

# FIVE YEAR HOUSING LAND SUPPLY REPORT AT APRIL 1<sup>ST</sup> 2020

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## Introduction

1. Wyre Forest District Council is able to demonstrate a 5 year Housing Land Supply (HLS). As of 1<sup>st</sup> April 2020 the HLS is 8.2 years.
2. The Government aims to significantly boost the supply of housing. It is therefore important that enough land can be brought forward where it is needed and that once permission is granted it is developed without unnecessary delays.
3. The National Planning Policy Framework (NPPF) (February 2019 para.73) requires all Local Planning Authorities to identify sufficient specific deliverable sites to deliver a minimum of five years' worth of housing against their requirement in their adopted Development Plan (or against a local housing need where the Local Plan is over 5 years old). The NPPF also sets out a requirement to provide an additional buffer of 5, 10 or 20% depending on circumstances.
4. The Wyre Forest Core Strategy was adopted in 2010 and a replacement Local Plan (2016-36) has recently been submitted to the Planning Inspectorate (April 2020). Thus the housing requirement for the purposes of this report is calculated using the Standard Method for assessing housing need.
5. The five year housing land supply for 2020-2025 as set out in this document should be used when making planning decisions. It shows that Wyre Forest District Council has a housing supply of 8.2 years.

## Calculating the Housing Requirement

6. The NPPF and its associated Planning Practice Guidance (PPG) stipulate that the Standard Method of calculating housing need should be based on the 2014-based household projections. Government has also now published the second year results for the Housing Delivery Test. This result was again positive for Wyre Forest District. Further details on the Housing Delivery Test results can be found in this report.

**Table 1** - Local Housing Need Figure Calculation

Using the Standard Method and the 2014-based household projections:

Household Growth Projection	2020	44,771
	2030	46,708
Annual projection	$(46,708 - 44,771) / 10$	193.7
Median workplace-based affordability ratio	2019 (latest published data)	7.12
Adjustment factor	$((7.12 - 4) / 4) \times 0.25$	0.195
Calculation	$(1 + 0.195) * 193.7$	231.47
The cap	$1.4 * 232$	325 (doesn't apply : cap is higher than 232) therefore 231 stands as housing requirement

7. For the purposes of this report, the housing requirement figure of 231 will be used as the basis for the five year HLS calculations. It should be noted that the local housing need figure

used in the Submission Wyre Forest Local Plan is 276 dwellings per annum. Justification for the use of this higher figure can be found in the Housing Topic Paper.

### Housing Completions

8. The PPG (updated July 2019) requires that any assessment of five year HLS should also include the total net completions from the base date of the Local Plan broken down by types of development eg. Affordable housing. The Submission Local Plan has a base date of 2016. The following tables show the net housing completions by tenure for the 3 towns plus the rural areas since the start of the plan period in 2016. Demolished dwellings are taken off gross completion figures in the year that the development completes which may not be the year in which the dwelling was demolished. Thus figures may differ slightly from those published elsewhere. Data shows that there have been 824 gross completions since April 2016 with 44 dwellings demolished giving a total net completion figure of 780 across Wyre Forest District 2016-20. Details of these completions are shown at Appendix A with 678 (net of demolitions) on fully completed sites and a further 102 on partially completed sites shown at Appendix B.

**Table 2** Completions (net) in Kidderminster

Tenure of dwelling/year	2016/17	2017/18	2018/19	2019/20
Market	96	80	70	78
Affordable	113	13	30	40
Total	209	93	100	118*

\*3 affordable units in use as show homes thus not handed over for occupation

**Table 3** Completions (net) in Stourport-on-Severn

Tenure of dwelling/year	2016/17	2017/18	2018/19	2019/20
Market	7	24	9	16
Affordable	0	3	60	0
Total	7	27	69	16

**Table 4** Completions (net) in Bewdley

Tenure of dwelling/year	2016/17	2017/18	2018/19	2019/20
Market	5	3	3	1
Affordable	4	-8*	0	0
Total	9	-5	3	1

\*24 sub-standard maisonettes were demolished and replaced with 16 new dwellings

**Table 5** Completions (net) in rural parishes

Tenure of dwelling/year	2016/17	2017/18	2018/19	2019/20
Market	40	20	10	49
Affordable	0	0	0	14
Total	40	20	10	63

\*Figure includes 41 dwellings completed on site adjacent to Kidderminster boundary

**Table 6** Completions (net) across Wyre Forest District

Tenure of dwelling/year	2016/17	2017/18	2018/19	2019/20
Market	148	127	92	144
Affordable	117	8	90	54
Total	265	145	182	198

9. The housing trajectory published in the Amendments to the Pre-Submission Publication Document (July 2019) showed projected completions for 2019/20 of 185 dwellings. The actual figure was slightly higher at 196 dwellings (net of demolitions and retained dwellings).
10. PPG sets out how past shortfalls in housing completions against planned requirements should be addressed. (68-031-20190722). Where the Standard Method for assessing local housing need is used as the starting point in forming the planned requirement for housing, past under delivery is specifically taken into account as part of the affordability ratio so there is no requirement to specifically address under delivery as part of this report.
11. Wyre Forest District has requested to fix the housing land supply through the local plan examination process. If the agreed housing requirement is 276 dwellings per annum then the shortfall since the start of the plan period in 2016 must be taken into account in any housing land supply calculations together with a 10% buffer.

**Approach to Preparing the Five Year Housing Land Supply – requirements set out in NPPF and PPG**

12. The Government requires all local planning authorities (NPPF 2019 para.73) to identify specific deliverable sites to deliver a minimum of 5 years’ worth of housing against their housing requirement. NPPF Annex 2 Glossary provides the following definition of deliverable:

“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

  - a) Sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
  - b) Where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”
13. The NPPG (updated July 2019) at paragraph 007 Reference ID: 68-007-20190722 states that in order to demonstrate five years’ worth of deliverable housing sites, local planning authorities will need robust up-to-date evidence, and it advises that evidence to demonstrate deliverability may include:
  - Current planning status, for example on larger sites with an outline or hybrid planning permission, how much progress has been made towards approving

reserved matters planning applications or a linked planning performance agreement with timetables for approval of reserved matters planning applications and discharge of conditions;

- Firm progress towards the submission of a planning application, for example a written agreement between the council and developer which confirms the developer's delivery intentions and anticipated start date and build out rates;
- Firm progress with site assessment work; or
- Clear relevant information about site viability, ownership constraints or infrastructure provision.

14. The NPPF (published February 2019 in the glossary) provides the following definition of developable:

“To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.”

15. The NPPG (updated in July 2019) requires that any assessments of five year HLS include:

- For sites with detailed planning permission, details of numbers of homes under construction and completed each year, and where delivery has either exceeded or not progressed as expected a commentary indicating the reasons for this or the effects on build out rates;
- For small sites, details of their current planning status and a record of the number of homes completed and under construction by site;
- Details of demolitions and planned demolitions; and
- For sites with outline planning permission or allocated in adopted Local Plans, and where included in the five year HLS, information and clear evidence that there will be housing completions on site within five years, including current planning status, timescales and progress towards detailed planning permission.

#### **Process undertaken by Wyre Forest District Council**

16. The Wyre Forest housing trajectory and the five year HLS calculations have been prepared in accordance with the guidance set out in the NPPF (February 2019) and the NPPG (updated July 2019) for housing trajectories and five year supply calculations.

17. Information on site progress comes from a number of sources including officer site visits, monthly schedules sent to the Valuation Office by Council Tax, monthly building control schedules showing applications and initial notices, starts and completions as well as monthly reports from the NHBC Building Control. All of this information is fed into a site database which is updated at least monthly with these changes and any new approvals for residential development are also added in on a weekly basis.

18. The housing trajectory sets out anticipated annual net completions from new builds, conversions and changes of use from 1<sup>st</sup> April 2020 to the end of the plan period at 31<sup>st</sup> March 2036 for:

- Allocations included in the submission Local Plan 2020 or non-implemented allocations from the Site Allocations and Policies Local Plan (2013) or the Kidderminster Central Area Action Plan (2013)

- Unallocated sites of 10 dwellings or more (net) with planning permission or a resolution to grant planning permission or prior approval permission for changes of use
  - Unallocated sites of 9 dwellings or less (net) with outline, reserved matters or full planning permission, prior approval permission for changes of use or technical details approval relating to permission in principle
  - Other unidentified windfall developments that are anticipated to come forward (a windfall allowance)
19. The housing trajectory also records actual net completions for 1<sup>st</sup> April 2016 to 31<sup>st</sup> March 2020 from new builds, conversion and changes of use.
20. The housing trajectory includes individual delivery timetables for each of the proposed allocations and developments on unallocated sites of 10 or more dwellings (net). For developments on unallocated sites of 9 dwellings or less (net), the housing trajectory includes an overall total of anticipated annual net completions for each of the 3 towns and the rural parishes. A windfall allowance for the entire Wyre Forest District is included from year 3 (2022/23).
21. The delivery timetable and anticipated annual net completions for each of the sites in the housing trajectory have been gathered from a number of sources, depending on the planning status and size of the site.
22. The housing trajectory at April 1<sup>st</sup> 2020 can be found at Appendix F. It should be noted that the capacities shown in the housing trajectory for some sites are different to those shown in the Submission Plan January 2020. These latest figures have been derived from planning applications or responses received from developers/landowners. Some of these capacities are yet to be formally approved through the planning process and may change again in the future.

**Table 7** Sites where dwelling numbers have changed

Site Reference	No. of dwellings shown in Submission Plan January 2020	No. of dwellings shown in housing trajectory at 1 <sup>st</sup> April 2020
AS/5	45	48
BW/1	231	246
BW/3	72	30
FHN/11	40	13
FPH/19	4	3
WFR/WC/18	56	57
AKR/10	22	12
AKR/14	250	370
MI/5	73	72
MI/38	115	118
WA/BE/5	35	44

23. Four sites also had completions during 2019/20 as shown in Table 8 below.

**Table 8** Allocated sites with housing completions during 2019/20

Site Reference	No. of dwellings completed 2019/20	No. of dwellings under construction at 1/4/2020	No. of dwellings outstanding at 1/4/2020
AS/1	15	8	0
BHS/18	22	10	8
BW/4	41	34	16
FPH/10	25	29	4

24. Further detailed information on the individual sites can be found in the Developer Engagement Statement (see separate document).

**Housing Delivery Test Results and the Appropriate Buffer**

25. Para.73 of the NPPF requires Local Planning Authorities to identify a supply of specific deliverable sites. Whilst the need for 5 years’ worth of housing against the requirement is mentioned, it also states that additional buffers are needed. A buffer should be added to the housing requirement over the plan period, before adding the relevant annual requirement. Buffers are not cumulative, meaning that an authority should add one of the following, depending on circumstances:

- The minimum buffer for all authorities, necessary to ensure choice and competition in the market, where they are not seeking to confirm a 5 year land supply (and where their delivery of housing over the previous 3 years has not fallen below 85% of the requirement) is 5%;
- The buffer for authorities seeking to confirm a 5 year supply through an annual position statement or recently adopted local plan (and where housing delivery over the previous 3 years has not fallen below 85%) is 10%; and
- The buffer for authorities where housing delivery over the previous 3 years has fallen below 85% of the requirement is 20%

(Para.3-037-20180913)

26. Footnote 39 of the NPPF refers to past delivery being measured against the Housing Delivery Test (HDT). The first HDT results were published in February 2019. This showed that Wyre Forest had achieved 115% of its requirement. The second year of HDT results were published in February 2020 and these showed that Wyre Forest had met 99% of its requirement over the 3 year period 2016-2019. This result means that only a 5% buffer is required for the purposes of the 5 year land supply at April 2020. The results of the latest HDT are shown in Table 9.

**Table 9** Housing Delivery Test 2019

3 year rolling period	2016/2017	2017/2018	2018/2019	Total
No. of homes required	189	201	246	636
No. of homes delivered	262	184	183	629
Housing Delivery Test measurement (HDT) 99%				



27. The standard method also includes uses such as communal housing / housing for older people so these will need to be factored into the supply side. This includes hostels, care homes and nursing homes where facilities are not fully self-contained. The Housing Delivery Test Rule Book (July 2018) applies a ratio of 1.8 bedroom spaces to derive an equivalent number of dwellings, rounded to the nearest whole unit. At the present time there are very few unimplemented permissions for communal establishments and they would make little difference to the overall supply. It should be noted that extra-care developments are fully self-contained and are listed as part of the main housing supply.

### Calculating a Windfall Allowance

28. A windfall site is one which has not been allocated through the Local Plan process. Para.70 of the NPPF (2019) says that planning authorities may make an allowance for windfall sites in the 5 year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Residential gardens are excluded from the definition.
29. An analysis has been undertaken of windfall sites delivered since 2008. The results are shown in Table 10. Numbers in brackets show the number of dwellings completed under the prior approval notification procedure. These dwellings are included in the overall total number of completions.

**Table 10** Windfall Completions since 2008

Year	Number of completions on windfall sites < 10 dwellings (Prior approvals shown in brackets)
2008/09	66
2009/10	51
2010/11	45
2011/12	45
2012/13	53
2013/14	59
2014/15	73 (8)
2015/16	70 (14)
2016/17	81 (15)
2017/18	35 (8)
2018/19	36 (12)
2019/20	57 (9)
Average over 12 years	56

In order to avoid 'double counting' with sites that already have planning permission, no windfall allowance is included for the first 2 years of the 5 year supply.

### Applying a Discount to Unimplemented Permissions

30. Whilst there is no reason to believe that any planning permissions granted for residential development will not be implemented, it is accepted that there may be some that will not come to fruition for a variety of reasons. An analysis has been undertaken of lapsed permissions which expired between April 2008 and the end of March 2020. If sites have since had permissions renewed or even implemented or have applications pending consideration at 31<sup>st</sup> March 2020 they have not been included in the figures.
31. The results shown in Table 11 are split between small sites (<10 dwellings) and larger sites. Over this 18 year period the average lapse rate was 4.35 %.

**Table 11** Unimplemented Residential Permissions

Year of expiry	No. of lapsed dwellings (net)	Total number outstanding (net)	% lapsed	No. of lapsed dwellings on sites < 10	No. of lapsed dwellings on sites >10
2002/03	8	1103	0.72	8	0
2003/04	14	904	1.55	14	0
2004/5	18	550	3.27	5	13 (1)
2005/06	6	695	0.86	6	0
2006/07	15	864	1.74	15	0
2007/08	0	872	0	0	0
2008/09	28	876	3.2	7	21 (1)
2009/10	21	770	2.73	21	0
2010/11	35	974	3.59	24	11 (1)
2011/12	5	1023	0.49	5	0
2012/13	37	1118	3.31	27	10 (1)
2013/14	77	731	10.53	17	60 (1)
2014/15	50	590	8.47	10	40 (2)
2015/16	7	563	1.24	7	0
2016/17	167	518	32.2	8	159 (1)
2017/18	73	519	14.06	12	61 (2)
2018/19	3	343	0.87	3	0
2019/20	35	743	4.71	7	28 (1)
Total	599	13756	4.35	196	403 (11)

Figures in brackets show the actual number of sites which lapsed

### C2 permissions

32. The submission Local Plan also includes a requirement for 487 units of C2 accommodation to be provided during the Plan Period 2016-36. In terms of Wyre Forest, this would take the form of care homes, nursing homes or hostels. These could be either bedroom extensions to existing care/nursing homes or brand new developments. A purpose built nursing home is usually around 65-70 bedspaces, so over the plan period 7 complexes would be required to meet the requirement. Since 2016, one new care home with 67 beds has been completed in

Stourport-on-Severn and another proposal for a 66-bed scheme on Silverwoods has approval subject to a S106 agreement (February 2020 planning committee). Potential suitable sites for new facilities include Lea Castle, Lion Fields and the Timber Yard and Kidderminster town centre and Parsons Chain in Stourport-on-Severn. A separate trajectory for C2 permissions is shown in Appendix G.

33. It should be noted that extra-care developments are fully self-contained and are therefore classed as C3 and listed as part of the main housing supply.

### **Five Year Housing Land Supply Calculations**

34. The sites feeding into the 5 year HLS are listed in the appendices to this report. Appendix A lists all of the sites which have been completed since April 1<sup>st</sup> 2016 and thus contribute towards the housing required for the plan period 2016-36. Appendix B gives details of the sites under construction at 1<sup>st</sup> April 2020. These sites contribute to the net commitments without requiring any lapse rate. There were 7 sites of 10 or more dwellings under construction contributing 342 dwellings (net) to the supply with small sites contributing a further 120 dwellings.
35. Appendix C lists those sites with permission in place where building or conversion to residential use has yet to start. These sites provide a total of 1278 dwellings (net of demolitions). There are 7 sites of 10 or more dwellings listed as having an unimplemented planning approval giving a total of 1075 dwellings. Although 3 of these permissions are in outline all sites are well-advanced and expected to deliver within 5 years. The allocation for 10 dwellings at Chester Road South Service Station in Kidderminster had approval for demolition in June 2019 and the site has now been cleared of all structures. A full application for 15 dwellings was refused in January on grounds of overdevelopment causing harm to the character and appearance of the area, highway safety and lack of affordable housing. A revised scheme is being worked up to overcome these issues. The large redevelopment site at Churchfields will be accessed via a new link road from the Ring Road and this is currently under construction. Site clearance will be required prior to any development and a demolition application is expected during summer 2020. The purchase of the site by a housing developer is well advanced with a reserved matters application expected in mid 2020. This site is however expected to deliver all of the dwellings before the end of March 2025. The former Lea Castle Hospital site near Cookley is in the ownership of Homes England. A preferred developer has now been appointed and a reserved matters application for the 600 dwellings was submitted in November 2019. It should be noted that 300 dwellings are not expected to complete within the next 5 years and have therefore not been included in the housing supply. A lapse rate of 4% has been applied to the 978 dwellings in Appendix C.
36. Appendix D lists those sites which have approval subject to a Section 106 Agreement being signed. There are a total of 91 dwellings across 3 sites, the largest of which will provide 56 dwellings. Cameron Homes are in the process of purchasing this former school site and will then demolish the buildings prior to starting on site. They are expecting to complete the development within the next 3 years.

37. Appendix E lists six other deliverable sites which have been included in the 5 Year Land Supply at 1<sup>st</sup> April 2020. Four of these sites are existing allocations with three being in Local Authority ownership. The largest one is the Former Carpets of Worth site in Stourport-on-Severn which is being marketed for redevelopment. A national house builder is in discussions with the Council about a scheme for bringing forward residential development on the site. The site previously had planning permission for 159 dwellings which lapsed in 2016/17. Since that original permission was given, a link road over the River Stour adjacent to the site has been provided as part of a superstore development on the other part of the site. Three locally-listed buildings on the site which were previously earmarked for conversion to mixed use with residential on the upper floors are now too badly dilapidated to retain and are likely to be demolished. Further details can be found in the Developer Engagement Statement. The other sites listed are proposed allocations in Stourport-on-Severn. Both sites have options taken on them by national house builders that intend to bring forward development on them within the next five years subject to planning approval. Discussions with the local planning authority are well advanced on the larger site.
38. The following table shows a summary of the housing completions and commitments at 1<sup>st</sup> April 2020.

**Table 12** Summary of Housing Completions and Commitments at 1<sup>st</sup> April 2020

	Number of dwellings (net)
<b>Total net completions 1<sup>st</sup> April 2016-31<sup>st</sup> March 2020</b>	<b>780</b>
Units on completed sites (Appendix A)	678
Units on sites under construction (Appendix B)	102
<b>Total net under construction at 1<sup>st</sup> April 2020</b>	<b>247</b>
Units on sites under construction (Appendix B)	247
<b>Total net outstanding at 1<sup>st</sup> April 2020</b>	<b>1091</b>
Units on sites under construction (Appendix B)	113
Units on Outstanding sites (excluding replacement dwellings) (Appendix C)	1278 -300 expected to complete beyond 5 years = 978
<b>Total net future commitments at 1<sup>st</sup> April 2020 (under construction and outstanding)</b>	<b>1338</b>

39. Table 13 shows the final calculation taking into account the sites listed at appendix B – E plus a windfall allowance for years 3-5.

**Table 13** Five Year Housing Land Supply Calculation at 1<sup>st</sup> April 2020

	Number of Dwellings	Average per annum
Housing requirement 2020-2025 plus 5% buffer	$231 + 5\% * 5 = 1212.75$	242.55 rounded up to 243
Net completions 2016-2020	$265 + 135 + 182 + 198 = 780$	195
Net commitments at 1/04/20 (appendices B & C)	978 with permission and not yet started less 4% lapse rate = 939 plus 113 not yet started on sites under construction plus 247 dwellings under construction = 1299	
Net dwellings with resolution to grant permission subject to S106 agreement (appendix D)	91 less 4% lapse rate = 87	
Other deliverable sites within 5 years (appendix E)	467 less 4% lapse rate = 448	
Windfall allowance	56 less 4% lapse rate over 3 years = 161	
Total supply	$1299 + 87 + 448 + 161 = 1995$	
5 year supply calculation	$1995 / 243 = 8.21$ years	

40. Wyre Forest District Council has asked to fix its five year housing land supply through the Local Plan Examination. This would use an annual requirement figure of 276 dwellings with a 10% buffer added and would also need to take account of any shortfall since the start of the plan period in 2016. Using the projected completions for 2020/21 as shown in the housing trajectory at Appendix F it is possible to rerun the calculation to estimate what the supply would be at 1<sup>st</sup> April 2021. This would not take into account any new permissions added to the supply during 2020/21 but on the flip side, many of those currently under construction will form part of the projected completions. This calculation is shown at Table 14. This shows that a five year housing supply would still be maintained going forward at plan adoption.

**Table 14** Estimated Housing Land Supply at 1<sup>st</sup> April 2021

	Number of Dwellings	Average per annum
Housing requirement 2021-2026 plus 10% buffer	$276 + 10\% * 5 = 1518$	303.6 rounded up to 304
Net completions 2016-2021	$265 + 135 + 182 + 198 + 364 = 1144$	229
Projected shortfall 2016-21	$276 * 5$ minus 1144 = 236	
Housing requirement 2021-26 taking account of undersupply	$276 * 5$ plus 236 plus 10% = $1380 + 236 = 1616$ plus 10% = 1778	355.6 rounded up to 356
Projected commitments	Using figures at 1 <sup>st</sup> April 2020 (likely to be under estimate) 1995	
Calculation at 1 <sup>st</sup> April 2021	$1995 / 356 = 5.6$ years	

