

Review of Objectively Assessed Need for Housing. Proposed Future Provision
Allocations Plan 2011-26

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1.1 Introduction

1.2 The assessment of housing need (requirements) is a vital component of plan making, as is the way in which they will be met. The National Planning Policy Framework (NPPF) and accompanying guidance contains advice about how this should be carried out and advocates a regular update using the methodology set out. This is used to establish the OAN (Objectively Assessed Need) and it is this which any plan should seek to provide for or provide reasons why it cannot. The adopted FoDDC Core Strategy (CS) was prepared before the NPPF was published in its final form and uses a different method of assessing the requirement for housing. It was based on the demographics of the time and was in tune with the then latest forecasts. The proposed level of provision was supported by the Examination.

1.3 Now that the Allocations Plan (AP) is about to be published and taking into account the need to regularly review housing requirements, a new assessment (OAN) has been completed. This has been used to inform the AP and its housing provision. The figures in the CS have in effect been replaced though the strategy and spatial distribution it advocates remains. The level of plan provision does not need to equal the OAN, providing there is suitable evidence to show why the Plan should not meet it. OAN is simply the “housing that households are willing to buy or to rent either from their own resources or with assistance from the state” PAS guidance 9.1. the definition is stated to be the total housing that would be provided if land supply was not constrained by planning.

1.4 The level of housing provision that was being provided for was established through the CS in 2011 and was based on the demographic requirements at the time, underpinned by the then proposed level of provision that was to be met in the former Regional Spatial Strategy. The level of provision proposed was about 6200 dwellings over 20 years or 310 per year. The CS indicated how these were to be provided for and this indication included an apportionment over the district. This in turn required additional housing sites to be allocated including some at the major and group villages. This group of allocations is part of the overall strategy that envisages most change (80% or so) at the towns, and the remainder in other locations. Should the numerical needs vary then the expectation would be that the spatial strategy would remain with any additional provision being made in accord with that strategy.

1.5 The CS is part of the development plan at present, and the other main component is the remaining site specific policies of the old 2005 Local Plan. These are being replaced by the AP (except for the area covered by the Cinderford Northern Quarter Area Action Plan).

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1.6 In addition to the overall provision throughout the plan period a five year land supply must be maintained. This is a assessed figure by which land equivalent to the need for land for housebuilding for the next five years can be provided. The NPPF prescribes an approach to the calculation of and retention of a five year supply of land for housing. In areas like the Forest of Dean it sets out the need to provide sufficient land to cover a buffer of 20% more than the basic requirement. This is because past housebuilding has not delivered the number of completions required. This enhanced rate of provision must be supplemented by a means to make up any backlog from within the plan period which exists at the time of assessment. In broad terms this takes the required land supply from the five year expected build of 1600 to the need to provide for 2042 dwellings by adding first 20% and then 122 (the so called backlog). This raises the annual figure from 320pa to 408. The majority of the land that will meet this requirement will be sites first identified in the AP or another Plan (2005 LP, Cinderford NQ AAP). A further contribution will be made by sites that currently have permission or may be regarded as commitments but which have not been allocated in any Plan. The balance will be met by the completion of small sites (less than 6 dwellings), or by an allowance for currently unidentified sites that will gain permission and contribute during the five year period.

1.7 In order to provide the greatest degree of certainty of supply, sites are allocated where possible. The overall level of provision in the AP is intended to ensure both a five year supply and an adequate supply able to meet the likely need over the whole plan period (to 2026). As a result some of the sites allocated (including some which have now received planning permission) will be unlikely to be completed within the first five or even ten years of the plan period.

1.8 The actual figure required to meet the five year supply will change according to the completions that are achieved as well as by responding to reviews of the actual need. Firstly when the annual delivery meets or exceeds the plan requirement when averaged over a period of, say, five years, there will be a reduction in the “buffer” from 20% to 5%. Secondly the numerical “backlog” will vary year on year and may disappear altogether. The plan requirement is fixed for a period but is reviewed regularly and the plan period will itself be extended to 2031 probably as part of the next review.

1.9 The present plan period is until 2026 and the provision (allocations and current supply plus an allowance for sites without permission) that is made is considered adequate for this period. The basis of the review of need is a study that looks at the trends and considers the period 2011-31. It is however possible to apply the study to the shorter plan period and also to make note of any longer term trends.

1.10 **The Assessment of needs** There is a requirement to regularly consider the housing needs in the district in order to provide an up to date assessment. This is then considered in context of the nature of the area and is adopted as a basis for plan making. Although it is presented in the evidence paper (see above) as an

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assessment of the needs of the area until 2031, it is used here for the period 2014-26 (the remaining time of the current plan period). It is also likely to be subject to review before that, earlier, end date.

1.11 The starting point for all assessments of housing need is the demographic forecasts which are regularly prepared by ONS. The geographical area that should be first considered for these is the strategic housing market area. This was defined for the RSS in 2003 as the administrative county of Gloucestershire and although not perfect this definition is still considered valid. Within it the main sub areas that need to be considered are those relating to the Joint Core Strategy (JCS), (Gloucester, Tewkesbury, Cheltenham) and the three remaining districts of Stroud, Cotswold and the Forest of Dean.

1.12 The household forecasts start with population projections, then derive household numbers from these and then household spaces (taking account of vacancy rates and second homes etc). Before the requirements are finalised however there is a need to consider if there are any basic adjustments required due to particular economic conditions or other “special” factors. The first adjustment required at present is a means of compensating for the low flows of population during the recession and the second, which is not peculiar to the post- recession timing of the projection is largely a means of reconciling the flow data with the known population. This addresses the difference between the flows and the 2001 and 2011 population figures from the census. As a result of this adjustment the actual population change in the Forest of Dean is, like that in the other authorities, likely to be greater than the current ONS forecasts suggest.

1.13 Household projections need to make assumptions about the future rate of new household formation, and this is also depressed during times of economic uncertainty and/ or rising house prices. It will therefore have been lower than expected during the recent recession. The 25- 34 year age group is where the reduced levels of the new household formation are particularly apparent and where allowance needs to be made. The allowance made in the evidence paper assumes a “partial return to trends, and it assumes therefore that new household formation does not fully return to previously forecast trends (which assumed a much higher rate than was ever realised).

The suggested Figure for the period 2011 - 31 for the Forest of Dean

FoD Homes needed 2011-31	Forest of Dean total new homes	Implied annual rate
2012 forecasts	5100	255
2012 based forecasts with allowance for revised 25-34 household formation	6400	320
2012 based forecasts with allowance for revised household formation across all age groups	6600	330

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- See full report “*The objectively assessed housing needs of Stroud Forest of Dean and Cotswold, 2014*” for full explanation of the background to this paper- Table 18.

1.14 The relevant policy guidance on the assessment of housing needs requires “other considerations” to be applied to the above and this includes the possible need for additional housing to cater for any projected job increase. It also includes any additions due to the present market being particularly constrained and any need to take account of the need for affordable housing. It is recommended in the paper that there is no case for “market” additions or to provide for additional affordable housing. The figure to be met is therefore that derived from demographic analysis and from any addition required because of the projected increase in jobs over and above the housing that will be available from meeting the (adjusted) demographic need as in the second row of the above.

- *Notes: The term “need” is used in the context in which it appears in the government guidance and refers to the overall requirement for housing as assessed by the LPA in an objective manner.*
- See full report (evidence paper) “*The objectively assessed housing needs of Stroud Forest of Dean and Cotswold, NMSS, 2014*” for full explanation of the background to this paper.

1.15 **Market constraints** (see especially paras 78, 81 and 84 of the evidence paper). The current market is considered to be able to support a reasonable level of house building and is not felt to be unduly constrained by the lack of sites. If anything some of the sites that are available are not coming forward because those available can at present more than cover the market demand. The trends in prices do not suggest under supply and the availability of housing on a variety of sites has not appeared to be constrained. It is rather the case that on some sites demand has been relatively slow and once commenced they have been built at a slower rate than envisaged. The relatively slow demand and the lack of evidence that prices are being held up by a shortage of housing may have an impact on the viability of some sites but this is considered when the range of sites on offer is reviewed not the number of dwellings that they should cater for. All of the allocated sites proposed in the AP have been reviewed and only those that are considered to have a realistic prospect of being developed during the plan period are proposed to be allocated.

1.16 **Affordable housing** (paras 85-88 of the evidence paper). Affordable housing need can be assessed in a variety of ways and there is support from the SHMA for the existence of a large need in the FoD. This is unfortunately a common situation across many districts. There is according to the SHMA a backlog of need and also a large future need. The OAN however needs to consider what it can provide and how. New housing can be expected to provide some affordable housing and there is evidence of this within the FoD. Only the net new households required can be considered in OAN, and this combined with the need to consider what can be provided (ie funded) in a relatively weak overall housing market leads to the conclusion that

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the an appropriate realistic delivery of affordable housing is already allowed for. To add a further figure to the OAN would not be achievable, could not be supported by the likely level of developer contributions, and is therefore not considered appropriate.

1.17 Economic projections The most complex additional factor is that of economic projections and how to take account of them. It is necessary to consider whether the housing likely to be needed as a result of the demographic forecasts above will need to be supplemented by additional units because of a demand arising from projected levels of economic growth. The issue is whether or not provision already made will be sufficient, including as it does assumptions which relate to economic activity. It is a complex issue involving economic activity rates, assumptions about working age, and most significantly future projections of the numbers of employees required and the numbers of households they will require.

1.18 The PPG guidance refers to the above issues and especially asks LAs to consider the possibility that the supply of (dwellings) for the working age population likely to be required will not be sufficient if sticking simply to demographic forecasts. It advises that the lack of sufficient dwellings in a given area could result in “unsustainable commuting patterns” and reduce the resilience of businesses.

1.19 Plans need to be consistent with the economic prospects of an area, and should be realistic in terms of the likely changes that are being planned for. Changes in commuting patterns, however desirable, are not safe to assume unless there is evidence and confidence that new jobs in an area will be attractive to those who commute out. Although the CS contains policies intended to influence this balance and provide a better range of employment as well as new housing within the district, no numerical allowance for a change in commuting patterns is made in the OAN calculations.

1.20 The evidence paper considers recent economic projections that were commissioned from two different sources in order to inform the OAN process and looks at the resulting implications for housing needs. It considers the period 2011-31, which takes the projections five years beyond the present FoD plan period. It covers Stroud, Cotswold and the Forest of Dean and is compatible with work covering the Joint Core Strategy area (Tewkesbury, Gloucester City and Cheltenham). The information which informs it is drawn from the best available sources which is often from county wide information. Looking at a larger area will reduce the possible variation which smaller areas may be susceptible to, though as a trade-off it may not reflect local variations that occur.

1.21 Economic forecasts are used to inform the OAN. In order to avoid the uncertainties from the period immediately following the recent recession, the period 2014-31 is that which is being considered. If the period 2011-14 is included then the projections from different sources are very different. The variation is a consequence of uncertainties in the underlying data.

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1.22 Even with the change in dates as above to give them more potential for stability, the economic projections vary widely. In the case of the FoD one forecaster's figure is five times that of the other (when considering the possible increase in jobs over a set period). Over the County, the variation is unsurprisingly much less. Whilst these projections may prove more accurate over the whole county, it is the FoD for which the OAN needs to be derived and this needs to take account of the impact of economic factors particular to the district and be representative of the likely additional need for housing (if any) arising from the economic growth projections. Some of the data used applies to the whole southwest and although it is the most suitable and available, small parts of the area (FoD for example) to which it relates may not show the same characteristics as the whole.

1.23 Over the county as a whole, there is no additional need for housing to cater for job growth if a simple average of the projections is taken. One projection for the FoD suggested a negative figure (ie the demographic requirement more than met the projected job growth, and one suggested there could be an increase of up to 2261 jobs over the period to 2031.

1.24 The assumed changes in jobs are split into sectors for the projections. One of these is "government services". One forecast sees a growth of 1500 jobs (to 2031) and the other 500. The former figure of 1500 represents about 66% of the total projected increase of jobs between 2011 and 2031. Another notable difference relates to the extent of any growth in financial and business services. Also noticeable is the difference between the two forecaster's assumptions about the rate of decline expected in the manufacturing sector. Given these variations which arise from entirely reputable projections it is apparent that it would be prudent to adopt a flexible approach in any plan. This flexibility may however be by review of the plan rather than simply using the highest figure and making allocations accordingly. From the point of view of local knowledge the prospect of major growth in the FoD of jobs in the "government" sector or financial and professional services seems remote at present. Such trends may emerge later in the plan period, but must be less likely in the short term. This reinforces the case for the suggested course of action for the FoD plan which runs to 2026 only. Changes in work itself can mean that overall outputs can rise alongside improvements in productivity. Improved productivity can suppress additional demands for labour.

1.25 A requirement for additional jobs will have implications for additional dwellings but there are other factors apart from the trends in the numbers of jobs in each sector that can affect the need for housing. These relate to the number and nature of the working population. One is the trend of older people working longer and others are the increased number of apprenticeships, and a tendency to work longer hours. Jobs which go to people within existing households presently not employed can also soak up additional numbers without the need for additional housing.

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1.26 The projections for the FoD cover a wide range of potential job provision, and within the county as a whole there is also considerable variation. The OAN report identifies the following key points arising from the economic reports. (The two economic reports are CE, Cambridge Econometrics and OE, Oxford Economics).

- “a. There are substantial uncertainties in any econometric projection of job numbers at the local authority level and hence in estimates of the implications these may have for an area’s housing requirement. Such calculations should be regarded as broadly indicative of a potential pressure on the housing stock and not regarded as exact or certain.
- b. In particular, faster improvements in productivity akin to those seen in the 1990s could mean many fewer jobs are created, at least in the next ten years. Given that the drop in productivity in the last recession was greater than in the previous two, productivity improvements larger than those seen in the 1990s could well occur.
- c. With the exception of Cotswold, the analysis of the OE projections suggests that the demographically projected population will be more than is necessary to support projected increase in jobs. Taking Gloucestershire as a whole the OE projections suggest that the demographically projected population will be adequate to support the projected economic growth by a fairly comfortable margin.
- d. The CE projections suggest that Stroud, Cotswold and the Forest of Dean will all need to add additional homes to support the projected increases in jobs. In contrast the JCS are(a) does not appear to need any additional homes and may have a small surplus. Taking Gloucestershire as a whole, the net additional housing requirement on the CE analysis is 5400 extra homes, of the order of 10% of the demographic OAN
- .e. Given the sizeable commuter flows between the Gloucestershire authorities there is a strong case for considering the relationship between homes and jobs on a broader basis than the individual authority. “ para 132, NMSS paper The objectively Assessed Housing needs of Stroud, Forest of Dean and Cotswold. Oct 2014.

1.27 It is important that there is not under provision for the future but in considering this there are some further points of note, again taken direct from the paper.

1.28 . If a simple average were taken of the housing requirements suggested by the analyses of the OE and CE projections the conclusion would be that Gloucestershire as a whole does not need to add to its demographic OAN.

1.29 . It would not be prudent, however, to ignore the indication from the CE projections that Stroud, Cotswold and Forest of Dean may need some additional housing to support economic growth by 2031. However, to make provision at anything like the full rate suggested by the CE analysis would not be appropriate given the

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LEP's focus on promoting growth in other parts of Gloucestershire; the bullish view taken by CE on job growth in government services; and the likelihood that improvements in productivity will reduce the rate of job growth significantly.

1.30 Against this background, a reasonable allowance for additional housing to support economic growth would be for Stroud, Cotswold and Forest of Dean to provide between them for half the additional homes which the CE analysis suggests might be needed across Gloucestershire i.e. 2,700. If these were allocated in line with the relative housing numbers suggested by the CE analysis Stroud would provide 800, Cotswold 1300 and Forest of Dean 900 (rounded).

1.31 Given that there are strong arguments for suggesting that productivity improvements in the next ten years are likely to be larger than have been assumed by both OE and CE and that this will reduce the number of jobs needed to produce the output increases projected, the additional homes to support economic growth may not be needed until the second half of the plan period. A possible approach would be to safeguard land for the additional homes but not to release it for development unless and until actual job growth demonstrates that it will be needed.

1.32 In any case, given the uncertainties, regular monitoring will be essential, together with readiness to adjust the housing numbers up or down in the light of developments.

1.33 Figure 42 sets out both the demographic OANs and the OANs with the suggested allowances for homes to support economic growth for the period 2011-31. The 'starting point' OANs (i.e. the OANs based simply on applying the latest official projections unadjusted) are also given for comparative purposes.

OANS for 2011 - 31

	Stroud	Cotswold	Forest of Dean	Forest of Dean implied annual rate	JCS	Gloucestershire
2012 SNPP + DCLG 2011	8200	5300	5100	255	26900	45400
Demographic OAN	8700	6300	6400	320	30400	51800
OAN with extra homes for jobs	9500	7600	7300	365	30400	54800

1.34 The key factors in respect of the FoDDC are:

- Projections for two different sources differ widely, to the extent that one would not require additional dwellings to meet the economic projections.
- Over the County as a whole there is no need for additional housing to meet the projected change in employment.

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- The area from which the greatest increase is projected is one not considered to be likely to deliver at least in the short term, this being government services. Compared with the urban areas of Gloucester and Cheltenham this sector is less well represented in the FoD.

1.35 The main conclusion in the form of a recommendation from the above paper is that it would be prudent to allow for there being an increase in the need for additional housing as a result of increases in jobs that are forecast over the period to 2031. This however reflects the outcome of only one of the two projections, and is made in full recognition of the great uncertainty of the projections. Other factors which have been discussed above but which are not at present allowed for such as increased productivity may change the figures. It appears unlikely that additional homes will be needed until the second part of the “plan” period, (2021-31).

1.36 There are assumptions about commuting patterns within the above and broadly these are assumed to remain. While the basic demographic assumptions should not be changed, it is considered that there should be scope for reviewing the provision of additional housing if there is a change in commuting. At present 49% of those in work who reside in the FoD commute to outside the FoD for that work. Whilst this is not exceptional, when considered with the actual geography (ie the nature of the journeys that are necessary), it is one of the issues that the CS and AP are trying to address. The impact of planning policy if successful would be to reduce commuting out of the district by providing additional jobs of the right nature within it, thereby reducing the need for further housing to meet the needs imposed by some of the additional jobs.

1.37 The illustrative growth in government services shown by the one projection is four times that expected in the UK as a whole. This itself in the absence of additional evidence is something that must lead to a reserved position about the resultant impact on job growth, and suggests that a prudent approach for the OAN is to plan for the demographic requirement which can accommodate some change arising from the recovery from the recession and does meet one of the two economic forecasts. The Plan will be reviewed on a regular basis and additional provision made if it is needed. At present it is possible to set out a case for an increase in the scale of housing needed but the evidence is thin and the past performance of the market would not appear to support it. Although it may be claimed that the market is being suppressed by a lack of supply at present, this is disputed and the reality is considered more to be that the market does not support the values which would be produced were there to be a greater demand.

1.38 For the OAN the conclusion is that a figure close to or at the level suggested by the demographic need is appropriate for the current plan, it can and will be reviewed and it does only form the basis of a plan for the next 12 years. Whilst the economic projections are the best available, they are only able to use available data and their wide variation suggests using them as a guide to the need for keeping the

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figures under review rather than using one or other to plan by. In any event the planned provision is in excess of the requirement which is suggested by one of the economic projections.

1.39 Anecdotally there are signs that the housing market in the FoD is slow, and although there is a big range of sites considered available, take up is relatively modest, and since 2006 completions have averaged about 18% below the plan figure of 310pa. Even when the recession is accounted for it appears unlikely that a figure substantially above the present CS' 310 could be met by the market. The likelihood is that at least 25% of the total will be made up from smaller sites (up to and including 5 dwellings net increase), leaving about 232 (75%) of the total to be met on larger sites which will be mainly managed sites involving local or national housebuilders.

1.40 The revised plan requirements are assessed as 320pa for the current period but will need to be regularly reviewed. This figure is an increase from the current 310pa that the CS adopted and implies a five year requirement of 1600, plus at present the 20% and any backlog since the period began. This is 2011 rather than the current plan period start of 2006 so would bring the requirement to 1920 (1600×1.2) plus 122 which is 2042.

1.41 The figure of 320 is that implied by the demographic information and lies between the two economic projections. It is lower than the 365 implied by the OAN report, in recognition of the variation and relative lack of evidence supporting the figures.

1.42 Given the way in which the requirement to maintain a five year land supply applies additional buffers and adjustments to the required supply, the draft AP will, in catering for this and the identified housing requirement over the whole Plan Period incorporate a degree of flexibility. The way it will be reviewed means that should the need arise, additional land can be allocated.

1.43 the current position in the draft Allocations Plan is summarised below. The figures used are for the period 2011-26 although the actual method is to take the annual requirement from 2011-31 and calculate the figure needed by the AP which runs to 2026 only. The new assessment replaces any previous considerations and looks at the current requirements afresh. It takes account of needs as they currently exist, and in establishing the future provision required uses the completions 2011-14, retains the 20% buffer and adds the so called backlog from 2011-14. The five year requirement is 2042 and the available supply, 2675, giving a supply of up to 6.55 years. The table below represents the current situation.

	high estimate		low estimate	
SUMMARY	1	2	3	4
	2011start	2011start	2011start	2011start

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Annual plan requirement	320	320	320	320
Backlog	122	122	122	122
Years supply	6.55	5.86	5.30	5.05
Completions to date	838	838	838	838
Five year CS	1600	1600	1600	1600
Five year CS plus 20%	1920	1920	1920	1920
Five year CS plus 20% and backlog	2042	2042	2042	2042
Numerical supply	2675	2394	2165	2064

- 1= upper range of available sites and includes sites new to the AP without planning permission
- 2= upper range of available sites and excludes sites new to the AP without planning permission
- 3= lower range of available sites and includes sites new to AP without planning permission
- 4= lower range of available sites and excludes sites new to AP without planning permission

1.44 The present plan is written to provide for a certain level of development and has some flexibility built in. The allocated sites together with assumed contributions from small sites and from other windfalls together provide a substantial buffer. This arises in part through the need to ensure that there is a reliable five year supply and in part from the normal expectation that there will need to be an allowance for sites that do not get built. The need to be able to meet the implied rate of development suggested by the five year requirement means that the Plan can accommodate a more rapid take up than the planned 320pa (408pa for a requirement of 2042). If there were supporting evidence that it was needed, it would be possible to revise the plan to increase its overall provision. Should there be a change in the observed trends in the number of new jobs being created in the district for example the housing provision could be revised if the present flexibility appears insufficient. It is also important to note that the plan as presently written runs to 2026, and the OAN evidence looks to 2031, with the comment that greater needs arising from growth in employment will be in the latter part of the period. Consequently there is both flexibility in the AP sufficient to not constrain the availability of land for housing and the expectation of review. The plan does not cover the period about which there is most uncertainty (2026-31) and for which revised provision can be made if needed.

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1.45 The CS hierarchy and proposed distribution of housing was written before the latest assessment of housing needs. The re assessment in 2014 led to an update of the CS which sees provision at the rate of 320pa for the period 2011-26. As this is very close to the levels planned in the CS the policies in the CS still apply and where the AP refers to the way in which it can meet the CS requirements it is also meeting the updated housing requirements as assessed by the Council. The CS as adopted made clear the need for additional housing allocations to be made, especially in some of the major villages where there were no sites allocated. The published AP makes allocations in these locations and others sufficient to ensure that the level of housing provision matches the assessed needs.

1.46 As drafted the AP identifies sites in the form of allocations for about 3101 new dwellings. In addition it contains policies that could enable a further 200 dwellings to be provided on sites allocated for mixed development. As well as these the plan will continue to support the development of small unidentified sites and at the current rate, the contribution of these is assessed at about 74pa. This is a lower rate than the historic observed levels of completions especially before the recession. There still needs to be a windfall allowance to cover unallocated sites of over 5 dwellings simply because unforeseen sites providing greater than 5 dwellings will continue to gain consent and be developed over the plan period. These allowances and the allocations made are set out below:

- Annual contribution of small sites, assumed to be at a rate equivalent to the completion of all dwellings under construction plus 60% of those yet to be started – 74pa assumed. (888 in 12)
- Larger windfall site- a sliding scale up to 81pa but limited to 48 total in the first five years. (total for 12 years assumed 523)
- Allocated sites capacity 3101.
- Sites not allocated and with permission and under construction current contribution within five years- 300 approx.
- Total from above 4812 approx. Plan requires $320 \times 12 = 3840$, or 3962 including “backlog”.

