

City of York Council
Examination of the City of York Local Plan
2017 – 2033

Phase 2 Hearings

Matter 5

Housing Land Supply

SUBMISSION ON BEHALF OF:

Galtres Garden Village Development Company

RESPONSE TO SCHEDULE OF MATTERS, ISSUES
AND QUESTIONS FOR THE EXAMINATION



Chartered Town Planning Consultants

March 2022

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MATTER 5 – Housing Land Supply

Introduction

This statement has been prepared on behalf of Galtres Garden Village Development Company (GGVDC) who have submitted representations at all stages of the Emerging Local Plan. That is representations on:

- Local Plan Preferred Sites consultation August 2016
- Local Plan Pre-Publication Draft (regulation 18 Consultation) Sept 2017
- Submission Draft Local Plan May 2018
- Local Plan Proposed Modifications Consultation June 2019:
- Proposed Modifications and Evidence Base Consultation June 2021

The GGVDC refence is SID620

GDDVC also attend the Phase 1 hearings in December 2019 for Matters 1, 2 and 3.

National Policy Context

- (i) The NPPF 2012 sets out the process for local plan preparation and in particular the establishment of Green Belt boundaries. At its heart is the presumption in favour of sustainable development, (para 14). One of the principles underpinning plan making is that local planning authorities are tasked to objectively identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. For housing, plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area (Para 17).
- (ii) To **boost significantly** the supply of housing (para 47) local Planning Authorities should use their evidence base:
 - to ensure their local plan meets the full objectively assesses needs for market housing;

- identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements
 - identify a supply of specific developable site or broad locations for growth
 - for market and affordable housing illustrate the expected rate of housing delivery through a housing trajectory for the plan period
- (iii) Local plans should be consistent with the principles and policies set out in the Framework, including the presumption in favour of sustainable development, (para 151). They should be aspirational but realistic and they should address the spatial implications of economic, social and environmental change (para 154).
- (iv) Each LPA should ensure that the Local Plan is based on adequate, up to date and relevant evidence about the economic, social and environmental characteristics and prospects of the area, (Para 158). They should have a clear understanding of housing need in their area and should prepare a Strategic Housing Market Assessment to ensure they meet household and population projections and cater for housing demand and the scale of housing supply necessary to meet this demand (Para 159).
- (v) The Local Plan submitted for examination should be 'sound', that is. positively prepared; justified; effective and consistent with national policy, (Para 182).

INSPECTORS QUESTIONS

The housing land supply overall

5.1 Does Policy SS1, and the Plan as a whole, provide an appropriate policy framework for the delivery of housing over the Plan period? If not, how is this to be addressed?

5.1.1 Policy SS1 can provide the policy framework for the delivery of housing with certain caveats and provided it is applied pragmatically. The caveats include the identification of a realistic housing requirement that provides for future population and household growth; accommodates aspirations for economic growth; and addresses the persistence and long run under provision of housing generally and the chronic under provision of affordable housing in particular.

5.1.2 With regard to the plan as a whole there are some key policy elements that are absent in a context where the Green Belt boundaries are being defined for the first time in a local plan. The inspectors have corrected the Council's mistaken assumption that the "exceptional circumstances" test had to be satisfied to justify the "release" of land from the Green Belt.

5.1.3 With this correction the Council had an opportunity to reconsider what land it was not necessary to keep permanently open so that adequate provision could be made for housing allocations. This opportunity has not been taken and consequently for the reason set out in our representations, not enough land is allocated to meet the City's housing needs.

5.2 We understand through the latest housing trajectory update [EX/CYC/69] that the sources of housing land supply underpinning the Plan are as follows:

- *8,642 dwellings on allocated new strategic housing sites (ST)*
- *1,703 dwellings on allocated housing sites (H)*
- *1,853 dwellings (commitments – unimplemented permissions as at 1 April 2021)*
- *3,113 dwellings (cumulative completions between 2017-2021)*
- *planning permission or resolution to grant planning permission as at 1 April 2021)*
- *720 dwellings in communal establishments /student accommodation*
- *1,764 dwellings on windfall sites (from 2024/25 – 2032/33 @196 per annum)*

This provides a total housing supply of a minimum of 17,795 dwellings during the Plan period. Is this correct?

5.2.1 Numerically, the 17,795 figure is correct except that:

- The number of student accommodation units included as housing completions has not been properly justified by the Council. The Council cannot explain how many dwellinghouses and apartments have returned to the general market as a result of new student housing.
- The “ratios” used to convert student completions to housing completions has not been properly justified or explained.
- As a consequence of including student units as housing completions the backlog is lower than it should be. We have addressed this issue in response to questions 2.4 and 2.5 under Matter 2.
- The allowance for windfalls is too high. We address in response to questions 5.3 and 5.4.

5.3 *We note that the windfall allowance per annum has been increased from 169 dwellings per annum in previous housing trajectories (e.g. [EX/CYC/17]) to 196 dwellings per annum in the 2021 Housing Trajectory [CYC/EX/69]. Is this correct? If so, what is the basis and justification for this change in the windfall allowance?*

5.3.1 We have explained our reservations about the inclusion of a windfall allowance in the plan at paragraph 2.61 of our July 2019 representations on the Proposed Modifications and paragraph 2.14 (vi) of our July 2021 representations. We cannot find any evidence justifying the 196 windfall figure which seems to have just appeared in the publication of the revised trajectory.

5.3.2 The supply of windfall sites in York has in large part been driven by the absence of a Local Plan housing allocations that can deliver housing at the scale and speed required to assess York’s housing crisis.

5.3.3 The figure of 196 represents almost 25% of the OAN or 2.2 years of delivery. The use of such a high windfall figure provides no certainty in delivery and results in low levels of affordable housing delivery as many windfalls are below affordable target thresholds.

5.3.4 The student accommodation the Council include in completion figures equates to 1.85 years of OAN delivery. Together, windfalls and student accommodation equate to over 4 years of OAN delivery delivering little or no affordable housing.

5.3.5 Windfalls do not bring the **certainty** of delivery that is at the heart of the **delivery** of the housing requirement.

5.4 *Is the estimate of windfall numbers identified by the Plan appropriate and realistic? Is the approach consistent with the Framework? Given the time that has passed since the Plan was submitted, is the identified windfall allowance in the Plan (169 dwellings per annum) still appropriate, realistic and justified?*

5.4.1 For the reasons set out in response to Question 5.3 and in our representations, we consider the use of a windfall allowance as neither appropriate, realistic or justified (See paragraph 2.61 of our 2019 representations.

5.5 *Are the suggested rates of planned housing development realistic and achievable when considered in the context of the past completion rates? What actions are being taken to accelerate housing delivery? Where is the evidence to support the approach adopted?*

5.5.1 We believe the rates of planned housing delivery are realistic and achievable and that even higher rates are achievable. In the past, in 2004/05, delivery rates of 1,000 units were achieved. Housing delivery has been held back by the lack of allocated development land. Without the certainty provided by allocations in an adopted plan, housebuilders will not invest in the staff and materials. Once the plan is adopted and allocations secured, the development industry will have more certainty that to invest in the workforce and materials to deliver the housing allocated.

5.6 *Is the housing trajectory update [EX/CYC/69] realistic? In the context of footnote 11 of the NPPF, does it form an appropriate basis for assessing whether sites are deliverable?*

5.6.1 We believe the housing trajectory in [EX/CYC/69] is completely unrealistic for the following reasons:

- The trajectory for many sites remains unrealistic. For example, the trajectory assumes completions on ST14 in by the end of March 2023 (1 year away) and on

ST15 by the end of March 2024 (2 years away). Both schemes will be EiA development. No planning applications have been submitted and both schemes will require significant up-front infrastructure. The trajectory for those two sites and other sites such as ST8 and ST9 are unrealistic

- It is understood that site ST16 – Land to the rear of the Terry's Factory (Phase 3) has planning permission for a hospital and is no longer available for residential use.
- We have therefore amended the trajectories for several sites and removed ST16 rear of Terrys factory from the trajectory update [EX/CYC/69]. In addition, we have amended the backlog to reflect the shortfall in completion for 2020/ 2021. Our amended trajectory is at Appendix I.

5.6.2 These changes have obvious impacts on delivery in the first 5 years of the Plan, but also on the delivery overall and delivery of affordable housing in particular. For example, delivery on strategic sites falls from 8,642 as presented in the Council's version of [EX/CYC/69] to 7,650 in our version.

Five-year housing land supply

5.7 What is the five-year housing supply requirement upon adoption of the Plan?

5.7.1 Our successive representations since 2018 have provided our estimate of 5-year land supply. We have never seen a Council's estimate of 5 year land supply. We see no point in producing a further 5-year land supply calculation until we have some indication of what the outcome is on matters relating to OAN, windfall, student housing and trajectory. However, we would make the following observations:

- In our assessment, with the exception of 2016/17, there has been a shortfall in completions against the 790 OAN requirement every year since 2012 (and indeed since 2008);
- Recent planning inquiries have established that the Council do not have a five-year land supply;

| | |
|---|--------------------|
| APP/C2741/W/21/3271045 - Boroughbridge Road, York Sep-21 | 2.19 to 2.77 years |
| APP/C2741/W/19/3233973 - Land at Moor Lane May-20 | 2.79 - 3.45 years |
| APP/C2741/W/19/3227359 - North of Boroughbridge Rd Oct-19 | 3.28 to 3.82 years |

- The revised trajectory we have provided at Appendix I indicates the Council will struggle to meet the 5-year land requirement.
- The Council have failed to meet the Housing Delivery Test in 2020 and therefore triggering the requirement for an Action Plan to address shortfall.

5.8 *Will the Council be able to demonstrate a rolling five-year housing land supply upon adoption of the Plan?*

5.8.1 This question can only be answered once we have a clear view and agreement on the OAN, backlog, windfalls and housing trajectory. In light of our representations on all of these issues we believe the Council will struggle to meet a rolling five-year housing land supply.

5.9 *The five-year housing supply, as set out in the latest housing trajectory update [EX/CYC/69], includes an allowance for windfall sites – the aforementioned 196 per annum:*

a) *What is the compelling evidence that such sites have consistently become available in the local area and that they will continue to provide a reliable source of supply?*

b) *Is the allowance made realistic, having regard to paragraph 48 of the Framework?*

5.9.1 See response to 5.4 above. We cannot find the compelling evidence that suggests the windfall supply will continue into the future and the approach adopted by the Council is contrary to guidance in paragraph 48 of the NPPF.

5.10 *Does the five-year housing land supply position, as set out in the updated Housing Trajectory 2021 [EX/CYC/69], present the most up-to-date position? Is it consistent with all other remaining up-to-date housing evidence? If not, how is this to be addressed?*

5.10.1 This question is addressed in our response to question 5.6.

5.11 *Paragraph 5.9 of the submitted Plan identifies that the Council accepts that there has been a persistent under delivery of housing as defined by the NPPF. As such, does the submitted Plan, and any subsequent submitted evidence on meeting housing need and supply, take into account the requirement for a 20% buffer to be applied to the housing supply? Has this buffer been applied to any subsequent update of evidence or proposed modification to the Plan identified?*

5.11.1 It is our understanding that the revised housing trajectory at [EX/CYC/69] is the first time the Council have acknowledged the requirement for a 20% buffer to be applied to the housing supply.

5.12 *Overall, is there a supply of specific deliverable sites sufficient to provide five years' worth of housing, with an appropriate buffer (moved forward from later in the Plan) to ensure choice and competition in the market for land?*

5.12.1 Bringing together our responses to all the questions under this matter, we do not believe there is a supply of specific deliverable site to provide five years worth of housing, and in particular to meet minimum objectives for delivery of affordable housing.

5.12.2 In addition the supply will not ensure choice or competition in the market for land. This is the issue at the heart of the affordable housing crisis in the city. As we have set out in our representations, the Council are anticipating that the strategic sites will deliver the major part of the future affordable housing requirement. Any interruption to the delivery of those strategic sites will severely impact on affordable housing delivery. In other words, all the eggs are in one basket. We have made clear the case in our representations the need for additional strategic allocations to widen the choice of land available and above all to ensure continuity of supply for housing generally and for affordable housing in particular.

Overall Conclusion

5.12.3 Overall, the housing supply identified in the Draft Plan will not meet need because the combination of incorrect assumptions about delivery trajectory; a high windfall allowance; a high proportion of student completions; and a low allowance for backlog act in combination to suppress the true housing requirement and mask a proper

assessment of the land required to address housing needs and affordable housing in particular.

5.12.4 For this reason, we hold that the plan is unsound because it is neither **effective** (because it will not be deliverable) or **consistent with national policy** (because it will not enable the delivery of sustainable development in accordance with the policies in the Framework).

5.12.5 To make the Plan sound, we hold that the housing requirement needs to be increased and additional housing allocations included in the plan to ensure the delivery of an adequate and continuous supply of housing throughout the Local plan period.

APPENDIX I

Amended Calculation of Housing Delivery Trajectory

EX/CYC/69 - Amended

| | | TOTAL | 17/18 | 18/19 | 19/20 | 20/21 | 21/22 | 22/23 | 23/24 | 24/25 | 25/26 | 26/27 | 27/28 | 28/29 | 29/30 | 30/31 | 31/32 | 32/33 | Total for Plan Period | 33/34 | 34/35 | 35/36 | 36/37 | 37/38 | Total 5 yr post plan | Post 2038 | |
|---|---|---------------------------|-------------|-------------|-------------|--------------|-------------|-------------|-------------|------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|------------|-----------------------|-------------|-------------|-------------|-------------|-------------|----------------------|-------------|---|
| 1. Net Housing Completions 2017 to 2020 | | Actual Completions | | | | | | | | | | | | | | | | | | | | | | | | | |
| Net Housing Completion | | 659 | 409 | 521 | 603 | | | | | | | | | | | | | | 2192 | | | | | | 0 | | |
| Net Communal Establishment and Student Accommodation Completions (Ratios applied) | | 0 | 0 | 0 | 0 | | | | | | | | | | | | | | 0 | | | | | | 0 | | |
| Total | | 659 | 409 | 521 | 603 | | | | | | | | | | | | | | 2192 | | | | | | 0 | | |
| 2. Housing Allocations Below 5 ha (H Sites) | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| H1a & b | Former Gas Works, 24 Heworth Green (National Grid Properties) | 607 | | | | | | | 215 | | 392 | | | | | | | | 607 | | | | | | 0 | | |
| H3 | Burnholme School | 72 | | | | | | 35 | 37 | | | | | | | | | | 72 | | | | | | 0 | | |
| H5 | Lowfield School | 165 | | | | | 85 | 71 | 6 | | | | | | | | | | 162 | | | | | | 0 | | |
| H7 | Bootham Crescent | 93 | | | | | | 15 | 35 | 35 | 8 | | | | | | | | 93 | | | | | | 0 | | |
| H8 | Askham Bar Park & Ride | 60 | | | | | | | | | 35 | 25 | | | | | | | 60 | | | | | | 0 | | |
| H10 | The Barbican | 187 | | | | | | | | | | 187 | | | | | | | 187 | | | | | | 0 | | |
| H20 | Former Oakhaven EPH | 56 | | | | | | | 35 | 21 | | | | | | | | | 56 | | | | | | 0 | | |
| H29 | Land at Moor Lane Copmanthorpe | 88 | | | | | | | 35 | 35 | 18 | | | | | | | | 88 | | | | | | 0 | | |
| H31 | Eastfield Lane Dunnington | 76 | | | | | | 35 | 35 | 6 | | | | | | | | | 76 | | | | | | 0 | | |
| H38 | Land RO Rufforth Primary School Rufforth | 33 | | | | | | | 18 | 15 | | | | | | | | | 33 | | | | | | 0 | | |
| H39 | North of Church Lane Elvington | 32 | | | | | | | 17 | 15 | | | | | | | | | 32 | | | | | | 0 | | |
| H46 | Land to North of Willow Bank and East of Haxby Road, New Earswick | 104 | | | | | | | 35 | 35 | 34 | | | | | | | | 104 | | | | | | 0 | | |
| H52 | Willow House EPH, 34 Long Close Lane | 15 | | | | | | | 15 | | | | | | | | | | 15 | | | | | | 0 | | |
| H53 | Land at Knapton Village | 4 | | | | | | | 4 | | | | | | | | | | 4 | | | | | | 0 | | |
| H55 | Land at Layerthorpe | 20 | | | | | | | | 20 | | | | | | | | | 20 | | | | | | 0 | | |
| H56 | Land at Hull Road | 69 | | | | | 69 | | | | | | | | | | | | 69 | | | | | | 0 | | |
| H58 | Clifton Without Primary school | 25 | | | | | | | 15 | 10 | | | | | | | | | 25 | | | | | | 0 | | |
| Annualised Projected Completions H Sites (Hide) | | 0 | | | | | 154 | 156 | 502 | 192 | 487 | 212 | 0 | 0 | 0 | 0 | 0 | 0 | 1703 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| 3. Housing allocations above 5ha (ST Sites) | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| ST1a | British Sugar/Manor School | 1100 | | | | | | | | | | 150 | 150 | 150 | 150 | 150 | 150 | 150 | 1050 | 50 | | | | | | 50 | |
| ST1b | Manor School | 100 | | | | | | | | | | 35 | 35 | 30 | | | | | 100 | | | | | | | 0 | 0 |
| ST2 | Former Civil Service Sports Ground Millfield Lane | 266 | | | | | 48 | 48 | 48 | 48 | 48 | 26 | | | | | | | 266 | | | | | | | 0 | |
| ST4 | Land Adj. Hull Road and Grimston Bar | 211 | | | | | | | 35 | 35 | 35 | 35 | 35 | 36 | | | | | 211 | | | | | | | 0 | 0 |
| ST5 | York Central | 2500 | | | | | | | 45 | 107 | 107 | 107 | 107 | 119 | 119 | 119 | 119 | | 949 | 143 | 143 | 143 | 143 | 143 | 715 | 836 | |
| ST7 | Land East of Metcalfe Lane | 845 | | | | | | | 35 | 35 | 70 | 70 | 70 | 70 | 70 | 70 | 70 | | 560 | 70 | 70 | 70 | 70 | 5 | 285 | 0 | |
| ST8 | Land North of Monks Cross | 968 | | | | | | | 35 | 70 | 70 | 70 | 105 | 105 | 105 | 105 | 105 | | 770 | 105 | 93 | | | | 198 | 0 | |
| ST9 | Land North of Haxby | 735 | | | | | | | | 35 | 35 | 35 | 70 | 70 | 70 | 70 | 70 | | 455 | 70 | 70 | 70 | 70 | | 280 | 0 | |
| ST14 | Land to West of Wigginton Road | 1348 | | | | | | | | 35 | 70 | 105 | 105 | 105 | 105 | 105 | 105 | | 735 | 105 | 105 | 105 | 105 | 105 | 525 | 88 | |
| ST15 | Land to West of Elvington Lane | 3339 | | | | | | | 35 | 35 | 70 | 105 | 105 | 105 | 140 | 210 | 210 | | 1015 | 280 | 280 | 280 | 280 | 280 | 1400 | 924 | |
| ST16 | Terrys Extension Site - Terrys Clock Tower (Phase 1) | 22 | | | | | 10 | 12 | | | | | | | | | | | 22 | | | | | | 0 | 0 | |
| ST16 | Terrys Extension Site - Terrys Car park (Phase 2) | 33 | | | | | | | 17 | 16 | | | | | | | | | 33 | | | | | | 0 | 0 | |
| ST16 | Terrys Extension Site - Land to rear of Terrys Factory (Phase 3) | 0 | | | | | | | | | | | | | | | | | 0 | | | | | | 0 | 0 | |
| ST17 | Nestle South (Phase 1) | 279 | | | | | | | 35 | 244 | | | | | | | | | 279 | | | | | | 0 | 0 | |
| ST17 | Nestle South (Phase 2) | 425 | | | | | | | 50 | 50 | 50 | 50 | 50 | 50 | 50 | 50 | 25 | | 425 | | | | | | 0 | 0 | |
| ST31 | Land to the South of Tadcaster Road, Copmanthorpe | 158 | | | | | | | 35 | 35 | 35 | 35 | 18 | | | | | | 158 | | | | | | 0 | 0 | |
| ST32 | Hungate (Phases 5+) (Blocks D & H) | 375 | | | | | | | | 196 | 179 | | | | | | | | 375 | | | | | | 0 | 0 | |
| ST33 | Station Yard Wheldarke | 147 | | | | | | | 35 | 35 | 35 | 35 | 7 | | | | | | 147 | | | | | | 0 | 0 | |
| ST36 | Imphal Barracks, Fulford Road | 769 | | | | | | | | | | | | | | | | 100 | 100 | 100 | 100 | 100 | 100 | 500 | 169 | | |
| Annualised projected Completions for ST Sites | | 0 | | | | | 10 | 60 | 170 | 613 | 716 | 989 | 813 | 827 | 810 | 809 | 879 | 954 | 7650 | 923 | 861 | 768 | 768 | 633 | 3953 | 2017 | |
| 4. Projected Housing Completions From Non Allocated Unimplemented Consents | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | | 1853 | | | | | 298 | 459 | 543 | 112 | 223 | 65 | 65 | 65 | 23 | 0 | 0 | 0 | 1853 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| 5. Projected completions from communal establishments and student accommodation | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | | 720 | | | | | 183 | 469 | 62 | 0 | 6 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 720 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | |
| Supply Trajectory | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Actual Net Completions (2017 to 2020) | | 659 | 409 | 521 | 704 | | | | | | | | | | | | | | 2293 | | | | | | | 0 | |
| Projected Completions (all sites) | | | | | 0 | 645 | 1144 | 1277 | 917 | 1432 | 1266 | 878 | 892 | 833 | 809 | 879 | 954 | | 11926 | 923 | 861 | 768 | 768 | 633 | 3953 | | |
| Windfalls | | | | | 0 | 0 | 0 | 0 | 196 | 196 | 196 | 196 | 196 | 196 | 196 | 196 | 196 | | 1764 | 196 | 196 | 196 | 196 | 196 | 980 | | |
| Actual and Projected Housing Completions (Inc Windfall Allowance) | | | | | 0 | 645 | 1144 | 1277 | 1113 | 1628 | 1462 | 1074 | 1088 | 1029 | 1005 | 1075 | 1150 | | 13690 | 1119 | 1057 | 964 | 964 | 829 | 4933 | | |
| Cumulative Completions (Including Windfalls) | | 659 | 1068 | 1589 | 2293 | 2938 | 4082 | 5359 | 6472 | 8100 | 9562 | 10636 | 11724 | 12753 | 13758 | 14833 | 15983 | | | 17102 | 18159 | 19123 | 20087 | 20916 | | | |
| Requirement (790pa plus 32 under supply) 822dpa | | 822 | 822 | 822 | 822 | 822 | 822 | 822 | 822 | 822 | 822 | 822 | 822 | 822 | 822 | 822 | 822 | | 13152 | 790 | 790 | 790 | 790 | 790 | 3950 | | |
| Cumulative Requirement | | 822 | 1644 | 2466 | 3288 | 4110 | 4932 | 5754 | 6576 | 7398 | 8220 | 9042 | 9864 | 10686 | 11508 | 12330 | 13152 | | | 13942 | 14732 | 15522 | 16312 | 17102 | 0 | | |
| Over/Under Supply | | -163 | -576 | -877 | -995 | -1172 | -850 | -395 | -104 | 702 | 1342 | 1594 | 1860 | 2067 | 2250 | 2503 | 2831 | | | 3160 | 3427 | 3601 | 3775 | 3814 | 0 | | |
| Detailed Trajectory (including 10% Non-Implementation Rate) | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Projected Completions (all sites) | | 0 | 0 | 0 | 0 | 645 | 1144 | 1277 | 917 | 1432 | 1266 | 878 | 892 | 833 | 809 | 879 | 954 | | 11926 | 923 | 861 | 768 | 768 | 633 | 3953 | | |
| Projected Completions (all sites) - 10% Non-implementation Rate Applied | | 0 | 0 | 0 | 0 | 581 | 1030 | 1149 | 825 | 1289 | 1139 | 790 | 803 | 750 | 728 | 791 | 859 | | 10733.4 | 831 | 775 | 691 | 691 | 570 | 3557.7 | | |
| Windfall Allowance | | | | | | | | 196 | 196 | 196 | 196 | 196 | 196 | 196 | 196 | 196 | 196 | | 1764 | 196 | 196 | 196 | 196 | 196 | 980 | | |
| Total Projected Completions (with 10% Non implementation rate applied and windfalls) + Actual completions 2017-2020 | | 659 | 409 | 521 | 603 | 581 | 1030 | 1149 | 1021 | 1485 | 1335 | 986 | 999 | 946 | 924 | 987 | 1055 | | 14689 | 1027 | 971 | 887 | 887 | 766 | 4537.7 | | |
| Cumulative Completions (with 10% non implementation rate applied and windfalls) | | 659 | 1068 | 1589 | 2192 | 2773 | 3802 | 4951 | 5973 | 7458 | 8793 | 9779 | 10778 | 11724 | 12648 | 13635 | 14689 | | | 15716 | 16687 | 17574 | 18461 | 19227 | | | |
| Annual Housing Target | | | | | | 790 | 790 | 790 | 790 | 790 | 790 | 790 | 790 | 790 | 790 | 790 | 790 | | 9480 | 790 | 790 | 790 | 790 | 790 | 3950 | | |
| Inherited Shortfall Annualised over Plan Period | | | | | </ | | | | | | | | | | | | | | | | | | | | | | |