
# Strategic Housing Land Availability Assessment Methodology

October 2025
Regulation 19 Version

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# Introduction

**1.1.** The Strategic Housing Land Availability Assessment (SHLAA) is a technical evidence-based document which Local Plan-Making Authorities are required, as outlined by paragraph 72 of the National Planning Policy Framework (NPPF) (2024), to produce to provide a clear understanding of the land available within their area.

**1.2.** The SHLAA will identify a future supply of land which is suitable, available and achievable, and may have potential for residential development for the period 2022-2050 to align with the new Local Plan (The MK City Plan 2050) currently being prepared. It will provide an important source of evidence to inform plan-making and decision taking but as outlined in the National Planning Practice Guidance (PPG), it is not the role of the SHLAA to determine whether a site should, or should not, be allocated for development.

**1.3.** The SHLAA's role is to provide information on the range of sites which are available to meet a Local Authority's requirements, but it is the role of the development plan itself to determine which of these sites are the most suitable to meet those requirements. The key objectives of the SHLAA are therefore to:

- 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 (availability and achievability).

**1.4.** It is therefore important to note that the SHLAA gives no planning weight to any sites which are ultimately included and, the identification of a site in the SHLAA does not mean that it will be granted planning permission or that it will be allocated for development in future Local Plans (not least because, not all sites considered in the SHLAA will be suitable for development); this will be done through the normal plan-making procedures and will involve extensive public, and stakeholder engagement and consultation, prior to the allocation of any new sites for development. To this end, the SHLAA will be a key document informing a separate site selection process for allocations to meet the identified needs for the plan.

**1.5.** Furthermore, the fact that a site does not get included in the SHLAA does not preclude the possibility of permission for development being granted on that site in the future.

**1.6.** The SHLAA will be undertaken based on the information available at the time of the study being prepared. Circumstances and/or assumptions may change over time which could mean, for example, that sites could come forward sooner or later than originally envisaged, or that identified constraints could change, or there may be additional constraints which were not identified at the time of the assessment. Any changes will be reflected when the SHLAA is updated, and the assessment/conclusions may be updated accordingly.

**1.7.** This document supersedes the previous Strategic Housing Land Availability Assessment (SHLAA) methodology (2017) and also amends/updates both the 2022 and 2024 versions of the published LAA methodology to reflect changes in our process for preparing the SHLAA.

## Local Context and Purpose of this Document

**1.8.** In 2017, we published a SHLAA which was prepared to inform the preparation of Plan:MK, our current Local Plan. Plan:MK, which was adopted in March 2019, sets out the requirements for the Borough of Milton Keynes through to 2031 and allocates land to meet, its full housing requirement of 26,500 dwellings plus a substantial buffer and, sufficient land to meet its needs in relation to employment and other economic development, as well as setting out policies to guide the development of other land uses.

**1.9.** With an up-to-date Local Plan adopted approximately six years ago, we have over the past three years been producing an updated evidence base to inform the preparation of our new local Plan; the MK City 2050 Plan, which will plan for the development of the Borough area of Milton Keynes through to the year 2050; a 28-year plan period when taken from its base date of 1 April 2022.

**1.10.** The long-term ambitions for growth in Milton Keynes have been set out in the Strategy for 2050 which we adopted in January 2021. The Strategy for 2050 sets out a long-term approach to spatial development. It aims for a steady population increase to around 410,000 people in the borough by 2050, as the best means of achieving Seven Big Ambitions.

**1.11.** Reaching a population of 410k equates to around 63,000 homes between 2022-2050. This is higher than our identified Local Housing Need of 50,372 new homes established using the Government's Standard Method for calculating housing need. As a result, the MK City Plan 2050 aims to ensure we meet our minimum housing requirement whilst also planning to provide additional homes as a buffer against the requirement and to support the growth ambitions set out within the Strategy for 2050. The housing requirement of 50,372 homes over the plan period (1,799dpa) will be used to calculate our five-year housing land supply and Housing Delivery Test. The use of a buffer on the identified Local Housing Need is a common requirement of Local Plans to ensure that housing need can be met, accounting for possible under delivery during the plan period.

**1.12.** A Gypsy and Travellers Accommodation Assessment (GTAA) conducted in 2025 identified a need for 75 pitches between 2022-2050, with 38 required between 2025 and 2030. On top of this, a need for 10 Showpeople's plots was also identified.

**1.13.** As the primary focus of the SHLAA is to inform the preparation of the MK City Plan 2050, the housing requirement set out above will be used as the target for the SHLAA and the assessment will cover the full plan period from 2022 – 2050.

**1.14.** Whilst this element of the evidence base was initially intended to be a full Land Availability Assessment with a broader scope to include land which is available for economic and all other development uses, during its preparation it has reverted back to a SHLAA and will only

be assessing land for residential uses, including for Gypsy and Traveller and Travelling Showpeople provision. An assessment of land availability for uses aside from residential has instead been carried out through other pieces of evidence work currently being prepared. Data and site information from the SHLAA will however be shared with the preparation of the wider evidence base. The assessment of potential Gypsy and Traveller sites is in accordance with the guidance set out within the Council's latest Gypsy and Traveller Accommodation Assessment.

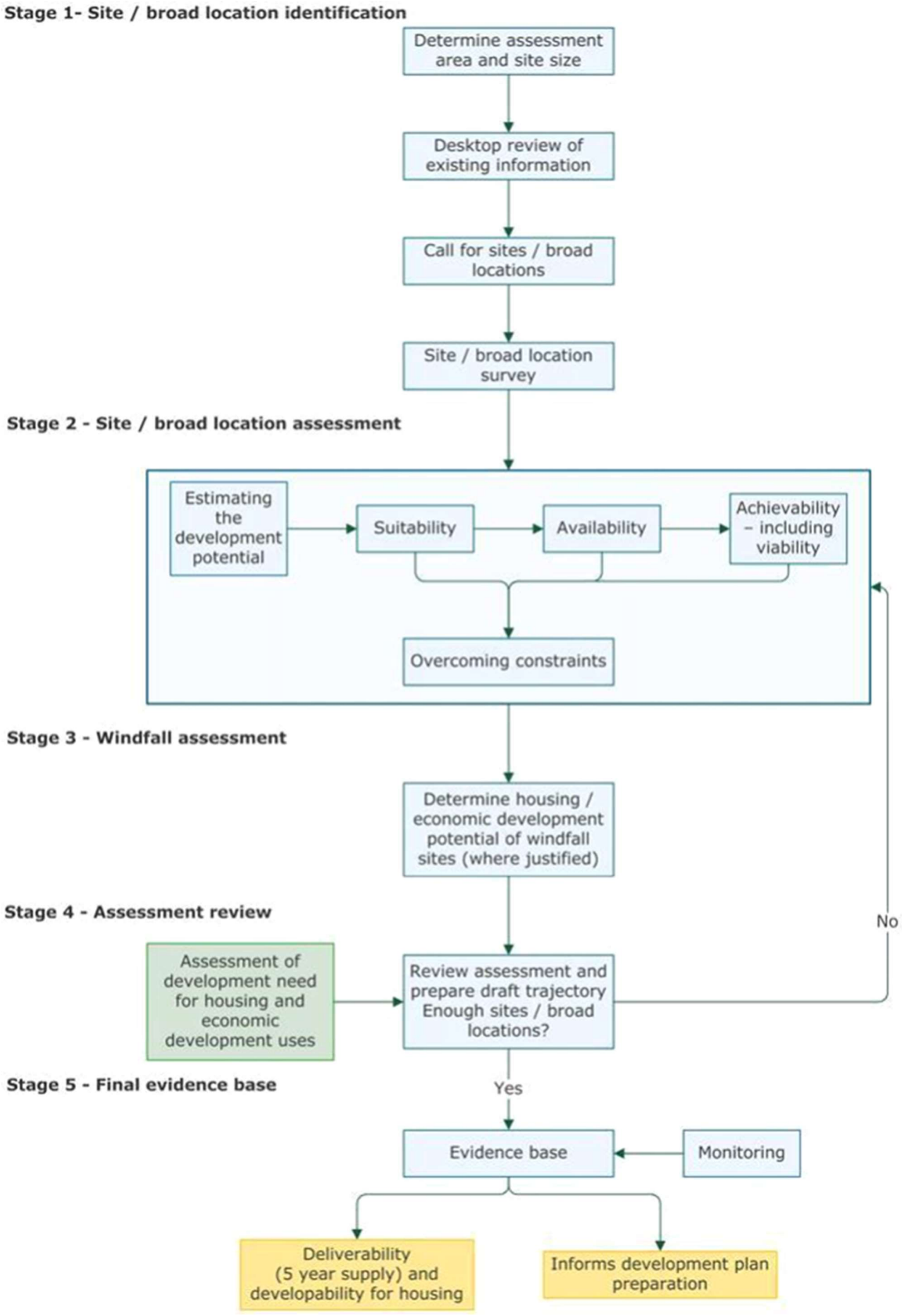
**1.15.** As well as assessing potential new development sites, the SHLAA will review existing Plan:MK allocations (unimplemented) to check that the site is still suitable, available and achievable. This will include assessing if the proposed use is still the most suitable or if there is the potential to change this, or change the mix of proposed uses, through preparation of the new Local Plan.

**1.16.** The role of this document is to set out the methodology which is being used in the preparation of the SHLAA. Whilst the approach will seek to build on that undertaken for previous SHLAAs and utilise lessons learnt from the processes of producing them, it will be predominantly based on the guidance outlined in the *"Housing and Economic Land Availability Assessment"* section of the PPG, which outlines the inputs and processes that should be followed by plan-makers in preparing their assessments.

**1.17.** As the primary focus of the SHLAA will be to inform the preparation of a new local plan for the Borough, no restrictions will be put in place at this stage in relation to the type and location of site, or broad location, which will be accepted for initial assessment within the SHLAA; existing policy constraints will however be considered and reported as part of the assessment. It is intended that the SHLAA will be a 'living document' and as such, sites may be reassessed against future emerging policy as it forms throughout the preparation of the new Local Plan.

**1.18.** The following chapters outline each stage of the methodology that will be followed in preparing this SHLAA. The stages follow those outlined in the PPG but are amended/added to where necessary to take into account local circumstances. The PPG provides a method flowchart which outlines the process of carrying out an assessment; this is reproduced below, with the detail of each stage expanded upon in the following chapters.

**1.19.** To assist with the preparation of the SHLAA, we have worked alongside Urban Intelligence (UI) utilising their PlaceMaker tool. The methodology therefore also reflects how this has been used within the process of carrying out the assessment.


Stage 1- Site / broad location identification
Determine assessment area and site size
Desktop review of existing information
Call for sites / broad locations
Site / broad location survey
Stage 2 - Site / broad location assessment
Estimating the development potential
Suitability
Availability
Achievability – including viability
Overcoming constraints
Stage 3 - Windfall assessment
Determine housing / economic development potential of windfall sites (where justified)
Stage 4 - Assessment review
Assessment of development need for housing and economic development uses
Review assessment and prepare draft trajectory Enough sites / broad locations?
No
Yes
Stage 5 - Final evidence base
Evidence base
Monitoring
Deliverability (5 year supply) and developability for housing
Informs development plan preparation

# Method - Stage 1: Identification of sites and broad locations

## Extent of the Study

**2.1.** In accordance with the PPG, the area covered by the SHLAA will be the plan-making area, which in this case is the entire Borough area of Milton Keynes. Whilst it is recognised that a large proportion of parishes within the Borough of Milton Keynes are active in neighbourhood planning, as the development strategy for the new plan for the Borough has yet to be adopted, the SHLAA will assess sites from all areas, including those which have existing made Neighbourhood Plans or plans which are currently being prepared.

**2.2.** Plan:MK allocated land to meet its requirements in full, including a substantial buffer for housing supply. Whilst the quantitative requirements for housing development for the new plan period have been set out via an updated Strategic Housing Market Assessment and the previous work on the Strategy for 2050, the SHLAA will form part of the evidence base to outline the options available for meeting our housing needs during the plan period and will therefore not be constrained by levels of need but will instead review all sites/broad locations to provide a full and complete audit of available land, as required by the PPG.

## Site size thresholds

**2.3.** The PPG outlines that plan-makers will need to assess a range of different site sizes from small-scale sites to opportunities for large-scale and, recommends that consideration is given to all sites and broad locations capable of delivering 5 or more dwellings. Whilst provision is made for alternative site-size thresholds to be considered, it is felt that the assessment of sites smaller than this will lead to a large amount of assessment work for a relatively insignificant development land yield. it is therefore considered that the thresholds set in the PPG are suitable for Milton Keynes and will therefore be applied to this SHLAA. The minimum site size for 5 dwellings is considered to be 1500m$^2$.

**2.4.** Site sizes where separately identified as part of the GTAA, which advises that it is generally accepted amongst the Travelling community that private sites of up to 6-10 pitches are appropriate. Public sites tend to be larger and have policies and procedures in place to ensure the effective management of sites. Whilst not national policy, previous design guidance '*Designing Gypsy and Travellers Sites: Good Practice Guide'* advises on a maximum plot site of 15 pitches. The GTAA recommended a Gypsy and Travellers Pitch size of between 0.0625 and 0.075 hectares, whilst a Travelling Showperson's plot should be a minimum of 0.5 hectares. A minimum pitch capacity of five, or 0.312 hectares, on public sites, is required to ensure viability.

## Who will be Involved?

**2.5.** As envisioned by the PPG, the SHLAA process will incorporate engagement with, and input from, a full range of consultees and key stakeholders at various stages of the process.

**2.6.** As a starting point, the initial version of this methodology was published for a consultation period between 23 February and 20 April 2022 which enabled any interested party to provide comment on the processes we will undertake in preparing the SHLAA. All comments received were considered and, where appropriate, the methodology was amended to reflect any updates to the process – these amendments have, in the main, been retained in this updated version. Further comments on the SHLAA methodology were received during the Regulation 18 consultation of the MK City Plan 2050; these have been considered as part of the review of all comments received and, where necessary further updates have been made to this version of the methodology in response.

**2.7.** At the same time as consulting on the draft methodology, MKC also undertook an eight week 'call for sites' period to enable any landowner or developer to submit sites to be considered for inclusion within the SHLAA via an online form. The call for sites asked for detailed information about promoted sites including ownership information, the proposed use(s), existing features and constraints relating to the site, and deliverability information.

**2.8.** The 'call for sites' was also subsequently re-opened in early 2023 following the launch of the PlaceMaker, utilising the tool to provide an online platform for interested parties to submit new sites. This remained open until the start of June 2024 and was then re-opened again for submission of new sites during the Regulation 18 consultation of the MK City Plan 2050.

**2.9.** Where necessary, direct correspondence has been and will continue to be undertaken with landowners, developers, housebuilders and agents with regards to sites that are considered an existing commitment so as to ensure we have the most up-to-date information regarding these sites.

**2.10.** Other key stakeholders will also assist in the process of assessing the suitability of sites for development. The input of technical consultees in relation to issues such as highways, housing, the environment, flooding and others will ensure that key issues are thoroughly considered for each site.

**2.11.** A bespoke Gypsy and Travellers Call for sites was opened for 6 weeks in May 2025, again utilising the PlaceMaker platform. No sites were submitted. Three sites were however but forward for consideration by the MKC's Asset Planning team following internal discussions. In addition to this, a desktop review of all council owned land (MKCC and MKDP) was carried out to identify land that may be suitable.

## Identifying Sites/Broad Locations

**2.12.** The PPG outlines that plan-makers need to be proactive in identifying as wide a range of sites and broad locations for development as possible, including those existing sites that could be improved, intensified or changed. To ensure a robust approach is taken, we will:

- Undertake a desktop review of existing data sources and information to both cover sites which are already 'known' and also to actively identify new sites;
- Undertake engagement with local ward members, parish and town councils and other departments within Milton Keynes Council (e.g. the Housing Department and the Estates Department) to identify new sites;
- Carry out a Call for Sites to provide landowners and developers an opportunity to submit their sites; and,
- Publicise the preparation of the SHLAA so as to reach as wide an audience as practicable and allow the opportunity to contribute.

**2.13.** The PPG also outlines the types of site that could be considered and the relevant data sources that could be reviewed to identify sites/broad locations. Taking this into account and reflecting on local circumstances, Table 1, outlines the type of sites that will be covered in the SHLAA.

**Table 1: Sources of sites with potential for housing development which will be covered by the SHLAA**

| **Sites in the Planning Process** |
|---|
| • Sites with planning permission which are under construction;<br>• Sites with unimplemented planning permissions;<br>• Existing allocations in Plan:MK (2019), the Site Allocations Plan (2018) and made neighbourhood plans which have not yet obtained planning permission;<br>• Sites with development briefs which have not yet obtained planning permission;<br>• Land which is no longer required for its allocated use (e.g. employment sites which could be suitable for housing)<br>• Unauthorised Gypsy and Travellers sites which are currently subject to enforcement action. |
| **Sites not currently within the Planning Process** |
| • Sites submitted through the Call for Sites or in response to formal local plan consultations;<br>• Sites where previous planning applications have been refused or withdrawn;<br>• Sites under the ownership of Milton Keynes Development Partnership which are not currently within the planning system;<br>• Land under the ownership of Milton Keynes Council;<br>• Surplus and likely to become surplus public sector land;<br>• Land within Metro corridors (600m radius from proposed Metro route carriageways);<br>• Sites identified on the Council's brownfield register;<br>• Vacant and derelict land and buildings;<br>• Redevelopment/re-design of existing residential or economic areas; |

- Sites/land in alternative uses which may be suitable for redevelopment e.g. car parks or commercial buildings;
- Additional opportunities within established areas (e.g. in residential areas, under-used garage blocks);
- Sites identified through other studies as not required in their existing use (e.g., redundant commercial buildings/land or, underutilised open space);
- Sites in, and adjacent to, existing rural settlements;
- Potential urban extensions.

**2.14.** Following the identification of sites, they will be mapped and uploaded to the PlaceMaker (where they have not been submitted directly via the PlaceMaker) and be subject to a sifting process to ensure sites are not duplicated, as they may have been identified via a number of sources.

**2.15.** In line with the PPG, an initial automated review will then be undertaken of each site to establish; which have a reasonable potential for development and should therefore be included in the detailed site survey part of the assessment and, those sites which should be excluded at this stage.

**2.16.** For sites already within the planning system, these will automatically be carried forward to the detailed site survey part of the assessment however, a full site survey will not be carried out unless there is potential for the site to be reallocated to an alternative use. Instead, existing information will be ratified and an up-to-date view on development progress will be sought from the landowner, developer or agent (recent monitoring data and data submitted for use in our annual five-year housing land supply assessments will be utilised).

**2.17.** For all other sites, the review will sift out those which do not fall within the scope of the study or where it is clear that they will not be suitable for development and should therefore be excluded from the more detailed stages of the assessment, reducing the need to assess sites later in the process which are in principle unacceptable. The reasons why sites may be excluded at stage 1 are set out in Table 2.

**2.18.** For land within Metro Corridors, additional aspects were considered at Stage 1. Any sites that coincide with an open space typology (with the exception of Amenity Open Space and Other Natural and Semi-Natural Greenspace) were excluded at stage 1. Similarly, any land within Metro Corridors that is already in use as a community facility was excluded at Stage 1. Any parcels of land there were too narrow, very awkwardly shaped or on steeply sloping land very also excluded at Stage 1.

**Table 2: Reasons for Exclusion of Sites at Stage 1**

| Category | Reason for Exclusion |
|---|---|
| Site does not fall within the scope of the study:<br>- Site is located entirely outside of the study area (Borough of Milton Keynes);<br>- Site will deliver fewer than 5 residential dwellings;<br>- Gypsy and Travellers sites will deliver fewer than 5 pitches. | Exclusion at this threshold is in accordance with the PPG. |
| Sites that are within a designated site of special scientific interest. | Sites of special scientific interest carry statutory protection and the presence of such a designation represents an overriding constraint. |
| Sites within Flood Zones 2, 3a and 3b. | Flood zones 2, 3a and 3b are considered to be overriding constraints and sites which fall entirely within them are usually excluded from further assessment. However, if a proposed use for all or part of a site meets the definition of 'water-compatible development' (which includes, for example, amenity open space nature recovery/biodiversity offsetting) or essential infrastructure, this will be taken into consideration. If part of a site falls within zones 2, 3a or 3b it is only considered to be an overriding constraint if the development proposed cannot be accommodated on the remaining part of the site outside of those flood zones. |

**2.19.** Consistency with current Development Plan policies and designations (those contained within Plan:MK (2019), Site Allocations Plan (2018) and 'made' Neighbourhood Plans) will be assessed and recorded, however, sites will not be ruled out at stage 1 due to inconsistency with the development plan.

**2.20.** All sites excluded at this stage will still be mapped and the final SHLAA reports will list the site as unsuitable, alongside providing the reason for exclusion.

**2.21.** All other sites which are not excluded will be carried forward to stage 2 of the SHLAA and will be subject to a more detailed survey including assessment against a wider list of constraints and seeking input from technical consultees and from other stakeholders as necessary (including town and parish councils and ward members) and, if required a site visit/survey. This will seek to ratify previous information received about the site, gain a

better understanding of the site and, to obtain further detailed information on the suitability, availability and achievability of the site to assist with the stage 2 assessment.

**2.22.** This assessment will be carried out utilising the PlaceMaker so as to ensure a consistent approach is applied to all sites. All site-specific data and assessment information will also be recorded on the PlaceMaker.

# Method - Stage 2: Site/broad location assessment

**3.1.** Stage 2 of the assessment involves assessing:

- the development potential of the site;
- whether the site is 'suitable' for residential use; and,
- whether the site is 'available' and 'achievable.'

**3.2.** Information on development potential, suitability, availability and achievability will have been collected and analysed through a combination of the PlaceMaker assessments, engagement and information submitted by landowners, agents and developers in response to the call for sites process, as outlined in Stage 1.

## Estimating the Development Potential of the Site

**3.3.** The PPG advises that the estimation of the development potential of each identified site can be guided by the existing or emerging plan policy including locally determined policies on density. When assessing development potential, plan makers should seek to make the most efficient use of land in line with policies set out in the National Planning Policy Framework.

**3.4.** For sites which have an extant planning permission, the number of housing units or amount of other development permitted on the site will be used for the purposes of the assessment, unless we are aware that it is intended not to implement the permission. In this case, the development potential of the site will be re-assessed, with the amount of development that has been previously permitted on the site being taken into account. With regards to sites which are already under construction, the number of homes still to be developed as at the base date of the SHLAA will be used.

**3.5.** For existing Plan:MK allocations which do not yet have a planning permission, a new assessment of the development potential of the site will be undertaken, so as the potential for alternative uses or types of development can be assessed and to ensure the most efficient use of the land is being made. If a revised development potential or use is arrived at within the SHLAA, any change to that allocation could only be made via the new Local Plan (or Neighbourhood Plan where relevant). Therefore, the SHLAA conclusion would not alter the status or weight of the allocation within the Development Plan.

**3.6.** For all new sites which have been identified through the SHLAA, an assessment of their development potential will be undertaken. This will be carried out on a site-by-site basis using a number of different sources of information to allow an indicative capacity for each site to be calculated. The capacity calculation will be based on the site area that is deemed suitable for development following the site's assessment of suitability.

**3.7.** As a starting point, we will utilise the PlaceMaker to carry out an initial site capacity assessment of each site using indicative densities, broadly aligning with those set out in Policy HN1 of Plan:MK, which are applied as follows:

**Table 3: indicative density multipliers**

| Area | Homes per hectare |
|---|---|
| CMK/Campbell Park | Work being undertaken separately as part of CMK growth Study (the final SHLAA report will outline these) |
| Central Bletchley Urban Design Framework SPD Area | 150dph – 250dph |
| The rest of the existing urban area | 35dph |
| Urban Extension Sites & Standalone Settlements | 35dph |
| Rural Sites | 35dph |

**3.8.** To give a realistic interpretation of the housing yield from each site, it is assumed that in the case of the larger sites that not all of the available land could be developed for housing. For example, on the largest sites it was assumed that land will also be required to provide for jobs, open space, schools and so on, as part of sustainable communities. Table 4 summarises the assumptions about the proportion of individual sites that are assumed to be available for housing.

**Table 4: Housing yields**

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

**3.9.** For sites within the existing urban area of Milton Keynes, a further assessment will be undertaken. By utilising the PlaceMaker to assess existing net-densities within each individual grid square an indicative capacity can be applied to each site based on the character of the grid square in which they sit.

**3.10.** Finally, any existing site-specific information (e.g. information submitted as part of a call for sites submission, previous SHLAA work or information in an existing Development Brief for the site) has been reviewed and taken into account.

**3.11.** For sites identified along Metro Corridors, their development potential has been calculated across a range of densities between 60 dph to 100 dph, with a central figure based on 80dph used for reporting purposes. This density range reflects the opportunity that new highly accessible public transport services provide for making efficient use of land within highly sustainable locations, with corresponding low or no provision of new parking to facilitate this.

**3.12.** Using the data garnered from these approaches an indicative housing capacity for each site will be applied whilst acknowledging that the true potential of individual sites would have to be determined through a detailed site assessment which considers a number of more detailed factors including, for example, the potential for high density development to be delivered in locations with good accessibility to facilities, that are well served by public transport, and where it can be accommodated by existing or improved infrastructure. For any sites that progress to an allocation in the new local plan, a more detailed assessment of capacity will be required to inform the site allocation.

**3.13.** During the preparation of the new Local Plan, the SHLAA will continue to be updated to reflect the emerging development strategy and policy and, as such, the development potential of each site will also be kept under review and may be modified. However, with the exception of sites which are already under construction, it must be noted that the development potential of a site indicated in the SHLAA is only indicative and it will be for a site-specific allocation within an emerging Local or Neighbourhood Plan or, a future planning application for the site, to determine the exact number of units or, amount of other development to be permitted on the site.

## Assessing Suitability

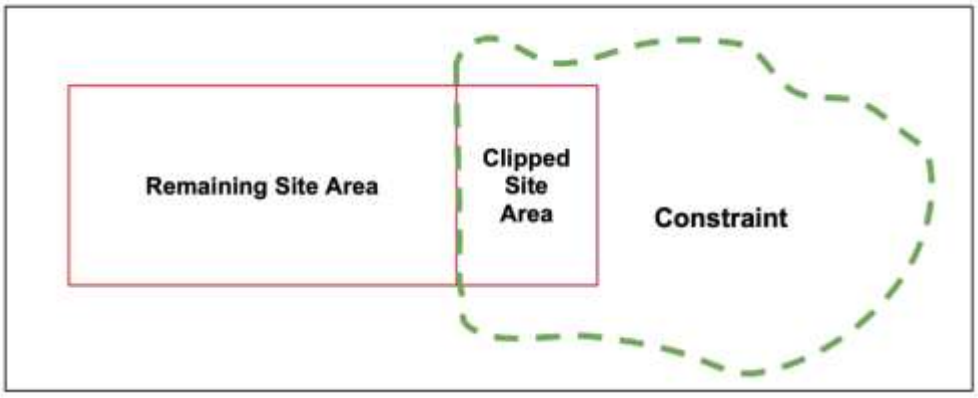
**3.14.** The PPG outlines that a site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated.

**3.15.** For sites with extant planning permissions or which are allocated in Plan:MK, it is considered that these have been previously assessed in terms of their suitability for development and do not require another evaluation.

**3.16.** For the purposes of all other sites, their suitability will initially be automatically assessed using the PlaceMaker (with the exception of Metro Corridor sites which have been manually assessed). The methodology applied takes each constraint we have considered in the site assessment, and assigns one of three approaches: Clip, Balance or For Information. A full schedule of the approaches assigned to each constraint can be found in Appendix A, and an explanation of the approaches is below.

**3.17.** **Clip Exclusions:** No policies or designations were considered so sensitive that any partial overlap on identified sites would make that entire site unsuitable for development. Instead, policies and designations that would make land unsuitable for development are 'clipped' from the developable area of the identified sites, with the remaining area of the site being retained within the assessment. However, any site fully covered by 'Clip' exclusions is designated as unsuitable. This process is shown in Figure 1. A full schedule of designations and classifications acting as suitability exclusions is within Appendix 1.

**Figure 1: Clip Exclusions**




**3.18.** Furthermore, if a site's developable area were to be 'clipped' to the extent that it was no longer of a size which could deliver 5+ homes, then the site would also be designated as unsuitable.

**3.19.** **Balance Scoring:** These layers may be compatible with development individually, however a cumulation of these layers on a site may make the site unsuitable. These have been categorised into levels of impact, with constraints that have a 'High' impact on suitability being the most severe. The severity of constraint, along with the amount of overlap between the constraint and the site, translates into a balance score. Any scores that are assigned to a site are removed from a base score of 100, and any site that's score falls below 0 is treated as unsuitable. The matrix below in Table 5 shows how the significance of the constraint, when combined with the overlap of the constraint on the site, creates the penalty score to be applied to the site. The penalty level applied for each constraint is outlined in Appendix 1. Balancing scoring was not applied to the Gypsy and Travellers sites, due to the separate review process.

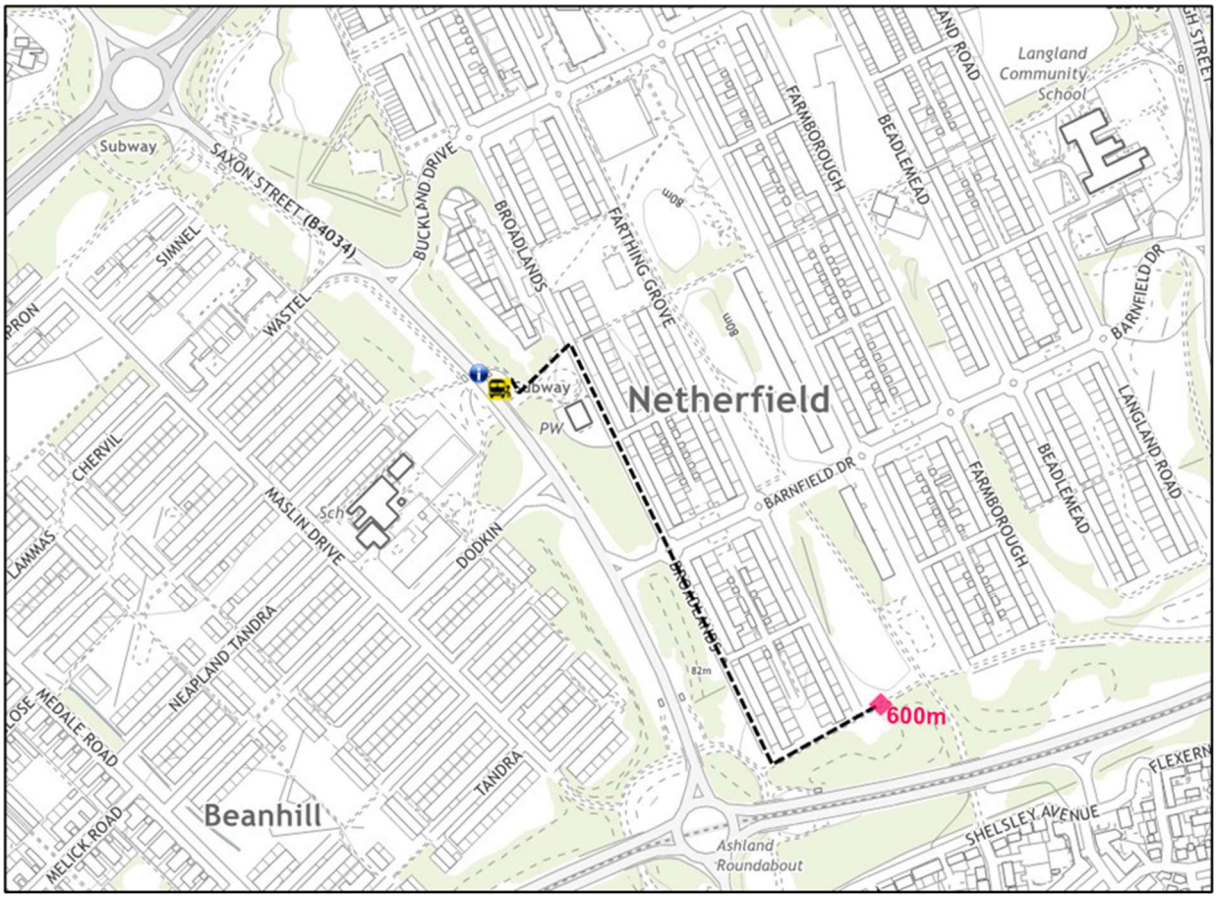
**Table 5: Balance Score Matrix**

| | | Overlap | | | |
|---|---|---|---|---|---|
| | | **Majority (>50%)** | **Significant (>25% and <=50%)** | **Minor (>5% and <=25%)** | **Negligible (<=5%)** |
| **Penalty Level** | **High** | 75 | 37.5 | 18.75 | 0 |
| | **Medium** | 50 | 25 | 12.5 | 0 |
| | **Low** | 25 | 12.5 | 6.25 | 0 |

**3.20.** **For Information:** Layers designated as 'For Information' will not have an automatic impact on site suitability. They are markers for matters that may need a more in-depth review by officers or are to be taken account of at a more detailed stage of plan-making.

**3.21.** Following this initial automatic assessment of sites, all sites which remain suitable are subject to a further sift by officers to review if any sites which have had significant areas clipped are no longer suitable because of removed land. For example, because the site would no longer be accessible, or was no longer attached to a settlement boundary because of the site area removed. All sites of this nature are deemed to be unsuitable following officer review.

**3.22.** Where appropriate, Metro Corridor sites have been manually clipped to remove areas of land that would be substantially more than 600m walking route away from a notional Metro Interchange Hub (assuming the presence of both existing walking routes and new routes through development of the sites in question). Given the nature of the preferred Metro routes (primarily following grid roads), notional Interchange Hubs were sited mid-way between junctions along a carriageway, which often coincides with the location of existing bus stops (the example diagram below illustrates this).




**3.23.** Sites which are wholly within the open countryside, share no immediate boundary with an existing settlement, could not form part of a wider extension to an existing settlement nor are of a scale which could form a new standalone settlement (5,000 homes plus) are also ruled to be unsuitable at this stage.

**3.24.** Finally, all remaining suitable sites are subject to a more detailed assessment by internal, specialist consultees on potential constraints which are applicable to the site but could not necessarily be assessed automatically – these include matters of highways, conservation and archaeology, ecology and landscape. Any issues raised by these specialists are outlined in the final assessment of each site for consideration at a later stage of the plan-making process unless they are considered to be a fundamental constraint to the site coming forward for residential development which could not be overcome (for example – there is no suitable means of accessing the site), in which case the site is ruled to be unsuitable following officer review.

**3.25.** Where a constraint or limitation has been identified 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 will be fully assessed and the constraints alongside potential mitigation measures will be recorded. The assessment of development potential of the site will also take account of this. For land within Metro Corridors, an assumption has been made that vehicular accessibility either directly from the existing grid road or via estate roads will be possible. However, there is an implicit assumption that vehicular parking will be minimal or not provided at all as the policy objective of growth within Metro Corridors is to maximise use of new highly accessible public transport services.

**3.26.** With regards to assessing sites against the existing adopted policies within the Development Plan, the assessment of suitability will outline where policy constraints currently exist however, these will not result in a site being deemed unsuitable on its own, unless other considerations would also lead to the conclusion that the site is unsuitable or whereby a decision has already been made to retain a specific protection (e.g. Linear Park). These policy constraints will be recorded, but it will also be noted that consideration of the site through the preparation of the new local plan, or a change in policy in the new local plan, could result in these constraints being overcome or mitigated, thus resulting in the site being suitable for development in the future.

**3.27.** During the preparation of the new Local Plan, the SHLAA may be further updated so as to allow the suitability assessment of each site to reflect upon the emerging development strategy and policies of the new plan.

## Assessing Availability

**3.28.** The PPG advises that a site can be considered available for development, when, on the best information available (confirmed by the call for sites and information from landowners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development. For example, land controlled by a developer or landowner who has expressed an intention to develop may be considered available.

**3.29.** For the purposes of this SHLAA, we will take the following approach to assessing availability:

- For sites which are under construction or have an extant planning permission or allocation in Plan:MK (2019), the site will be deemed to be available unless we have information to suggest otherwise. Information gathered through our monitoring processes will be utilised and, where necessary, we will contact the landowners/developers to clarify areas of uncertainty.

- For sites put forward through the Call for Sites, whereby a completed and signed form/submission on PlaceMaker (including a map outlining the land under the ownership or option of the entity making the submission) is submitted, the site will be deemed to be available. Where we become aware of issues such as ransom strips, existing tenancies or continued existing use of the site, which could affect when a site may be available, further information will be sought from the landowner/developer and this will be used to supplement the assessment of availability.

- Where sites have been identified through other means, such as through refused planning applications, engagement with town and parish councils or aerial photography, efforts will be made to identify landowners and contact them to seek their views on the potential availability of the site for development and, where possible obtain a completed Call for Sites submission. Where it is not possible to identify or contact owners, a reasoned judgement will be made as to the likelihood of development coming forward on individual sites and therefore whether the site should be deemed available or not. The majority of land and sites identified within Metro Corridors is within public ownership (MKCC or MKDP), with some vacant land in MK Community Foundation ownership due to the historic land settlement of the new town. As these are within public or third sector ownership, they are assumed to be available. The ownership of a limited number of identified sites is unknown but as outlined above a judgement has been made that there is a good likelihood that development would come forward on these sites should the MK City Plan set out a positive policy approach to development in Metro Corridors.

- In respect of Gypsy and Travellers, where sites were identified as a result as a desktop search of all MKCC and MKDP land and they were deemed to be provisionally suitable and achievable, confirmation on the site's availability was also sought.

**3.30.** Any sites which are not deemed to be available for development to commence before 2050 will be outlined in the SHLAA report as unavailable along with a reason for this judgement.

## Assessing Achievability

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

**3.32.** For the purposes of this SHLAA, we will take the following approach to assessing achievability:

- For sites which are under construction, have an extant planning permission or which are allocated in Plan:MK, the site will be deemed to be achievable unless we have information indicating otherwise. Information gathered through our monitoring process will be used, and where necessary, landowners/developers will be contacted to clarify any areas of uncertainty.

- For sites put forward through the call for sites, information submitted as part of that process relating to site viability will be assessed and used to inform the consideration of achievability, in combination with any available, relevant conclusions from the updated Viability Study which is also being prepared to inform the new local plan. Information submitted relating to market and delivery factors (including adjoining land uses, marketing information and proposed phasing) will also inform the achievability assessment. A site will be considered to be achievable if there is a reasonable prospect that it will be developed at a particular point in time. If we become aware of any constraints that could affect the achievability of the site, further information will be sought from the landowner/developer and this will be used to supplement the assessment of achievability.

- Where sites have been identified through other means, such as through refused planning applications, engagement with town and parish councils or aerial photography, efforts will be made to identify landowners and contact them to seek their views on the potential achievability of the site, and where possible, obtain a completed Call for Sites submission. Where it is not possible to identify or contact owners, a reasoned judgement will be made as to the achievability of the site. As with sites put forward during the call for sites process, the conclusions in the Viability Assessment to accompany the new local plan will be used to inform the assessment of achievability.

**3.33.** Taking the above factors into account, each site's achievability will be assessed as being either achievable or not achievable.

## Overcoming Constraints

**3.34.** The PPG sets out that where constraints have been identified, the assessment will need to consider what action could be taken to overcome them. Examples of constraints include policies in the National Planning Policy Framework and the adopted or emerging development plan, which may affect the suitability of the site, and unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners, which may affect the availability of the site.

**3.35.** Identified constraints may not necessarily rule out a site completely, and consideration will be given to how they could be overcome. This consideration will utilise information submitted through the call for sites process, and expert opinion will be sought wherever appropriate, for example from highways, nature conservation and flooding to verify any conclusions. Where constraints, taking into account possible mitigation, are deemed to be unacceptable in planning terms the site will be recorded as unsuitable and reasons for this outlined. Where it is concluded that there is a reasonable chance of the constraint being overcome, the site will continue to be included as a potentially suitable site.

### Assessment of timescale and rate of development

**3.36.** As set out in the PPG, information on suitability, availability, achievability and constraints can be used to assess the timescale within which each site is capable of development. For residential developments, this may include indicative lead-in times and build-out rates for the development of different scales of sites. On the largest sites allowance will be made for several developers to be involved. Information provided by developers and agents will be important in assessing lead-in times and build-out rates by year and we will also utilise our most up-to-date Housing Land Supply Phasing Methodology which sets out assumptions on lead-in times and build-out rates specifically for Milton Keynes and is reviewed on an annual basis.

**3.37.** Subsequent decisions on phasing of individual sites or broad locations for growth over the plan period to 2050 will be made as part of the wider plan-making process taking into account other evidence and the vision and objectives of the plan. For the purposes of the SHLAA, each site will be determined to be either Deliverable (can be built-out within five years), Developable (can be built out at a later stage in the plan period) or Undeliverable (cannot come forward during the plan period as the site is one or more of unsuitable, unavailable or unachievable).

# Method - Stage 3: Windfall Assessment

**4.1.** As set out in the PPG, an allowance for windfall may be justified in the anticipated supply if there is compelling evidence as set out in paragraph 75 of the NPPF. This sets out that any allowance should be realistic and have regard to past delivery rates and expected future trends.

**4.2.** The SHLAA will assess the nature of previous windfall development and completion rates on windfall sites and come to a judgement as to whether there are genuine local circumstances to justify a windfall allowance and what this allowance should be. Care will be taken to avoid duplication with sites already identified. Consideration will be given to whether historic windfall rates are likely to continue in the future. This will involve mapping windfall completions and assessing whether areas where windfall rates have been high still have potential for the future.

# Method - Stage 4: Assessment review

**5.1.** The PPG sets out that once the sites and broad locations have been assessed, the development potential of all sites can be collected to produce an indicative trajectory

including an indication of when development is likely to happen (i.e. within years 1 to 5, 6 to 10, and 11 and beyond). An overall risk assessment will be made as to whether sites will come forward as anticipated.

**5.2.** The review of the assessment will also look at those sites whereby constraints have been identified which could be overcome, but where it is uncertain when this might occur. Such an example might be where a planning policy position would need to change for a site to be considered suitable. Such a constraint could be overcome but it would not be the role of the SHLAA to assume this will happen, however the review of the assessment could comment on the implications of amending planning policy on housing land supply.

**5.3.** If it is concluded that there are insufficient sites/broad locations to meet objectively assessed needs, including the identified local housing need, the assessment will need to be revisited in the first instance. This may include carrying out a further call for sites or reviewing assumptions about the development potential of particular sites to ensure these make the most efficient use of land. This may include applying a range of densities that reflect the potential of different areas.

**5.4.** In accordance with the PPG, if insufficient land remains, it would be necessary to investigate how this shortfall could best be planned for in accordance with the duty to cooperate. If needs could not be met following that process, the Council would have to demonstrate why as part of the plan examination.

# Method - Stage 5: Final Evidence Base

**6.1.** The outputs of the assessment will be:

- A digitally accessible interactive map which outlines all sites assessed, the conclusions of their assessment and the ability to review how mapped constraints impact upon the site (except for Gypsy and Travellers),
- A set of tables listing all sites considered, and summarising their assessment conclusions;
- The assessment of each site will include:
  - Where these have been discounted, evidence justifying reasons given;
  - Where these are considered suitable, available and achievable; the quantity of development and details of how any barriers to delivery could be overcome and when;

The SHLAA forms part of the evidence base for the MK City Plan 2050 and, will be a key document informing a further site selection process for allocations carried out through the Sustainability Appraisal to meet the identified needs for the plan in line with its vision and objectives. The SHLAA may need to be reviewed during the plan preparation process as new information becomes available.

# Appendix 1 - schedule of designations and classifications acting as suitability exclusions or penalty balance scores

## Clip Exclusion Constraints

National Planning Policy Guidance (NPPG) makes it clear that a site's exclusion from the HELAA process during the desktop review will only occur where no feasible development potential can be demonstrated due to the presence of overwhelming constraints for the foreseeable future. Sites which are only partially affected are excluded at this stage but if necessary may still be considered in a finer grained assessment depending on the extent and impact of the associated constraint if there is a requirement to revisit the assumptions. This process is described in more detail in the full methodology report. In these cases where part of the site falls into an area of absolute constraint the gross developable area would be reduced to reflect the constraint but the overall site would be shown on the subsequent mapping.

| Constraint Name |
|---|
| EA Flood Zone 2 |
| EA Flood Zone 3 |
| SFRA draft Fluvial climate change modelling (merged outlines) - 1000cc19 |
| SFRA draft Fluvial climate change modelling (merged outlines) - 1000cc30 |
| SFRA draft Fluvial climate change modelling (merged outlines) - 100cc19 |
| SFRA draft Fluvial climate change modelling (merged outlines) - 100cc30 |
| SFRA draft FZ3b 50yr detailed modelling |
| SFRA draft FZ3b proxy 3a |
| Scheduled Monuments |
| Pipelines |
| Ancient Woodland (BMERC data) |
| Bodies of Water |
| District Parks |
| Linear Parks |
| Local Nature Reserves |
| Local Wildlife Sites |
| Priority Habitats |
| Sites of Special Interests |
| Churchyards, cemeteries and burial grounds |
| Common Land and Village Green |
| Country Park |

| |
|---|
| District Park |
| Food growing areas |
| Formal Outdoor Playing fields |
| Linear Park |
| Local Park |
| Other natural and semi-natural green spaces |
| Paddocks |
| Pocket Park |
| Registered Parks and Gardens |
| Plan:MK Employment - Existing |
| Plan:MK Employment - Proposed |
| Plan:MK Green Separation Buffer |
| Plan:MK Gypsy and Traveller Sites – Existing |
| Plan:MK Mineral Allocations Building Stone |
| Plan:MK Mineral Allocations Sand and Gravel |

# Penalty Balance Score Constraints

| Constraint | Penalty Level applied |
|---|---|
| SFRA draft ROFSW 1000yr | Low |
| SFRA draft ROFSW 100yr | Medium |
| Listed Buildings: Grade I | High |
| Listed Buildings: Grade II | Medium |
| Listed Buildings: Grade II* | Low |
| Biological Notification Site | High |
| Wildlife Corridors | Medium |
| Plan:MK Minerals Primary Focus Areas | Medium |
| Plan:MK Minerals Secondary Focus Areas | Low |
| Agricultural Land Classification - Post 1988 - Grade 2 | High |
| Agricultural Land Classification - Post 1988 - Grade 3a | High |
| Agricultural Land Classification Grade 2 | High |

# Key constraints included for information

| Constraint Name |
|---|
| Conservation areas |
| Air quality risk areas |
| Canal Corridors |
| Highway Corridors |
| MK to Bedford Canal Route Buffer |

| |
|---|
| Landfill Buffer |
| Landfill Sites |
| Mineral Search Area |
| Agricultural Land Classification - Post 1988 - Grade 3b |
| Agricultural Land Classification - Post 1988 - Grade 4 |
| Agricultural Land Classification Grade 3 |
| Agricultural Land Classification Grade 4 |
| Biodiversity Opportunity Area |
| Landscape Character Assessment |
| Notable Species (BMERC data) |
| Tree Preservation Orders - Group |
| Tree Preservation Orders - Individual |
| Rural hedges |
| Urban hedges |
| Amenity Greenspace |
| Green Access Link |
| Plan:MK Open Countryside |
| Plan:MK Primary Shopping Area |
| Plan:MK Primary Shopping Frontage |
| Plan:MK Secondary Shopping Frontage |
| Plan:MK Community Facilities - Existing |
| Plan:MK Community Facilities - Proposed |
| Plan:MK District Centres |
| Plan:MK Town Centres |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