

Milton Keynes Council Housing Land Supply Phasing Methodology 2020

August 2020

Development Plans



milton keynes council



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1. Introduction

- 1.1 The Council is required to monitor the progress of housing completions and, as required under Paragraph 73 of the National Planning Policy Framework (NPPF), to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing¹. As part of this monitoring the Council carries out an assessment of when housing, either with planning permission or contained within the Development Plan, is expected to be built and the rates at which each site is expected to be delivered.
- 1.2 The Council produced this Phasing Methodology to help inform the annual assessment of when housing in the Borough can realistically be expected to be built, which ultimately is used to prepare an annual five-year housing land supply (5YHLS) position. This document sets out the processes the Council undertakes both in terms of housing monitoring and to gain information from landowners, developers and housebuilders, so as to evidence the deliverability of sites. This document also introduces a further element of the assessment for when it has not been possible to gain written detailed information from the development industry and to assist in sense checking information the Council has received. This process is a set of parameters and assumptions, based on the size of housing site and the stage it is at in its development, which show how the Council will assess the delivery of new homes.
- 1.3 This methodology sets out:
 - When a site is considered deliverable in the context of the NPPF;
 - The land supply assessment undertaken by the Council to determine the deliverability of a site;
 - How the capacity of a site has been calculated;
 - A set of assumptions related to lead-in times to be used in the land supply assessment, and;
 - A set of assumptions related to build-out rates to be used in the land supply assessment.
- 1.4 This methodology and the assumptions set out within are reviewed on an annual basis to ensure it reflects up-to-date monitoring information and advice relating to housing delivery within Milton Keynes gathered throughout each year. This is the second iteration of the Phasing Methodology for Milton Keynes and has been updated to reflect the monitoring year 2019/20 and also to consider further evidence that has been gathered and analysed throughout the year. Specific changes that have occurred in this update will be referenced where applicable throughout the document.
- 1.5 During the early stages of preparing the 2020 5YHLS assessment the Country has been hit by the onset of the Covid-19 global pandemic. The Council recognises that Covid-19 will have some impact upon housing delivery and will therefore need to be considered in the preparation of the Council's final 5YHLS assessment. As such, whilst this document sets out the approach that was being utilised by the Council for this year's assessment, a separate section within Chapter 2 discusses the impact of Covid-19 on the 5YHLS assessment and the approach the Council is proposing to apply to take account of it.

¹ The Council produces an annual five-year housing land supply statement which responds to the requirement of Paragraph 73 of the NPPF (2019). This statement establishes the housing requirement that the Council needs to demonstrate is deliverable and then assesses the land supply available to deliver the requirement over the next five years.

2. Purpose of this Document

- 2.1 The Council publishes annually its housing land supply assessment which demonstrates the number of dwellings expected to be built in each year of the Local Plan period. During the production of the assessment the Council has to reach a conclusion on whether housing sites, from a range of sources, including those which are allocated for development in the Development Plan, or those with a planning permission, can be considered deliverable and whether that will be within the next 5 years or whether they will take longer to develop.
- 2.2 The Council, for the purposes of its 2020/21 annual assessment has assessed the deliverability of housing sites with regard to Paragraphs 67 and 73 of the NPPF (2019), its footnotes and definitions.

Paragraph 73 states:

“Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.”

The definition of “deliverable” in the context of the NPPF is set out in its glossary.

*“**Deliverable:** To be considered deliverable, sites for housing 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. In particular:*

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”

- 2.3 The definition sets out how types of sites should be considered as deliverable within the five-year supply period depending on their progress towards a fully consented development. It sets out firstly that sites with detailed permission should be considered deliverable within the five-year period unless there is clear evidence that this will not occur. The second part of the definition of ‘deliverable’ covers sites about which their deliverability should not be automatically assumed as within the five-year period, unless there is clear evidence of a realistic prospect that housing will be delivered on the site within five years.
- 2.4 The revision of the definition to the 2012 NPPF, has an emphasis on clear evidence being needed to assess whether delivery will or will not occur within the five-year period. This focus on obtaining clear evidence reflects the process undertaken by the Council to inform its annual assessment.

2.5 It should be noted that a recent Consent Order by the Secretary of State² confirmed that

“The proper interpretation of the definition is that any site which can be shown to 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’ will meet the definition; and that the examples given in categories (a) and (b) are not exhaustive of all the categories of site which are capable of meeting that definition. Whether a site does or does not meet the definition is a matter of planning judgment on the evidence available.”

2.6 This therefore provides clarity that the definition of ‘deliverable’, as outlined in the NPPF, is not to be taken as a ‘closed list’ and that types of site not listed within the definition (for example; sites with a resolution to grant planning permission subject to the execution of a s.106 agreement, or draft allocations in an emerging plan) are capable of being considered deliverable. As such, the Council does not restrict its assessment of land supply to only those sites which fall within the examples listed within the NPPF definition of ‘deliverable’, but instead considers and assesses all sites where evidence suggests it may be deliverable.

What constitutes clear evidence?

2.7 Neither the NPPF nor the Planning Practice Guidance (PPG) outlines specifically what is considered to constitute clear evidence for the purposes of demonstrating a site, which falls under part b of the NPPF definition of deliverable, has a realistic prospect of delivering housing and can thus be considered for inclusion within the five-year period.

2.8 The PPG at paragraph 007 (Reference ID: 68-007-20190722) in its section on ‘Housing Supply and Delivery’, seeks to provide further guidance on the types of evidence that could be used to demonstrate deliverability of sites that fall under part b of the NPPF definition.

Paragraph 007 states:

“Such evidence, to demonstrate deliverability, may include:

- *current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;*
- *firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates;*
- *firm progress with site assessment work; or*
- *clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.”*

² Claim No. CO/917/2020 (issued 12 May 2020) in relation to appeal reference: APP/G2815/W/193232099

- 2.9 Whilst this is not an exhaustive list and is still not clear on what exactly the evidence should be, it provides some assistance as to how a planning judgement could be made and evidenced as to whether a site is deliverable or not. Furthermore, this reflects the type of evidence the Council gathers through its ongoing monitoring and engagement processes and through the preparation of its annual assessment, to maintain up-to-date evidence on each site.
- 2.10 Indeed, recent decision letters for S78 appeals³ (including a recovered Secretary of State decision) which have tested the Council's 5YHLS position and supporting evidence, have all identified the Council's approach (previously through the use of proforma) as satisfying the requirement of the NPPF/PPG in being sufficient to demonstrate clear evidence.

How has the Council prepared its Annual Assessment and gathered clear evidence?

- 2.11 The Council Over the past 3 years has carried out significant work in terms of obtaining site specific data and information in relation to sites within its housing trajectory. Starting with the preparation of the 2017 SHLAA and continuing through the examination stages of Plan:MK, the Council consulted landowners, developers and agents to obtain up-to-date information on projected start and build out rates, so as to assist in informing the housing trajectory that was included in Plan:MK.
- 2.12 As part of the examination of Plan:MK, the Inspector carried out a thorough site-by-site analysis of the trajectory and, as can be seen from the Inspector's examination correspondence, the proposed modifications and his report, he was satisfied with the approach taken by the Council in respect of the sites included in its 5YHLS calculation, both in terms of its general methodology and the site specific projections.
- 2.13 Whilst Plan:MK was examined against the 2012 NPPF under transitional arrangements, the trajectory and site-specific projections provide a good starting point for the continual review of ongoing site progress and delivery. However, in preparing the 2019/20 assessment, the Council took the opportunity to review and improve its processes in assessing the deliverability of sites within the housing land supply to more accurately reflect the changes to the definitions of 'deliverable' and 'developable' contained within the revised NPPF.
- 2.14 The changes implemented for the 2019 Assessment have continued throughout the 2019/20 monitoring year enabling the Council to gather further, up-to-date information and evidence on each site. This has been further enhanced by extra work that the Council have carried out to obtain up-to-date information to present at two appeal inquiries that took place in January and February 2020.
- 2.15 For the purposes of preparing the 2020 Assessment the Council therefore already has available a wealth of site-specific information covering at least a 2-3-year period which it can utilise for assessing the deliverability of each site. Furthermore, much of this data was only collected in late 2019 and early 2020.
- 2.16 However, in line with the updated approach first undertaken in the 2019 Assessment, the Council has not only sought to repeat the process of obtaining up-to-date information and evidence on the progress

³ *Land off Castlethorpe Road* (Appeal Ref: APP/Y0435/W/18/3214365); *Malt Mill Farm* (Appeal Ref: APP/Y0435/W/18/3214564); *The Globe* (Appeal Ref: APP/Y0435/W/19/3220584); *Rectory Farm* (Appeal Ref: APP/Y0435/W/19/3234204); *Land to the east of Newport Road and west of Cranfield Road* (Appeal Ref: APP/Y0435/W/17/3169314).

of each site, specifically to inform the 2020 Assessment, but has also further updated some of the processes and procedures it is undertaking in preparing the Assessment.

2.17 The following sub-sections therefore outline the stages undertaken by the Council in compiling evidence and preparing its annual assessment of land supply, a number of which are processes that are continually ongoing throughout the year. It should be noted for the purposes of the 2020 Assessment, the onset of the Covid-19 pandemic has impacted upon certain parts of this process and the approach the Council is taking; this is discussed separately at paragraphs 2.25 to 2.32.

Quarterly Housing Monitoring

2.18 The Council undertakes quarterly housing monitoring following robust procedures and using a variety of data sources. In summary the housing monitoring involves the following:

- Continuous monitoring of the planning record database to update the extant planning permission records as new applications are permitted and inserting these into the housing monitoring database;
- Every quarter undertaking a site visit to every major residential development site and allocation which is registered as under construction or whereby information received has shown there to be progress towards development on site;
- For quarter 4 of the year, undertaking a site visit to all major residential development sites and allocations and all minor residential sites which have a grant of planning permission;
- The site visits lead to records being made of the number of units that have started, completed or are under construction, as well as noting each individual plot against the approved planning permission and recording any other useful information in relation to the progress of the site;
- This data is then checked and reconciled with Building Control records and Council Tax records.

2.19 The data collected from site visits and housing monitoring enables the progress of each site, or parcel of a site, to be monitored against the current projections and to start to build a picture of the potential projections moving forward. Furthermore, enabling the Council to recognise sites which may not be progressing as initially intended.

Engagement with Site Representatives and other parties involved in delivery

2.20 The Council seeks, through its housing monitoring, to be proactive in engaging with representatives of all sites within the Borough, so as to gain direct information to inform the annual assessment. This engagement is carried out in a variety of forms throughout the year:

- For all sites across the Borough which are not subject to a FUL permission of REM approval, an annual Statement of Common Ground (SoCG) is sent to a representative of the landowner, so as to gain direct information on progress towards delivering the site including for example, a programme for taking the site through the planning system, projected start dates and build out rates and any other information which may be useful in understanding the future delivery of the site. The SoCG is new for the 2020 assessment and has replaced, for these sites, the pro-forma approach that has been previously used by the Council. Whilst, as outlined in paragraph 2.10, the proforma approach in Milton Keynes has been recognised by inspectors and the Secretary of State as being sufficient to demonstrate deliverability, it is felt that the SoCG allows for more information to be provided by the landowner and enables the Council to continue to make its approach to the 5YHLS assessment even

more robust and reliable (a blank copy of the SoCG and proforma templates for 2020, along with a copy of the explanatory letters sent out with both, are included within Appendix 4).

- For sites which have FUL permission or REM approval the Council continues to utilise its proforma approach so as to seek updated projections from the housebuilders.
- The SoCG are sent out first, prior to the end of the monitoring year, with proforma for sites with detailed permission and those which are under construction being sent out once the end of year monitoring surveys have been undertaken. Officers then follow up via chasing emails and phone calls so as to ensure a maximum response rate.
- Further contact is made with site representatives throughout the year at stages where progress has been made through the planning process, or whereby progress does not appear to have occurred in line with previous information submitted. This can take the form of emails, phone calls, or in some cases the updating of a SoCG or proforma; this enables information on sites to be kept up to date.
- For strategic sites within the Borough which form part of the Milton Keynes Tariff⁴, quarterly contact is also made with the developers/housebuilders so as to ascertain projected completion rates for future quarters.
- Discussions are held with case officers and other internal officers (e.g. housing officers, s106 officers, MK Tariff Officer etc.) to gain in-depth information on site specific issues and progress on any relevant planning applications (e.g. discharge of conditions, pre-application discussions, entering of planning performance agreements).
- Every quarter the information gathered from housing monitoring and through contact with site representatives is presented to the Councils Joint Housing Delivery Team⁵ (JHDT), so as to monitor delivery and provide further useful insights/information into the progress on sites.

2.21 The Council continues to carry out both its monitoring and engagement throughout the year, so as to ensure as up-to-date information as is possible is available on each site within the trajectory and so as the projections used for each site within the annual assessment are not just based on a single response from a site representative at a single point in time, but rather on regular monitoring and engagement via a robust process.

Review and Compilation of Trajectory/Assessment

2.22 Having obtained relevant data and information from housing monitoring and engagement with relevant site representatives, the Council carries out a range of reviews of this data on a site-by-site basis before compiling its final trajectory. This includes:

- An initial 'sense check' of all the direct information compiled through monitoring and submitted by site representatives for each site to ensure all data received aligns and, to ensure projected delivery

⁴ The 'Tariff' is an amount of money per residential unit, or per hectare of employment development, that is payable by owners of land in the strategic growth areas. The Tariff money goes towards funding infrastructure and services that are required to support the growth of the City. The Framework Agreement binds the landowners who have signed it to paying the Tariff and to its terms and conditions. The Tariff now only applies to phases that remain on relevant sites including the Western and Eastern Expansion Areas, the Strategic Land Allocation, Kingsmead South and Tattenhoe Park.

⁵ The Joint Housing Delivery Team (JHDT) is a predominantly Milton Keynes Council internal group which consists of officers from the Planning Department (including representatives from Housing Monitoring, Development Management, Development Plans and the Delivery and Infrastructure Team), Housing Department, Properties Department, Milton Keynes Development Partnership and Homes England. Other Council departments are also invited as and when their input is necessary.

rates are realistic and achievable. The 'sense checking' process is informed by discussions with case officers and other officers across the planning department who have detailed knowledge of individual sites, as well as checking each site against known delays and the assumptions and parameters outlined in this phasing methodology.

- The proposed trajectory is then reviewed by the JHDT, both as a whole and on a site-by-site basis, prior to being finalised and published as the updated 5YHLS position.

2.23 The Council will always use up-to-date monitoring information supported, in the first instance, by direct information on the delivery of housing sites. There are however instances whereby up-to-date, direct information cannot be obtained and/or the information submitted needs to be sense checked. To this end the Council, in 2019, also produced the first iteration of this phasing methodology so as to outline a set of parameters and assumptions which are used, alongside older site-specific data, to provide a 'sense check' of all the information submitted, to ensure a robust approach to assessing the deliverability of each site.

2.24 For the purposes of the 2020 Assessment the Council has further refined the Phasing Methodology, carrying out further detailed analysis of local data and reviewing new national studies to update the assumptions and parameters contained within, so as to ensure they are appropriate for use in Milton Keynes and are based on clear evidence. Furthermore, a draft version of this 2020 Phasing Methodology was distributed to a range of consultees within the development industry, including those involved within Milton Keynes and a number of national bodies, so as to provide an opportunity for them to provide feedback⁶ which has then been taken into consideration in both, finalising the 2020 Phasing Methodology, and preparing the 2020 Assessment. Appendix 3 lists the consultees who were provided the opportunity to comment as well as outlining the feedback that was received, associated responses from Council officers, and details on how this been used in preparing the final phasing methodology, where applicable.

The Covid-19 Pandemic

2.25 During the early stages of preparing the 2020 5YHLS assessment the Country has been hit by the onset of the Covid-19 global pandemic. The Council recognises that Covid-19 will likely have some form of impact upon the wider housing market and housing delivery and as such this will need to be considered in the preparation of the Council's 5YHLS assessment for this year.

2.26 With regards to the 2019/20 end of year monitoring, the Council was able to carry out its site visit surveys for the majority of sites, albeit the decision was taken to carry these out prior to the end of March with the likely impending 'lockdown' due to Covid-19 in mind and in order to protect the welfare of the Council's officers. As such there may be completions that took place in the last two weeks of March across all sites which have not been recorded, as well as completions on sites which were not able to be visited. These will be picked up when the Quarter 1 monitoring process for 2020/21 takes place and will be recorded as completions within 2020/21.

⁶ It was intended that, for the purposes of the 2020 Phasing Methodology preparation, a workshop would be held at the Council's bi-annual Agents Forum, so as wider feedback and input could be gained in an open forum. However, due to the restrictions in place as a result of the Covid-19 lockdown, this approach was not feasible, and it was decided to instead seek written responses. For the 2021 assessment, the Council will review this and hopefully will be able to run such an event.

- 2.27 The full impact of Covid-19 on the housing market will not be known for some time, and at this stage is difficult to predict with certainty what the response may be. Whilst it is apparent that in the short-term we will see some reduction in the delivery of housing, due to the temporary closure of a number of major sites across the Borough from the start of April, this has lasted for no more than approximately 4-6 weeks, with almost all sites once again open and delivering completions by the end of May 2020.
- 2.28 In the context of this Phasing Methodology and the 5YHLS assessment, it is also important to recognise that a temporary slowing down in the delivery of housing, which is distinct from an impact on deliverability, does not automatically equate to a diminution in 5YHLS. To the contrary, in circumstances such as the present where the Council is continuing to grant planning permission for residential development⁷ and thus continues to play an active role in boosting the housing supply in the area, despite the lockdown situation, a local planning authority may actually increase its 5YHLS because at least in the short term, the unbuilt homes will remain in the 5YHLS (as any pause was temporary, not a falling away of delivery altogether). This is consistent with recent research and analysis by Savills⁸.
- 2.29 It is however recognised that the potential impact of Covid-19 will likely differ on a site-by-site basis and as such these issues need to be considered both when assessing the deliverability of a site and in projecting the timescales around when a site will be delivered and the number of units it will likely deliver in the immediate monitoring year and over the five-year period. To-date, no guidance has been provided by Government on how the impacts of Covid-19 should be taken into consideration in preparing a 5YHLS position or in relation to forthcoming Housing Delivery Tests.
- 2.30 Taking into account evidence that locally, housebuilders have resumed work and completions on site, albeit not at full capacity on many sites, it is felt that reviewing each site, on a site-by-site basis is the most appropriate manner in which to respond to this issue in preparing the updated 5YHLS position. The Council has therefore taken the following approach to take account of Covid-19 in preparing its 2020 5YHLS assessment:
- 2.30.1 For sites with detailed permission (i.e. FUL permission or REM approval): The Council has continued to engage with developers/housebuilders and where possible will use direct information to inform the assessment. Where it has not been possible to obtain this information, the Council will utilise existing data taken from previous engagement with the developer, checked against 2019/20 monitoring data and the assumptions outlined in this phasing methodology, and will make an informed planning judgement on the likely number of units to be delivered in the forthcoming years.
- 2.30.2 For all other sites (e.g. those which are allocated or have outline permission only): For those sites which the Council had already deemed were undeliverable as of the 1 April 2020, these will remain outside of the five-year period. For sites which the Council had deemed to be deliverable and had clear evidence to demonstrate the site's deliverability as of the 1 April 2020, the Council has sought to engage further with the landowner to assess the potential impacts, if any, of Covid-19 on the progress of the development. This evidence has been used

⁷ Since the start of lockdown, Milton Keynes Council has granted planning permission for 749 dwellings (747 with full planning permission or reserved matters; and 306 of which were from a windfall application), whilst four further applications for either reserved matters approval or outline permission on allocated sites are due for determination by the end of August, which will provide over 1,100 further units.

⁸ "Coronavirus and residential development" https://www.savills.co.uk/research_articles/229130/298654-0

where necessary to either confirm existing information on the delivery programme of the site, or to reassess its deliverability.

2.31 The results of this approach have then been fed into the assessment and a 5YHLS position will be published. If, during the time taken to carry out this further engagement and analysis, guidance is published by Government, this will be taken into account and the 5YHLS assessment adjusted as required.

2.32 Under normal circumstances, the Council publishes its 5YHLS assessment and position once a year, as required by national policy, however in light of the ongoing nature of Covid-19, it is felt appropriate that the 5YHLS position is kept under constant review and a further interim position be prepared later in the year if it is necessary to do so.

3. Development of the Phasing Methodology

- 3.1 It is well recognised that there is no established methodology for assessing how quickly a site can deliver new homes⁹, predominantly due to the wide range of factors that can influence the progress of sites from allocation to completion.
- 3.2 It is with this in mind that the Council applies the approach it does in assessing the delivery of sites on an individual basis utilising direct information on each site, detailed monitoring processes and the professional expertise of its officers. The Council does however recognise that formulating a set of assumptions against which it sense checks the data received will ensure its processes are as robust and transparent as possible.
- 3.3 In formulating the assumptions and parameters set out in this 2020 version of the phasing methodology, the Council have considered:
- National Studies;
 - A thorough analysis of lead-in times and build-out rates on sites within Milton Keynes over the past 6 years;
 - A review of the approach and assumptions used by our neighbouring authorities; and
 - The expertise and knowledge of planning professionals within the Council.
- 3.4 With regards to National Studies, there are a number that have assessed lead-in times and build-out rates which are commonly quoted, including, most recently:
- *Start to Finish: How Quickly do Large-Scale Housing Sites Deliver?* Lichfields (November 2016);
 - *Start to Finish: What Factors affect the build-out rates of large-scale housing sites?* Second Edition (February 2020);
 - *Urban Extensions Assessment of Delivery Rates* Savills (October 2014);
 - *Housing Supply Research* Parsons Brinkerhoff for CPRE (2014);
 - *Independent Review of Build Out Final Report* (October 2018) and *Draft Analysis* (July 2018); regularly referred to as the Letwin Review.
- 3.5 Regard has been given to these studies, both in terms of the findings of their data analysis and the key messages they present in trying to formulate wider conclusions and assumptions. The findings where relevant are referenced in more detail in the sections of this Phasing Methodology on lead-in times and build-out rates.
- 3.6 However, utilising national studies alone does bring with it a number of limitations. Comparing across studies is not always easy due to the range of types of sites assessed by each individual study and the differing period of the development process that has been reviewed; not to mention the different times at which these sites have been developed out and the differing circumstances that surround each site and the area in which they are located. This is highlighted within the *Savills* (2014) report which outlines that, within the data assessed for the report alone, “*the individual nature of these sites means it is difficult to identify absolute trends*”.

⁹ Savills: “*Spotlight: Planning and Housing Delivery*” (15 May 2019)

- 3.7 Some studies also view each stage of the delivery process as discrete, whereas in reality often certain stages, particularly those such as REM permission and discharge of conditions, will overlap resulting in shorter lead-in times. Furthermore, these studies normally do not cover the full time period over which a site has been built out, rather using actual build-out data that is available and then relying on projections for future years. Additionally, the use of average timescales can mask those sites assessed which varied from the rest of the dataset and had lead-in times and build-out rates that were significantly outside the normal range.
- 3.8 The inability of these studies to take full account of local circumstances and conditions is a key issue which particularly impacts upon placing an over reliance on them in Milton Keynes. Both *Lichfield* (2016) and (2020), and *Savills* (2014) highlight Milton Keynes within their assessment as being different. *Lichfield* (2016) states that “it is widely recognised that the planning and delivery of large-scale housing sites in Milton Keynes is distinct from many other areas”. Meanwhile, *Savills* recognise Milton Keynes as an established growth area whereby sites are more likely to progress more quickly through the planning system, whilst also highlighting the Milton Keynes Eastern Expansion Area as a site with very high rates of delivery, despite sites of a similar size not performing so well elsewhere in the Country.
- 3.9 It is therefore essential in formulating assumptions and parameters to assist in assessing delivery in Milton Keynes, that local data and evidence, alongside local professional expertise is also given full consideration. This is why, for the purpose of this year’s Phasing Methodology a more detailed analysis and assessment of historic data specific to Milton Keynes has been carried out and used in formulating assumptions.
- 3.10 The assumptions and parameters set out in the remainder of this document have therefore been shaped by no one single source of data or information, albeit reference is made to sources throughout, with the aim that they are specific to, and appropriate for use in Milton Keynes for the purposes of the 2020 assessment.

4. Calculating Capacity of a Site

- 4.1 All sites contained within the Council's housing trajectory are either the subject of an extant planning permission, an allocation for residential development within the Development Plan, an application which is awaiting determination or have been assessed by the Council in work such as the SHLAA or Brownfield Register.
- 4.2 For all sites which have planning permission for residential development, the capacity for the site is that for which it has permission, or a lower figure which has been provided by the developer/housebuilder based on their most up-to-date evidence. For example, Eaton Leys gained Outline permission for 600 units in June 2017. For the Council's 2018/19 trajectory, this was reduced to 500 units following ongoing engagement with the landowners, who had recommended the final number would be significantly less following their further site investigations. This number was then reduced further, for the 2019/20 trajectory, following the submission of an application for detailed permission for 448 units. This also further evidences the nature of the Council's ongoing monitoring and engagement with landowners, developers and housebuilders which results in projections for sites within the trajectory being based on up-to-date evidence and information and how the Council uses this information to ensure its trajectory is robust.
- 4.3 For sites which are allocated within the Development Plan but do not yet have planning permission, the capacity of the site will be based primarily on the indicative number of units the site is allocated for, unless further evidence from the landowner, through ongoing discussions, pre-application processes, or the submission of an application, suggests that the capacity of the site should be different. For example, Tickford Fields, a site allocated for up to 1200 units which was subsequently reduced to 930 units as a result of feedback from the landowner following their more detailed site investigations and pre-application discussions.
- 4.4 The method used for calculating the capacity of a site for allocation in the Development Plan was taken from the Council's 2017 Strategic Housing Land Availability Assessment, which informed the preparation of Plan:MK. For sites outside the planning process whereby site-specific information was not available, the capacity of a site was based on site densities 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, which were applied as follows:

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

- 4.5 To give a realistic interpretation of the housing yield from each site, it was 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. The table below summarises the assumptions about the proportion of individual sites that were assumed to be available for housing.

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

- 4.6 Using this approach forms an indicative housing capacity, 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.
- 4.7 It should also be noted that the adopted Plan:MK now allows for higher densities in some areas of Milton Keynes than are accounted for in the indicative approach outlined above. For example, Policy HN1: *Housing Mix and Density* of Plan:MK allows for development of up to 500 dph in Central Milton Keynes and up to 250 dph in the area covered by the Central Bletchley Prospectus.
- 4.8 For the purposes of the current housing trajectory, indicative capacities for sites in these areas have not been increased to account for this, so as to ensure that the trajectory maintains a conservative approach and does not overestimate the capacity of a site. Once a planning application has been submitted for the site, or following more detailed information being shared with the Council by the landowner, which outlines a different site capacity is achievable, then the capacity of these sites will be reconsidered through following annual updates to the trajectory.

5. Lead-in Times

- 5.1 As outlined previously, to ensure clear evidence is provided of deliverability for all sites the Council contains within its 5-year housing land supply, site specific information is used as the primary source for applying lead-in times to sites. Furthermore, given the wide range of factors that can influence lead-in times, ongoing engagement and site-specific information provide a much more reliable source of data than utilising a one-size fits all approach. However, where up-to-date direct information cannot be obtained from developers/housebuilders of specific sites, but the Council deems there to be enough clear evidence that the site will be delivered within the five-year period, a set of assumptions relating to lead-in times, as outlined in Table 5.1, are used. Furthermore, these assumptions are used as part of the Council's 'sense check' of site-specific information submitted by housebuilders and developers, to ensure that lead-in times presented are not unduly unrealistic.
- 5.2 The assumptions, as outlined below in Table 5.1 have been developed taking account of a review of national studies, the assumptions used by neighbouring authorities immediately adjacent to Milton Keynes, and analysis of progress of recent sites through the planning system in Milton Keynes.

National Studies

- 5.3 As outlined in Section 3, there are a number of limitations with using national studies and their conclusions and the examples of this predominantly relate to the difficulty in outlining trends in lead-in times, as opposed to build-out rates. Furthermore, the large majority of national studies tend to focus on large and strategic sites and do not incorporate figures for small and medium sized sites, which can make up a large percentage of the number of sites within a housing supply.
- 5.4 The review of national studies undertaken has therefore focused on the more recent reports of *Lichfields* (2016 and 2020) and *Savills* (2014) and the key conclusions of each are outlined below.
- 5.5 The ***Lichfields (2020)*** report outlines that for sites of over 500 dwellings, if the site has an outline permission, on average it delivers its first home between 2-3 years after outline permission is granted. This figure is however greater when taken from the date at which the outline application is validated and can, for some sites over 2,000 units in size, take as long as 8.4 years from validation to first completion.
- 5.6 The *Lichfields (2020)* report is also one of the few that considers smaller sites, albeit covering them all under a bracket of 500 dwellings and less. For sites of this size, first completions on average occur 1.9-2 years from approval of an outline permission.
- 5.7 The ***Savills (2014)*** report also reviews sites over 500 dwellings and found that construction on the first phase of housing starts on average 4 years after the submission of an outline application, however for sites since 2010 this average drops to under 3 years.
- 5.8 *Savills (2014)* continues to outline that, following the grant of outline permission it takes on average 3 years to progress to the start of the first phase of housing, with post 2010 data again showing a drop in the average to 18 months - 2 years. This however considers the time taken to achieve s106 agreement and the preparation of a REM application as two separate stages, when in reality there will be at least

some overlap between these two stages, which could lead to a shorter timeframe. Finally, the study outlines the average time taken between submission of a REM application and the start of the first phase of housing as 14 months, or 8 months for sites post 2010.

5.9 The *Savills (2014)* report is however very clear that progression through these stages can be vary variant from these averages, with potential risks at each stage leading to delays, or indeed in parts of the Country which are established growth areas, such as Milton Keynes, progression can be quicker.

5.10 Reviewing these two studies alone, outlines the potential limitations of solely utilising national studies with both having outlined average timings which are based on different stages of the process (e.g. Lichfields data is based on first completions date whereas Savills is based on start of first housing phase), both outlining different averages overall, and the Savills report on its own showing quite significant differences for post 2010 sites compared to the other sites it has assessed.

5.11 It is therefore essential that local historic evidence is also considered, as is taken into account below, as well as an emphasis being placed on engagement with the landowner and developer of a site to assess the likely delivery timetable for each site on its own.

Neighbouring Authorities

5.12 As part of the process of establishing appropriate lead-in time assumptions for Milton Keynes, it was a felt a review of the assumptions used by some of our neighbouring authorities may be of use. The authorities of Aylesbury Vale District Council (AVDC)¹⁰ and Central Bedfordshire Council (CBC) have been used for the purposes of the 2020 assessment as they form two of the largest of our immediately adjacent neighbouring authorities, have both followed similar paths in terms of recent plan preparation and both propose plans which seek to deliver against similar housing requirements as that of Milton Keynes. As discussed above, there are a range of factors influencing lead-in times and as such differences can occur between neighbouring authorities (for example, the size of the local planning authority and the speed at which they process applications) which means that direct comparisons should not necessarily be drawn. A review of assumptions being used in neighbouring authorities does however still assist in sense checking the assumptions we are proposing.

Aylesbury Vale District Council

5.13 The assumptions used by AVDC are outlined in their most recent Five Year Housing Land Supply Position Statement (April 2019) and are stated as, the assumed time taken between submission of an outline application to first completions on site was between 2 years and 6 months, and 3 years, whilst the assumed time taken from submission of a detailed application to first completions is between 1 year and 18 months.

Central Bedfordshire Council

5.14 The assumptions used by Central Bedfordshire Council are outlined in the *Central Bedfordshire Council Local Plan (2015-2035) Strategic Housing Land Availability Assessment (April 2018)*), and are stated as,

¹⁰ As of 1 April 2020, AVDC now forms part of the new Buckinghamshire Unitary Authority and as such no longer exists as an authority in its own right. Data from AVDC still however provides the most up-to-date source of information for those areas immediately bordering the Borough boundary of Milton Keynes and as such provides the best source of data for comparison purposes with this area.

the assumed time taken from the registration of an outline application to first completions is 3 years and 6 months, whilst assumed time taken from registration of a detailed application to first completions is 2 years and 2 months. Both of which are longer time frames than those used by AVDC, again showing that consideration of local evidence in setting assumptions is essential.

Local Evidence

5.15 Whilst evidence from national studies and neighbouring authorities can be useful in formulating and checking assumptions on lead-in times, their lack of local focus does mean that the most reliable and useful data to review is that related to Milton Keynes. For the purposes of this year's Phasing Methodology, the Council have undertaken more detailed analysis of historic lead-in times for sites within the Borough by analysing the different stages of the delivery process on a large proportion of major residential development sites (and parcels of a site) which have delivered dwellings within past 6 years (2014/15 – 2019/20). This has enabled a more detailed and robust understanding of how long sites take to come forward, specific to the Borough.

5.16 The full assessment of sites is outlined in Appendix 1, whilst some of the key findings are outlined below. Table 5.1 then outlines the lead-in time assumptions that will be used for the purposes of the 2020 assessment. The assessment sought to look separately at strategic sites, non-strategic sites that had followed the route of obtaining outline permission followed by REM approval, and finally smaller sites which obtained FUL permission.

Strategic Sites (for the purposes of the Phasing Methodology this relates to sites of 2,000+ units)

5.17 With regards to strategic sites, the data outlined in Tables 1-3 of Appendix 1 shows that there is no real trend which relates to the time taken once outline permission has been secured through to the first completion. In Milton Keynes this has ranged from 18 months on part of the Strategic Land Allocation (SLA), to 40 months for the Eastern Expansion Area (EEA) and 95 months for the Western Expansion Area (WEA), albeit the timing of the later was significantly impacted by the economic crash in the late 2000's. Given the EEA, WEA and SLA all now have outline permission, parcels with REM approval, and are delivering units, it is not necessary to set an assumption for the period between outline and first completion for these strategic sites.

5.18 Within Plan:MK there are only two new strategic site allocations (East of the M1 Motorway and South East Milton Keynes), these will only be included within the five-year supply when there is clear evidence of their deliverability, including evidence relating to the timescales associated with their delivery, and as such expected progress will be informed by site specific information only.

5.19 In terms of the time taken for the first completion on a parcel of a strategic site once it has REM approval, Table 6 of Appendix 1 shows the average time in Milton Keynes is approximately 13 months and this is consistent over time and over all currently active strategic sites. Albeit there are examples where this period can be as low as 4 months.

Non-Strategic Sites (for the purposes of the Phasing Methodology this relates to sites of less than 2,000 units)

5.20 For non-strategic sites which currently only have an allocation, but do not yet have a planning permission approved, no site will be included within the five-year period unless site specific information provides evidence of progress and demonstrates there is a realistic prospect that housing will be

delivered on the site within the five-year period. The lead-in times related to these sites will only be based on site specific evidence, if this is not available, then the site will be deemed undeliverable. As such, an assumption for the period of time between allocation and first completion is not provided.

- 5.21 For sites which have achieved outline permission, the assessment outlined in Table 4 of Appendix 1, shows an average of 31 months from outline approval to first completion. This includes a range of smaller standalone sites, as well as the larger sites of Oakgrove and Newton Leys. This can also be compared with the separate sites which make up the SLA, which average 38 months; the slightly longer period likely being due to the nature of the SLA, whereby each site was under different ownership and a number of equalisation issues had to be resolved as part of the planning process. It should however be noted that the evidence does show this can be achieved in a much shorter time period (e.g. Land of Castlethorpe Road only took 12 months, whilst Oakgrove, a substantial site of 1,105 dwellings only took 19 months).
- 5.22 These average timings also align with the findings of *Lichfields (2016 and 2020)* which showed national averages of 2-3 years and 1.9-2 years, depending on site size, and *Savills (2014)* which outlined averages of 3 years, or 18 months – 2 years for sites post 2010. They are also comparable with those of our neighbouring authorities.
- 5.23 From the grant of detailed planning permission (FUL or REM) to first completion, the data outlined in Tables 4 and 5 of Appendix 1, shows that there is very minimal difference in this time period between sites which have achieved FUL permission and those which have followed the route of Outline permission and REM approval. As outlined in Table 6 of Appendix 1 the average across these sites is approximately 15 months, albeit the evidence does show this can be achieved in as little as 5 months. Again, these averages align with those in the *Savills (2014)* report and the assumptions used by our neighbouring authorities.
- 5.24 Finally, it should be noted that despite the range of sites which were assessed little correlation was found to enable any further distinctive assumptions to be made, for example on differences between greenfield and brownfield sites or on further splits in relation to site size.

Lead-in Time Assumptions for Milton Keynes 2020

- 5.25 Taking account of the above information, a set of Lead-in Time assumptions have been derived for use in preparing the 2020 5YHLS Assessment and trajectory. The assumptions, as outlined in Table 5.1 draw heavily on the conclusions of our analysis of local delivery evidence, as well as that of national studies and neighbouring authorities, all of which show a good correlation.
- 5.26 Further notes on how these assumptions will be used are outlined below, but It must however be noted that these assumptions will not be applied rigorously, but rather as a broad-brush approach, with site specific information providing the main source of evidence to ensure lead-in times are tailored specifically to each site which is deemed deliverable.

Table 5.1: Lead-in Time Assumptions

Status of Site at 1 April 2019	Lead-in Time to first completion
Strategic Sites	
With REM Approval	13 months
Non-Strategic Sites	
Outline Planning Permission	30 Months
Detailed Planning Permission (FUL or REM)	15 Months

Notes on the application of Lead-in Time Assumptions

1. The lead-in time is applied from the date at which the extant permission for the site was granted.
2. No lead-in time will be applied to sites which, through recent monitoring, have been recorded as being under construction (i.e. dwellings have been recorded as started). These sites have effectively 'used up' their lead-in time.
3. For sites with outline permission, the period of time of 30 months includes the 15 months from REM approval to first completion, this period is not in addition to the 30 months.
4. For allocated sites whereby the Council is aware that the site is developable and that progress towards delivery has been made, however the evidence provided suggests it is unlikely or questionable as to whether the site will deliver housing within the five-year period, these sites will have had their lead-in times increased accordingly and will not feature within the five-year period.
5. On larger strategic sites which have a large Outline permission and numerous parcels with detailed permission which are already delivering, a wider view of the entire site will be taken when applying assumptions on lead-in times, and when sense checking information provided by developers/housebuilders, for future parcels. For example, the lead-in times for a parcel which has recently received detailed permission may be elongated if it is felt that due to the number of parcels already delivering on the wider site, it is unlikely to come forward within the 13-month period.

6. Build-Out Rates

- 6.1 For all sites within the Council's housing trajectory, the Council seek to obtain regular updates on projected build-out rates through ongoing communication with developers, housebuilders, landowners and agents. On at least an annual basis, the Council also request the completion of a site-specific Statement of Common Ground (SoCG) or pro-forma for each site from the relevant body. Where this information is provided the Council will use this alongside an analysis of recent delivery on the site (or, where delivery is yet to start on the site, analysis of similar sites within the area) and a sense check against the Council's assumptions for build-out rates, to populate the projected annual delivery rate for the site moving forward.
- 6.2 Where site specific information on build-out rates has not been provided for the assessment which is being prepared, but the site is considered deliverable, the Council will take into account: any previous site-specific information that has been submitted; the number of units under construction at the start of the year; recent build-out rates achieved on the site and performance against previous projections; and, consideration against a set of build-out rate assumptions, specifically derived for the Borough, as set out in Table 6.4
- 6.3 The build-out rate assumptions, as outlined in Table 6.4 have been developed taking into account a range of data sources and evidence including build-out rates that have been achieved in Milton Keynes in recent years (as recorded by the Council's quarterly housing monitoring process), evidence from national studies, and consideration of build-out rate assumptions applied by our immediate neighbours. A review of each of these evidence sources is outlined below.

National Studies

- 6.4 With regards build-out rates, few of the recognised national studies provide an assessment across the full range of site sizes, instead tending to focus on large scale development; furthermore, the findings of a number of these studies seek to outline an average annual build-out rate which applies across the board to all sizes of sites assessed. For example, **Savills (2014)** assessed 84 sites varying in size from 500 dwellings to 3,000+ dwellings but reports that annual delivery can be anticipated to be around 60 units in first year of construction, picking up to more than 100 units per annum in subsequent years and increasing to around 120 units. This does not however consider differences that may occur across the sites of differing sizes.
- 6.5 Furthermore, the *Savills (2014)* report goes on to state that "*We are aware of many urban extensions in the south of England where recent delivery rates have been substantially in excess of 120 units per annum*". Indeed, the report specifically outlines the Milton Keynes Eastern Expansion Area as one of these sites, referencing the competition from multiple developers on site as being a reason behind this. Therefore, whilst the Savills report does not provide much assistance in proving a range of annual build-out rates, its recognition of sites within Milton Keynes which are delivered by multiple housebuilders is useful. This approach is still applied to the Western and Eastern Expansion Areas and the Strategic Land Allocation and will most likely also apply to the more recently allocated sites East of the M1 Motorway and South East Milton Keynes. The recognition that the approach to delivering these larger sites within Milton Keynes leads to higher delivery rates than the average outlined within the *Savills (2014)* report is

also supported by the work of *Lichfields (2016 and 2020)* and is clearly borne out in the review of local evidence, as outlined below in Table 6.3, and therefore must be considered when formulating assumptions for sites of this size in Milton Keynes.

- 6.6 Similarly, the Letwin review (***Independent Review of Build Out Final Report (October 2018) and Draft Analysis (July 2018)***), whilst providing some useful discussion and conclusions, does not provide any average annual build-out rates, instead outlining the median percentage of a site built out per year, based on a review of 15 large sites, which included the Western Expansion Area of Milton Keynes. This found that across these sites the average median percentage of a site build out in a year was 6.5%. Applied to Area 10 of the Western Expansion Area, a site of 4,320 dwellings, this would lead to an average annual rate of 281 units. As outlined in the local evidence in Appendix 2, this rate and above has been achieved in the past 3 years but is above the average annual rate for the first 5 years of delivery on the site, which stands at 211dpa.
- 6.7 Reviewing this against Brooklands in the Eastern Expansion Area, a site of 2,501 dwellings which has been delivering for a longer period of time, using the Letwin Review percentage would lead to a build-out rate of 163dpa, whereas local evidence as outlined in Appendix 2 shows the average annual build out rate has been substantially higher at 236dpa.
- 6.8 For the purposes of build-out rates, the Letwin Review also used projected data, alongside actual delivery data, provided by developers and Local Planning Authorities to establish this position. This approach is often criticised as it is not founded upon evidence of actual delivery, with many viewing the build-out percentage as being too high as a result. Local evidence in MK however shows that actual historic delivery on large sites in Milton Keynes does vary from the Letwin percentage but not always resulting in a lower figure. Indeed, the only example of a large site that has been developing for a number of years in Milton Keynes, the Eastern Expansion, shows an average median percentage of site build out in a year of 7.1% since first completions were recorded in 2008/09.
- 6.9 Two studies that have looked in more detail at a range of site sizes and have provided a more detailed breakdown of average annual build-out rates are the Colin Buchanan report, ***'Housing Delivery on Strategic Sites' (2005)*** and the two prepared by *Lichfield's (2016 and 2020)*. Whilst the Buchanan report is now 15 years old and provides evidence that pre-dates the recession, the two Lichfield reports provide up-to-date evidence and are well regarded sources of information.
- 6.10 Both Lichfield's reports seek to outline the same information and the 2020 report acts as an update to the original 2016 report, whilst also adding further sites to the assessment. The average annual build-out rates for sites of differing sizes from both reports are outlined in Table 6.1.

Table 6.1: Average Annual Build-Out Rates (taken from Lichfield's 2016 and 2020 reports)

Site Size (Dws)	NLP 2016 (Annual Build-out Rate)	NLP 2020 (Annual Build-out Rate)
Sites less than 100	27	22
Sites 100 to 499	60	55
Sites 500 to 999	70	68
Sites 1,000 to 1,499	117	107
Sites 1,500 to 1,999	129	120
Sites 2,000 +	161	160

- 6.11 As outlined in the 2020 report, whilst the trend is for average annual build-out rates to have dropped between 2016 and 2020, there is little difference observed. Furthermore, as both reports highlight, the figures presented are averages and there are examples of sites which deliver significantly higher and lower than these averages, both overall and in individual years. Indeed, the Eastern Expansion Area in Milton Keynes is highlighted as a key example, whereby both the peak annual build-out rate (473 dwellings) and the average annual build-out rate (268dpa) are significantly above the average identified in the study.
- 6.12 It should also be noted that alongside the Eastern Expansion Area, two further large sites in Milton Keynes formed part of the 2020 assessment. This included 'Oxley Park (East & West)', a site of 1,300 dwellings which was built out over 8 years and delivered at an average of 145dpa; 38 dwellings a year more than the average for a site of this size (107dpa) as outlined in the 2020 report. The second site, 'Broughton (Broughton & Atterbury)', a site of 1,200 dwellings which was built out over 7 years, delivered at an average of 171dpa; 64 dwellings a year more than the average.
- 6.13 The local evidence outlined in Table 6.3 and Appendix 2 also provides further evidence that sites of greater than 2,000 dwellings in Milton Keynes are delivering at a higher annual rate than presented in the Lichfield's reports; an average of 204 units compared to 160 units. Local evidence on smaller sized sites does however generally appear to conform relatively well with Lichfields analysis; for example, large sites up to 2,000 dwellings in Milton Keynes are delivering on average at 140dpa, compared to 120dpa in the Lichfields 2020 report and 129dpa in their 2016 report.
- 6.14 Similarly, on sites up to 500 dwellings, the highest average in Milton Keynes is 48dpa, compared with 55dpa and 60dpa in the 2020 and 2016 Lichfield reports respectfully. This provides a good sense check for the local Milton Keynes evidence, but also supports the view as outlined in paragraphs 3.6 to 3.9 that it is essential that local evidence on delivery is considered alongside general assumptions from national studies, so as local differences can be recognised.
- 6.15 The Lichfield reports also outline a number of other points which are useful considerations both generally and in relation to Milton Keynes specifically.
- 6.16 In relation to Milton Keynes, both reports and the Savills (2014) report outline that it is widely recognised that the planning and delivery of large-scale housing sites in Milton Keynes is distinct from many other areas. Through the Milton Keynes model, serviced parcels with roads and key infrastructure already provided are delivered so as multiple house builders are able to proceed straight onto the site and commence delivery on different serviced parcels. This has been found to limit the upfront site works required and boost the annual build rates. Most 'large' sites and all 'strategic' sites within the housing supply are being, or will be, delivered by multiple housebuilders across a number of parcels, using this same model; once again enabling a higher than average delivery rate to be realised. For example, during 2019/20, the Western Expansion Area, Area 10 had twelve active parcels under five different housebuilders and delivered 341 dwellings.
- 6.17 The Lichfield reports also outline that where 30% or above affordable housing is proposed on a site the build rates are at the higher end of the national average. Plan:MK requires sites to provide a minimum of 31% affordable housing, whilst the Western and Eastern Expansion Areas and all elements of the Strategic Land Allocation have all been granted outline permission based on the provision of 30% affordable housing.

Neighbouring Authorities

6.18 As part of the process of establishing appropriate build-out rate assumptions for Milton Keynes, a review of the assumptions used by some of our immediate neighbouring authorities has been undertaken; for the reasons outlined in paragraph 5.12, AVDC and CBC have been reviewed. This allows for both a comparison of delivery performance with Milton Keynes and also a sense check of the assumptions we are proposing.

Aylesbury Vale District Council

6.19 Whilst the most recent 2019/20 5YHLS assessment for AVDC does refer to build-out rate assumptions used by the Council, there is no document where these are specifically set out.

6.20 The January 2017 Housing and Economic Land Availability Assessment which was used for preparing the Vale of Aylesbury Local Plan and submitted for the purposes of its ongoing examination, outlined that build-out rates depended on the location of the site and the settlement size, setting out for example that large sites in Aylesbury and Buckingham are considered to be able to deliver 200dpa, but sites over 50 dwellings in larger villages are considered to deliver more like 20dpa. It states that these are seen as “*general conservative assumptions based on past delivery rates*”.

6.21 The 2019/20 5YHLS assessment does however suggest more varied rates, stating that sites in Aylesbury deliver approximately 175dpa, sites in Buckingham 100dpa and sites in villages 30dpa; no details around how these assumptions are applied, or to what size of sites they are applied, are however provided.

Central Bedfordshire Council

6.22 For CBC the most up-to-date source of evidence outlining the assumptions they use with regards to build-out rates can be found within the *Central Bedfordshire Council Local Plan (2015-2035) Strategic Housing Land Availability Assessment (April 2018)*. The assumptions, as outlined in Table 6.2, are average annual expected completions based on delivery rates from all sites of 10 or more dwellings over the previous three-year period. The figures do however discard the first and last years of a site’s delivery as these do not represent a full 12 months.

Table 6.2: Average annual delivery rates on sites in Central Bedfordshire over 3-year period 2015-2018

Site size	Annual average dwellings delivery
10-20	Completed in 1-2 years
21-50	21
51-100	44
101-200	46
201-500	87

Local Evidence

6.23 As outlined previously in this Phasing Methodology, whilst evidence from national studies and neighbouring authorities can be useful in formulating and checking assumptions on build-out rates, the most reliable and useful data is that related to Milton Keynes. For the purposes of this year's Phasing Methodology, the Council have therefore undertaken more detailed analysis of historic build-out rates within the Borough by analysing delivery rates on every major residential site (and parcel of a site) which has delivered dwellings, for the past 6 years (2014/15 – 2019/20). This has enabled a more detailed and robust understanding of delivery specific to the Borough.

6.24 The full assessment of each site can be found in Appendix 2 of this Phasing Methodology, whilst the summary of the average annual build-out rates and average peak annual build-out rates are outlined in Table 6.3. The table is broken down by site size; the site sizes used were chosen due to noticeable trends within the data set. Discussion relating to some of these trends and the data analysed is also outlined below.

Table 6.3: Average Annual Build-Out Rates of all sites within Milton Keynes between 2014/15 and 2019/20

Site Size (Dws)	Average Annual Build-out Rate (dpa)	Average Peak Build-out Rate
Small: 10-50	14	16
Medium: 50-200	43	56
Large: 200-500	48	76
Extra-Large: 500-2,000	140	200
Strategic: 2,000 +	204	311
Parcels on Extra-Large and Strategic Sites		
Parcels >200	69	92
Parcels <200	38	48

Notes on analysis of local evidence

1. For this research, all sites that delivered completions within the 6-year period were used in the assessment, including larger sites (or parcels) which may have only shown deliveries in one year. In some of these cases, where it is the first or last year of completions on a site, these most likely do not represent a full year of completions and as such their inclusion does potentially skew the average annual build-out rate, making it more conservative. A number of national studies seek to remove these from their analysis so as to get an average for when the site is delivering at its best. These years have however been left in our analysis so as to ensure the data is as realistic as possible and is not reflected in a manner which would be deemed as overly optimistic.
2. With regards to 'Large' sites, the data set analysed does not provide much information on sites of this size which are split into a number of parcels. For those sites of this nature for which data was available during the period analysed (Kingsmead South and NEA Rocla Pipes), it also captures the site at the start or end of its delivery. As such the data does not provide much of a delivery picture for

how 'Large' sites split into parcels may come forward. For example, for Kingsmead South in the year 2019/20 when two parcels were active, the site delivered 131 dwellings, substantially higher than the average 48 dwellings per annum that analysis of the full data set has outlined. The same can be said for the NEA Rocla Pipes site in 2014/15, the only year where more than one parcel was delivering. As such an average annual delivery rate of 48dpa may be considered low for a site of this size which has more than one active parcel.

3. In establishing the average annual build-out rates for 'Strategic' sites, the totals for the Strategic Land Allocation (SLA), were not included. This is because the SLA is at a very early stage of delivery with almost all parcels that have delivered completions only having done so for one year. As such, there inclusion would cause an unrealistic skew to the average annual delivery rates of strategic sites. The SLA completions on a parcel by parcel basis, have however been included within the analysis of delivery rates for parcels within 'Extra-Large' and 'Strategic' sites.
4. With regards 'strategic sites' it is worth noting that the EEA is the only site delivering for more than 5 years within the data analysed in Appendix 2. Both the WEA sites have only been delivering for 5 years as of the end of 2019/20. The *Lichfield (2020)* report outlines that sites delivering for 5 + years provide higher average annual completions; this is also reflected in the local evidence with the EEA having a higher average than both the WEA sites. It could therefore be the case that the average annual build-out rate for sites with 2000+ dwellings outlined in Table 6.3 is actually lower than could be expected and local evidence has been skewed by the relatively limited time for which both WEA sites have actually been delivering for.
5. Given Milton Keynes' history as a new town, the large majority of sites reviewed (and indeed future development sites within the housing trajectory) are greenfield sites. The completions data reviewed does however contain a range of brownfield sites that have been delivered in recent years and, as there is no discernible difference in the delivery rates between greenfield and brownfield sites analysed, the assessment has not sought to split the data further under these headings.

Build-out Rate Assumptions for Milton Keynes 2020

- 6.25 Taking account of the above information, a set of build-out rate assumptions have been derived for use in preparing the 2020 5YHLS Assessment and trajectory. The assumptions, as outlined in Table 6.4 draw heavily on the conclusions of our analysis of local delivery evidence, as this provides the best data for understanding how different sites deliver within Milton Keynes. Furthermore, with the exception of those outlined for 'strategic' sites, the assumptions set out in Table 6.4 align well with the average build-out rate data set out in national studies, particularly the *Lichfield (2016 & 2020)* reports, and fall below those used in neighbouring authorities.
- 6.26 With regards to 'strategic' sites, whilst the assumption used here is above the average build-out rate for sites of this size outlined within national studies, these national studies, as discussed in paragraphs 6.11, 6.12 and 6.16, recognise Milton Keynes' ability to deliver at higher rates than the national average on large sites and this is further supported by local evidence of a higher average build-out rate. Indeed whilst the build-out rate assumption for 'strategic' sites set here is slightly above that outlined in the local evidence in Appendix 2, it still remains below the average annual build-out rate seen on the

Eastern Expansion Area and is substantially lower than the figure of 300dpa which was used in the 2019 Phasing Methodology.

Table 6.4: Build-Out Rate Assumptions

Site Size (Dws)	Potential Annual Yield Assumption (dpa)
Small: 10-50	15
Medium: 50-200	40
Large: 200-500 with one parcel	45
Large: 200-500 with two parcels	70
Extra-Large: 500-2,000	140
Strategic: 2,000+	220
Parcels on Extra-Large and Strategic Sites	
Parcels >200	70
Parcels <200	35

Notes on the Application of Build-Out Rate Assumptions

1. The assumptions outline the average annual build-out rate for the development across the entirety of its lifetime. They are not a yearly maximum and, for most sites, particularly those of ‘medium’ scale and above, the rate will not necessarily be applied uniformly across each year of the sites delivery. Many sites will have lower completions in early and later years to reflect that not every year of a development will see a full year of completions (e.g. a site may provide its first completion halfway through a year). Furthermore, ‘Extra-Large’ and ‘Strategic’ sites may also experience peaks and troughs in delivery in relation to the number of outlets delivering, the disposal of parcels, and the stage at which any reserved matters applications are at. Where the Council has evidence that this could potentially occur, the build-out rates applied will attempt to reflect these delivery cycles.
2. For ‘Extra-Large’ and ‘Strategic’ sites whereby numerous parcels are projected to be delivering at the same time, the build-out rates of individual parcels may be reduced below the assumed build-out rate for that parcel size, so as the potential annual yield of the wider site does not exceed its build-out rate, unless site specific evidence and monitoring information has been provided that demonstrates this is achievable.
3. Projected average annual build-out rates for a specific site that exceed those in Table 6.4, may still be applied in circumstances where evidence has been provided by the housebuilder/developer of the site and, following sense checking by Council officers, the rates are felt to be realistic and deliverable, particularly where recent delivery rates on the site show it to be achievable.
4. In applying the assumptions, or using them to sense check information, consideration will also be given to other factors that may influence the build-out rate of a site, for example, on a larger site, how many parcels/outlets are currently active on the site, how many other parcels does the housebuilder have on the same site and how has the wider development, and the relevant parcel and housebuilder, performed in recent years.

5. For sites which contain blocks of flats/apartments, whether entirely, or as a part of the development, this will be taken into consideration. As a block of flats/apartments will be completed in its entirety rather than in stages, the projected completions will be shown at the end of the site's delivery period. If the site contains a number of blocks of flats, the Council will seek to obtain phasing data for each block and apply build-out rates that take these into account.

Slippage Discount

- 6.27 For the purposes of its 5YHLS position, the Council has, in recent years, applied a 10% discount to the housing supply of all sites where completions (of any quantity) were profiled in year 5 of the five-year period. This discount was applied as an allowance for unforeseen potential slippage in the expected delivery of sites.
- 6.28 As outlined in the Council's submitted proofs of evidence for two S78 appeals heard during 2019/20¹¹, it is the Council's view that the application of a generic discount to the housing supply is no longer deemed appropriate or necessary as it does not align with the approach required of the NPPF and PPG to provide clear site-specific evidence of delivery. It is the view of the Council that where a site is included for delivery within the five-year period it is done so only because there is clear evidence, following an assessment of each individual site, to demonstrate a realistic prospect that housing completions of the level outlined, will be delivered on the site within five years. It was therefore proposed that the Council would not apply this 10% discount for future 5YHLS assessment.
- 6.29 The Inspectors at both aforementioned appeals concluded that there was no requirement within the NPPF or PPG to apply a discount to the housing supply to account for either potential slippage or lapse, or indeed for optimism bias and, the Inspector at the Cranfield Road appeal went further in his conclusion that a discount was not required, by outlining that the detailed assessment of sites undertaken by the Council in his view reduces uncertainty within the housing supply.
- 6.30 In light of the Inspectors' conclusions at these appeals, the absence of national policy or guidance requiring the application of a discount, and the detailed site-specific assessment the Council undertakes in preparing its 5YHLS position (as outlined in this phasing methodology), the Council will not be including a generic discount to the housing supply element of the assessment.

¹¹ APP/Y0435/W/19/3234204 – Rectory Farm, Bow Brickhill, and; APP/Y0435/W/17/3169314 – Land to east of Newport Road and to the east and west of Cranfield Road, Woburn Sands.

7. Conclusions

- 7.1 For the purpose of assessing housing delivery the Council will continue to implement the robust processes in place to secure direct information on a site-by-site basis, both through continual monitoring and engagement, as its primary source of evidence to demonstrate deliverability.
- 7.2 This phasing methodology adds another layer to this process by providing a set of locally specific, assumptions and parameters to sense check site specific data and to assist in projecting delivery on sites whereby the level of site-specific information is not as detailed. Furthermore, the methodology adds further transparency to the process undertaken by Council officers in preparing its annual assessment of 5YHLS.
- 7.3 The processes and assumptions outlined within this document will continue to be reviewed every year to ensure they are fit for purpose and reflect any changes that impact upon housing delivery at both a national and local level. This is particularly prevalent given the ongoing Covid-19 crisis at the time of preparing this 2020 report.
- 7.4 As a whole, the Council considers this approach provides the 'clear evidence' needed to assess housing delivery within the five-year period, as required by the NPPF and PPG.

Appendix 1: Milton Keynes Lead-in Times

Table 1: Strategic Site - Western Expansion Area

Table 2: Strategic Site – Eastern Expansion Area (Brooklands)

Table 3: Strategic Site – Strategic Land Allocation (SLA)

Table 4: Non-Strategic Sites with Outline permission

Table 5: Small to Medium sized sites with FUL permission

Table 6: Average lead-in times from grant of detailed permission

Table 1: Strategic Site - Western Expansion Area

Ref	Area and Site Name	Total dws	Green/Brown	OUT Approval	Full Approval	First Comp	Detailed to Comp (Months)		
05/00291/MKPCO	WEA AREA 10 - WHITEHOUSE	4320		Oct-07	Apr-15	Sep-15		OUT to first Comps = 95 months	
14/02385/REM	AREA 10.1 PARCEL F	61	Greenfield	Oct-07	Apr-15	Sep-15	5		
14/02383/REM	AREA 10.1 PARCELS A AND B	121	Greenfield	Oct-07	Jul-15	Apr-17	21		
15/00499/REM	WEA 10.3 PARCELS C1 B1 F R J G N AND P	217	Greenfield	Oct-07	Oct-15	May-17	19		
15/01368/REM	WEA PARCEL 10.3A PART 2	85	Greenfield	Oct-07	Nov-15	Jan-17	14		
15/02532/REM	WEA AREA 10.1 PARCEL I	34	Greenfield	Oct-07	Jan-16	Oct-19	45 ¹		
15/02630/REM	WEA AREA 10.3 BELLWAY PHASE 1	230	Greenfield	Oct-07	Feb-16	Jan-17	11		
16/01457/REM	WEA PARCEL 10.1E	114	Greenfield	Oct-07	Aug-16	Dec-17	16		
16/02817/REM	PARCELS 10.1 C AND D	129	Greenfield	Oct-07	Mar-17	May-18	14		
17/00164/REM	WEA PARCEL 10.1G	111	Greenfield	Oct-07	Apr-17	Apr-18	12		
17/00248/REM	WEA PARCEL 10.3A PART 1	50	Greenfield	Oct-07	Jul-17	Oct-18	15		
17/03408/REM	PARCEL 10.1H RE-PLAN	64	Greenfield	Oct-07	Mar-18	Oct-19	18		
18/00726/REM	PARCELS 10.3G PARTS 1 AND 2	146	Greenfield	Oct-07	Jul-18	Oct-19	15		
18/01724/REM	WEA 10.1 TO 10.3	129	Greenfield	Oct-07	Oct-18	Oct-19	12		
						Average	17		
06/00123/MKPCO	WEA AREA 11 - FAIRFIELDS	2220	Greenfield	Oct-07	Feb-15	Jun-15			OUT to first Comps = 92 months
14/01316/REM	WEA AREA 11 PARCELS 3A 4A AND PART 3B	144	Greenfield	Oct-07	Feb-15	Jun-15	4		
14/01790/REM	WEA AREA 11 PARCELS 4B 5C AND PART 3B	262	Greenfield	Oct-07	Aug-15	Apr-16	8		
15/03045/REM	WEA AREA 11 PARCELS 6A 6B AND 6C	216	Greenfield	Oct-07	Apr-16	Jun-17	14		
16/03133/REM	AREA 11 PARCELS 2B 2C 5A 5B 6D	241	Greenfield	Oct-07	Jan-17	Apr-18	15		
17/01669/REM	FAIRFIELDS PHASE 5	240	Greenfield	Oct-07	Sep-17	Nov-18	14		
						Average	11		

Notes:

1 – ‘WEA Area 10.1 Parcel I’ is a small parcel which has been used by Abbey Homes as their works compound whilst delivering the units on the adjacent parcels for which they also have control. It is therefore the last of their parcels that they began work on and as such this has led to the extended time between receiving detailed permission and first completion.

Table 2: Strategic Site – Eastern Expansion Area (Brooklands)

Ref	Area and Site Name	Total dws	Green/Brown	OUT Approval	Full Approval	First Comp	Detailed to Comp (Months)		
06/00220/MKPCO	LAND AT BROOKLANDS	2501	Greenfield	Aug-07	Feb-10	Dec-10	8	OUT to first Comps = 40 months	
13/01842/REM	BROOKLANDS BDW PHASE 1	197	Greenfield	Aug-07	Apr-14	Dec-14	9		
14/01069/REM	BROOKLANDS BDW PHASE 1B	427	Greenfield	Aug-07	Oct-14	Jun-15	8		
14/01896/REM	BROOKLANDS BDW PHASE 1C	58	Greenfield	Aug-07	Mar-15	Nov-15	8		
14/02883/REM	BROOKLANDS GATEWAY SITE	48	Greenfield	Aug-07	Jul-15	Jun-16	11		
15/01448/REM	BROOKLANDS BDW PHASE 1E	61	Greenfield	Aug-07	Oct-15	Nov-16	13		
15/01477/REM	BROOKLANDS BDW PHASE 1D	84	Greenfield	Aug-07	Jan-16	Oct-16	9		
16/00086/REM	BROOKLANDS BDW PHASE 2A	225	Greenfield	Aug-07	Jun-16	Jun-17	12		
16/00125/REM	BROOKLANDS SQUARE PHASE B	21	Greenfield	Aug-07	Nov-16	Apr-19	29		*Development entirely flatted ¹
16/02695/REM	BROOKLANDS BDW PHASES 2B 3B 3C AND 4A	276	Greenfield	Aug-07	Dec-16	Oct-17	10		
16/03397/REM	BROOKLANDS BDW PHASE 3A 4B 5A 7A 7B	362	Greenfield	Aug-07	Feb-17	Apr-18	14		
16/02793/REM	BROOKLANDS SQUARE PHASE A & C	55	Greenfield	Aug-07	Feb-17	Apr-19	26		*Development entirely flatted ¹
18/02664/REM	LAND AT BROOKLANDS	111	Greenfield	Aug-07	Feb-19	Oct-19	8		
					Average		13		*without two flatted developments = 10 months

Notes:

1 – Completions on developments that consist of one flat block will all be registered at once as opposed to being delivered in stages across a number of years, this therefore elongates the time between the granting of detailed approval and the first completion (the timescale is essentially the time taken from approval to completion of the whole scheme, rather than the first unit) compared to that seen on developments which predominantly consist of houses. The data above has therefore been presented with and without the two flatted schemes included, so as to be clear on the impact they have on the overall averages.

Table 3: Strategic Site – Strategic Land Allocation (SLA)

Ref	Area and Site Name	Total dws	Green/Brown	OUT Approval	Full Approval	First Comp	OUT to Comp (Months)	Detailed to Comp (Months)
HAYNES LAND	14/02167/OUTEIS - 385DWS	385	Greenfield	Apr-15	Jan-18	Mar-19	47	14
18/02183/REM	HAYNES LAND (Phase 3 Parcel B2) (Land West of EFS)	174	Greenfield	Apr-15	Dec-18	N/A		N/A
17/02483/REM	HAYNES LAND (Phase 2 Parcel D1) (Land West of EFS)	200	Greenfield	Apr-15	Jan-18	Mar-19	47	14
EAGLE FARM	13/02381/OUTEIS - 410DWS	410	Greenfield	Apr-15	Aug-17	May-18	37	9
17/01038/REM	EAGLE FARM (Phase 1 Parcel B1)	259	Greenfield	Apr-15	Aug-17	May-18		9
GLEBE FARM	13/02382/OUT - 1140DWS	1140	Greenfield	Apr-15	Mar-18	Jun-19	50	15
19/01268/REM	GLEBE FARM - Lot 1 Parcel A	198	Greenfield	Apr-15	Oct-19	N/A		N/A
19/01632/REM	GLEBE FARM - Lot 2 Parcel A	168	Greenfield	Apr-15	Sep-19	N/A		N/A
17/02883/REM	LAND AT GLEBE FARM (Phase 1) parcel D	160	Greenfield	Apr-15	Mar-18	Jun-19		15
18/02097/REM	LAND AT GLEBE FARM (Phase 2) Parcel C	225	Greenfield	Apr-15	Nov-18	Dec-19		13
LAND SE OF ELMSWELL GATE	15/02768/OUT - 240DWS	240	Greenfield	Sep-17	Feb-18	Mar-19	18	13
17/03283/REM	LAND SE OF ELMSWELL GATE	191	Greenfield	Sep-17	Feb-18	Mar-19		13
18/03056/REM	LAND SE OF ELMSWELL GATE PHASE 2	49	Greenfield	Sep-17	Mar-19	N/A		N/A
							Average	13

Table 4: Non-Strategic Sites with Outline permission

Ref	Area and Site Name	Total dws	Green/Brown	OUT Approval	Full Approval	First Comp	OUT to Comp (Months)	Detailed to Comp (Months)
16/02871/REM	BETWEEN 36 AND 38 LONG STREET ROAD	12	Greenfield	Mar-15	Jan-17	Dec-17	33	10
16/00533/REM	FORMER EMPLOYMENT ALLOCATION PHASE 1	33	Greenfield	May-14	Jan-17	Oct-19	65 ¹	33
17/03236/REM	LAND WEST OF HIGH STREET	36	Greenfield	Mar-16	Aug-18	Apr-19	36	8
15/00171/REM	SITE AT SHERWOOD DRIVE DEPOT	56	Brownfield	Feb-15	Apr-15	Oct-16	20	18
17/03385/REM	LAND OFF CASTLETHORPE ROAD	150	Greenfield	Dec-17	Jun-18	Dec-18	12	6
18/01608/REM	SITE SOUTH OF HALES FOLLY FARM	141	Greenfield	Mar-18	Oct-18	Oct-19	19	12
						Average	31	15
OAKGROVE	09/00618/OUTEIS - 1,105 DWS			Oct-11	Mar-12	May-13	19	14
11/02404/REM	OAKGROVE PHASE 1	231	Greenfield	Oct-11	Mar-12	May-13	19	14
13/01924/REM	OAKGROVE PHASE 2	112	Greenfield	Oct-11	Dec-13	Jan-15		13
14/00207/REM	OAKGROVE PHASE 3	279	Greenfield	Oct-11	May-14	Aug-15		15
12/00733/REM	MIDDLETON - NOON LAYER DRIVE	64	Greenfield	Oct-11	Sep-12	Jun-13		9
14/02178/REM	OAKGROVE PHASE 4	183	Greenfield	Oct-11	Dec-14	Nov-16		23
16/02523/REM	OAKGROVE PHASE 5	73	Greenfield	Oct-11	Dec-16	Apr-19		28
							Average	17
NEWTON LEYS	02/01337/OUT - 1,650 DWS			Jun-05	Jul-07	Jan-09	43	18
08/00233/REM	NEWTON LEYS PHASE 2	394	Greenfield	Jun-05	May-08	Jul-10		26
11/00851/REM	NEWTON LEYS PHASE 3A	75	Greenfield	Jun-05	Dec-11	Jun-12		6
12/02515/REM	NEWTON LEYS PHASE 3B AND 3C	259	Greenfield	Jun-05	Jun-13	Apr-14		10
13/00224/REM	NEWTON LEYS PHASE 2 E2	63	Greenfield	Jun-05	Dec-13	Jun-14		7
12/00887/REM	NEWTON LEYS PHASE 4	194	Greenfield	Jun-05	Oct-14	Aug-15		10
16/03407/REM	NEWTON LEYS PHASE 3D	11	Greenfield	Jun-05	Mar-17	Nov-18		21
17/01059/REM	PHASE 6 NEWTON LEYS	183	Greenfield	Jun-05	Aug-17	Jan-19		16
17/02143/REM	NEWTON LEYS, PHASE 5	248	Greenfield	Jun-05	Nov-17	Aug-19		21
							Average	15

Notes:

1 – The timescales associated with ‘Former Employment Allocation Phase 1’ are explained due to issues regarding gaining planning permission for Phase 2 of the scheme. Following approval of outline permission for Phase 1, outline permission was sought for Phase 2. The application for Phase 2 was refused and eventually planning permission was granted via appeal over 18 months later. At this stage, REM approval was submitted and granted for Phase 1, however submission of Phase 2 for REM approval was delayed due to on-site issues relating to flooding and the proximity to an Anglian Water Sewerage works on adjacent land. It is only once permission was granted for Phase 2 that work has begun on Phase 1. Overall, this led to a significantly longer time between outline permission, and REM approval, being granted and the first completion than is seen on any other site that has been analysed.

Table 5: Small to Medium sized sites with FUL permission

Ref	Area and Site Name	Total dws	Green/Brown	Full Approval	First Comp	Detailed to Comp (Months)	
12/00186/FUL	LAND REAR OF 9 NEWPORT ROAD	10	Greenfield	Oct-12	Apr-14	18	
12/00916/FUL	FORMER BT SITE	56	Brownfield	Jun-13	Apr-14	10	
13/01117/FUL	GREENS HOTEL	35	Brownfield	Nov-13	Feb-16	27	*Development entirely flatted ¹
13/01619/FUL	FORMER FIRST SCHOOL SITE	24	Brownfield	Mar-14	Dec-14	9	
13/02328/FUL	LAND AT BEDGEBURY PLACE	40	Greenfield	Apr-14	Dec-14	8	
13/00005/FUL	NAMPAK PHASE 4	95	Brownfield	Apr-14	Sep-14	5	
15/00825/FUL	OXLEY PARK SITE 4A AND 5	131	Greenfield	Mar-16	Dec-16	9	
15/00670/FUL	ST GILES RESIDENTIAL HOME	52	Greenfield	May-16	Oct-18	29	*Development entirely flatted ¹
16/00166/FUL	BLIND POND FARM	24	Brownfield	Jun-16	Feb-17	8	
14/02799/FUL	LAND AT NETWORK HOUSE	73	Brownfield	Aug-16	Jun-17	10	
16/01348/FUL	7 & 7A AYLESBURY STREET	14	Brownfield	Jan-17	Jan-18	12	
16/03118/MKCOD3	18A ST GEORGES ROAD	10	Brownfield	Jan-17	Apr-19	27	
16/01100/FUL	LAND WEST OF LILLESALL AVENUE	24	Greenfield	Jan-17	Dec-17	11	
16/02331/FUL	LAND TO THE SOUTH OF PENN ROAD	39	Greenfield	Feb-17	Dec-17	10	
16/03038/FUL	809 TO 811 SILBURY BOULEVARD	139	Brownfield	Mar-17	Jan-20	34	*Development entirely flatted ¹
14/02425/FUL	LAND AT OUR LADY OF LOURDES CHURCH	11	Brownfield	Mar-17	Jul-18	16	
15/02319/FUL	NAMPAK PHASES 5 & 6	81	Brownfield	Apr-17	Oct-18	18	
16/00312/FUL	LAND REAR OF 90 EAST STREET	14	Brownfield	Apr-17	Jan-18	9	
16/00349/FUL	FORMER ASTON MARTIN SITE	86	Brownfield	Apr-17	Sep-17	5	
16/02904/FUL	2 WESTBURY LANE	10	Brownfield	May-17	Jul-18	14	
16/01475/FUL	THE SUFFOLK PUNCH	27	Brownfield	Apr-18	Jan-19	9	
18/00735/FUL	LAND OFF LADBROKE GROVE	26	Greenfield	Oct-18	Jan-20	15	
					Average	14	*without two flatted developments = 13 months

Notes:

1 – Completions on developments that consist of one flat block will all be registered at once as opposed to being delivered in stages across a number of years, this therefore elongates the time between the granting of detailed approval and the first completion (the timescale is essentially the time taken from approval to completion of the whole scheme, rather than the first unit) compared to that seen on developments which predominantly consist of houses. The data above has therefore been presented with and without the two flatted schemes included, so as to be clear on the impact they have on the overall averages.

Table 6: Average lead-in times from grant of detailed permission

Site	Average time from FUL Permission/REM Approval to First Completion (Months)
Strategic Sites with REM Approval	
WEA Area 10	17
WEA Area 11	11
Brooklands	13 (10 without flatted only developments)
SLA Average	13
Overall Average	13.5 (12.75 without flatted only developments)
Non-Strategic Sites	
Non-Strategic Sites with REM	14 (13 without flatted only developments)
Oakgrove	15
Newton Leys	17
Sites with REM Approval	15
Overall Average	15.25 (15 without flatted only developments)

Appendix 2 – Milton Keynes Build-Out Rates 2014/15 – 2019/20

Table 1: Small Sites 10-50 dwellings

Table 2: Medium Sites 50-200 dwellings

Table 3: Large Sites 200-500 dwellings

Table 4: Extra-Large Sites 500-2000 dwellings

Strategic Sites: 2000+ dwellings

Table 5: Western Expansion Area

Table 6: Eastern Expansion Area

Table 7: Strategic Land Allocation

Table 8: Average Annual Build-Out Rates – Strategic Sites

Table 9: Average Annual Build-Out Rates – Parcels >200 Dws, on Extra-Large & Strategic Sites

Table 10: Average Annual Build-Out Rates – Parcels <200 Dws, on Extra-Large & Strategic Sites

Table 1: Small Sites 10-50 dwellings													
Area	Site	Ref	Total dws	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	Total dws built	No. Yrs	Average annual build-out	peak annual build out
BLETCHLEY	LAND TO THE SOUTH OF PENN ROAD	16/02331/FUL	39	0	0	0	12	27	0	39	2	20	27
BLETCHLEY	25 TO 27 AYLESBURY STREET	15/01872/FUL	14	0	0	0	14	0	0	14	1	14	14
BLETCHLEY	7 & 7A AYLESBURY STREET	16/01348/FUL	14	0	0	0	14	0	0	14	1	14	14
BLETCHLEY	18A ST GEORGES ROAD	16/03118/MKCOD3	10	0	0	0	0	0	10	10	1	10	10
BLETCHLEY	86-96 QUEENSWAY	16/03111/FUL	10	0	0	0	0	10	0	10	1	10	10
BOW BRICKHILL	BLIND POND FARM	16/00166/FUL	24	0	0	10	14	0	0	24	2	12	14
COFFEE HALL	LAND AT OUR LADY OF LOURDES CHURCH	14/02425/FUL	11	0	0	0	0	11	0	11	1	11	11
HANSLOPE/LONG STREET	BETWEEN 36 AND 38 LONG STREET ROAD	16/02871/REM	12	0	0	0	9	3	0	12	2	6	9
HANSLOPE/LONG STREET	LAND REAR OF 9 NEWPORT ROAD	12/00186/FUL	10	10	0	0	0	0	0	10	1	10	10
HEELANDS	THE SUFFOLK PUNCH	16/01475/FUL	27	0	0	0	0	18	9	27	2	14	18
KENTS HILL	LAND AT BEDGEBURY PLACE	13/02328/FUL	40	4	36	0	0	0	0	40	2	20	36
MONKSTON	LAND WEST OF LILLESBALL AVENUE	16/01100/FUL	24	0	0	0	2	22	0	24	2	12	22
MONKSTON PARK	LAND OFF LADBROKE GROVE	18/00735/FUL	26	0	0	0	0	0	6	6	1	6	6
NEWPORT PAGNELL	2 WESTBURY LANE	16/02904/FUL	10	0	0	0	0	10	0	10	1	10	10
OLNEY	LAND REAR OF 90 EAST STREET	16/00312/FUL	14	0	0	0	14	0	0	14	1	14	14
OLNEY	FORMER EMPLOYMENT ALLOCATION PAHSE 1	16/00533/REM	33	0	0	0	0	0	15	15	1	15	15
SHENLEY BROOK END	LAND AT FORMER FIRST SCHOOL SITE	13/01619/FUL	24	10	14	0	0	0	0	24	2	12	14
SHENLEY BROOK END	FORMER FIRST SCHOOL SITE	13/01619/FUL	24	10	14	0	0	0	0	24	2	12	14
SHERINGTON	LAND WEST OF HIGH STREET	17/03236/REM	36	0	0	0	0	0	24	24	1	24	24
STACEY BUSHES	FORMER BRIAR LODGE	12/02258/OUT	13	13	0	0	0	0	0	13	1	13	13
WESTCROFT	WESTCROFT SITE 16	12/01179/REM	57	32	0	0	0	0	0	32	1	32	32
WOBURN SANDS	GREENS HOTEL	13/01117/FUL	35	0	3	23	9	0	0	35	3	12	23
WOLVERTON	FORMER SCRAP YARD MCCONNELL DR	12/00498/FUL	11	11	0	0	0	0	0	11	1	11	11
											AVERAGE	14	16

Average Build-Out Rate	14 DPA
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Table 2: Medium Sites 50-200 dwellings													
Area	Site	Ref	Total dws	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	Total dws built	No. years	Average annual build-out	Peak annual build-out
BLETCHLEY	SITE AT SHERWOOD DRIVE DEPOT	15/00171/REM	56	0	0	56	0	0	0	56	1	56	56
BLETCHLEY	FORMER BT SITE	12/00916/FUL	56	56	0	0	0	0	0	56	1	56	56
CAMPBELL PARK	BLOCKS 14A AND 14B	13/01113/REM	169	22	23	84	40	0	0	169	4	42	84
CENTRAL MILTON KEYNES	809 TO 811 SILBURY BOULEVARD	16/03038/FUL	139	0	0	0	0	0	139	139	1	139 ¹	139
HANSLOPE/LONG STREET	LAND OFF CASTLETHORPE ROAD	17/03385/REM	150	0	0	0	0	9	49	58	2	29	49
HANSLOPE/LONG STREET	SITE SOUTH OF HALES FOLLY FARM	18/01608/REM	141	0	0	0	0	0	7	7	1	7 ²	7
NEWPORT PAGNELL	LAND AT NETWORK HOUSE	14/02799/FUL	73	0	0	0	32	41	0	73	2	37	41
NEWPORT PAGNELL	FORMER ASTON MARTIN SITE	16/00349/FUL	86	0	0	0	11	65	10	86	3	29	65
OXLEY PARK	OXLEY PARK SITE 4A AND 5	15/00825/FUL	131	0	0	9	41	64	17	131	4	33	64
STONY STRATFORD	ST GILES RESIDENTIAL HOME	15/00670/FUL	52	0	0	0	0	52	0	52	1	52	52
WOBURN SANDS	NAMPAK PHASE 3	09/01516/FUL	112	23	0	0	0	0	0	23	1	23	23
WOBURN SANDS	NAMPAK PHASE 4	13/00005/FUL	95	19	48	14	14	0	0	95	4	24	48
WOBURN SANDS	NAMPAK PHASES 5 & 6	15/02319/FUL	81	0	0	0	0	11	44	55	2	28	44
											AVERAGE	43	56

Average Build-Out Rate	43 DPA
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Notes:

1 – ‘809 to 811 Silbury Boulevard’ was an entirely flatted scheme which, as is often the case for flatted schemes, completed all units in one year, hence the high average annual figure.

2 – Data only captures the first completions on ‘Site South of Hales Folly Farm’ and this does not represent a whole year, hence the low average annual figure.

Table 3: Large Sites 200-500 dwellings													
Area	Site	Ref	Total dws	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	Total dws built	No. years	Average annual build-out	Peak annual build-out
CAMPBELL PARK	CANALSIDE MARINA	17/00850/REM	383	0	0	0	0	0	49	49	1	49	49
BLETCHLEY	LEISURE CENTRE PHASE 2	09/01662/REM	211	35	47	36	50	0	0	168	4	42	50
KINGSMEAD SOUTH	12/01851/MKPCO - 450 DWS												
KINGSMEAD SOUTH	SITES 3 & 4 Part 1	17/00098/REM	107	0	0	0	0	3	48	51	2	26 ¹	48
KINGSMEAD SOUTH	SITES 1 & 2	15/00699/REM	206	0	0	7	33	50	83	173	4	43	83
											AVERAGE	34	66
			Annual Total	0	0	7	33	53	131	224		56	
ASHLAND	02/02139/OUT - 400 DWS												
ASHLAND	PHASE 2 AREAS A TO F	08/02023/REM		46	78	13	34	0	0	171	4	43	69
NEA ROCLA PIPES SITE	04/01174/MKPCO - 455 DWS												
NEA ROCLA PIPES SITE	NEA - ROCLA SITE 1	10/01274/MKPCR	136	30	0	0	0	0	0	30	1	30 ²	136
NEA ROCLA PIPES SITE	NEA - ROCLA AREA 4	12/02253/MKPC	116	41	56	19	0	0	0	116	3	39	56
											AVERAGE	34	96
			Annual Total	71	56	19	0	0	0	146		49	

Average Build-Out Rate	48 DPA
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Notes:

1 – The low average annual build-out for ‘Kingsmead South; Sites 3 & 4 Part 1’ is skewed due to the site providing its first completions at the very end of 2018/19.

2 – For ‘NEA Rocla Site 1’, the data only captures the final year of the site’s delivery hence the lower average annual build-out rate.

Table 4: Extra-Large Sites 500-2000 dwellings													
Area	Site	Ref	Total dws	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	Total dws built	No. years	Average annual build-out	Peak annual build-out
OAKGROVE	09/00618/OUTEIS - 1,105 DWS												
	Parcels > 200 dws												
OAKGROVE	OAKGROVE PHASE 1	11/02404/REM	231	134	0	0	0	0	0	134	1	134	134
OAKGROVE	OAKGROVE PHASE 3	14/00207/REM	279	0	86	150	0	0	43	279	3	93	150
											AVERAGE	114	
	Parcels < 200 dws												
OAKGROVE	MIDDLETON - NOON LAYER DRIVE	12/00733/REM	64	17	0	0	0	0	0	17	1	17 ¹	17
OAKGROVE	OAKGROVE PHASE 4	14/02178/REM	183	0	0	21	95	61	6	183	4	46	95
OAKGROVE	OAKGROVE PHASE 5	16/02523/REM	73	0	0	0	0	0	67	67	1	67	67
OAKGROVE	OAKGROVE PHASE 2	13/01924/REM	112	17	89	6	0	0	0	112	3	37	89
											Average	42	
			ANNUAL TOTAL	168	175	177	95	61	116	792		132	
NEWTON LEYS	02/01337/OUT - 1,650 DWS												
	Parcels > 200 dws												
BLETCHLEY	NEWTON LEYS PHASE 2	08/00233/REM	394	69	2	0	10	56	0	137	4	34	69
BLETCHLEY	NEWTON LEYS PHASE 3B AND 3C	12/02515/REM	259	79	64	96	20	0	0	259	4	65	96
BLETCHLEY	NEWTON LEYS, PHASE 5	17/02143/REM	248	0	0	0	0	0	49	49	1	49	49
											AVERAGE	49	
	Parcels < 200 dws												
BLETCHLEY	NEWTON LEYS PHASE 2 E2	13/00224/REM	63	63	0	0	0	0	0	63	1	63	63
BLETCHLEY	NEWTON LEYS PHASE 4	12/00887/REM	194	0	74	58	39	23	0	194	4	49	74
BLETCHLEY	NEWTON LEYS LOCAL CENTRE	15/01695/FUL	34	0	0	0	14	20	0	34	2	17	20
BLETCHLEY	NEWTON LEYS PHASE 3A	11/00851/REM	75	12	0	0	0	0	0	12	1	12 ¹	12
BLETCHLEY	NEWTON LEYS PHASE 3D	16/03407/REM	11	0	0	0	5	6	0	11	2	6	6
BLETCHLEY	PHASE 6 NEWTON LEYS	17/01059/REM	183	0	0	0	0	29	99	128	2	64	99
											AVERAGE	35	
			ANNUAL TOTAL	223	140	154	88	134	148	887		148	

Average Build-Out Rate	140 DPA
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Notes:

1 – Data only captures the first completions for ‘Middleton; Noon Layer Drive’ and ‘Newton Leys Phase 3A’ and neither represents a full year’s completions hence the lower average annual build-out.

Strategic Sites: 2000+ dwellings

Table 5: Western Expansion Area													
Area	Site	Ref	Total dws	2014/15	2015/16	2016/17	2018/18	2018/19	2019/20	Total dws built	No. Yrs	Average annual build-out	peak annual build out
WHITEHOUSE (Area 10)	05/00291/MKPCO - 4320 DWS												
	Parcels > 200 dws												
WHITEHOUSE	WEA 10.3 PARCELS C1 B1 F R J G N AND P	15/00499/REM	217	0	0	39	34	82	58	213	4	53	82
WHITEHOUSE	WEA AREA 10.3 BELLWAY PHASE 1	15/02630/REM	230	0	0	11	102	76	41	230	4	58	108
											AVERAGE	55	95
	Parcels < 200 dws												
WHITEHOUSE	PARCELS 10.1 C AND D	16/02817/REM	129	0	0	0	0	24	46	70	2	35	46
WHITEHOUSE	WEA PARCEL 10.1G	17/00164/REM	111	0	0	0	0	23	47	70	2	35	47
WHITEHOUSE	PARCELS 10.3G PARTS 1 AND 2	18/00726/REM	146	0	0	0	0	0	21	21	1	21	21
WHITEHOUSE	AREA 10.1 PARCELS A AND B	14/02383/REM	121	0	0	33	64	9	0	106	3	35	64
WHITEHOUSE	WEA PARCEL 10.1E	16/01457/REM	114	0	0	0	12	38	64	114	3	38	64
WHITEHOUSE	PARCEL 10.1H RE-PLAN	17/03408/REM	64	0	0	0	0	0	16	16	1	16	0
WHITEHOUSE	AREA 10.1 PARCEL F	14/02385/REM	61	0	21	32	8	0	0	61	3	20	32
WHITEHOUSE	WEA PARCEL 10.3A PART 2	15/01368/REM	85	0	0	9	50	26	0	85	3	28	50
WHITEHOUSE	WEA AREA 10.1 PARCEL I	15/02532/REM	34	0	0	0	0	0	10	10	1	10 ¹	10
WHITEHOUSE	WEA PARCEL 10.3A PART 1	17/00248/REM	50	0	0	0	0	19	31	50	2	25	19
WHITEHOUSE	PARCELS 10.1 C AND D (partial re-plan)	18/01724/REM	24	0	0	0	0	0	7	7	1	7 ¹	7
											AVERAGE	25	33
	WEA Area 10 Totals		ANNUAL TOTAL	0	21	124	270	297	341	1053		211	
FAIRFIELDS (Area 11)	06/00123/MKPCO - 2220 DWS												
	Parcels > 200 dws												
FAIRFIELDS	WEA AREA 11 PARCELS 4B 5C AND PART 3B	14/01790/REM	262	0	0	135	110	17	0	262	3	87	135
FAIRFIELDS	WEA AREA 11 PARCELS 6A 6B AND 6C	15/03045/REM	216	0	0	0	157	59	0	216	2	108	157
FAIRFIELDS	AREA 11 PARCELS 2B 2C 5A 5B 6D	16/03133/REM	241	0	0	0	0	194	23	217	2	109	194
FAIRFIELDS	FAIRFIELDS PHASE 5	17/01669/REM	240	0	0	0	0	18	140	158	2	79	18
											AVERAGE	77	101
	Parcels < 200 dws												
FAIRFIELDS	WEA AREA 11 PARCELS 3A 4A AND PART 3B	14/01316/REM	144	0	114	30	0	0	0	144	2	72	114
											AVERAGE	72	72
			ANNUAL TOTAL	0	114	165	267	288	163	997		166	

Notes:

1 – Parcels '10.1 C & D (partial re-plan)' and '10.1 Parcel I', are both very small parcels and the data only outlines their first completions which do not represent a full year, hence the low average annual build-out.

Table 6: Eastern Expansion Area													
Area	Site	Ref	Total dws	2014/15	2015/16	2016/17	2018/18	2018/19	2019/20	Total dws built	No. Yrs	Average annual build-out	peak annual build out
BROOKLANDS	06/00220/MKPCO - 2501 UNITS												
	Parcels > 200 dws												
BROOKLANDS	BROOKLANDS BDW PHASE 1B	14/01069/REM	427	0	136	98	12	0	0	246	3	82	136
BROOKLANDS	BROOKLANDS BDW PHASE 2A	16/00086/REM	225	0	0	0	84	48	71	203	3	68	84
BROOKLANDS	BROOKLANDS BDW PHASES 2B 3B 3C AND 4A	16/02695/REM	276	0	0	0	54	66	76	196	3	65	76
BROOKLANDS	BROOKLANDS BDW PHASE 3A 4B 5A 7A 7B	16/03397/REM	362	0	0	0	0	54	60	114	2	57	60
											AVERAGE	68	89
	Parcels < 200 dws												
BROOKLANDS	BROOKLANDS PHASE 1B, 17 AND 30	11/01827/MKPCR	150	84	25	5	0	0	0	114	3	38	84
BROOKLANDS	BROOKLANDS BDW PHASE 1	13/01842/REM	197	60	103	37	0	0	0	200	3	67	103
BROOKLANDS	LAND SW OF FEN STREET	18/02664/REM	111	0	0	0	0	0	22	22	1	22 ¹	22
BROOKLANDS	BROOKLANDS BDW PHASE 1C	14/01896/REM	58	0	41	17	0	0	0	58	2	29	41
BROOKLANDS	BROOKLANDS BDW PHASE 1D	15/01477/REM	84	0	0	28	37	19	0	84	3	28	37
BROOKLANDS	BROOKLANDS BDW PHASE 1E	15/01448/REM	61	0	0	16	45	0	0	61	2	31	45
BROOKLANDS	BROOKLANDS GATEWAY SITE	14/02883/REM	48	0	0	38	10	0	0	48	2	24	38
BROOKLANDS	BROOKLANDS SQUARE PHASE B	16/00125/REM	21	0	0	0	0	0	21	21	1	21 ²	21
BROOKLANDS	BROOKLANDS SQUARE PHASE A & C	16/02793/REM	55	0	0	0	0	0	29	29	1	29	29
BROOKLANDS	BROOKLANDS SQUARE PARCEL D	17/02553/REM	46	0	0	0	0	0	22	22	1	22	22
											AVERAGE	31	
			ANNUAL TOTAL	144	305	239	242	187	301	1418		236	
BROUGHTON	06/00709/MKPC - 1400 UNITS												
BROUGHTON	BROUGHTON GATE PARCEL I1 AND I2	08/00879/MKPCR	191	78	0	0	0	0	0	78	1	78	78
BROUGHTON	BROUGHTON GATE PARCEL M2	16/02271/REM	65	0	0	0	5	60	0	65	2	33	60
BROUGHTON	BROUGHTON GATE PARCEL M1	16/00541/REM	56	0	0	0	15	41	0	56	2	28	41
BROUGHTON	BROUGHTON MANOR BUSINESS PARK	17/02254/REM	62	0	0	0	0	10	36	46	2	23	36
BROUGHTON	BROUGHTON GATE RES SITES CM5-CM8	11/02316/MKPC	18	0	0	0	4	14	0	18	2	9 ²	14
BROUGHTON	BROUGHTON RESERVE SITE CM4	15/02678/FUL	23	0	0	0	23	0	0	23	1	23 ²	23
											AVERAGE	32	
			ANNUAL TOTAL	78	0	0	47	125	36	286			

Notes:

1 – Data for ‘Land SW of Fen Street’ only covers the site’s first completions which also do not represent a full year, hence the low average annual build-out.

2 – All three of these parcels are very small with low overall numbers of units, which have been built out in 12 months; hence the parcels’ lower average annual build-out rate and the likely impact this has had on skewing the overall averages for the wider site.

Table 7: Strategic Land Allocation													
Area	Site	Ref	Total dws	2014/15	2015/16	2016/17	2018/18	2018/19	2019/20	Total dws built	No. Yrs	Average annual build-out	peak annual build out
	Parcels > 200 dws												
EAGLE FARM SOUTH	EAGLE FARM PHASE 1 PARCEL B1	17/01038/REM	259	0	0	0	0	62	58	120	2	60	62
WAVENDON	HAYNES LAND (PHASE 2 PARCEL D1)	17/02483/REM	200	0	0	0	0	0	74	74	1	74	74
GLEBE FARM	LAND AT GLEBE FARM PHASE 2 PARCEL C	18/02097/REM	225	0	0	0	0	0	23	23	1	23 ¹	23
											AVERAGE	52	
	Parcels < 200 dws												
GLEBE FARM	LAND AT GLEBE FARM PHASE 1 PARCEL D	17/02883/REM	160	0	0	0	0	0	40	40	1	40	40
GLEBE FARM	SITE SOUTH EAST OF ELMSWELL GATE	17/03283/REM	191	0	0	0	0	3	54	57	2	29	54
GLEBE FARM	LAND AT THE GABLES	15/01492/FUL	34	0	0	0	34	0	0	34	1	34	34
											AVERAGE	34	

Notes:

1 – The data for 'Land at Glebe Farm Phase 2 Parcel C' only accounts for the first completions on this parcel which also do not represent a full year of delivery, hence the low average build-out rate.

Table 8: Average Annual Build-Out Rates – Strategic Sites	
	Average Annual Build-Out Rate
Western Expansion Area: Area 10	211
Western Expansion Area: Area 11	166
Eastern Expansion Area: Brooklands	236
Average Annual Build-Out Rate Strategic Sites	204

Table 9: Average Annual Build-Out Rates – Parcels >200 Dws, on Extra-Large & Strategic Sites	
	Average Annual Build-Out Rate
Oakgrove	114
Newton Leys	49
Western Expansion Area: Area 10	55
Western Expansion Area: Area 11	77
Eastern Expansion Area: Brooklands	68
Strategic Land Allocation	52
Average Annual Build-Out Parcels >200 Dws	69

Table 10: Average Annual Build-Out Rates – Parcels <200 Dws, on Extra-Large & Strategic Sites	
	Average Annual Build-Out Rate
Oakgrove	42
Newton Leys	35
Western Expansion Area: Area 10	25
Western Expansion Area: Area 11	72
Eastern Expansion Area: Brooklands	31
Eastern Expansion Area: Broughton	32
Strategic Land Allocation	34
Average Annual Build-Out Parcels <200 Dws	38

Appendix 3: Consultation Feedback

In July 2020 a draft version of the 2020 Phasing Methodology was sent to a range of landowners, developers, agents and housebuilders, including those with an active interest within Milton Keynes and, a range of national bodies, so as to seek feedback directly from the development industry and further add to the robustness of both the Phasing Methodology and the Council's annual housing land supply assessment.

This engagement provided an opportunity for the consultees to provide comments on any aspect of the draft phasing methodology. These comments have subsequently been reviewed by Council officers and, where considered appropriate, amendments have been made to the final version of the Phasing Methodology in response.

The following organisations were contacted and asked to provide comment:

Barratt Homes

Barton Willmore

Bellway

Bidwells

David Lock Associates

David Wilson Homes

Home Builders Federation

Homes England

L&Q Estates

Milton Keynes Development Partnership

Savills

Smith Jenkins

Storey Homes

Taylor Wimpey

In total four detailed responses were received. The comments received are outlined in Table A3 below alongside Council Officer responses and details of changes that have been made to the Phasing Methodology in response to the comment, where considered appropriate. The comments are outlined in order of the document.

Table A3: Consultation comments and responses			
Section of Phasing Methodology	Consultee	Comment	Officer Response
Title	David Lock Associates (DLA)	not sure this is the right title? It's more a housing build-out and completions monitor? It should have the word 'housing' in the title, as a minimum.	Noted; Given the purpose of the document and the link to the Council's annual housing land supply assessment, we have updated the title to "Milton Keynes Council Housing Land Supply Phasing Methodology 2020". We will review this again for the 2021 update.
2.5-2.6	Storey Homes	It is recognised that interpretation of the definition of deliverable sites has now been expanded from purely the category (a) and (b) sites by virtue of the High Court decision. What is important to take from this decision is that the clear evidence for each site must show a realistic prospect of delivery, and the emphasis should be upon the realism of each piece of evidence.	<p>Noted; As referred to within the Phasing Methodology (initially at Paragraph 2.2), the Council recognises the definition of 'Deliverable' as outlined in the Glossary of the NPPF and its reference to a "<i>a realistic prospect that housing will be delivered on the site within five years</i>".</p> <p>The approach undertaken by the Council, as outlined in the Phasing Methodology, is therefore to assess whether there is a "<i>a realistic prospect that housing will be delivered on the site within five years</i>" based on the evidence available.</p> <p>The High Court decision referred to does not make any reference to "<i>the realism of each piece of evidence</i>" and neither is this a concept within the NPPF or PPG. The NPPF requires '<i>clear evidence</i>' to be provided and this is recognised and discussed, alongside the Council's approach, within the Phasing Methodology (specifically at paragraphs 2.7-2.24).</p>
2.5-2.6	Savills	The document refers to The Willows, Thrapston, East Northamptonshire District. I wonder whether it would be helpful to clarify that the definition is not to be taken as a 'closed list' and site types not listed within the definition – for example, sites with a resolution to grant planning permission subject to the execution of a s.106 agreement, or draft allocations in an emerging plan - are capable of being deliverable if the evidence shows that they are "available now, offer a suitable location for development now, and are achievable with a realistic prospect that housing will be delivered on the site within five years". As you know this will be a matter for planning judgment on the evidence available.	Noted; Paragraph 2.6 has been expanded to provide this clarity.
2.18-2.22	DLA	This section and below might benefit from a flow diagram for how the monitoring is undertaken?	Noted; Consideration will be given to how this section may be better presented for the 2021 update, including the use of charts and visuals to present processes.
2.20	Storey Homes	It is appreciated that the Council are now seeking to use Statements of Common Ground where possible and appear to only be resorting to the proforma method of collection where absolutely necessary. The detail that can be given in a Statement of Common Ground is likely to be more effective in determining the deliverability and speed of delivery of a site.	Noted

2.20	Savills	What is the reasoning for not sending SoCG to sites with full or REM approval (para.2.20)? I ask just to understand the reasoning but also because such sites do not necessarily get delivered as envisaged or by the full or REM applicant. An example is a site at Newport Road, Wavendon (ref: 18/00581/REM). The allowed appeal (ref: 14/00033/REF) was by Frosts Family LLP, the REM was Careys Homes and now the NMA is Hayfield Homes.	SoCG are sent to those sites which fall under part B of the NPPF definition of deliverable (i.e. those sites whereby the LPA is required to provide clear evidence). It was felt that the use of SoCG may enable more evidence to be provided by the respondent which would assist the Council in assessing deliverability. As outlined in Paragraph 2.20, the proforma approach (which has been accepted by a number of Inspectors dealing with s78 appeals in Milton Keynes as being sufficient to demonstrate deliverability) is still being applied to all other sites to ensure up-to-date delivery information is available for all sites and any changes (such as the example provided in this comment) are captured.
2.20	DLA	It would be useful to include this (a copy of the SoCG) in the appendix.	A blank template copy of the SoCG has been added as Appendix 4.
2.20	DLA	As above, include in the appendix (a copy of the proforma). Also, would be useful to say/show how they differ?	A blank template copy of the proforma has also been added to Appendix 4, so as to outline the differences.
2.20	DLA	The Council could utilise the relationships established between case officers and agents to get up to date information, rather than separate contact from policy officers? (this is with reference to obtaining SoCG and Proforma)	Noted; As outlined in Paragraph 2.20 of the Phasing Methodology, discussions are held with case officers, and other internal officers, to gain in-depth information on site specific issues and progress on any relevant planning applications to assist with assessing deliverability and the timing of delivery of sites. This also includes utilising the relationships between case officers and applicants to assist in obtaining direct information. This will however be reviewed for the 2021 Phasing Methodology update to assess if it can be put to more efficient use in obtaining data and information.
2.20	Savills	Under para. 2.20 is it possible to explain that the MK Tariff only continues on for the phases that remain on relevant sites?	Noted; a note on this has been added to the footnote relating to Paragraph 2.20.
2.22	Savills	In terms of sense-checking and to an extent the role of the JHDT I have known of some LPAs running a panel approach that includes development industry representatives. Some years ago, I was involved in this in South Kesteven District albeit mainly associated with the SHLAA work.	It was the intention for the purposes of the 2020 Phasing Methodology update to run a workshop with development industry representatives to assist in preparing the document, however due to the lockdown associated with Covid-19 this was not possible, and the decision was taken to offer the opportunity to provide written responses instead. This will be reviewed for the purposes of the 2021 update and it is hoped a more interactive engagement with the development industry can take place. Reference to this has been added under footnote 6. Furthermore, the Council are looking at ways in which the update to its SHLAA can also build in input from representatives of the development industry.

2.23	DLA	<p>This point could be made clearer. For example, will the Council apply assumptions to those sites that they do not get direct contact with the agent/developer, or will they accept that they haven't made contact and therefore it is too uncertain to include in the trajectory?</p>	<p>This will depend on the status of the site (e.g. if it falls under category A or B of the NPPF definition of deliverable) and all the evidence the Council has before it.</p> <p>For category A sites, which are deemed to be deliverable under the NPPF definition, a lack of up-to-date contact will not automatically rule the site undeliverable. As per the NPPF, only where the Council has clear evidence that the site will not be delivered within five years will it be ruled out.</p> <p>For category B sites, a planning judgement will be made based on <u>all</u> the evidence that is before the Council, as to whether there is a realistic prospect of the site delivering completions within 5 years and the evidence available is clear in demonstrating this.</p> <p>All available evidence will also be used, alongside the assumptions set out in the phasing methodology, to determine lead-in times and build-out rates for each site. For example, even in circumstances whereby direct, up-to-date contact has been made with a housebuilder, the phasing methodology assumptions may be applied if these are felt to be more realistic than those provided by the housebuilder. A planning judgement will be made for each site on a case-by-case basis.</p>																																				
2.25-2.30	Savills	<p>There is a logic to the reasoning under The Covid-19 Pandemic and it is positive to see the extent of permission referred to under footnote 6. You might be interested in the attached UK Housing Market Update by Savills published yesterday. Whilst much of this is about the sales side of new homes it is relevant to note that the "Stamp duty holiday" that would exempt the first £500k of a property purchase from the tax. This means that an estimated 90% of home sales will now be free from stamp duty, saving buyers up to £15,000. The attached Residential Development Land update Q2 2020 is also relevant with a mixed approach to land buying. This is just a snapshot in time of course and not necessarily signs of a longer-term trend.</p>	Noted.																																				
2.25-2.30	Storey Homes	<p>Turning to paragraphs 2.25 to 2.30 related to the impact of the COVID19 pandemic. It is understood that it is challenging to predict the lasting impact of COVID19 on housebuilding, however there is merit in using the data from the late 2000's recession to model the potential impact. Evidently Storey Homes would like to be optimistic that the economy will withstand the COVID19 impact and housebuilding would thus be lesser effected than at the last recession, however this modelling exercise could provide a realistic scenario how a similar downturn could impact delivery.</p> <p>During the recently closed inquiry (Reference: APP/YO435/W/17/3169314), the appellant highlighted in its evidence the impact on delivery within the Council's administrative area in the last recession, which was considered a direct parallel to the present situation. There was a marked decline in completions as a result of the 2008 recession, completion rates fell by 20% in each of the first 2 years before a slight rally in 2011-12 and then a further decline through to the end of 2013-14 (Table 1).</p> <table border="1" data-bbox="727 1577 1777 1919"> <thead> <tr> <th>Year</th> <th>Completions</th> <th>Change from previous year</th> <th>Change from pre-recession rates</th> </tr> </thead> <tbody> <tr> <td>1st April 2005 - 2006</td> <td>1,808</td> <td></td> <td></td> </tr> <tr> <td>1st April 2006 - 2007</td> <td>1,672</td> <td></td> <td></td> </tr> <tr> <td>1st April 2007 - 2008</td> <td>2,317</td> <td></td> <td></td> </tr> <tr> <td>1st April 2008 - 2009</td> <td>1,856</td> <td>-20%</td> <td>-20%</td> </tr> <tr> <td>1st April 2009 - 2010</td> <td>1,422</td> <td>-23%</td> <td>-39%</td> </tr> <tr> <td>1st April 2010 - 2011</td> <td>1,306</td> <td>-8%</td> <td>-44%</td> </tr> <tr> <td>1st April 2011 - 2012</td> <td>1,586</td> <td>21%</td> <td>-32%</td> </tr> <tr> <td>1st April 2012 - 2013</td> <td>1,315</td> <td>-17%</td> <td>-43%</td> </tr> </tbody> </table>	Year	Completions	Change from previous year	Change from pre-recession rates	1st April 2005 - 2006	1,808			1st April 2006 - 2007	1,672			1st April 2007 - 2008	2,317			1st April 2008 - 2009	1,856	-20%	-20%	1st April 2009 - 2010	1,422	-23%	-39%	1st April 2010 - 2011	1,306	-8%	-44%	1st April 2011 - 2012	1,586	21%	-32%	1st April 2012 - 2013	1,315	-17%	-43%	<p>As stated in the Phasing Methodology and referred to in this comment, predicting the impact of, and response to, the Covid-19 pandemic, both in the short and longer term is challenging.</p> <p>The Council is not of the view that direct comparisons between the current situation and the 2008 recession are of particular assistance in carrying out a land supply assessment at this time and do not agree that it should be considered a direct parallel to the present situation.</p> <p>The circumstances regarding the current situation, and potential recession that will follow, are markedly different to that which led to the recession in 2008, as indeed the response will also likely be. For example, the Government has already begun to introduce measures such as the holiday on stamp duty and the prospective changes to thresholds of sites for affordable housing provision, to name two, with the aim of limiting the longer term impact of Covid-19 on the housing market.</p> <p>As has been outlined in a number of national housing market updates (for example, see Savills comments above), data from June and July 2020 is also showing a continued recovery in market activity already, something that was not seen in the 2008 recession. Whilst it is acknowledged that this recovery may slow and could be impacted by the longer term response to Covid-19, this is a good example as to why direct parallels with the 2008</p>
Year	Completions	Change from previous year	Change from pre-recession rates																																				
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Table 1: MK Housing Delivery 2005/2006 to 2013/2014

A similar reduction in the rate of delivery would result in a delivery of 7,675 completions between 2020/2021 and 2025/2026, based on the now known recorded level of completions in the year 2019/20 (Table 2). These projections show that the highest level of completions per annum may only hit 1,674 homes (year 2020/2021).

Year	Completions	Change from previous year	Projected completions	Year
1st April 2005 - 2006	1,808			
1st April 2006 - 2007	1,672			
1st April 2007 - 2008	2,317		2,090	2019/20
1st April 2008 - 2009	1,856	-20%	1,674	2020/21
1st April 2009 - 2010	1,422	-23%	1,283	2021/22
1st April 2010 - 2011	1,306	-8%	1,178	2022/23
1st April 2011 - 2012	1,586	21%	1,431	2023/24
1st April 2012 - 2013	1,315	-17%	1,186	2024/25
1st April 2013 - 2014	1,001	-24%	903	2025/26
Total completions 5 year post recession	8,487		7,656	

Table 2: MK Housing Delivery Projections 2020/2021 to 2025/2026 assuming a recession impact similar to 2008

This section upon the COVID19 impact rightly acknowledges that the cessation of works on sites was temporary, albeit the duration of stoppages varied site by site. However, it makes no reference to the ongoing challenges that sites face in terms of getting back to their targeted efficiencies, largely due to the difficulty of ensuring the number of workers on site would not compromise social distancing. This continued restriction on the ability of sites to operate at 'full capacity' should be acknowledged and research would be welcomed upon to what extent site progress has returned to 'normal'.

The analysis of the impact of COVID19 also does not refer to risks to delivery, such as localised COVID19 outbreaks either at or surrounding sites in the shorter term, or in the longer term the potential hesitance of housebuilders to break ground on new sites when their focus needs to remain on maintaining their current sites progression. These matters should be closely monitored.

recession should not be favoured over continual monitoring of the situation.

Furthermore, the comparison data provided here, does not review all delivery measures (e.g. number of units under construction, or with detailed planning permission) and as such does not take account of all local circumstances at that time or indeed currently.

As outlined in the comment, the data presented here was submitted at a recent inquiry (Reference: APP/YO435/W/17/3169314); it should be noted that the Secretary of State in providing his conclusion on the matter stated: "The Secretary of State considers that, as the quantification in that document is based on the appellant's modelling using a past event and they have not put forward specific evidence about the deliverability of individual sites, it does not affect his judgement in this case.". The Secretary of State and his inspector both concluded the Council could demonstrate a deliverable 5YHLS in this decision (decision date: 25 June 2020).

Whilst it is indeed useful to understand the impacts of the 2008 recession on the housing market at that time, the Council considers that their approach of seeking up-to-date information and evidence on each site is more appropriate and more in line with the assessment of deliverability as outlined in the NPPF and, furthermore, aligns with the approach advocated by the Secretary of State in the above recent appeal decision.

Paragraphs 2.29 and 2.30 do make reference to the fact that work has started on sites in some form and that the potential impacts of Covid-19 will likely differ on a site-by-site basis both in the short term and over the forthcoming five-year period. Paragraph 2.30 has been updated to clarify that sites are not returning at full capacity. It is for this reason the Council considers its approach of reviewing each site, on a site-by-site basis, to be the most appropriate.

The progress of each site will continue to be reviewed via the Council's quarterly housing monitoring, thus allowing the impacts of Covid-19 on each site to be reviewed on a regular basis.

As above, the impacts on delivery of each site, taking account of the points raised in this comment, will be reviewed on a quarterly basis as part of the Council's housing monitoring programme alongside continued engagement with representatives of each site, as well as monitoring the national picture. As outlined in Paragraph 2.32, if an interim update to the annual assessment is required, because of the impact of Covid-19, one will be undertaken.

2.30.1 DLA

This is potentially risky. If you cannot get information from the developer/agent on build out (and there is no site activity) then in our view it is too uncertain to include in the trajectory.

As per the NPPF definition of deliverable, sites which fall under category A (which is what is being discussed in 2.30.1), are deemed to be deliverable unless there is clear evidence that homes will not be delivered within five years.

			For those sites which the Council has not been able to obtain direct information from the developer/agent for the 2020 assessment, it will assess all other information available (including from site visits and recent monitoring) and if it is felt that there is clear evidence that a site is no longer deliverable, it will remove the site from the trajectory.
2.32	Savills	I support the intention (para. 2.32) to provide a further interim position this year.	Noted
3.8	Savills	Infrastructure requirements, clarifying what and how, is such an important factor in the timing for delivery of new homes especially on strategic-scale sites. In part this seems to be recognised and whilst there is commentary (para.3.8) I do wonder whether a discreet piece of research can be undertaken on delivery from the strategic sites in MK?	Noted. The analysis and accompanying data of site delivery outlined in this Phasing Methodology has sought to look at strategic sites independently in terms of their lead-in times and build-out rates. In assessing the deliverability of forthcoming strategic sites, officers will also take into account the provision and delivery of infrastructure requirements specific to the site in question, and their impact on delivery.
3.9	DLA	This is a good approach to take – and should be considered robust by those reviewing and examining the outcomes.	Noted
4.4	Savills	Under para. 4.4 I do wonder about the effect of a 250dph density forecast for sites in CMK not least the context of likely supply or otherwise.	Plan:MK Policy HN1 (Housing Mix and Density) allows for a range of between 150-500 dwellings per hectare within Plan:MK and indeed a number of schemes that have been submitted (and in some cases now positively determined) since the adoption of Plan:MK have made use of this increased density provision. However, as outlined in Paragraph 4.8 of the Phasing Methodology these densities have not been indicatively applied to CMK sites within the housing supply, instead, where the capacity of a site has not been established through a planning application or more detailed site assessment work (e.g. a Development brief), lower capacities, as outlined in Plan:MK, have continued to be used, so as to ensure a conservative approach. It should be noted that all schemes that have been granted planning permission in CMK, on sites allocated in Plan:MK, have been approved with higher capacities than those outlined in Plan:MK (in some cases with significant increases).
4.5	DLA	These are standard assumptions but what evidence is this based on?	The assumptions used here are those outlined in the Council's 2017 Strategic Housing Land Availability Assessment (SHLAA) which was used to support the preparation of Plan:MK and the capacities of sites outlined within (whereby a more detailed site specific capacity was not available). The Council will be updating its SHLAA as part of the preparation for the review of Plan:MK and it is hoped that an updated methodology, alongside the evidence to prepare it, will have been completed by the time the Phasing Methodology is updated in 2021 and thus can inform that review.

Section 5: Lead-in Times & Section 6: Build-Our Rates	Taylor Wimpey	The 'neighbouring authorities' referred to appears only to be AVDC and CBBC, with no mention of South Northants and Bedford Borough, both of which I think have quite a bit of data available on delivery. Is there a particular reason why SNC and BBC have been excluded?	<p>The purpose of reviewing data from neighbouring authorities was to provide some comparison with both national and local data; given the differing circumstances across local authorities it is acknowledged that lead-in times and build-out rates can vary and what is standard for one, should not be assumed as correct for another.</p> <p>As outlined in Paragraph 5.12, for the purposes of the 2020 Phasing Methodology CBC and AVDC were used as both share significant borders with Milton Keynes, both have followed similar paths in terms of recent plan preparation and both propose plans which seek to deliver against similar housing requirements as that of Milton Keynes, including allocations close to, or on the border of Milton Keynes.</p> <p>It is noted that both SNC and BBC have data available on housing delivery within their area, and this will be reviewed for the purposes of preparing the 2021 Phasing Methodology.</p>
Section 5: Lead-in Times	Storey Homes	<p>Section 5 of the methodology sets out the Council's assumptions with regard to lead-in times. Whilst the interpretation of national studies is to be tempered with a little caution due to the large scale of the research, what is clear from paragraphs 5.5 to 5.6 is that 'smaller' non-strategic sites generally deliver quicker. The importance of such sites is recognised at paragraph 66 of the NPPF (2019) which states that "small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out very quickly." Often these sites are built-out by a Small and Medium Enterprise (SME) housebuilders such as Storey Homes, highlighting the valuable role that our business provides in the sector.</p> <p>The local evidence provided is useful in terms of understanding how these assumptions have been arrived at, however a clear limitation of the evidence is that it only refers to the last 6 years. There appears to be little explanation for why this timeframe has been chosen, and as with the above information upon completions during the recession, it would be useful to see what impact this economic decline had upon average lead-in times. Particularly given that the paragraph 5.17 of this methodology acknowledges that the Western Expansion Area had a 95 month lead-in time due to a significant impact of the "economic crash in the late 2000's."</p> <p>It is agreed that the Council should not include the new strategic site allocations within the five year housing land supply evidence until there is clear evidence upon specific timescales. Even so, the Council should also remain cautious about this information they receive, as it is evident that potential further economic downturns could significantly adjust lead-in times.</p> <p>Table 5.1 provides the lead-in times for three site types, whilst the above point stands regarding potential impacts of another recession, these appear reasonable in 'normal' times. There does appear to be on discrepancy between the Table and paragraph 5.21; this paragraph states that the average lead in time for non-strategic sites to progress from outline permission to first completion is 31 months, whereas the Table states that this average is 30 months.</p> <p>The assumptions regarding lead-in times appear not to discuss how site and development characteristics might affect this, for example whether the site is brownfield or greenfield, or if the units are predominantly houses, flats or care provision. There would be merit in further researching how these characteristics impact upon lead-in times.</p>	<p>Noted</p> <p>Noted; reference to the timeframe of data used is covered in officer responses to other comments below.</p> <p>Noted</p> <p>Noted</p> <p>31 months was the average based on the local data analysed in Table 4 of Appendix 1. This data was however heavily influenced by the extended lead-in time of one site ("Former Employment Allocation Phase 1") and as such the decision was taken to reduce the lead-in time assumption to 30 months (this also still aligns with the timescales outlined in national studies).</p> <p>As outlined in Paragraph 5.24 of the Phasing Methodology, little correlation was found in the data analysis to enable any further distinctive assumptions to be made, for example on differences between greenfield and brownfield sites. The Council will however continue to analyse data</p>

			that is available to see if there is merit in including a wider breakdown of site types in future updates of the Phasing Methodology.
5.17	DLA	What's a 'strategic' site? A definition in this doc would help.	For the purposes of the Phasing Methodology, strategic sites are considered to be those of 2,000+ dwellings (a note has been added to outline this in the document).
5.20	DLA	What's a 'non-strategic' site?	For the purposes of the Phasing Methodology, non-strategic sites are considered to be those of less than 2,000 dwellings (a note has been added to outline this in the document).
5.26	DLA	Agree that the first test to understand site deliverability is to understand the developer's lead-in/build out information. The lead-in evidence set out above is useful context.	Noted
Table 5.1	Savills	I am surprised by the lead-in time for non-strategic sites with detailed planning permission being 2 months longer than strategic sites.	Noted
Section 6: Build-Out Rates	Taylor Wimpey	There does seem to be an issue with the period over which the data is compiled. The methodology of focusing only on the last few years means that the full development period has not been reviewed for the larger schemes, only the end period when they were delivering at the highest rate and in relatively good economic conditions.	<p>Whilst it is acknowledged that the local data presented in the appendices relates to only the past 6 years, it should be noted that the Nathaniel Lichfield work which is referenced throughout the document did analyse the delivery of three large sites (Eastern Expansion Area, Oxley Park East and West, and Broughton & Atterbury) within Milton Keynes over a longer period of time.</p> <p>For Oxley Park East, the Lichfield work covered the first 8 years of a 9 year build out, which ran from 2004/05 (therefore through the 2008 recession). As outlined in Paragraph 6.12 of the Phasing Methodology this delivered at an average of 145dpa; the Phasing Methodology sets an assumption of 140dpa for sites of this size.</p> <p>For Broughton & Atterbury, the Lichfield work covers the full 7 year build-out of the site from 2003/04. As outlined in Paragraph 6.12 of the Phasing Methodology this delivered at an average of 171dpa; the Phasing Methodology sets an assumption of 140dpa for sites of this size also.</p> <p>For the Eastern Expansion Area, the Lichfield work covered the first 6 years of build out, which ran from 2008/09 (therefore immediately following the 2008 recession). As outlined in Paragraph 6.11 of the Phasing Methodology, over the first 6 years this delivered at an average of 268dpa and, as demonstrated in the local data set out in Table 6 of Appendix 2, for the past 6 years (which follows on from that in the Lichfield work) the whole site has delivered at an average of 285dpa; therefore 276dpa over the lifetime of the development to-date. The Phasing Methodology sets an assumption of 220dpa for sites of this size.</p> <p>Therefore, the Phasing Methodology has taken account of longer term work carried out by Lichfields, specifically in relation to those larger strategic sites in Milton Keynes, however the assumptions that have been presented in the phasing methodology still sit below the annual averages found by the Lichfield work for these sites; predominantly due to the lower annual averages that have been found when analysing the last 6 years of local data.</p> <p>With specific reference to larger schemes (which tend to be those that span more than 6 years), the local data presented in Appendix 2 focuses on</p>

		<p>As we know the larger schemes inevitably span economic cycles and are generally slow to start unless there are multiple access points that can serve multiple outlets. For example, paragraph 6.8 refers to the average median percentage of site build out in a year as being 9.3% since 2014/15, but this is irrelevant as the first completions were in 2010, so this distorts the true picture as 2010-2014 is effectively non-existent?</p>	<p>the Eastern Expansion Area (for which longer term data is considered, as outlined above), the Western Expansion Area, for which the 6 years of data presented covers the first 6 years of the site's delivery, and the Strategic Land Allocation, which has only been delivering units for 2 years. It is therefore not correct to say that the data presented only considers the end period for larger sites, when they were delivering at their highest rate.</p> <p>The past 6 years of data was used as, on an individual site basis it was the most accessible data covering all sites delivering across the Borough, that could be analysed in a timely manner. It presented a period of data similar to that in length of the five-year period for which the assessment is predominantly covering, it covered a range of site sizes and, for strategic sites (which tend to be the main sites which deliver over a period of longer than 6 years) it covered a number of different sites at different stages of their construction. Furthermore, the large site data was complimented by that from national studies, as outlined above, which offered a further sense check.</p> <p>The Council will continue to add each year's monitoring data to the phasing methodology analysis as it becomes available so as the data analysis continues to take account of the most up-to-date delivery and local circumstances; however, for the purposes of this phasing methodology the Council considers all the data analysed (both local data and that from national studies) has helped to establish a set of robust assumptions to assist in preparing the 2020 assessment.</p> <p>Noted; for clarity purposes, the figures outlined in paragraph 6.8, relating to average median percentage of site build out, have been updated to take account of the full lifespan of the Eastern Expansion Area to-date.</p>
Section 6: Build-Out Rates	Storey Homes	<p>As with the lead-in times, the local evidence covers the last 6 years and there is no detailed assessment upon the potential impact of COVID19 and the likely similarities to the recession in the late 2000's. This research is warranted and would provide an added level of reliability to the methodology, looking at both 'worst' and 'best' case scenarios. This element of the methodology does begin to look at the differences in build-out rates dependent upon the characteristics of the site and development. This is worthwhile and further details upon any identified variances would be welcomed.</p>	Noted
6.4	DLA	<p>Much of this section might be better in an Appendix?</p>	<p>Noted; The Council feels that is important for the reader to have taken account of the evidence gathered from national studies so as to understand how the MK specific data compares with this and therefore how the assumptions to be used by the Council have been reached. It is therefore proposed to leave this in the main body of text, but review if the data from national studies can be presented in a more concise manner in the 2021 phasing methodology.</p>

6.16	Storey Homes	<p>Throughout the methodology, it is acknowledged that Milton Keynes typically relies upon strategic sites to meet their needs. This in itself can cause issues regarding the resilience of housing land supply, and the Council should adjust their focus to provide a wider variety of site sizes, which as aforementioned provide a valuable contribution to meeting housing needs.</p> <p>Paragraph 6.16 states that these strategic sites are divided into smaller parcels that are then developed by multiple housebuilders. Whilst this is factually correct, it is important to note that these parcels are generally still of a size that are geared towards volume housebuilders and do not allow SME housebuilders to enter the frame. To this end, although a variety of volume housebuilders may be present on a given strategic site, when looking at all the strategic sites in Milton Keynes, the same (or a very similar) suite of housebuilders will often be delivering the units.</p> <p>As such, a selection of volume housebuilders presently dominate the new-build housing market in Milton Keynes and provide the same type of 'product' across multiple sites. The repetitive nature of this volume housebuilding means that often the homes built do not adequately respond to local demand and importantly buyers across Milton Keynes are very limited in what styles of homes are available.</p> <p>Storey Homes, as an SME housebuilder, create designs that are site-specific with no set house-types that are transposed across each and every development. This allows them to respond flexibly to Council requirements and create an interesting and bespoke design for each site. This ability of Storey Homes, as a truly local SME housebuilder, to provide each housing site with property types and styles that are distinctly different to volume housebuilders and that local people truly desire, should not be overlooked.</p> <p>Additionally, Storey Homes, are proud to be a privately owned family business founded and thriving in Milton Keynes. There are few housebuilders that have a such a strong local connection, with the capacity and capability of meeting current and future housing needs across the borough. Milton Keynes should strive to support its own 'homegrown' businesses, and an adjustment in its focus, to now support more small to medium scale sites promoted by local housebuilders would achieve this.</p>	<p>The need for a varied supply is noted and whilst it acknowledged that in the past Milton Keynes has been deemed to have an over reliance on large scale sites, this is something that Plan:MK has already sought to adjust. The Phasing Methodology does not however make any reference or acknowledgment to Milton Keynes typically relying upon strategic sites.</p> <p>All points are noted.</p>
6.19	DLA	<p>Whilst we are aware of the current difficulties with the VALP and changeover to the new Bucks Authority, it could help strengthen the MKC methodology if a formal (or recorded/periodic reporting) relationship between case/policy officers at MKC and the new authority could be established ASAP for information sharing etc?</p>	Noted
Appendix 1	DLA	<p>All these appendices would benefit from notes on why certain assumptions have been made. The methodology in the main doc seems very clear and robust, but the appendices and review of actual sites is more opaque and therefore could be open to criticism. So, if each table/appendix could be accompanied by a commentary/caveat or any peculiar/specific circumstances, it would help confirm the transparency of the approach and minimise the risk of challenge?</p>	Noted; where applicable notes have been added to the tables within Appendices 1 and 2 so as to explain where specific sites have lead-in times or build-out rates that appear to differ significantly from the averages that have been identified in the analysis of local data.
General Points	Savills	<p>There are legal commentators who have said that assuming the definition is actually defined properly, deciding whether or not a site is actually 'deliverable' requires a fact-sensitive exercise of planning judgment. Something it seems that the courts will not normally get involved in.</p> <p>When it comes to decisions on planning applications and planning appeals the position on housing land supply isn't always determinative in that the development plan is the starting point for decisions but other matters are brought in. The recent decision in Cheshire (APP/R0660/A/13/2197532) does not find the tilted balance to be triggered but ultimately grants permission on an unallocated site.</p>	<p>Noted</p> <p>Noted</p>

Appendix 4: 2020 SoCG/Proforma Templates

This appendix contains blank templates of the SoCG and Proforma sent out to landowners/agents/developers/housebuilders etc. to enable them to report on delivery progress of their sites, for the purposes of the 2020 Housing Land Supply Assessment.

Also included is a copy of the explanatory letter that was sent out alongside the SoCG and Proforma so as to inform the respondent of the data we were seeking, how to complete the proforma, the purpose of the proforma and what the Council would be using the data for.

The SoCG were sent out in the first week of March 2020, whilst the proforma were sent out mid-July 2020. The proforma would normally be sent out earlier than July, however the decision was made for the purpose of the 2020 Assessment to delay them so as to allow time for the impacts of Covid-19 to be considered.

6 March 2020

Dear Sir/Madam,

Milton Keynes Housing Land Supply; Delivery Update and Statement of Common Ground (2020)

The Development Plans Team is in the process of preparing its 2020 annual housing land supply update as part of our monitoring and forecasting programme. This process is important in terms of assisting our understanding of current and future housing delivery across the Borough, calculating our five-year housing land supply position, and supporting the preparation of future planning documents and evidence.

To aid the robustness of our monitoring and forecasting, we'd appreciate it if you could take a few minutes to complete the attached form which contains the details of a site which you or your company either owns or is the planning agent for.

On the form are details of the site, which is currently either, an allocation or has an outline planning permission, including our current understanding of the housing capacity of the site (these are either those agreed in the planning permission for the site, or the indicative capacity outlined within the site's allocation).

For Part 1 of the form we ask that you provide any information with regards to progress of the site towards delivery. Examples of the type of information we are seeking is outlined on the form, but please feel free to also include any other information which is deemed useful or important. If you are also able to provide details such as dates (e.g. for anticipated submission of applications) or references (e.g. for pre-application advice or Planning Performance Agreements) this would be much appreciated.

For Part 2 of the form we ask that you complete the two tables with the current anticipated timing for the start of construction on-site, and the projected annual delivery rates for each financial year, starting from the 1st April 2020.

If you could then please complete the form by adding your signature to Part 3 and returning the completed forms by email to the address at the top of this letter.

Your responses will form part of our evidence in reaching conclusions on the deliverability of each site and its potential annual delivery of homes, and in preparing our updated housing trajectory and annual five-year land supply position. Furthermore, your responses will also be presented as evidence in supporting the Council's five-year land supply position at Section 78 Planning Appeals, should it be required.

If you would like to discuss any of the above in more detail, please feel free to contact me using the details at the top of this letter.

I apologise if you are not the most appropriate person in your company to complete the form. If this is the case please could you ensure that it is passed to the relevant person for a response.

Please could you endeavour to return the completed form to us by Friday 27th March.

Thank you in advance for your time.

Yours sincerely,

James Williamson
Senior Planning Officer
Development Plans

Enc.

**MILTON KEYNES COUNCIL
HOUSING LAND SUPPLY**

**DELIVERY UPDATE & STATEMENT OF COMMON GROUND
March 2020**

Planning Status (reference where applicable)	Site Name/Address	Site Capacity (undeveloped homes as at 1st April 2020)

1. Progress towards delivery

For the above site, please provide, in the box below, any updates on progress towards the delivery of housing on the site.

For sites with outline permission this may include details of progress towards submission, and anticipated timing, of a reserved matters application, pre-application advice, the discharging of conditions or, links to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions.

For allocated sites this may include details relating to progress of site assessment work, pre-application advice, progress towards submission of a planning application (whether outline or full) or, links to a planning performance agreement that sets out the timescale for approval of applications.

Please also include any other information or details which relate specifically to the delivery of this site (for example, if the site requires disposal, please outline details of site marketing and disposal).

Progress Towards Delivery

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2. Statement of Common Ground

Taking account of information provided here, I(insert name), (insert job title) at(insert company name) can confirm that the information set out in the tables below are an accurate reflection of the anticipated lead-in times and delivery rates on this site as at 1 April 2020.

Anticipated Start on Site date:	
--	--

Financial Year (1 st April - 31 st March)	Number of Completions
2020/21	
2021/22	
2022/23	
2023/24	
2024/25	
2025/26	
2026/27	
2027/28	
2028/29	
2029/30	
2030/31	
(2031 and beyond)	

3. Signatures

Signed: (Developer/Landowner/Agent)	
Date:	

Signed: (Milton Keynes Council)	
Date:	

15 July 2020

Dear Sir/Madam,

Milton Keynes Housing Land Supply; Delivery Update and Proforma (2020)

The Development Plans Team is in the process of preparing its 2020 annual housing land supply update as part of our monitoring and forecasting programme. This process is important in terms of assisting our understanding of current and future housing delivery across the Borough, calculating our five-year housing land supply position, and supporting the preparation of future planning documents and evidence.

To aid the robustness of our monitoring and forecasting, we'd appreciate it if you could take a few minutes to complete the attached proforma which contains the details of a site which you or your company either owns or is the planning agent for.

On the proforma are details of the site, which has an extant FUL permission or REM approval, including our current understanding of the housing capacity of the site (these are either those agreed in the planning permission for the site, or where the site is under construction, the number of units which remain uncompleted as of 1 April 2020).

The proforma also outlines the forecasts currently in place for the future completion of homes on the site; these are based on previous information you have provided us with and/or our own monitoring data. We'd appreciate it if you could review these forecasts and, where necessary, update the projected annual delivery rates for each financial year, starting from the 1st April 2020. If construction has not yet started on site, could you please also provide the expected start on site date and if you have any other information with regards to the delivery of the site please also include this.

If you could then complete the proforma by adding your signature and details and returning it by email to the address at the top of this letter.

Your responses will form part of our evidence in projecting potential annual delivery of homes, and in preparing our updated housing trajectory and annual five-year land supply position. Furthermore, your responses will also be presented as evidence in supporting the Council's five-year land supply position at Section 78 Planning Appeals, should it be required.

If you would like to discuss any of the above in more detail, please feel free to contact me using the details at the top of this letter.

I apologise if you are not the most appropriate person in your company to complete the form. If this is the case please could you ensure that it is passed to the relevant person for a response.

Please could you endeavour to return the completed form to us by Friday 31st July 2020.

Thank you in advance for your time.

Yours sincerely,

James Williamson
Senior Planning Officer
Development Plans

Enc.

**MILTON KEYNES COUNCIL
MONITORING SURVEY OF OUTSTANDING HOUSING PERMISSIONS
2020**

Planning reference	Address	Site Capacity (undeveloped homes as at 1 st April 2020)

The table below sets out the current forecasts we have for when the remainder of the above development will be completed. These forecasts are based on information received from yourselves through recent housing monitoring surveys and our own monitoring, also taking into account the number and rate of any completions in recent years.

Please review the below figures and, where your own forecasts vary from those in the table, update the projected annual delivery rates for each financial year, starting from the 1st April 2020. Where the below figures remain correct please sign the proforma and return without amendment.

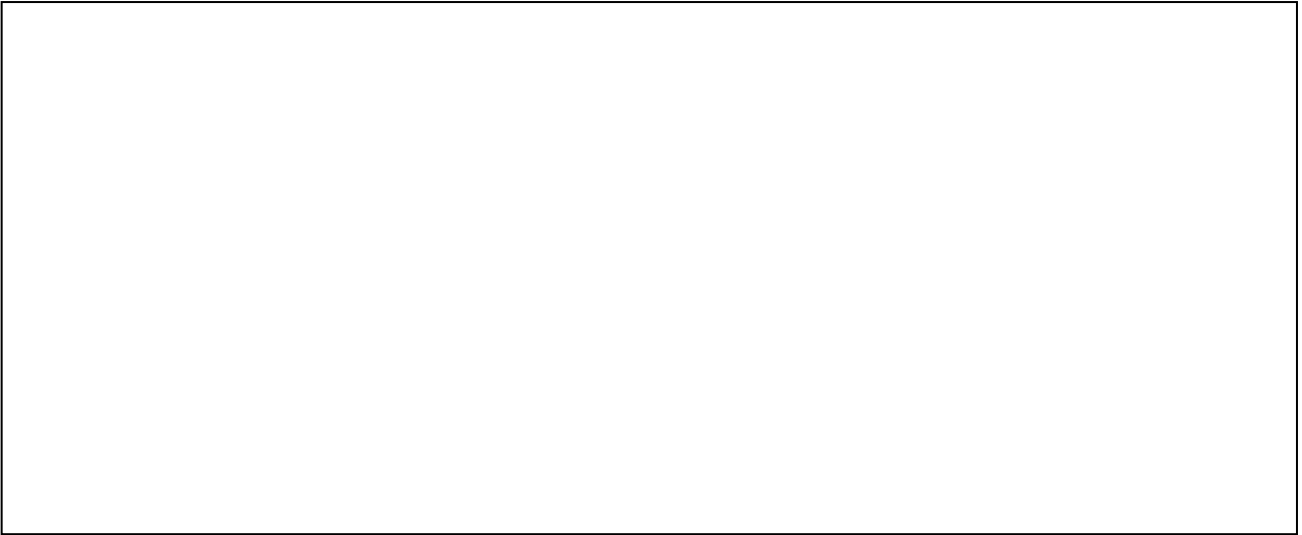
The years run from 1st April to 31st March.

Year	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29
Dwellings									
Year	29/30	30/31	Post 2031						
Dwellings									

Other site-specific questions

If the development has yet to commence, please outline the anticipated date for start on site?

Is there anything else that we should know about the site which might affect its delivery (e.g. revised/amended application expected, infrastructure needed etc.)? Please include any details in the box overleaf.



Signed:

Name:

Position:

Company:

Date:

Please return to james.williamson@milton-keynes.gov.uk

Contact us

E: development.plans@milton-keynes.gov.uk

T: 01908 691691

Development Plans, Civic, 1 Saxon Gate East, Central Milton Keynes, MK9 3EJ