# SHMA – Objectively Assessed Need Progress Note

**June 2016**

## 1.    Background

1.1    Following the Local Plan hearings that took place between the 9th of May 2016 and the 12th of May 2016 the Inspector raised a number of issues regarding the methodology used by the Council to calculate its Objectively Assessed Need.  The OAN is assessed within the Council's SHMA[1]. The OAN is the overall demand for new housing regardless of any constraints on development across the Local Plan Period running from 2014 to 2032. The OAN is used as the basis for determining the housing target for the District, which is set out in Local Plan Policy LS2 – Housing Targets and Distribution. It is therefore essential to ensure that the OAN is robust and accurate in its assessment of housing need.

1.2    During the hearings session it became apparent that the Inspector had several concerns regarding the methodology used by the Council to determine its OAN.

1.3    An alternative OAN methodology was put forward by Barton Willmore (acting on behalf of Story homes). This alternative assessment was based on different data sources and procedural assumptions. As a result this alternative OAN figure was higher than contained within the Submission Draft Local Plan (SD001).

1.4    In response to the outcome of the hearings and the round up session held on the 12th of May the Inspector advised that the Council should seek to rationalise their approach to the OAN and address several issues regarding the suitability of the approach compared to that taken by Barton Wilmore. This work is to be completed prior to the commencement of the second stage of hearings, set to commence on the 19th of July.

1.5    The issues that the Council will seek to address are as follows;

1. Assessment of Barton Wilmore's alternative OAN assessment, followed by a decision of whether the Council agrees with what is being suggested. The Inspector also encouraged the Council to advocate their own approach if we did not feel that Barton Willmore's assessment was suitable.

2. The Inspector considered that the Communities and Local Government 2012 projections, which are used as baseline data by the Council in its assessment of the OAN for the District, are insufficient on their own due

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[1] Strategic Housing Market Assessment – Taking Stock 2015 (Parts 1-4)

to potentially supressed household formation rates as a result of the recession.

3. The Inspector considered that the 10% uplift to take account of market signals applied by the Council early in its assessment of the OAN should either be removed all together from the calculations or moved to a later part of the assessment.

4. The Inspector advised that the Council should reassess its employment forecasts. He advised that this portion of the OAN assessment with the most range in terms of what approach is correct. The Council was advised to ensure that it could provide a complete explanation of the methodology.

5. The Council was asked to provide a 'policy off' figure for its OAN, as this is not explicitly stated in the SHMA.

6. The Inspector advised that the Council may wish to apply a 'policy on' approach.

7. The Inspector asked the Council to confirm/ demonstrate that the OAN can demonstrate boost in supply beyond past delivery rates.

8. The Inspector indicated that any OAN must be deliverable.

1.6    This report is intended to update the Inspector on the progress that the Council has made towards dealing with the issues set out above.

## 2.    Progress to Date assessing Barton Willmore's Alternative OAN Assessment

2.2    In dealing with the inspector's first issue identified by the Inspector regarding producing an assessment of Barton Willmore's alternative OAN the Council has carried out a desk based assessment of the alternative OAN methodology. We have some queries regarding Barton Willmore's approach to determining a demographic OAN. In particular we are concerned that the conflation of data from the CLG 2012 based projections with earlier demographic data, particularly in respect to household formation rates. This

would be contrary to the PAS[2] guidance which indicates that we should not 'mix' or blend projections.

2.4     Notwithstanding the above initial concerns, the Council is continuing to assess Barton Willmore's alternative OAN and has requested further information regarding the methodology used by Barton Willmore in producing their alternative OAN. We were informed on the 1st of July 2016 that we can expect this information by Tuesday the 4th of July 2016. .

2.5     In addition to assessing Barton Willmore's alternative OAN the Inspector indicated that we should provide a robust explanation of our own OAN methodology. The Council's OAN methodology is broken down in Table 1 below.

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[2] Objectively Assessed Need and Housing Targets, Peter Brett for the Planning Advisory Service, July 2015. Paragraph 6.41.

Table 1: EDC OAN Methodology Reference Table

| EDC Methodology | Source | Explanation |
|---|---|---|
| Overview | | - To meet Household growth we will need 110 households per year. To adjust for market signals we apply an uplift of 10% (in accordance with PAS guidance). So 110 households per annum becomes 121 households per annum. <br><br> - We convert the figure of 121 households into a dwelling number by applying the current ratio of households to dwellings, which is 1.089 according to the 2011 Census (this reflects vacant and second home ownership). Applying this figure gives us a starting point figure of 132 dpa to meet future demand. <br><br> - The second stage of the process is to consider possible market pressures or signals. We conclude that there is no 'hotspot' type behaviour compared to neighbouring districts, but that affordability has worsened over time, which could justify a need to raise targets (this matter is dealt with later in the SHMA process). <br><br> - The third stage is to look at the need to support future job growth. Several methods of looking at job growth were considered with the conclusion that up to 194-206 homes per year may be needed to support jobs growth. <br><br> - The fourth stage of the assessment considered whether the OAN figure which was reached in stage three would result in enough housing being developed to meet the district' s affordable housing need. It concludes that our figure of 200 per annum, together with new affordable housing supply will meet this need. <br><br> - The fifth stage considers if we need to cater for neighbouring districts. A small amount of need is identified in the part of Eden which lies in the Lake District |

| EDC Methodology | Source | Explanation |
|---|---|---|
|  |  | National Park. We conclude that the figure of 200 homes per year will meet this need, and that it can be accommodated outside the National Park within the rest of Eden District.<br><br>- Based on the assessment outlined above we conclude that a figure of 200 dwellings per annum is the appropriate figure. |
| Identify housing market area |  | - Eden is a largely rural district and its major employers and many of its residents are located at its biggest town (Penrith) which is centrally located within the area.<br><br>- The area does not have any major settlements sitting next to its boundaries that cannot meet their own needs.<br><br>- The area has previously been established through joint working with other Cumbrian authorities and common HMA geography has been agreed.<br><br>- No significant cross boundary housing supply and demand issues have been identified through the duty to co-operate, and there have been no requests from other authorities for Eden to accommodate housing demand from elsewhere.<br><br>- The area corresponds to the 'single tier' area set out in the 'Geography of Housing Market Areas' study referred to in the Planning Advisory Services technical note on establishing need. This work carried out by Newcastle University and published by the Department of Communities and Local Government in 2010 set out a 'top down' national set of housing market areas based on migration and commuting patterns from the 2001 Census. |
| CLG Household Projections (2012 base) | The 2011 census is the starting point. | **Task 1:**<br>**110** households per year based on 2011 census.<br>(Equivalent to **120** dpa) |

| EDC Methodology | Source | Explanation |
|---|---|---|
| | 2012 household projections | |
| 10% uplift to address market signals | PAS Guidance[3] | In response to identified Market signals (falling levels of in migration, increase in overcrowded households, falling completion rates during recession and Eden's underperformance on housing completions when compared nationally) an uplift of **10%** is applied to the 110 households per year figure, which gives us an uplift of **121** households per annum. |
| Demographic Projections | 2012 – Based SNPP<br><br>CLG 2012 based household formation rates | The figure of **121** households per annum is converted into a dwelling number by applying the current ratio of households to dwellings (based on 2011 Census – **1.089** dwellings to households, meaning there is second home ownership in the district).<br>• **132** dwellings per annum (inclusive of vacancy and second homes rate) |
| Past delivery & market signals | Royal Institute of Chartered Surveyors<br><br>Valuation Office<br><br>Department of Communities and Local Government (collected up to 2011)<br><br>(House prices used as proxy for land prices) | **Task 2**<br><br>No changes applied to the OAN at this stage, following assessment of land and house prices, rents, affordability, development rates, and overcrowding. |

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[3] PAS: Objectively Assessed Need and Housing Targets; Technical Advice Note, p.31

| EDC Methodology | Source | Explanation |
|---|---|---|
| | Department of Communities and Local Government<br><br>Zoopla 'Zed-index' | |
| Other local circumstances not captured by past trends | | None Identified. |
| Future Jobs | **Jobs and workers now**:<br>National online Manpower Information Service (NOMIS), run by ONS.<br><br>**Jobs now and in the future:**<br>Based on bespoke "Experian" projection data. (the data is commissioned for the County-wide POPGROUP analysis)<br><br>ONS Statistics 2012 SNPP projections. | **Task 3:** Future job growth (Economic OAN).<br><br>**2011 Census**<br>38,375 residents aged 16+, of whom 28,413 are economically active. 26,527 are in work and 6,685 are self-employed.<br><br>**Travel Flows**<br>1,466 more people travel in to Eden daily than travel out of Eden. Therefore the District is a net importer of labour. 75% of working residents work in the District (70% is considered to represent a self- contained housing market).<br><br>**NOMIS data**<br>ONS Annual Population Survey – 28,500 economically active residents at 2014.<br><br>'Employment b occupation' for 2014 based on ONS Annual Population Survey estimates 27,600 workers.<br><br>ONS Business Register and Employment Survey (BRES) suggest 22,200 'employee jobs' at 2013. This excludes self-employed and those working in agriculture. |

| EDC Methodology | Source | Explanation |
|---|---|---|
| | | NOMIS reports a figure of 31,000 jobs at 2013. It includes part time workers and self-employed, as well as Government supported trainees. This compared to the resident working age population of 31,800 gives a job density ratio of **0.98**. |
| | | **Job Seekers Allowance data** |
| | | Eden has low levels of unemployment (1.3%) and therefore has little in the way of an untapped workforce. |
| | | **Experian Data** |
| | | 2014 Experian job projections data prepared for the County Council. This shows **22,037** full time equivalent and jobs at 2014 and **27,228** total employment. |
| | | (FTE equivalent are defined as full time employees plus 40% of the hours worked by full time employees). |
| | | Experian projections assume a forecast growth of 1,571 additional full time equivalent jobs over the period 2014-31 To account for the shortfall of 1 year between the projections and the end of our plan period we assume a proportional rate of growth for this year, giving us 1,663 additional jobs to 2032, meaning 23,700 jobs. |
| | | The total employment figure is **29,722**. |
| | | **ONS 2012 SNPP** |
| | | Demographic OAN = 110 dpa. |
| | | Economic activity rates derived from the 2011 Census (16-74 year olds, which is the age range provided by the census). |
| | | This gives us a decline of 1,088 female workers; a decline of 832 male workers; and a total |

| EDC Methodology | Source | Explanation |
|---|---|---|
| | | decline of 1,920 workers between now and 2032[4]. <br><br> **Workers now and in the future** <br><br> For 2014 – The 2011 Census data gives us 28,400 workers for our calculation. <br><br> For 2032 – The 2012 SNPP for 2014 with 2011 economic activity rates applied to the age range 16-74 gives us 26,480 workers in 2032. A decrease of 1,920 over the plan period. <br><br> (Some Local Plans assume increasing economic activity rates due to increasing retirement ages. However this has been criticised and is not methodologically robust). <br><br> **Jobs now and in the future** <br> For 2014 – Experian - 27,228 in employment or 22,037 FTE jobs at 2014. <br><br> For 2032 – Experian - 29,583 in employment and 23,608 FTE jobs to 2031To calculate the extra year of our plan period. Take the 2031 figure 29,583 and minus the 2014 figure 27,228 to equal 2,355. Divide 2,355 by 17 years to give you 138.5 and add this to 29,583 to give you 29,722. <br><br> 29,722 in employment and 23,700 FTE to 2032. <br><br> This is an increase of 2,494 over our plan period (or 1,663FTE) <br><br> We apply the growth rate of 9.16% over the period 2014-2032 for all jobs to the 2011 Census 'employees resident workforce in employment plus net commuting' figure of |

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[4] SHMA, Table 19, p.50

| EDC Methodology | Source | Explanation |
|---|---|---|
| | | 27,993 this would result in 30,557 jobs and- an additional **2,564** jobs. |
| | | We apply a percentage increase based on the ONS NOMIS 2014 figure of 31,000 jobs quoted in the job density calculations this would result in 33,374 jobs – an additional **2,374** jobs. |
| | | This gives us a range of **2,293-2,564** jobs. |
| | | Converting the loss of 1,920 economically active workers and the gain of somewhere between 2,293 and 2,564 new jobs into housing demand. |
| | | We chose the economically active figures of 2014-28,400 and 2032-26,441 to use in our calculations. We chose these because they represent the bigger number. |
| | | We then apply the existing labour force ratio (employees to jobs) and apply this to the future jobs, to give us the future additional workforce. This is then converted into a population equivalent by assuming the current ratio of residents to employees, and then to households by dividing the figure by average household size according to the 2011 census (2028 people per household). |
| | | Households are then converted to dwellings using the ratio that applied at the time of the 2011 Census i.e. (1.089 dwellings to households). |
| | | For the loss of economically active workers we apply a ratio based on the relationship between the economically active populations to employees in employment figure from the 2011 Census to provide a figure for 'lost' workers. |
| | | The full calculation to translate new jobs into dwellings is set out in the SHMA Table 21: Jobs to Dwellings Calculator. |

| EDC Methodology | Source | Explanation |
|---|---|---|
| | | This gives a range of **194-206** homes per year.<br><br>Given the methodological weaknesses of this part of the OAN other scenarios are tested to see if 194-206 seems reasonable.<br><br>In brief these methods are:<br><br>• Method 2 – POPGROUP – Bespoke economic and housing projection models POPGROUP automatically assumes people automatically come into an area to do new or vacant jobs. This produces an unrealistic figure. It gives a figure of **307** new homes per year. For Eden the modelled rate was 307 dwellings per year, based on 2011 household formation rates (2012 rates not being available at the time).<br><br>• Method 3 –Estimates based on past trends this gives a figure of 179 new homes per year, which is below the figure we have identified through our demographic projections and job forecast calculations. |
| * this will give the OAN (Policy off) | | The range of **194-206** new homes per year is considered to represent what we need to meet future jobs growth.<br><br>We take the midpoint of this range to be our Objectively Assessed Housing Need. |
| Policy and supply factors | | **Task 4.**<br><br>From this point we consider what is needed to meet our Policy Objectives.<br><br>Our policy objective is to deliver enough affordable housing for those unable to access market housing. |

| EDC Methodology | Source | Explanation |
|---|---|---|
| Affordable housing need | | **Affordable Housing Need**<br><br>OAN and Affordable housing are calculated by alternate methods.<br><br>**Estimation of Housing Need**<br><br>The model: *New demand into the system - existing demand - demand leaving the system.*<br><br>The basic method set out in Government guidance is;<br><br>1. **Current need** - People on the housing waiting list or in overcrowded or unsuitable accommodation.<br><br>2. **People falling into need** - Total newly arising housing need (gross per year). The number of newly forming households multiplied by the proportion of those unable to afford market housing **plus** existing households falling into need. Then **subtract** current supply of available affordable housing stock, along with any that will already be built in the future given eventual figures. (There are several data sources available – Household projections/ English Housing Survey/ Local Authority and registered social landlords databases, and mortgage lenders.<br><br>**Results:**<br>**Stage1**: **Current Need**<br>Census 2011 = **824** overcrowded households.<br><br>Our approach is to take the highest figure we can find to avoid underestimating need and to compensate for the fact that the 2011 census does not provide information on adult children living with parents. |

| EDC Methodology | Source | Explanation |
|---|---|---|
| | | **Stage 2:Future Need**<br>2012 household projections = **110** households per year<br>CACI data indicates that 78.4% of dual person households will fall into need.<br>110x0.784 = **86** affordable homes per year.<br><br>Existing households falling into need is based on Continual Recording of Lettings and Sales (CORE) Data = 64 households Combining 86 and 64 = **150** households per year.<br><br>Stage 3: Affordable Housing Supply<br>Minus affordable housing supply.<br>Surplus stock = **0**<br>Committed supply of new affordable stock =**56**<br>Unit to be taken out of management = **0**<br>Annual supply of social re-lets (net) = **140**<br>Annual supply of intermediate stock available for re-let/sale at sub market levels = **3**<br>Total supply of affordable housing = **199** for the first 5 years, **203** thereafter<br><br>**Stage 4; converting the stock and flow of need into an annual affordable housing figure**<br><br>Total households = **23,043**<br><br>The following sub-stages are then applied to the total number of households.<br><br>*Stage 1.Current Need*<br>1a – homeless households and those in temporary accommodation – annual requirement = 0<br>1b – Overcrowded households – current need = **824** |

| EDC Methodology | Source | Explanation |
|---|---|---|
| | | *Stage 2: Future Need*<br>2a – number of new households who can't afford based on ONS household formation (adjusted) and Paycheck Data – 78.4% new households cannot afford a lower quartile house = **86**<br><br>2b – Existing households falling into need – Annual requirement = **64**<br><br>2c – Total newly arising housing need (gross each year) – 2a+2b = **150**<br><br>*Stage 3: Affordable Housing Supply*<br><br>3a – Committed supply of new affordable units – Total annual = **56**<br><br>3b –Units to be taken out of management – none assumed = **0**<br><br>3c –Total affordable housing stock available – 3a + 3b = **56**<br><br>3d – Annual supply of social re-lets (not new build, net) – Annual Supply (3 yr. average) = **140**<br><br>Total Households: **23,043**<br><br>3e – Annual supply of intermediate affordable housing available for re-let or resale at sub-market levels = **3**<br><br>3f – Annual supply of affordable housing – 3b+3c+3d+3e = **199**<br><br>Stage 4: Estimate of Annual Housing Need<br>4a – total backlog need – 1b = **824** |

| EDC Methodology | Source | Explanation |
|---|---|---|
| | | 4b – annual backlog reduction – assume backlog is removed over 5 years (20% p.a.) – 4b+4c = **165**

4c - –Plus newly arising need includes existing households falling into need – 2c = **150**

4d – Total annual affordable need-4b+4c = **315**

4e –Annual affordable supply- 3f = **199**

5 – net annual shortfall- 4d-4e = **116** (total affordable housing need, annualised over the next 5 years**)**

**Stage 5: Applying an element of housing need to the plan target**

Establishing a 'trajectory of need'
824 overcrowded households
+86 annually (newly arising need) x 18=1,548
+64 annually (households falling into need) x18=1,152
There is a need for **3,524**

Amount of affordable housing supply coming forward:
**279** committed supply available over the first 5 years.

New affordable housing coming forward: 30% of 200
= **60** units per year after the first 5 years factoring in **relets**(properties that are occupied by people in need and then become available again):
**140** per year plus **3** per year on average of intermediate stock becoming available. |

| EDC Methodology | Source | Explanation |
|---|---|---|
| | | Added to the potential supply over the plan period we get **3,633** affordable homes 2014-2032 (including re-lets). <br><br> This means we have **no need** to increase our OAN beyond 200 units per year. |
| Cross boundary unmet need | None identified | No other neighbouring Councils have requested that we meet any of their housing need. |
| Policy objectives | To meet the whole OAN for the District. | The OAN 'Policy Off' figure is **194-206.** <br><br> A figure of 200 is identified as the amount of housing we should plan for based on a consideration of potential policy on figures. This is based on the grounds that the 200 homes per year figure will ; <br> - Meet the objectively assessed requirements for both market and affordable housing. <br> - Significantly exceed available household projections <br> - Boost significantly the supply of housing above past trends <br> - Meet job growth aspirations <br> - Provides an anticipated level of affordable housing to meet need. |
| Housing target (Policy On) | | The Policy On target is therefore **200**. |

2.6     Table 1 above sets out our existing OAN methodology. We note that the Inspector has suggested that we consider what outputs we would get if we changed the methodology in light of some of the issues arising from the first stage of hearing sessions. These matters are discussed further below.

## 3      Potential suppression of the CLG 2012 projections

3.1     The Inspector indicated that the Communities and Local Government 2012 projections which underpin part of the Council's assessment of demographic OAN may be suppressed as a result of the recessionary period which they cover. The SHMA does carry out an assessment of why the 2012 and 2008 projections differ and concludes that the main reason is due to a fall in the anticipated rate of in-migration into Eden from the rest of the Country.

3.2     The SHMA does take account of the fact that there has been some criticism of the 2012 based projections with regards to the possible impact of the recession. It follows the advice provided in the PAS technical note[5] which warns against mixing or blending protections by applying different Household Representative Rates (HRRs). The starting point for our initial OAN figure is therefore based on the 2012 projections.

3.3     The SHMA includes an assessment of what may be driving the differences between the 2008 and 2012 projections and concludes that inward migration into the district is the main variable in driving population growth.

3.4     We also note that supply may also have played a role in supressing household formation or may have deterred people from moving into the District. The SHMA assessment indicates that issues such as affordability are notable in Eden. This may have prevented household formation, particularly among younger people.

3.5     The council is presently undertaking work to assess the impact that adjusting the 2012 projections would have.

## 4      The 10% uplift applied to the demographic OAN should be removed from the methodology all together or applied later

4.1     The Inspector indicated that the 10% uplift applied to the demographic OAN in the SHMA to account for market signals should be applied later in the methodology or removed entirely.

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[5] Objectively Assessed Need and Housing, Peter Brett for the Planning Advisory Service, July 2015. Paragraph 6.41.

4.2 This figure is applied to take account of falling levels of in-migration, increases in overcrowding, falling completion rates during the recession and apparent underperformance in housing completions compared to national trends.

4.3 The Council considers that the Inspector is correct in his assessment that this uplift should be applied later in the methodology.

4.4 Assuming that the rest of the OAN methodology were to remain unchanged and we were to apply the 10% market uplift after we had made our assessment of both demographic and economic OAN then the council could expect its Full OAN to increase to between 200 and 213 dpa.

**5 The Inspector advised that the Council should ensure that its employment forecasts are justified. He pointed out that this section of the OAN assessment has the most potential for variation between given methodologies.**

5.1 The Council considers that its assessment of economic OAN is justified. The step by step approach to the economic elements of the OAN is set out in Table 1.

**6 The Inspector asked the Council to provide a 'policy off' OAN**

6.1 This SHMA proposes to meet the Full OAN which is identified as 194-206 dpa. The Council then concludes based on an assessment of affordable housing that the District's affordable housing needs can be met by a figure of 200dpa.

6.2 It is worth noting that if the council were to apply the 10% uplift to account for market signals, later in the methodology the Full OAN figure for the District would be 200-213 assuming no other elements of the methodology change.

**7 The Inspector asked the Council to demonstrate that the OAN would provide a boost in supply beyond past delivery rates.**

7.1 The council considers that the figure of 200 dpa will indeed boost significantly the supply of housing above past rates as demonstrated when it is compared to table 2 below, which shows an average of 167 dwelling completions per year between April 2003 and March 2016.

Table 2: Completions (April 2016)

| Monitoring Year | Total Number of Completions |
|---|---|
| April 2003 - March 2004 | 186 |
| April 2004 - March 2005 | 210 |
| April 2005 - March 2006 | 148 |
| April 2006 - March 2007 | 165 |
| April 2007 - March 2008 | 158 |
| April 2008 - March 2009 | 153 |
| April 2009 - March 2010 | 104 |
| April 2010 - March 2011 | 129 |
| April 2011 - March 2012 | 121 |
| April 2012 - March 2013 | 237 |
| April 2013 - March 2014 | 175 |
| April 2014 - March 2015 | 129 |
| April 2015 - March 2016 | 258 |

**8**      **The Inspector indicated that Council must be able to demonstrate that the OAN is deliverable in the District.**

8.1      Table 2 below shows an indicative breakdown of the Council's current land supply. It is clear that once the Council begins to approach a figure of 220 dpa our ability to deliver a five year housing land supply will become increasingly tenuous.

8.2      If the Council were to apply its current OAN of 200 dpa then it would indeed be deliverable. However were the Council to apply the 200-213 dpa figure which is reached by applying the 10% uplift for market signals then keeping in mind the supply situation, the council would be significantly closer to its limit of 220 dpa, after which deliverability would become a potential challenge.

8.3      Another issue that has arisen based on consideration of a possible increase in the Council's OAN figure comes from the fact that Cumbria County

Council's assessment of infrastructure capacity and future requirements in the District is based on an OAN figure of 200dpa. If this number were to increase significantly then there would likely be significant impacts on the capacity of the District's infrastructure to accommodate it.

8.4     A meeting between officers from the District and County has been arranged for the 7th of July to discuss these matters further.

Table 3: Land Supply Indicative Table (April 2016)

|  | New Local Plan | 250 | 245 | 240 | 235 | 230 | 225 | 220 | 215 | 210 | 205 |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Local Plan Target (18 Years) | 3600 | 4500 | 4410 | 4320 | 4230 | 4140 | 4050 | 3960 | 3870 | 3780 | 3690 |
| Completions to Date | 385 | 385 | 385 | 385 | 385 | 385 | 385 | 385 | 385 | 385 | 385 |
| Target Completions | 400 | 500 | 490 | 480 | 470 | 460 | 450 | 440 | 430 | 420 | 410 |
| Undersupply | 15 | 115 | 105 | 95 | 85 | 75 | 65 | 55 | 45 | 35 | 25 |
| Undersupply + 20% | 45 | 138 | 126 | 114 | 102 | 90 | 78 | 66 | 54 | 42 | 6 |
| 5 Year Requirement | 1000 | 1250 | 1225 | 1200 | 1175 | 1150 | 1125 | 1100 | 1075 | 1050 | 1025 |
| 5 Year Requirement + 20% | 1200 | 1500 | 1470 | 1440 | 1410 | 1380 | 1350 | 1320 | 1290 | 1260 | 1230 |
| Requirement + Undersupply | 1245 | 1638 | 1596 | 1554 | 1512 | 1470 | 1428 | 1386 | 1344 | 1302 | 1236 |
| Annual Requirement | 249 | 327.6 | 319.2 | 310.8 | 302.4 | 294 | 285.6 | 277.2 | 268.8 | 260.4 | 247.2 |

| | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Extant (Large Sites) | 433 | | | | | | | | | | |
| Extant (Small Sites) | 115 | | | | | | | | | | |
| Implemented (Large Sites) | 321 | | | | | | | | | | |
| Implemented (Small Sites) | 160 | | | | | | | | | | |
| Local Plan Sites | 0 | | | | | | | | | | |
| SHLAA Sites | 178 | | | | | | | | | | |
| S106 Sites | 177 | | | | | | | | | | |
| Windfall | 150 | | | | | | | | | | |
| Total Units | 1,534 | 1534 | 1534 | 1534 | 1534 | 1534 | 1534 | 1534 | 1534 | 1534 | 1534 |
| **Supply (Years)** | **6.16** | **4.7** | **4.8** | **4.9** | **5.1** | **5.2** | **5.4** | **5.5** | **5.7** | **5.9** | **6.2** |