

Assessment of Five Year Land Supply 2015 - 2020

June 2015



www.milton-keynes.gov.uk/planning-policy

Introduction and background

The National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG) seek to underpin the Government's step change in housing delivery through a more responsive approach to land supply at the local level. As a Local Planning Authority, Milton Keynes Council are required to identify and maintain a rolling five year supply of deliverable housing land, to ensure the continued supply of homes in the area.

Milton Keynes has a very good record of ensuring there is a significant land supply available across the Borough. This remains the case with land for nearly 23,000 homes already in the development pipeline, over 17,500 of which have at least outline planning consent.

This is a sufficient quantity of land available to deliver the overall Core Strategy target by 2026, and is felt to put Milton Keynes in a very strong position when compared to other authority areas where land supply may be a constraint to housing delivery. Of particular importance is the fact that a number of major strategic sites where development has been delayed over recent years are now starting to commence development and are making progress towards showing their first housing completions, or are making good progress through the planning process.

The Council has thorough arrangements in place to regularly monitor and forecast rates of development, which helps with the assessment of the five year land supply. The Council also regularly updates its Strategic Housing Land Availability Assessment (SHLAA) to ensure that it has a comprehensive understanding of potential sites that could make a contribution to land supply in the future.

This assessment covers the five year period from 1st April 2015 to 31st March 2020. It firstly establishes the housing requirement the Council needs to demonstrate is deliverable and then assesses the land supply available to deliver the requirement over the next five years.

A list of available and suitable sites, with a commentary on their deliverability (as of April 2015) is provided in Appendix 1. This information will be updated on an annual basis to reflect any new sites that become available and any change in circumstance with existing sites. It may be updated throughout the year if necessary, but as required by the Planning Practice Guidance, this annually produced report provides the Council's position on the five year land supply position for the year from 1st April 2015.

The report takes into account the NPPF requirement for an additional 5/20% allowance on the five year land supply to create competition and choice in land supply, and the requirement to consider meeting any past shortfall in completion rates. These factors are discussed at the relevant point in the report, as is the different outcomes generated by using the 'Sedgefield' and 'Liverpool' methods to treat past shortfalls in completion rates.

Overall, the report concludes that there is sufficient land available across the Borough.

The five year land supply requirement

The basic requirement

In accordance with paragraph 029 of the PPG, the starting point for establishing the five year land supply requirement is the housing target set out in the Council's Core Strategy, which was subject to examination in 2012, adopted in 2013 and is NPPF compliant.

The housing target in the Core Strategy is to deliver an average of 1,750 homes across the Borough. This figure remains a robust basis for calculating the five year land supply requirement, particularly as the target remains higher than the latest Government Household Projections¹, which could be seen as an alternative, and as the figure is in line with the figures in a revised Strategic Housing Market Assessment prepared to support the development of a new Local Plan, Plan:MK².

This starting point gives a basic five year requirement for 8,750 homes across the Borough.

1,750 x 5 = 8750 homes basic requirement

The NPPF 'buffer'

The NPPF (paragraph 49) requires a 5%'buffer' to be added to the basic requirement with the objective of bringing sites forward from later in the plan period to ensure choice and competition in the market for land. Where there has been a persistent record of under delivery of housing this buffer should be increased to 20% to boost the prospect of achieving planned supply.

In recent years despite delivering a significant number of homes relative to other areas, the planned Borough housing target has not been achieved. The PPG (paragraph 035) states that where this is the case, it is a matter of judgement by the decision maker as to whether a particular degree of under delivery of housing triggers the need to bring forward additional supply (i.e. add a 20% buffer).

Given performance has on average been around 25% below the target requirement for the last 5 years, and because there has been no specific impediment to the deliverability of housing (other than the basic lack of finance and realisable demand), such as a housing moratorium mentioned in the NPPF, it is considered necessary to add a 20% buffer.

For clarity, despite adding the 20% buffer to the requirement, the Council does not consider that it has failed to make enough housing land available for development – it is a result of market failings and viability issues that homes have not been delivered, not housing land supply.

In adding the 20% buffer, the basic land supply requirement increases by 1,750 homes to 10,500.

8,750 x 1.2 = 10,500 homes (basic requirement plus 20%)

¹ The latest Government Household Projections can be seen at <https://www.gov.uk/government/statistics/2012-based-household-projections-in-england-2012-to-2037>

² The updated SHMA can be downloaded from <http://www.milton-keynes.gov.uk/housing>

Dealing with past under-supply

The PPG also requires local authorities to 'aim' to deal with any undersupply of housing within the first five years of the plan period where possible. There is still no definitive guidance from the Government as to exactly what this means and there remain two possible approaches:

- The **Liverpool** approach where past under supply is spread evenly across all of the remaining years of the plan period
- The **Sedgefield** approach, where past under supply is all included in the first five years of the plan period.

Planning Inspectors currently appear to be favouring the Sedgefield approach. However, as there is a case for both positions to be used, and both have been the basis for establishing land supply positions in planning appeals, the requirements established by using both approaches are set out in this report.

The approach favoured by the Council is the Liverpool method. This is based on the conclusions of the Inspector into the Core Strategy who acknowledged that in the forth-coming years there is little evidence to suggest that delivery of rates significantly in excess of those set out in the Core Strategy are actually achievable. She noted that there is a ready, unconstrained land supply available to respond to increased demand should the market improve³.

As will be seen from the figures later in this report, the use of the Liverpool approach is considered most appropriate in the context of the current Milton Keynes land supply position and the nature of the growth plans.

Since the start of the Core Strategy Plan period (1 April 2010), there have been 6,617 net completions. Against the average requirements of the Core Strategy this means there has been a shortfall of **2,133** homes across the Borough.

Splitting the overall shortfall over the remaining 11 years of the plan period gives an additional 194 homes per year—970 homes in total over the first 5 years (194 x 5).

Taking this shortfall into account alongside the basic requirement and the buffer gives an overall five year requirement of **11,470 homes**.

Basic requirement (8,750) + 20% buffer (1,750) + shortfall allowance (970) = **11,470**

For context, the overall requirement generated by using the Sedgefield methodology and the figures for the Borough would be 12,633 homes. This is calculated as above but with all of the 2,133 home shortfall from previous years built into the figure.

However for the purpose of measuring the land supply position in Milton Keynes in the period 2015 to 2020 the figure established by the Council is **11,470 homes**.

³ See analysis in Core Strategy Inspectors Report, paragraphs 30-34 (http://www.milton-keynes.gov.uk/assets/attach/14498/Milton_Keynes_CS_report_for_FINAL.pdf)

Milton Keynes deliverable five year land supply

The definition of 'deliverable' is set out in footnote 11 of the NPPF It states:

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

The PPG (para 031) clarifies what constitutes a 'deliverable' site in the context of housing policy. The new policy guidance clarifies that the approach the Council has previously adopted remains valid. This includes clarifying that planning permission is not a prerequisite of a deliverable housing site.

It states that sites that could make up deliverable supply include:

- Sites with planning permission (outline or full) or allocated for development which have not been implemented, unless there is clear evidence that schemes will not be implemented
- Unallocated or permitted sites where there are no significant infrastructure constraints

The PPG (paragraph 024) also states that a windfall allowance can be made in the five year period, where it can be justified.

As per the definition in the NPPF, the PPG reinforces that the size of sites will be a key consideration in assessing their deliverability, with lead in times and rates of development on large sites needing to be robust to ensure an accurate five year land supply. This is a key consideration in Milton Keynes' land supply given the number of large sites in and around the city.

Essentially the key consideration is whether there is a realistic prospect of development taking place on a given site within the next five years.

As of the 1st April 2015 land was available for 22,951 homes. This was broken down as follows:

Table 2: Total available land at 1st April 2015

Permissions	Outline	14,704
	Full	3,017
Local Plan Allocations, deliverable brownfield opportunities and windfall allowance		5,230
Total		22,951

This land has not automatically been assumed to be deliverable. The likely timing of development is kept under review through the Council's Joint Housing Monitoring Team (JHMT) which meets quarterly to review intelligence of the deliverability of land, with a particular focus on the major sites.

This information is supplemented where possible with information directly from land owners and developers, again with a focus on the major sites where the vast majority of development takes place, and takes into account current rates of development on individual sites.

The focus of the work has been on reviewing the likely future rate of development and understanding when sites that have yet to commence development are likely to begin construction, given issues like construction of infrastructure, ownership issues and dealing with planning requirements, such as the discharge of conditions.

The outcome of this work is a site by site schedule with the estimated rate of completion. This schedule can be seen in Appendix 1. Where it has been provided, this includes reference to the most recent feedback from landowners and developers.

The deliverability of individual sites of less than 10 units has not been specifically assessed. Instead a windfall allowance has been included. The justification for this allowance, which is 35 homes per year in the rural area and 60 per year in the urban area, is set out in Appendix 2.

At the foot of the table in Appendix 1 is an indicative trajectory of how much land can be provided, created by collating the information on individual sites. This needs to be read alongside the risk assessment provided on page 6.

In summary the figures in Appendix 1 suggest that there is currently deliverable land available for 11,521 homes over the next five years.

**Key points relating to the land supply position
Five year housing supply vs. housing requirement**

The total land supply for homes across the Borough is slightly above the requirement established earlier in this paper. This is set out in Appendix 1 below. The table shows that the Council can currently demonstrate that a deliverable land supply is in place for 5.02 years' worth of housing land.

Table 2- Milton Keynes overall five year housing land supply position at April 2015

	Total
Overall requirement 2015-2020	11,470
Overall supply of deliverable sites	11,521
Overall supply compared to requirements	+51
Overall years supply	5.02 (100.4%)

Risk assessment

As required by the Planning Practice Guidance, the indicative trajectory of site available for development needs to be accompanied by an overall risk assessment (para 025).

Any site specific risks have already been considered in assessing the deliverability of each of the individual sites, as set out in Appendix 1. However, there are a few general factors which also need to be considered when looking at the indicative land supply trajectory created by combining the individual site assessments.

Sites with Planning Permission

Of the deliverable land supply around 77% has extant planning permission in place. This includes a number of large sites which are already under construction and a couple that are to start imminently. This is a slight increase from 76% reported in last year's report.

The 23% without permission is therefore a slight decrease on last year's position. This reflects progress that has been made on starting to bring the Strategic Land Allocation (SLA) through the planning application process. Once the SLA all has outline permission, the proportion of the land supply without planning permission will drop to around 14%.

The number of plots with reserved matters planning permission has stayed broadly the same as last year. Importantly however, the first reserved matters applications have started to be received and approved for the Western Expansion Area. Therefore, there is a good supply of sites with planning permission to enable the continued delivery of homes across the Borough.

Related to this is the progress which is being made on the delivery of major sites. Over the last year:

- As noted above, the first outline planning applications have been approved for the Strategic Land Allocation.
- The construction of primary infrastructure for the Western Expansion Area has commenced and is now well progressed.
- The sale of land parcels in the WEA has continued with in excess of 4,000 plots now controlled by house builders.
- The first reserved matters applications for the WEA have been approved, with further applications under consideration and further parcels being discussed through pre-app.
- Further reserved matters applications have been approved for the development of Brooklands and the developer Barratt David Wilson have picked up the rate of development after a lull during the transfer of ownership.
- The Oakgrove development site has continued to be built out at a quicker rate than originally expected.
- The Kingsmead South parcels have moved towards application stage with a reserved matters application submitted in March 2015 for sites 1 and 2, with sites 3 and 4 expected to follow.
- The first disposal of land in Campbell Park for several years is well progressed with MKDP currently in the process of appointing a preferred developer.

These factors show that good progress is being made on bringing major sites forward across Milton Keynes, helping to maximise levels of completions. The risk of major sites not meeting the expected completion rates is therefore falling.

Sites without planning permission

Of the sites without planning permission, the majority are on allocated sites. Only around 1% of the overall land supply is on unallocated, brownfield sites that have been identified as being deliverable in the next five years. This includes a small windfall allowance.

The specific sites that have been identified are those where there appears to be real intent on behalf of a landowner or developer to bring the site forward for development. Normally, there would have been some form of pre-application discussion relating to the site for it to be included – they are not sites that the Council has identified as having potential and that it's simply 'hoped' might come forward for development.

The low level of brownfield development reflects the fact that Milton Keynes is a planned new town with a relatively limited number of redevelopment opportunities compared to other areas. Many redevelopment opportunities, such as old garage sites, are small and for less than 10 units. Sites of this size are covered by a windfall analysis and therefore to avoid double counting, specific small brownfield sites are not listed in the schedule. The overall deliverable supply of housing is therefore not at risk due to the reliance on the delivery of potentially difficult brownfield opportunities.

Market constraints

The constraints of the market have been noted elsewhere in this report. It is worth noting that the 5, 10 and 15 years completion rates across the Borough have been around 1,500 homes per year, irrespective of the housing target set out by the Council.

As part of the work on the new Local Plan, in line with the requirements of the NPPF and PPG, the Council has been looking at market signals. These are summarised in Appendix 3. The signals indicate that over recent years, despite only 1,500 homes per year being delivered, the affordability of housing in Milton Keynes has performed similarly to other comparable areas and England as a whole. Other key factors also compare well. The indication is that 1,500 homes per year have broadly satisfied the realisable market demand for new housing. This further reinforces the accuracy of the conclusion drawn by the Core Strategy Inspector (see later comments) and the point about financial constraints mentioned earlier.

The indicative trajectory of housing land supply suggests that from year two deliverable land is available for in excess of 2,200 homes. This is clearly well in excess of the long term average completion rates across the Borough.

This position emerges as several new major housing sites, including the Western Expansion Area, the Strategic Land Allocation and Campbell Park start being built out, on top of the ongoing supply of homes from sites already under construction such as Brooklands, Oakgrove and Newton Leys.

The Council are now in a position where they can be more certain than ever that development on the identified sites is able to progress in a timely manner. In previous years there was always uncertainty about the start date on site but now primary infrastructure is in place or under construction, land parcels are in developer ownership and reserved matters applications are being approved with developers keen to get on site.

Therefore it is felt that the indicative trajectory provides a realistic overview of the deliverable land available for each of the next five years.

Whether all of this deliverable land will end up being delivered is a separate issue, which will be determined by the ability of the wider Milton Keynes housing market being able to sustain levels of completion well in excess of past average rates.

If delivery rates of in excess of 2,000 homes per year are not achieved it is not felt that this will be down to a lack of deliverable housing land across the Borough which supports the conclusions of the Core Strategy inspector that “there is no substantive evidence that the supply is constraining housing delivery in the borough” (para. 31) and “there is insufficient reason to doubt that the identified supply is fit for purpose” (para. 86).

New policy documents

Despite the position with market constraints outlined above, the Council is preparing a Site Allocations Plan to allocate new, non-strategic housing sites across the Borough. The aim is to allocate a range of small/medium housing sites that can supplement existing land supply and hopefully boost completion rates – if there is market demand. The first consultation on this document took place in late 2014 with preferred options to follow in the autumn of 2015 before adoption in 2016. This process is therefore likely to provide additional deliverable sites in the current five year period, which runs to March 2020.

There are also several Parish Councils in the process of producing Neighbourhood Plans. These are each considering the need to allocate new housing sites with the rural authorities in particular, likely to allocate land that will be deliverable, at least in part, in the current five year period. This is reflected in the inclusion of Tickford Fields to the housing trajectory, which forms part of the Newport Pagnell Neighbourhood Plan that is expected to be submitted to the Council in July.

Therefore, as with delivery not being reliant on the need for securing the principle of development through a planning permission, the delivery is also not reliant on the adoption of any new policy document. Indeed, it is likely that any new policy documents under preparation will only enhance the supply of deliverable land.

Regeneration areas

The Council is committed to a comprehensive regeneration programme across a number of the older new town estates. The Council has set aside funding to deliver the programme and is currently commissioning a delivery partner to take forward the programme of regeneration, which will in part be driven by improving the range and quality of housing on estates. This partner is scheduled to be appointed at the July 2015 meeting of the Cabinet.

A detailed timetable for delivery of the regeneration programme has yet to be established, however it is expected that the programme could be delivering change inside the next 2-3 years (i.e. inside this five year land supply period). The programme is therefore likely to contribute additional housing opportunities in the next five years, supplementing existing supply.

The programme is expected to begin in the next couple of years and be undertaken over the next 10-15 years. Currently no allowance has been made for the delivery of homes on regeneration estates in the five year period. Therefore as with new policy documents, the regeneration programme has the potential to supplement the existing supply of sites.

Additional points

Urban / rural split

In previous years, land supply reports have specifically identified land availability in the rural and urban parts of the Borough. In the last report it was clearly set out that the urban rural/split was provided for the purpose of plan making, to ensure that in planning to deliver the Core Strategy housing requirements land is identified in the appropriate areas.

This information was not provided with the intention of it being used in the determination of planning applications. As per recent planning appeals across the country (e.g. para. 41 of appeal APP/T2405/A/13/2198620 [Westleigh Developments against Blaby District Council]), disaggregated approaches continue to not be considered appropriate for considering land availability in an authority area.

The figures in the report show that across the Borough, the Council can demonstrate a 5-year land supply.

Performance against the Core Strategy housing trajectory

The figures in this report include a shortfall in recent completions against the average housing target in the Core Strategy. However, as has been previously noted, during the examination of the Strategy, it was accepted that in the short term, the target would be difficult to achieve. A housing trajectory was included in the Core Strategy which set out a realistic rate of delivery.

Against this trajectory there has still been a shortfall of completions (around 1,600 homes). However, this shortfall in delivery is still just within the tolerance of 20% agreed as part of the Strategy (see Core Strategy table 17.1), although this position is becoming increasingly marginal. The current land supply trajectory is not dis-similar in shape to that in the Core Strategy. The main cause of the shortfall appears to be the delay in bringing forward the major sites around the city, which as noted earlier, is now beginning to be addressed.

Appendix 1 - Site by site forecast of land availability

Area	Site	2015/16		2016/17		2017/18		2018/19		2019/20		2020/21		2021/22		2022/23		2023/24		2024/25		2025/26		Future Years		Totals		Notes on deliverability	Planning Reference													
		Physical Starts	Physical Completions	Physical Starts	Physical Completions	Physical Starts	Physical Completions	Physical Starts	Physical Completions	Physical Starts	Physical Completions	Physical Starts	Physical Completions	Physical Starts	Physical Completions	Physical Starts	Physical Completions	Physical Starts	Physical Completions	Physical Starts	Physical Completions	Physical Starts	Physical Completions	Physical Starts	Physical Completions	Physical Starts	Physical Completions															
TARIFF PROJECTS																																										
BROOKLANDS	LAND AT BROOKLANDS 2501 UNITS OUTLINE	200	35	0	250	95	50	250	180	160	300	300	179	200	250	250	250	0	190	200	0	50	200	0	0	61	0	0	0	1350	1350	1350	Site is remainder of permitted outline application so is considered suitable. It is available now and in ownership of Barratt Homes. In terms of deliverability, the figures are in line with developer forecasts for c.200-250 dpa across the area. Phased completions in line with realistic delivery rate for Brooklands site and more than realistic given observed rates of development. Pre-app discussions currently ongoing regarding parcels d and e.	06/0020/MKPCO								
BROOKLANDS	BDW PHASE 1	0	17	75	0	0	62	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	17	137	Site is under construction so is deliverable. Achievability of development rate is realistic.	13/0153/REM										
BROOKLANDS	BDW PHASE 2	0	120	100	0	100	100	0	19	100	0	0	36	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	339	436	Site has full planning permission and is in control of housebuilder so is deliverable. Development rates achievable given previous completions in the area.	14/0106/REM										
BROOKLANDS	BDW PHASE 1C	0	59	59	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	59	59	Site has full planning permission and is in control of housebuilder so is deliverable. Development rates achievable given previous completions in the area.	14/0189/REM											
BROOKLANDS	BROOKLANDS PHASE 1	0	0	0	15	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15	15	Remainder of phase 1 is currently occupied by marketing suite, which will become deliverable towards the end of the 5 year period.	09/0060/MKPCR											
BROOKLANDS	BROOKLANDS PHASE 1B, 17 AND 30	0	0	30	0	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	44	Site is under construction and is nearing completion.	11/01827/MKPCR											
BROOKLANDS	BROOKLANDS SITE 18	0	54	25	0	29	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	54	54	Site is under construction and is nearing completion.	12/0023/MKPCR											
BROOKLANDS	GATEWAY SITE	50	25	0	25	50	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	50	50	50	New development site - mixed use area in the Development Brief. No obvious constraints to development and application expected shortly.												
BROOKLANDS SUMMARY		250	310	289	250	235	320	250	280	260	300	319	279	200	250	286	150	250	250	190	200	0	50	200	0	0	61	0	0	1400	1884	2145										
BROUGHTON	BROUGHTON GATE PARCEL M1 AND M2 REMAINDER	112	0	0	60	20	0	52	56	0	0	36	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	112	112	112	Last parcel of Broughton, Compensation site linked to provision of the secondary school and open space in Brooklands. Exact timing of development uncertain but release of the site to PFP expected in May 2015 and development expected well within the next 5 years. Confirmed via Tariff Manager involved with negotiation over site release April 2015. May have more than 112 homes set out in the legal agreement.	04/01069/MKPCO										
BROUGHTON	BROUGHTON MANOR BUSINESS PARK	14	0	0	14	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	14	14	14	Discrete land parcel in a wider urban expansion area. Development of the permitted 62 home scheme unlikely to progress whilst revised scheme for 14 homes is considered. No constraint to development suggesting development will be beyond 5 year period.	1/01340/MKPCO										
BROUGHTON	BROUGHTON GATE RES SITES CM5-CM8	0	0	0	18	18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	18	18	18	Reserve site in developer ownership. Mixed use development inc retail on development area nearing completion. Occupier for retail unit found. Minor modification to permission expected in Q1 2015/16 with delivery of residential units likely the following year.	11/02316/MKPC										
BROUGHTON	BROUGHTON GATE RES SITE CMH (Haven Street)	18	0	0	18	18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	18	18	18	Reserve site not taken up for alternative use. Due to be released under the terms of the legal agreement. Application expected shortly after release of the site.											
BROUGHTON SUMMARY		144	0	0	110	70	0	52	56	0	0	36	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	144	162	162												
KINGSMEAD	KINGSMEAD SOUTH SITES 3 AND 4	0	0	0	170	50	19	0	70	71	0	50	76	0	4	0	0	0	0	0	0	0	0	0	0	0	0	170	170	170	Allocated housing site. Second Kingsmead South parcel to follow on from the first. Marketing of the site commenced in early 2015 - closed end of April 2015. Developer to be appointed by end of 2015. Site is deliverable but lead in time allowed for procurement process to be undertaken; reserved matters approval to be secured; and works on infrastructure undertaken. Assumed two development parcels.	06/00602/MKPCO										
KINGSMEAD	KINGSMEAD SOUTH SITES 1 AND 2	0	0	0	206	60	39	0	60	52	0	60	52	0	26	52	0	11	0	0	0	0	0	0	0	0	0	206	206	206	Allocated housing site with primary infrastructure already in place. Site under contract, public consultation has taken place and application submitted April 2015. Site could be built out more quickly depending on approach of the developer. Details confirmed by HCA.	06/00602/MKPCO										
KINGSMEAD SUMMARY		0	0	0	376	110	58	0	130	123	0	110	128	0	26	56	0	11	0	0	0	0	0	0	0	0	0	376	376	376												
TATTENHOE PARK	TATTENHOE PARK EP APP	0	0	0	0	0	0	500	75	37	198	175	150	310	200	206	0	200	287	0	175	169	0	150	76	0	33	76	0	7	0	1008	1008	1008	Land allocated for development and currently owned by the HCA. Remainder of Tattenhoe Park to be sold to one developer. Previous forecasts based on phased releases of parcels to the market. Site to be marketed in summer 2015. Development rate based on actual progress on phase 1. Appropriate lead in time allowed for procurement process to be undertaken and for the HCA to rework/submit the outline planning consent (assumption is that this will require amendments to the masterplan to be made and a revised S106 to be signed - work on this already ongoing); reserved matters approval to be secured; and works on infrastructure to be undertaken.	06/00856/MKPCO						
TATTENHOE PARK	TATTENHOE PARK SITE 1	0	0	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Development well under construction. May be completed in 2015 well ahead of forecast. Actual rate of completion 158 units in 15 months - equivalent to 112 homes per year. Developer has confirmed all units have been sold.	12/00969/MKPCR							
TATTENHOE PARK SUMMARY		0	0	5	0	0	0	500	75	37	198	175	150	310	200	206	0	200	287	0	175	169	0	150	76	0	33	76	0	7	0	1008	1008	1013								
WESTERN EXPANSION AREA	WEA AREA 10.1 - 10.3 REMAINDER	0	0	0	400	129	63	400	245	189	360	250	250	360	283	263	360	300	300	320	300	330	300	300	216	300	300	216	300	326	1137	1181	3746	3746	3746	Remainder of site that has outline planning permission. Main site infrastructure well under construction. Three areas of the site now in developer ownership and first four REM under consideration for c.300 units. Bovis development programme for 700 units to be on site by 2020 (Phasing plan 14/01753/DISCON). Abbey Homes confirmed intention to begin construction during 2015 - application imminent. Taylor Wimpey have taken ownership of a third larger parcel and are engaged in pre-app discussions. High density High Street area from over 400 apartments also being marketed. At least five development parcels expected on site from 2015. Development rate from 2017/18 in future years takes into account additional MKC land holding which is likely to be disposed on inside the next few years. These will boost development outlets and therefore supply/delivery rates. 300 units per year will be realistic once development is fully established on site.	05/00291/MKPCO					
WESTERN EXPANSION AREA	Bovis - 10.1 a and b	121	40	30	50	50	0	31	41	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	121	121	121	Applications under consideration. Expected to go to July 2015 committee.	14/02383/REM										
WESTERN EXPANSION AREA	Bovis - 10.1	61	40	30	21	31	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	61	61	61	Reserved matters granted April 2015. Developer expected on site shortly. Bovis suggest 40 units deliverable by the end of the calendar year across the two land parcels (update published for committee April 2015)	14/02385/REM										
WESTERN EXPANSION AREA	Abbey	217	30	10	50	50	0	50	50	0	50	50	0	37	57	0	0	0	0	0	0	0	0	0	0	0	0	217	217	217	Application under consideration. Developer confirmed that 10 completions expected in 15/16 with around 50dpa to follow.	15/00499/REM										
WESTERN EXPANSION AREA	Taylor Wimpey phase 1	85	30	15	50	50	0	5	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	85	85	85	Application expected late Spring. Public consultation advertised May 2015												
WESTERN EXPANSION AREA	WEA AREA 11 - REMAINDER	100	0	0	300	50	30	300	250	170	300	300	278	300	300	300	270	300	300	244	225	250	0	200	230	0	150	176	0	39	80	0	1814	1814	1814	Forecasts confirmed with developer. First two REM applications under consideration for 153 units and 252. First parcel for 153 units approved in April 2015. Site infrastructure well under construction and first homes expected to begin construction in Spring 2015. Plans for three different arms of Barratt on site - Barratt, David Wilson and Barratt North Thames. Future applications expected on a regular basis over next few years to maintain their expected development out-turn from the site. Development rate increased to 300 from 2018/19 to reflect future Gallagher land sales in Area 11, expected by 2016, once ongoing archaeological and ecological works have been completed. In 2015/16, applications for phases 4 and 5 expected after pre-app discussions.	06/00123/MKPCO					
WESTERN EXPANSION AREA	Barratt - 3a, 4a and part of 3b	144	100	80	44	64	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	144	144	144	Overall projections checked with Gallagher Estates and individual developers. Overall rate of development at 500-600 homes per year across the whole development area is not unrealistic in early years given context of Broughton Gate, at 350-400 homes per year on a 1,500 unit expansion area. 600 homes per year across the whole site seen as appropriate development rates once the site is operating at capacity.	14/01316/REM										
WESTERN EXPANSION AREA	Barratt H2 to H3	262	100	80	100	80	0	62	80	0	0	22	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	262	262	262												
WEA SUMMARY		990	340	245	700	494	418	700	643	550	660	600	600	660	620	620	630	600	600	564	525	550	320	540	530	300	480	476	300	255	380	300	216	300	326	1137	1181	6450	6450	6450		
TOTALS FOR TARIFF PROJECTS		1384	650	539	1326	949	866	1450	1180	1026	1158	1204	1193	1170	1096	1168	780	1050	1148	564	890	919	320	740	806	300	513	613	300	255	387	300	216	300	326	1137	1181	9378	9680	10146		
FUTURE TARIFF PROJECTS																																										
STRATEGIC RESERVE	SIBLEY HAULAGE	36	0	0	36	20	0	16	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	36	36	36	Site in developer ownership. Application refused in early 2015 with design issues. Developer is likely to submit revised application or appeal refusal. Outcome expected to be resolved in 2015 although site remains deliverable.											
STRATEGIC RESERVE	RIPPER LAND	0	0	0	0	0	80	40	20	0	40	40	0	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	80	80	80	Two small, discrete sites within the SLA which could be bought forward independently of the bulk of the site. One site (Sibley Haulage) in developer ownership and full application submitted (36 units). Site likely to be subject to an appeal. Ripper Land could accommodate 80-100 units. Ongoing discussions regarding the sale of the site.										
STRATEGIC RESERVE	HAYNES LAND	0	0	0	0	200	70	50	185	50	50	0	50	50	0	50	50	0	50	50	0	15	35	0	0	0	0	0	385	385	385	Outline application permitted, site is deliverable.	14/02167/OUTEIS									
STRATEGIC RESERVE	EAGLE FARM	0	0	0	210	100	70	200	100	100	0	100	100	0	90	75	0	20	65	0	0	0	0	0	0	0	0	0	410	410	410	Outline consent granted for 410. REM Application for northern area infrastructure under consideration. Expected on site by Christmas 2015. Site is actively being marketed.	13/02381/OUTEIS									
STRATEGIC RESERVE	GLEBE FARM	0	0	0	200	100	70	200	150	100	200	200	150	200	175	150	200	175	150	140	120	150	0	90	150	0	80	150	0	50	70	0	0	0	1140	1140	1140	Outline consent granted. Approved figure is for 1140 homes. Intelligence via the Tariff implementation team is that the first reserved matters application expected summer 2015.	13/02382/OUT			
STRATEGIC RESERVE	GOLF COURSE LAND	0	0	0	0	0	200	50	30	200	50	50	0	50	50	0	50	50	0	50	50	0	50	50	0	50	50	0	400	400	400	Site is land locked with access needing to be provided from an adjacent site. However the site has outline permission and is deliverable within 5 years (in part).										
STRATEGIC RESERVE	CHURCH FARM	0	0	0	350	50	30	0	50	50	0	50	50	0	50	50	0	50	50	0	50	50	0	50	50	0	20	0	0	0	0	0	0	0	350	350	350	Site separate from the rest of the development area. Already in the ownership of a house builder. Outline application for up to 350 in refused March 2015 on highways grounds although the site is allocated and remains deliverable within 5 years (in part).	14/01810/OUT			
STRATEGIC RESERVE	WEST OF STOCKWELL LANE	0	0	0	240	50	30	0	50	50	0	50	50	0	50	50	0	40	50	0	0	10	0	0	0	0	0	0	240	240	240	Site is allocated so is considered suitable and available. Achievability expected to be confirmed via outline planning application. Issue regarding ensuring access to the Stables venue now resolved.										

APPENDIX 2 - Windfall Analysis, June 2015

1. Introduction

- 1.1 Windfall development was defined in Annex 2 of the National Planning Policy Framework (NPPF) as:

“Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously developed sites that have unexpectedly become available”.

- 1.2 The now deleted Planning Policy Statement 3: Housing, gave examples of potential sources of windfall sites including closed factories or small sites such as a residential conversion or a new flat over a shop.
- 1.3 This report has been prepared to assess the contribution of windfall development to housing growth in Milton Keynes. It takes a historic look at windfall completions over the last 13 years, using the findings of this work to identify trends in provision and assess the potential level of windfall development that could be expected to occur in Milton Keynes in the future.
- 1.4 The report covers a period from 1st April 2002 up to the end of the most recently completed full monitoring period, 31st March 2015, drawing on data collected in the Council’s housing database.

2. What does the monitoring information show us?

- 2.1 Housing monitoring shows that over the period between 2002 and 2015 there were 19,303 (net), housing completions in Milton Keynes, an average of 1,485 per annum. 1,504 (8%) were in the rural area and 17,799 (92%) were in the designated urban area.
- 2.2 There were 3,229 windfall homes built in this period. This is an average of 248 per year across the whole Borough. 2,593 (80%) of these were within the designated urban area of Milton Keynes. 636 (20%) were in rural settlements outside the urban area.
- 2.3 This means that over the last 13 years on average there have been 199 homes per annum in the urban area and 49 homes per annum in the rural area completed on previously unidentified sites.
- 2.4 Windfall development accounted for 17% of all completions in the Borough between 2002 and 2015. In terms of rural development, windfall accounted for 42% of all housing completions. In the urban area windfall development accounted for 15% of all completions. This information is summarised in Table 1 below.

Table 1 - summary of housing completions information 2002-2015

	Completions	Windfall completions	Annual average windfall	% windfall of total completions
Urban	17,799	2,593	199	14%
Rural	1,504	636	49	42%
Overall	19,303	3,229	248	17%

3. Completions by settlement

- 3.1 This section looks more closely at the location of the windfall developments, considering where the ‘hot spots’ for windfall sites are.
- 3.2 In the urban area, a significant number of the windfall developments have been found in the older parts of the city with 18% (481) of urban windfall homes being developed in Wolverton/Wolverton Mill and 29% (761) in Bletchley. Together these two settlements account for nearly 50% of the urban windfall completions over the last 13 years. There have also been significant levels of windfall development in other older areas such as New Bradwell and Stony Stratford. This suggests a correlation between the age of an area and the prevalence of windfall development.
- 3.3 There have still been 622 (48 per year on average) windfall completions within city estates, showing that despite being newer, opportunities for their (re)development still exist.
- 3.4 Interestingly, during 2014/15, the first significant windfall completions have been seen in Central Milton Keynes. There were 33 completions as a result of changes from office to residential under the new permitted development rights. This is a new source of windfall completions which will need to be kept under review over the next few years.
- 3.5 The remainder of urban windfall completions have been on sites where housing has replaced the original use designation for land. This is on developments such as Intervet in Walton and the Extracare village in Shenley Wood, both of which were allocated employment sites.
- 3.6 In the rural area, Newport Pagnell (240 windfall completions / 38% of total rural windfall completions) was the hot spot for windfall development. Olney (100 / 16%) also had a significant amount of windfall development over the 2002-2015 period.
- 3.7 However, 46% of rural windfall completions were also spread across the smaller rural settlements, including Woburn Sands. In total there have been windfall completions in 26 of the 28 rural settlements, showing the wide availability of windfall opportunities. This information is summarised in Table 2 overleaf.

Table 2 - windfall completions by settlement

Rural area	
Newport Pagnell	240
Olney	100
Woburn Sands	25
Other settlements	271
Urban area	
New Town City Estates	622
Bletchley	761
Wolverton	481
New Bradwell	121
Stony Stratford	54
CMK Office to resi	33
Major sites allocated for other uses	521

4. Completions by size of site

- 4.1 Across the Borough, windfall development sites have ranged in size from one dwelling to 300. However, the vast majority of sites (88%) are for five dwellings or less. This extends to 93% including sites up to ten dwellings in capacity. In total, windfall development on sites of 5 dwellings or less accounted for 25% of windfall development (units on sites of less than 10 dwellings accounted for 35% of all windfall completions). This is an average of 62 dwellings per year over the last 13 years on sites of five or less dwellings across the Borough, and 89 per year on sites of less than 10 dwellings.

Rural area

Table 3 - Completions in the rural area by size of site

	COMPLETED			
	Units	Sites	% of completions	% of sites
5 and under	396	274	62%	93%
6 to 9	89	13	14%	4%
10 to 19	73	5	11%	2%
20 to 29	29	1	5%	0.5%
30 to 49	49	1	8%	0.5%
50 to 99	0	0	0	0
100 +	0	0	0	0
	636	294		

- 4.2 In the rural area it can be seen that 62% of rural windfall completions are part of developments of five or less dwellings. These sites average 31 homes per year over

the last 13 years. 76% of homes have been completed on sites of less than 10 dwellings – on average 37 homes per year.

- 4.3 When considered against overall completion rates in the rural area over the same period (1,504) it can be seen that 26% of all completions in the rural area are windfall completions from sites of fewer than five units. This extends to 32% for windfall completions of sites of less than 10.
- 4.4 There have been very few larger rural windfall sites over the last 13 years. This is likely to be as a result of a fairly up-to-date Local Plan (adopted in 2005) being in place which had identified a number of the major brownfield rural housing sites, such as Nampak in Woburn Sands, Renny Lodge in Newport Pagnell and the Cowper Works in Olney.
- 4.5 Given that the current Local Plan is now several years old and the majority of allocated sites have been developed, it is likely that there may be an increase in large scale windfall development ahead of a replacement plan being adopted. However, as is noted later in this report, the largest brownfield windfall opportunities have been identified as part of the SHLAA process.
- 4.6 More recently (during 2011/12), 49 specialist dwellings for the elderly were completed in Newport Pagnell, as an extension to an existing scheme. This type of development is becoming more prevalent across the whole of Milton Keynes as the population ages, and a similar scheme now underway in Woburn Sand. This situation may result in more large scale windfall developments over the next 5- 10 years.

Urban area

Table 4 - Completions in the urban area by size of site

	COMPLETED		
	Units	Sites	% of completions
5 and under	418	275	15%
6 to 9	236	22	9%
10 to 19	306	21	11%
20 to 29	178	7	6%
30 to 49	220	7	9%
50 to 99	273	3	11%
100 +	962	7	39%
	2,593	343	

- 4.7 The profile of urban windfall sites is distinctly different to that of the rural area. As in the rural area a significant number of homes have still being delivered from windfall sites of five or less dwellings (an average of 32 per year/16% of total urban windfall completions) and sites of less than 10 dwellings (50 per year/25%). However, there have also been a greater number of larger windfall sites developed

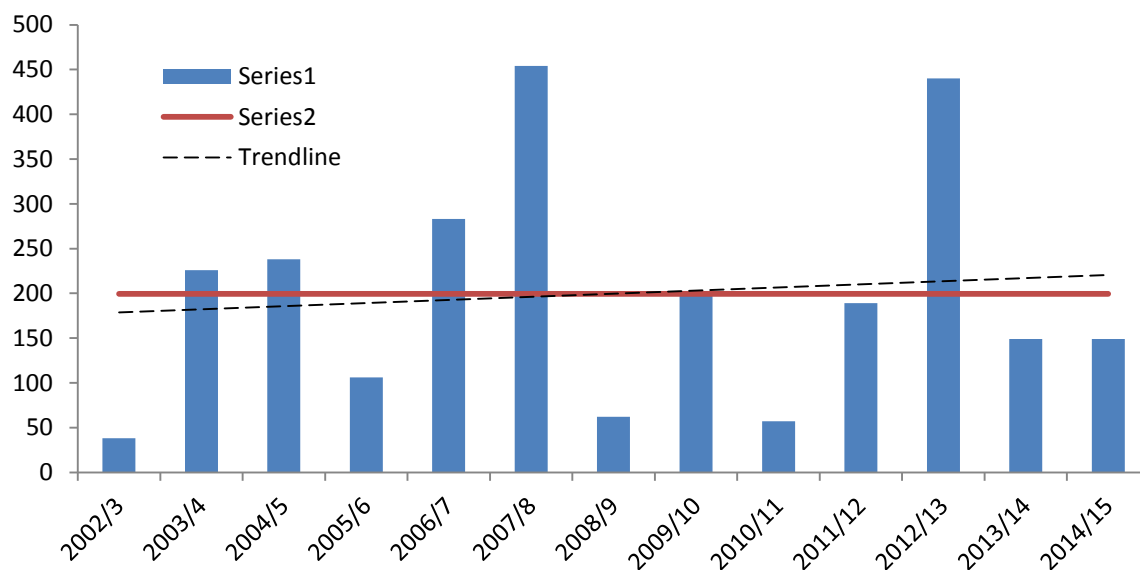
in the urban area than in the rural area. This is likely to be due to the wider scope for redevelopment opportunities in urban locations than in rural areas.

- 4.8 The 654 dwellings which come from sites of less than 10 dwellings is still a significant number, despite it contributing just 3.7% of total urban completions (17,799) over the last 13 years. This is significantly different to the contribution made in the rural area from small sites (32%).
- 4.9 Of the larger sites (30+ dwellings), 10 of the 17 sites are in either Bletchley or Wolverton, reflecting the contribution made by sites in the older parts of the city. The sites predominantly involve the redevelopment of former industrial buildings/areas, old schools sites and office blocks. However, the sites also include developments which make more efficient use of land elsewhere in the city, such as at the hospital where 109 new homes for nurses were built in 2007 on an underused greenspace. During 2014/15 the first homes were built at Bedgebury Place, Kents Hill, which involved the redevelopment of a site for 40 units within a city estate. This may be a form of development which becomes more prevalent in the future as the city estates start to age.
- 4.10 Increasingly over the last couple of years, the development of land allocated for other purposes, particularly employment, has seen additional windfall development. Two schemes at Shenley Wood and Walton are on land allocated for employment use on the Proposals Map, but which has not been developed since the designation of Milton Keynes. This type of development could become more prevalent in the future as pressure to develop un-used greenfield sites within the city increases, and assessments show that land is no longer needed for its proposed use, ahead of a comprehensive review in the new Local Plan.

5. Timing of completions

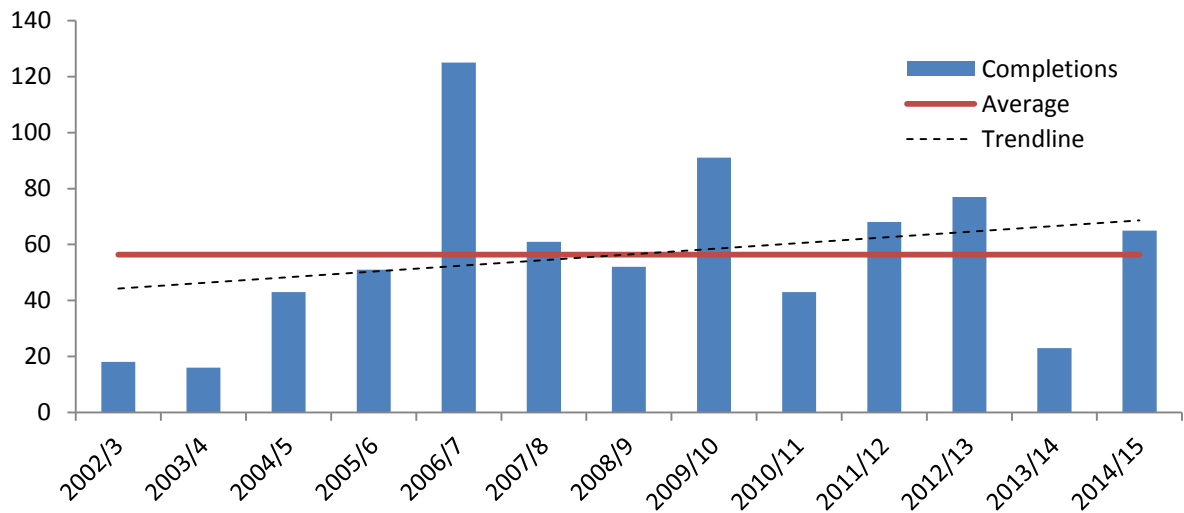
- 5.1 The nature of windfall development means that sites can come forward at any time. The following section charts how annual windfall completion rates have changed over the last 13 years.

Figure 1 - Urban windfall completions



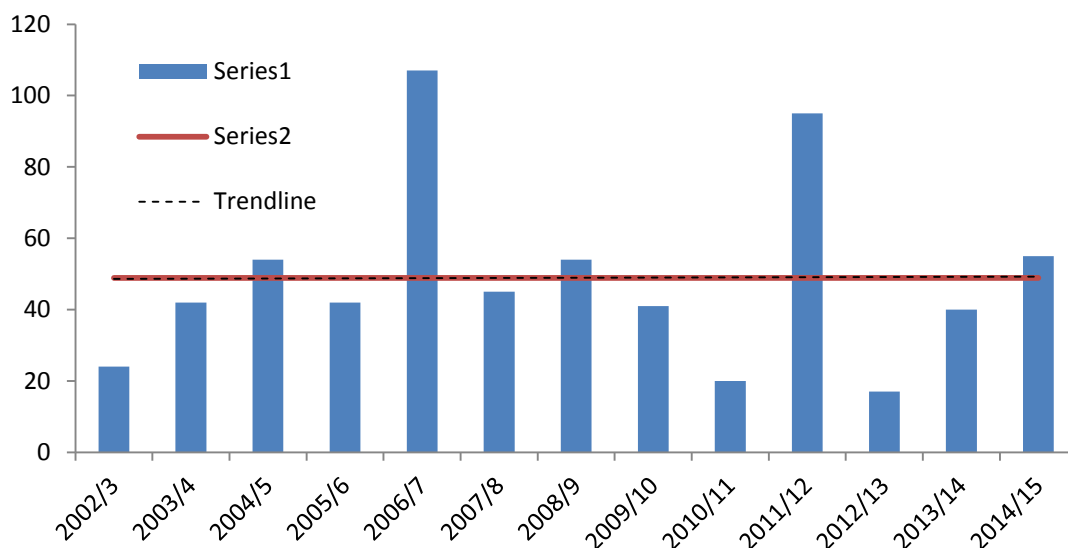
- 5.2 It can be seen from figure 1 that urban windfall completions have generally become slightly more prevalent over the last 13 years (hashed trendline). This would suggest there is a trend towards increasing rates of windfall development in the urban area. However, it can be seen that in the years 2008-2011, there was a 'lull' in windfall completions, This is likely to have been as a direct result of the economic downturn, which had an impact on the housing market in general, with less risks to development being taken. The peak in completions between 2006-2008, along with this lull, suggests that there is a direct correlation between the state of the economy and the level of windfall development. The peak in 2012/13 is in relation to the ongoing build out of the Extracare village at Shenley Wood and the Intervet site in Walton, two of the largest windfall developments in recent years.
- 5.3 Completions in the last three years have averaged 246 homes suggesting that the lull accompanying the recession is over and windfall development is strong again, which is further supported by the figures for the units under construction, as is discussed later in this report.

Figure 2 - Urban Completions Under 10 units



5.4 When looking at sites for ten or less dwellings across the urban area, which are the most common source of windfall completions, there appears to be a slightly more consistent level of completions. Over the 13 year period, there have been an average of 56 homes per year on small sites of less than 10 units. The trendline suggests that over the last 13 years there has been a trend towards increasing completions from small sites in the urban area. This is also reflected by the fact that in three of the last four years the rate of windfall completions from small sites has been above the longer term average.

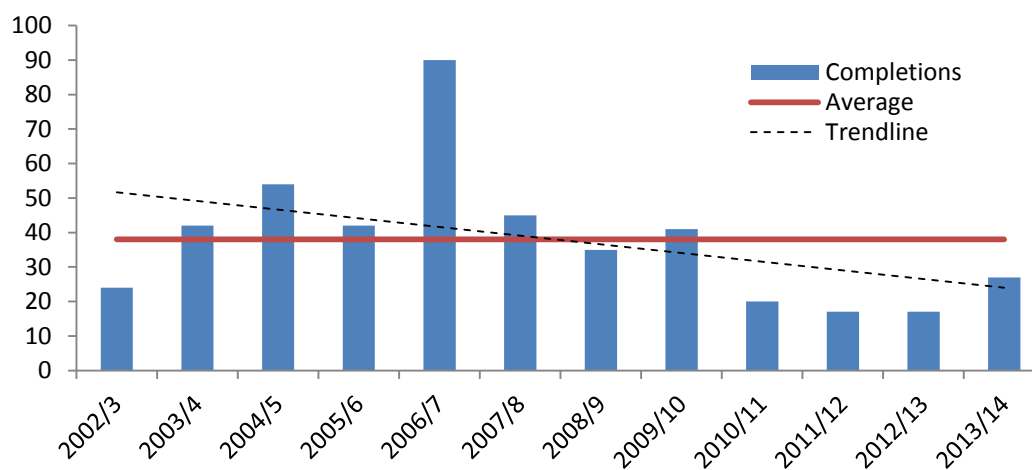
Figure 3 - Rural Windfall Completions



5.5 From figure 3 it can be seen that in the rural area there has been fairly consistent level of completions over the last 12 years, with just a couple of years where completions were significantly higher. Over the 13 year period there has been an average of 49 windfall completions each year.

- 5.6 From figure 4 below, it can be seen that when windfall sites of less than 10 dwellings are considered on their own, there appears to be a trend towards slightly decreasing completions from small sites (the average rate of completions is 38 homes per year). However, pre-economic downturn there was a period where there was an average of over 50 homes developed each year from small windfall sites, which heavily influences this trendline. Since the peak of completions in 2006/7 (i.e. 2007/9 to 2014/15) there has been an average of 31 windfall homes per year on small sites in the rural area. Excluding just the peak rate in 2006/7 gives a long term average of 35 dwellings per year.
- 5.7 Current monitoring shows that on sites for less than 10 homes in the rural area there are currently 96 units either permitted or under construction, suggesting a continued supply of small site to the market.
- 5.8 Making an assumption that 85% of all permissions granted will be implemented before they expire, even before any new permissions are considered, it is realistic to assume a minimum of 27 homes will be completed in each of the next three years on small sites in the rural area.

Figure 4 - Rural completions- sites under 10 units



6. Type of site being developed

- 6.1 A range of different types of site have made up windfall development since 2002. These include:

- Redevelopment – demolition of an existing building (of any type) and replacement with housing
- Residential garden – development clearly in the back gardens of existing residential properties. May involve the loss of one property to access a site.
- Intensification/infill – the development of housing on sites where there is already housing or an ongoing use which is retained but intensified. Includes sites such as

farms, town centre sites and sites associated with existing houses (excluding land that is clearly part of the garden)

- Sub division – the splitting of existing houses into flats or separate dwellings. Includes dwellings created in extensions to existing buildings as part of a conversion
- Flat above shop – the creation of flats as part of new build shops (excludes conversions above existing shops)
- Conversion – the conversion of existing buildings (excluding those already in residential use) to dwellings or flats. Includes large office blocks, small retail/offices uses and disused outbuildings and barns.

- 6.2 There has been no clear pattern to the level of windfall development that can be expected from each type of site. The redevelopment of sites is the stand out source of supply, with an average of around 80 completions per year over the 13 year period. There have also been around 35 homes per year from infill and intensification and 35 homes per year from conversions over the period. In 2014/15 there were 85 windfall completions as a result of the conversion of buildings, boosted by 33 completions in Central Milton Keynes as a result of the revised permitted development rights. Together, these sources of windfall development have contributed around 75% of all windfall completions over the last 13 years.
- 6.3 In the few couple of years, the development of homes on sites allocated for other uses in the Local Plan has boosted windfall completion rates. The Shenley Wood Extra Care facility (300 homes) and the Intervet site (138) are examples of this.
- 6.4 In terms of development of residential gardens, which the NPPF should be specifically excluded from any windfall allowance in the 5 year land supply, there has been an average of 10 completions per year on garden sites. These have mainly been in the older areas of the city, where homes have larger gardens that can be exploited for development. They have also mainly been single dwellings rather than large scale developments. This may link to the fact that, as a new town with less older properties with large gardens, obvious opportunities for larger scale garden development are limited.
- 6.5 Completions in the rural area have been more consistent from a number of sources. Conversions are the most prevalent source of supply over the last 13 years with an average of 17 per year. These are mainly on small sites, including barns and other farm buildings, but also in town centres where there are disused outbuildings and changes from retail/office type uses. The other main two sources of supply are infill/intensification (13 per year) and redevelopment (10), although the intensification/infill figure is slightly skewed by one significant development in 2011/12. They types of site redeveloped in recent years include an former bus depot in Hanslope (5 units) and the conversion of an office block in Woburn Sands, with intensification on the surrounding land.
- 6.6 In terms of garden developments, there has been an average of 5 per year over the 12 year period. This average reduces to around 3 when just small sites are looked at.

An element of the infill/intensification may also be classed as ‘garden’ land where the description of the development did not make it clear whether the development site was garden land or not. There is an occasional larger garden development in the rural area, given the prevalence of larger gardens than are found in the area compared to the majority of the city estates.

7. Trends and observations for future windfall development

7.1 The key trends are:

- Proportionately, windfall development made more of a contribution to rural housing growth than urban housing growth between April 2002 and March 2015.
- The contribution of windfall development in the rural area (42%) is a significant contribution to the overall supply of housing in the area.
- The 199 units from urban windfall sites is a significant number despite not being proportionately significant as in the rural area.
- The completion of homes on small (under 10 units) sites has been fairly consistent over the last 13 years in both the rural and urban areas, with a trend towards increasing completions on such sites in the urban area.
- In the rural area, the majority (76%) of windfall development is on small sites for less than 10 homes.
- Windfall development on small sites of less than 10 units has contributed 32% of all rural completions over the last 13 years.
- In the urban area, there is a greater spread in the size of windfall sites.
- Hotspots for windfall development are the older parts of the urban area (Bletchley and Wolverton) and the two largest rural towns (Newport Pagnell and Olney). This has been consistent over the 13 year period.

8. Conclusions

8.1 This section concludes whether it is justified and necessary to include a windfall allowance in Milton Keynes Council’s land supply position.

8.2 The NPPF sets out that an allowance for windfall can be made by Local Authorities if:

- They have compelling evidence that such sites have consistently become available
- Such sites will continue to be a reliable source of supply

8.3 Any allowance should be realistic and have regard to:

- The Strategic Housing Land Availability Assessment (SHLAA)
- Historic windfall delivery rates
- Expected future trends
- Should not include residential gardens

- 8.4 This part of the statement looks at the degree to which these requirements can be satisfied and the Council can justify a windfall allowance for the future.

Have sites consistently become available?

- 8.5 Yes - over the last 13 years it can be seen that windfall development has consistently provided a significant number of homes across the Borough. At 42% of all completions, windfall development has been integral to delivery of new homes in the rural “rest of the Borough”. At 199 dwellings per year, although not as significant proportionately as in the rural area (at around 13%), windfall development has consistently contributed a considerable number of homes in the urban area.
- 8.6 The rate of development from small sites of less than 10 dwellings has been particularly consistent across both the rural (an average of 38 homes per year) and urban (56 homes per year) areas.

Will such sites continue to be a reliable source of supply?

- 8.7 From an analysis of all windfall completions it can be seen that a large number homes come from the ad hoc redevelopment previously developed sites, particularly in the urban area. These sites range in size and use from large scale former employment areas to smaller sites, such as pubs or small workshop style buildings. Despite there being peaks and troughs of development there is no sign that this form of development has slowed down over the last 13 years.
- 8.8 Conversions have also made a significant contribution over the last 13 years – both large scale conversions of former office blocks and small scale redevelopment of barns or outbuildings. This is likely to continue in the future, particularly given the Government’s support for the change of use from B class uses to residential. This year has seen the first 33 units developed in Central Milton Keynes as a result of this change and there are other developments already identified in other areas of the city, in areas such as Caldecotte.
- 8.9 Small sites of 10 dwellings or less have generally shown a consistency in delivery, and continue to do so through ongoing monitoring. The source of this type of supply is mainly through redevelopment/conversion/ intensification of existing built up areas. There is no sign that opportunities from this source of development are likely to stop in the future given the continued evolution of the older centres.
- 8.10 Windfall development in the rural “rest of the Borough” has been seen in 26 of the 28 rural settlements, showing a spread of opportunities. There has also been a continual supply of new homes coming from small sites in the main hotspots of Newport Pagnell and Olney, the largest rural settlements, where it is expected that opportunities will continue to emerge as the towns evolve and develop.
- 8.11 In the urban area, small sites also show no sign of slowing down. In the main windfall hotspot area, Bletchley, there has been a trend of increasing supply of homes from

sites of fewer than 10 dwellings, indicating that supply could rise in the future. This has partly stemmed from the subdivision of larger homes in the area into flats. The redevelopment of small, informal employment areas has also boosted supply as older sites, likely in the face of competition from newer sites across Milton Keynes, come forward for redevelopment.

- 8.12 Across the 12 year period there appears to be a relationship between the economic situation and the rate of windfall development, emphasised by the rate peak rate of windfall development in 2006/7, the peak of the market, followed by a period of lower completions reflecting the downturn. The improving economic situation is therefore likely to coincide with an increase in the rate of windfall completions.

Can a windfall allowance be justified?

Rural area

- 8.13 Windfall development has clearly made a significant contribution to development in the rural area. Given that the rural housing requirement is largely based on continuing past rates of development to meet local need, it is felt appropriate to include a windfall allowance for the area.
- 8.14 The SHLAA has identified a number of larger, deliverable brownfield sites. Therefore, if, to avoid duplication with these sites, any windfall allowance made in the five year land supply report should avoid making an allowance for larger sites.
- 8.15 Looking specifically at small sites in the rural area, there is no indication that the rate of development will be significantly above or below that seen previously (an average of 38 homes per year). There has been a bit of a lull in completions in recent years, with an average of 31 dwellings per year since 2007/8. Current monitoring of permissions and construction shows that completions there is potential to continue this rate of development as a minimum in future years.
- 8.16 A small proportion of small scale windfall completions have been on garden sites (around 3-5 homes per year). Under the terms of the NPPF, these sites should not be included in any windfall allowance.
- 8.17 Therefore, under the requirements of the NPPF, the Council can justify an allowance of around **35 dwellings per year** from small scale rural windfall sites.

Urban area

- 8.18 Over the last 12 years, windfall completions have made a large contribution to total urban completions. Although not as significant proportionately as in the rural area, the number still warrants consideration in land supply terms.
- 8.19 As with sites in the rural area, the SHLAA has identified a number of deliverable brownfield sites. Therefore, these should not be taken into account in a windfall

allowance unless they are not specifically included in the 5 year land supply assessment. However, in recent years there has been an increase in windfall completions on large greenfield sites. Such sites are not – by definition as windfall-identified in the 5 year land supply report, so inclusion of an allowance for their completions would not cause duplication.

- 8.20 Looking specifically at small sites in the urban area, there has been an average delivery of 58 homes per year. These have shown a trend towards increasing over the last 13 years.
- 8.21 In addition to small sites, there have also been a number of completions from large scale (over 10 dwellings) conversions over the last 13 years (an average of 17 per year). This trend is likely to increase in future years given a) the proportion of vacant office units across the city b) the aging of this office stock and c) the Government’s support for change of use from B1 to C3.
- 8.22 There are a couple of prior notification sites identified in the 5 year land supply report. However, as conversions are not specifically addressed in the SHLAA, and the rate of their development is likely to increase in the future, they can be considered as part of the windfall allowance. Therefore, combined with the allowance from small scale sites (excluding garden development), it is considered that the Council can justify a modest urban windfall allowance of at least **60 dwellings per year**.

APPENDIX 3 – MARKET SIGNALS

		Milton Keynes	Similar Local Authorities				England
			Bracknell Forest	Swindon	Northampton	Average	
Indicators relating to price							
House prices (source: Land Registry)							
Average House Price	2015 level	183,611	257,274	142,371	151,256	183,628	178,007
	Relative to England	+3.1%	+44.5%	-20%	-15%	-3%	-
	2010 level	153,224	206,112	132,064	136,513	156,978	162,052
	5 year change	+19.8%	+24.8%	+7.8%	+10.8%	+16%	+9.8%
Affordability (source: DCLG table 576)							
Lower quartile house prices to earnings	2013 ratio	6.75	8.0	5.74	5.98	6.6	6.45
	Relative to England	+4.7%	+24%	-11%	-7.3%	+2.6%	-
	2008 ratio	7.29	7.78	7.14	6.95	7	6.97
	5 year change	-7.4%	+2.8%	-19.6%	-14%	-9.2%	-7.5%
Rents (source: VOA)							
Average monthly rent (all property types)	Mid 2014 level	£757	£1,102	£594	£580	£758	£720
	Relative to England	+5.1%	+53.1%	-17.5%	-19.4%	+5.3%	-
	Mid 2011 level	£721	£932	£579	£549	£695	£694
	3 year change	+5%	+18.2%	+2.6%	+5.6%	+9.1%	+3.7%
Indicators relating to quantity							
Rate of Development (source: Census)							
Increase in stock	2001-2011 change	+18%	+5.5%	+17.5%	+9.5%	+13.5	+8%
	Relative to England	+125%	-31%	+119%	+19%	+69%	-
Overcrowding (source: Census)							
Overcrowded households	2011 proportion	9.5%	5.2%	7%	8.9%	7.65%	8%
	Relative to England	+19%	-35%	13%	11%	-4%	
	2001 proportion	7.6%	5.9%	5.8%	6.2%	6.4%	7.1%
	10 year change	+25%	-12%	+21%	+44%	+20%	11%

Milton Keynes Council
Planning and Transport

Civic Offices
1 Saxon Gate East
Central Milton Keynes
MK9 3EJ

T 01908 252358

F 01908 252330

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

www.milton-keynes.gov.uk/planning-policy

