**3.33** Where a written response has not been received from the developer/land owner/agent follow-up phone calls and emails have been made and information recorded.

**3.34** Intelligence from site monitoring visits has also fed into the assessment of availability, in particular helping to identify sites actively under construction

**3.35** This information was supplemented by figures from the Joint Housing Monitoring Team (JHMT) who provide quarterly updates on projections for major sites direct from the developers.

**3.36** At this stage only where a developer/land owner/agent has confirmed that there is no intention to pursue development of the site has the site been deemed undeliverable.

**3.37** In Milton Keynes there are also a number of Homes and Communities Agency (HCA) owned sites which are allocated for development but are yet to come forward. These sites are monitored through JHMT and therefore the quarterly update has been used to establish the position regarding the availability of these sites.

**3.38 Sites outside the planning system:**

**3.39** Those sites submitted to the Council through the call for sites and Plan:MK consultations are generally assumed to be available for development as they have been promoted by the land owners or their agents. Where additional information is available, on issues such as ransom strips, this has also been used to supplement the assessment of availability.

**3.40** In certain cases, where there is known to be activity on sites which could limit their immediate availability, such as continued employment use with potential tenancy issues, further information has been sought from the developer/landowner/agent to clarify site availability.

**3.41** For sites identified through other means, such as by Council Officers, efforts have been made to establish land ownership and the availability of the land. This included reviewing any recent planning applications on sites to a) try and establish who the land owner of the site is and b) whether a different land use on the site is being pursued. Where establishing ownership has not been possible, or a site is clearly being pursued for an alternative use, the sites have been classed as being undeliverable and undevelopable.

**3.42** Conclusions on the availability of potential housing land across the Borough can be seen in the tables in Appendix A. The findings of the review of land availability have been considered alongside the review of the achievability of development (next stage) to assess when and whether a site could be bought forward for development.

### Assessing achievability of sites

**3.43** A site is considered achievable for housing development where there is a reasonable prospect that housing will be developed on the site at a particular point in time. This is essentially a judgement about economic viability of the site, and the capacity of the developer to complete and sell the housing over a certain period of time.

**3.44** The assessment of achievability has taken into account a number of issues including-

- Market factors- attractiveness of the location, market demand for the site, potential value of alternative use, projected rate of sales

## 3 . Overview of Methodology

- Cost factors- site preparation costs, physical constraints, planning standards/s106 requirements, potential to address identified constraints
- Delivery factors- build out rates and phasing, single or multiple developers and their capacity

**3.45** For sites within the planning process, as with site suitability, each developer/landowner/agent has also been contacted to see if there were any mitigating circumstances that would affect the achievability of housing on their sites and what the timescales for delivery on their sites are. This information has been supplemented by work from the JHMT on the larger sites in Milton Keynes where the progress of sites under construction is monitored and developer aspirations for sites with planning permission are recorded and updated quarterly.

**3.46** For sites outside of the planning process information has also been gained from call for sites submissions, whereby developers were asked to provide information on a range of factors relating to achievability. Furthermore any further information obtained or observations made through the assessment of each site which may impact upon achievability (e.g. Neighbouring uses or existing uses) has also been given consideration.

### Overcoming Constraints

**3.47** As part of the assessment work undertaken, where constraints to successfully developing a site for residential development were identified, consideration was given to whether it was possible to overcome these constraints. If it was deemed possible to overcome identified constraints, an assessment was then made as to whether the measures required would negatively impact the viability of the site for residential development.

**3.48** Identified constraints varied from those which were easy to overcome, to those which were more fundamental. In some instances, the measures for overcoming constraints were identified as being easy to implement and not likely to adversely affect viability to unacceptable levels. Therefore, subject to being suitable sites in all other respects, these sites were able to remain in the assessment as suitable, available and achievable sites. Other sites which had constraints that could not be overcome or which would reduce viability to unacceptable levels were assessed to be undeliverable and undevelopable.

### Assessing when and whether sites are likely to be developed

**3.49** Following the assessment of the sites/broad locations, and based on the assumptions made on suitability, availability and achievability, all sites which have not been rejected have been designated in one of the three categories set out below:

**3.50** Deliverable: a suitable site, available now, with a reasonable prospect of housing being completed within years 2-5 of the plan period

**3.51** Developable: a suitable site, with a reasonable prospect that it will be available for development within years 5-15 of the plan period

**3.52** Undeliverable and Undevelopable: a significant constraint to development is currently felt to affect the site, which cannot be realistically overcome (or it is not known when it could be overcome) and would make the development of the site for housing either unsuitable, unavailable or unachievable (or a combination of each).

**3.53** The conclusions for each site have been noted in the tables in Appendix A.

## 4 . Review of the Assessment

### 4 Review of the Assessment

#### Conclusions

**4.1** As previously discussed in the existing Commitments section of this report, there have already been 1,247 completions within the first year of the Plan:MK period and as of April 2017 the Council can also demonstrate a total of 20,603 existing commitments which, as outlined in tables 1 and 2 of Appendix A, are expected to be delivered by 2031.

**4.2** This provides a total of 21,850 dwellings towards the 26,500 dwellings requirement outlined in the Council's SHMA (2017), which leaves land to be found for a further 4,650 dwellings as a minimum.

**4.3** As can be seen in Tables 3 and 4 of Appendix 1 the SHLAA has broken the assessment of sites into two. The first assessing sites within the existing urban area and the second assessing sites which have been proposed as potential urban extension sites.

#### Potential sites in the existing Urban Area

**4.4** In total the SHLAA assessed 146 sites, with a total capacity of 7,575 dwellings, across the existing urban area (Assessment of sites shown in Table 3 of Appendix 1).

**4.5** 47 of these sites were assessed to be deliverable or developable with no constraints that would impact upon the suitability, availability or achievability of the site. These were also the only sites assessed by the SHLAA that were deemed as deliverable or developable without any form or policy change.

**4.6** In total these sites would provide an estimated additional 2,675 dwellings during the Plan:MK period. These sites in addition to the the existing commitments within the Borough would provide a total of 24,525 dwellings; still some 1,975 dwellings short of the minimum housing requirement of Plan:MK.

**4.7** Of the 99 sites that were considered undeliverable and undevelopable within the existing urban area, 61 of these sites, with an estimated capacity of 2,142 dwellings, fail the assessment because they are currently designated for another use (predominantly employment land or open space) and therefore are unsuitable on their current policy position.

**4.8** The implication of this being that such constraints could be overcome through consideration of sites as part of a site allocations process in the preparation of a development plan document such as Plan:MK. A policy change via a development plan document could allow for further sites to become deliverable or developable and form part of the land supply. This however is not the role of the SHLAA, any such decisions would need to be made through the planning process following further, more detailed site assessments and consultation.

#### Potential urban extension sites

**4.9** In total the SHLAA assessed 15 sites which were promoted as potential urban extension sites to the existing City. These had a combined estimated capacity of approximately 36,000 dwellings (Assessment of sites shown in Table 4 of Appendix 1).

## 4 . Review of the Assessment

**4.10** Whilst all of these sites are outside of existing policy and would therefore require a policy change via a development plan document, such as Plan:MK, to come forward, 4 of the sites were deemed undeliverable and undevelopable for a number of physical or availability constraints.

**4.11** The remaining 11 sites were deemed, subject to a policy change, to be deliverable and/or developable within the Plan:MK period. This provided potential sites for a total of 15,287 dwellings which could be developed by 2031 and form part of Plan:MK's land supply.

**4.12** As previously discussed, It should be noted that in the case of potential future expansion sites, whilst general constraints to development have been assessed and noted, if allocations and development were to be actually pursued, far more detailed assessments, which are outside the scope of the SHLAA, would need to be carried out to assess their suitability. Such studies may provide additional detail that would render a site(s) unsuitable for development. Furthermore the SHLAA also does not compare the relative suitability of potential expansion sites, therefore whilst a site may be deemed generally suitable, there could be several other suitable sites which would be preferred.

### Overall Conclusions

**4.13** Overall the SHLAA has shown that, completions during 2016/17, existing commitments as of April 2017, and the sites assessed as deliverable and developable in the existing urban area, provide for a total of 24,525 dwellings towards the housing requirement of 26,500 dwellings outlined in the SHMA (2017) and the draft Plan:MK.

**4.14** This outlines a shortfall of a minimum of 1,975 dwellings to be added to the land supply so as to meet the housing requirements of Plan:MK.

**4.15** The SHLAA furthermore outlines a number of potential options to addressing this shortfall and meeting the housing requirements, which could be considered through the preparation of Plan:MK:

- Further assessment of sites within the existing urban area which were deemed undeliverable and undevelopable due to a policy constraint and their potential for a change of use through Plan:MK.  
Potential additional supply: up to 2,142 dwellings.
- Further assessment and potential allocation of an urban extension site(s).  
Potential additional supply: up to 15,287 dwellings.
- Further assessment of the application of a windfall allowance. The existing Core Strategy has an allowance of 95 dwellings per year to cover the delivery of windfall sites with a capacity of less than 10 dwellings. If further assessment provided justification for the continuation of this throughout the Plan:MK period it could provide additional land supply.  
Potential additional supply: 1,330 dwellings (based on the Core Strategy allowance)

**4.16** As these options show, there is enough land identified through the assessment to enable the housing requirements of Plan:MK to be met, however Plan:MK will be required to allocate further land to ensure this.

## 4 . Review of the Assessment

### Summary of assessment against housing requirements over next 15 years

**4.17** This section provides a brief summary of the delivery of those sites which were assessed as deliverable or developable against the requirements over the Plan:MK period.

**Table 4.1 Summary of assessment outcomes against housing requirements over next 15 years**

	0-5 years	6-15 years	Total
<b>Requirement</b>	8,830	17,660	26,500 (rounded)
<b>Supply</b>			
Existing Commitments (inc. 2016/17 completions)	12,136	9,714	21,850
Deliverable/Developable sites	1,235	1,440	2,675
<b>Total Supply</b>	13,371	11,154	24,525

**4.18** Whilst also outlining the overall shortfall in supply against the Plan:MK requirement, as discussed above, Table 4.1 also shows that there is more than enough deliverable land to meet the requirements of first 5 years of the plan and that the shortage in land supply exists during the later 10 years of the plan.

**4.19** However, as can be seen in Appendix 1 the existing land supply for Milton Keynes is reliant on a number of existing large strategic sites and whilst the SHLAA has tried to be as thorough in its assessment of delivery on these sites, there is always potential for some slippage which could result in sites delivering at a later stage in the plan period.

**4.20** In further assessing sites and making decisions on site selection and allocation, Plan:MK should consider the data outlined in Table 4.1 to ensure that there is a continuous but flexible land supply throughout the Plan:MK period, so as to ensure the housing requirements of the plan are met.



## 5 Appendix 1

### Site Assessment Tables

Table 1 - Existing Commitments, Urban Area

Table 2 - Existing Commitments, Rural Area

Table 3 - Potential Urban Sites

Table 4 - Potential Urban Extension Sites