March 2021

# Statement of Common Ground

Housing and Traveller
Accommodation Needs in East
Hampshire



# Statement of Common Ground (SoCG)

#### 1. Introduction

- 1.1 This Statement of Common Ground (SoCG) is a jointly agreed statement between East Hampshire District Council (EHDC) and the South Downs National Park Authority (SDNPA). It sets out the position and understanding with respect to the strategic cross-boundary matters of housing and traveller accommodation needs, as well as agreed actions to resolve outstanding matters. It is not binding on either party, but sets out a clear and positive direction, at a point in time, to inform ongoing strategy and plan making.
- 1.2 It should be noted that EHDC and the SDNPA share a number of other cross-boundary strategic issues namely landscape and the setting of the National Park, biodiversity and in particular international sites, transport and in particular non-motorised travel routes and tourism and local employment. These will be subject to a further statement of common ground.
- 1.3 This SoCG supersedes an earlier version, published in November 2020, to account for more up-to-date data regarding completions and anticipated delivery timescales.

#### 2. List of Parties involved

- 2.1 The following local planning authorities have engaged in this SoCG on housing and traveller accommodation needs in East Hampshire:
  - South Downs National Park Authority
  - East Hampshire District Council

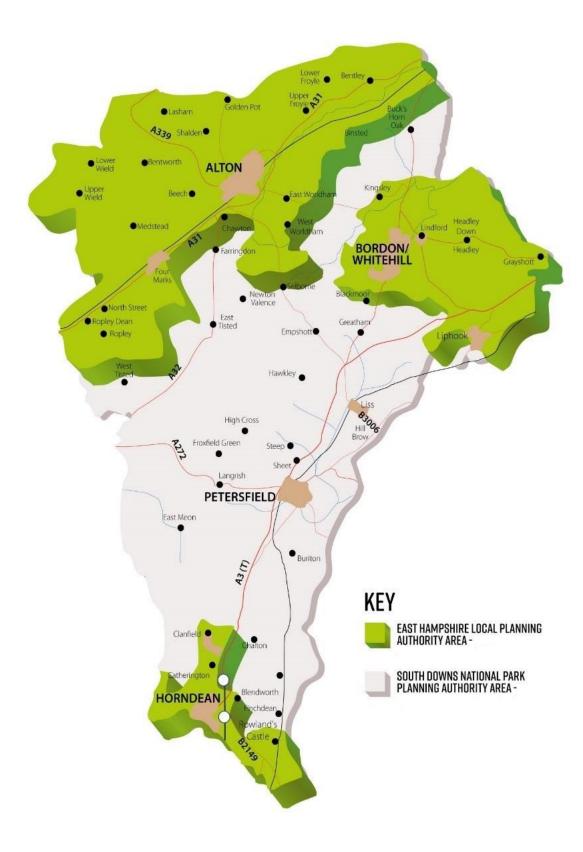
## 3. Signatories

3.1 Cllr Angela Glass, Portfolio Holder for Planning on behalf of East Hampshire District Council.Tim Slaney, Director of Planning on behalf of South Downs National Park Authority.

#### 4. Strategic Geography

- 4.1 This SoCG covers East Hampshire district. As illustrated from the map below (Fig.1), the district consists of two separate local planning authorities, namely East Hampshire District Council (EHDC) and the South Downs National Park Authority (SDNPA).
- 4.2 Section 62 of the Environment Act 1995 requires all relevant authorities, including local authorities such as EHDC, to have regard to the purposes of national parks. These are:
  - To conserve and enhance the natural beauty, wildlife and cultural heritage of the area:
  - To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

Fig.1 Map of East Hampshire District



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#### 5. Strategic Matters

#### Strategic Matter 1: Meeting identified housing needs within the District

#### Background

- 5.1 East Hampshire District Council has historically collaborated with the South Downs National Park Authority (SDNPA). In 2014, both authorities adopted the Local Plan: Joint Core Strategy (JCS) covering the whole of East Hampshire District including that part within the National Park. The JCS set both authorities' overall approach towards local application of sustainable development through its objectives and core policies over the period 2011 to 2028. It should be noted that the SDNPA adopted its own Local Plan in July 2019, which superseded all the JCS policies within that part of the National Park that fall within East Hampshire District.
- The JCS housing requirements were supported by a Strategic Housing Market Assessment (SHMA)<sup>1</sup> to assess the full housing needs of the district. The SHMA analysed the housing markets that affect the district to determine the need for housing that should be met within East Hampshire, including the National Park.
- 5.3 The SHMA identified that the objectively assessed housing need (OAHN) for the district lies within the range of 520-610 dwellings per annum. The JCS Inspector's report<sup>2</sup> (paragraph 25) stated that the Inspector considered the OAHN to be around 610 dwellings per annum (dpa), that being 10,370 new dwellings up to 2028. The Inspector noted that the Plan proposed 592 dpa (10,064 dwellings) which is less but not significantly so (about a 4% difference) and that he considered the difference to be well within a reasonable margin for error. The Inspector concluded that the evidence submitted to the examination supports the figure of 10,060 as the minimum number of new homes that should be provided to 2028.
- In 2015, a Memorandum of Understanding (MoU) was signed by both EHDC and the SDNPA, which committed to meeting the housing need for East Hampshire noted above. It was recognised and agreed at the time that based on environmental and landscape constraints within the National Park an appropriate apportionment for doing so (based on expected housing delivery in the National Park as 1<sup>st</sup> April 2013) would equate to a minimum of 8,366 dwellings outside the National Park and a minimum of 1,694 dwellings within the National Park. Therefore, East Hampshire LPA should monitor its housing land supply against a minimum of 492 dpa (8,366 dwellings over the plan period equates to 492dpa). This approach was supported by the East Hampshire Housing and Employment Allocations Plan's Inspector's Report<sup>3</sup> (2016).
- 5.5 Moving forward, whilst preparing separate Local Plans, in both March 2018 and December 2018 both Local Authorities signed SoCGs setting out the position and understanding with respect to the strategic cross boundary matter of housing and agreed actions to resolve

<sup>&</sup>lt;sup>1</sup> East Hampshire Strategic Housing Market Assessment and Local Housing Requirements Study (August 2013)

<sup>&</sup>lt;sup>2</sup>https://www.easthants.gov.uk/sites/default/files/documents/EHSD%2BInspectors%2BReport%2BFINAL%2B1 60414.pdf

<sup>&</sup>lt;sup>3</sup>https://www.easthants.gov.uk/sites/default/files/documents/East%20Hampshire%20District%20Council%20 Allocations%20Report.pdf

- outstanding matters. Both SoCGs further endorsed the JCS requirements associated with a minimum 100 dwellings per annum in the National Park and the remaining 492 dwellings per annum in wider East Hampshire for the period 2011 to 2028.
- 5.6 It should be noted that the commitments set out in the MoU (2015) and SoCGs (March 2018 and December 2018) were based upon historic assessments of housing supply (with no influence from the standard method for calculating housing need). At that point in time, the housing trajectories supporting the SoCGs maintained similar housing delivery assumptions to the commitments made, however, these assumptions are now considered out-of-date for future plan-making and five-year supply purposes. It should be noted that for the purposes of monitoring Policy CP10 in the JCS (in the EHDC AMR), the previous agreement of 492 dwellings per annum in East Hampshire will be used.

#### Future Housing Requirements

- 5.7 Significantly boosting the supply of homes is a key Government objective. In order to achieve this, it is important that a sufficient amount and variety of land can come forward where it is needed, the needs of groups with specific housing requirements are addressed and, that land with planning permission is developed without necessary delay. Therefore, meeting the housing needs of East Hampshire within the district in partnership with the SDNPA remains an important issue for both LPAs.
- 5.8 The National Planning Policy Framework (NPPF) expects strategic policy-making authorities to follow a standard method for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply. The formulae behind the standard method are set out within Planning Practice Guidance (PPG)<sup>4</sup>, and identifies a minimum annual housing need figure, which relies on publicly available and robust data.
- The publicly available data that supports the standard method is presented for East Hampshire district as a whole and does not make a distinction between the South Downs National Park area (accounting for 57% of East Hampshire) and the remainder of district. This is important as EHDC is not the local planning authority for the National Park.
- 5.10 Whilst not offering a clear solution, the PPG<sup>5</sup> notes that where strategic policy-making authorities do not align with local authority boundaries, such as National Parks, an alternative approach will have to be used. However, the PPG is clear that any alternative method will still need to consider the best available information on anticipated changes in households as well as local affordability ratios.
- 5.11 A Housing & Economic Development Needs Assessment (HEDNA) was produced in 2017 to support the South Downs Local Plan (adopted in June 2019), covering the whole of the National Park. The local housing need figures determined in the South Downs HEDNA do not use the standard method and cannot be compared, however, they provide a useful indication of the needs associated with the parts of East Hampshire district that fall within

<sup>&</sup>lt;sup>4</sup> PPG (Paragraph: 004 Reference ID: 2a-005-20190220)

<sup>&</sup>lt;sup>5</sup> PPG (Paragraph: 014 Reference ID: 2a-014-20190220)

the National Park at that point in time. However, moving forward and in order to broadly align with the NPPF and PPG, it is considered that the standard method should remain the starting point for calculating the minimum housing needs in East Hampshire In a similar fashion to previous commitments between the two Authorities, it is considered that housing delivery in the South Downs National Park should then be taken into account when determining the residual housing needs of East Hampshire Local Planning Authority area.

#### Standard Method

- 5.12 The starting point for all calculations related to the standard method for assessing local housing need is provided by national household projections for the area of the local authority. As mentioned previously, this data is presented across the whole of East Hampshire district, which includes part of the National Park.
- 5.13 The PPG requires setting the baseline using national household growth projections (2014-based household projections in England, table 406 unitary authorities and districts in England) for the area of the local authority. Using these projections, the projected average annual household growth over a 10-year period is calculated (this should be 10 consecutive years, with the current year being used as the starting point from which to calculate growth over that period). For the period 2020 to 2030, the number of households within East Hampshire district is projected to increase from 50,817 to 54,740 in 2030. This is an increase of 3,923 households, equivalent to 392.3 new households per annum.
- 5.14 An important consideration in assessing an appropriate level of housing is the affordability of homes, which means that projected household growth needs to be adjusted to take account of market signals. The most recent median affordability ratios, published by the Office for National Statistics (ONS) at a local authority level, should be used for adjusting household projections. The affordability ratios essentially compare median house prices to median workplace earnings. The most recent data on affordability ratios is for 2019 (April, 2020), which shows that East Hampshire has an affordability ratio of 13.41, representing the fact that households are required to spend over 13 years' earnings on the cost of purchasing a home.
- As noted by the PPG, the precise formula that should be used to calculate the adjustment that should be made to account for market signals is as follows:

5.16 Therefore, for each 1% increase in the ratio of house prices to earnings, where the ratio is above 4, the average household growth should be increased by a quarter of a per cent. No adjustment should be applied where the ratio is 4 or below. When the formula is applied to East Hampshire district the adjustment factor is 0.59.

5.17 Using this adjustment factor, local authorities should calculate their local housing need using the standard method as follows:

#### Local housing need = (1 + adjustment factor) x projected household growth

5.18 Based on the above, the local housing need for East Hampshire is considered to be 624 dwellings per annum (1.59 x 392.3). However, it should be noted that this figure is for the whole of the District area (including the South Downs National Park).

#### Making adjustments for the South Downs National Park

- 5.19 As a National Park Authority and a separate Local Planning Authority, plan-making for the SDNPA remains subject to the NPPF whereby Local Plans should meet objectively assessed needs, <u>unless</u> specific policies in the NPPF indicate development should be restricted. Footnote 6 on page 6 of the NPPF identifies National Parks as an area where development should be restricted.
- 5.20 Furthermore, Paragraph 172 of the NPPF states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. It should also be noted that the DEFRA UK Government Vision and Circular 2010 on English National Parks and the Broads, referenced in the NPPF, makes clear that the Government recognises that National Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them.
- 5.21 As mentioned previously, the standard method is the starting point for calculating the local housing need for East Hampshire district, it does not distinguish between the needs of the two separate LPAs. Therefore, taking the Government's intentions for National Parks in to consideration, the most logical approach to distinguishing local housing need would be accounting for the anticipated housing delivery in the National Park part of East Hampshire when determining the local housing need for the remainder of East Hampshire (outside the SDNP).
- 5.22 The most recent housing trajectory associated with National Park is published within the South Downs Authority Monitoring Report (AMR, 2020). A specific housing trajectory has been produced to cover that part of the National Park within East Hampshire (Appendix A & Appendix B), illustrating the anticipated housing delivery as at 1<sup>st</sup> April 2020 (with and without discounted assumptions). Although housing delivery beyond 2033 is currently unknown within the National Park, it is assumed that the 18 dwellings per annum associated with windfall is still likely to come forward. When determining the housing trajectory for the South Downs National Park, a number of factors are taken into account:
  - Phasing as indicated by the site owner, either through pre-application discussions or details submitted to the SHLAA, or information provided by Neighbourhood Development Groups

- Site specific constraints which may affect delivery (e.g. providing appropriate access or sites in multiple ownership)
- The current use of the site and whether there are ongoing operations.
- 5.23 It should be noted that for the purpose of monitoring future housing supply in the South Downs National Park, the number of planning permissions is discounted by 10% for large sites and 20% for small sites, to allow for some planning permissions not being implemented. A further 10% deduction is also made for sites allocated for housing either in the South Downs Local Plan or made Neighbourhood Development Plans (NDPs). This represents a conservative approach to supply from these sources, adding robustness. However, the South Downs AMR (2020) acknowledges that the approach to discounting will be kept under review in light of any further evidence.
- 5.24 Appendix C shows the lapse rates associated with that part of the National Park within East Hampshire. In terms of large sites, there has not been any permissions that have lapsed from 2011 onwards. In terms of small sites, the lapse rate associated with planning permissions (2011-20) averages at 2.63%, equivalent to four dwellings per annum. It is considered that the discounts outlined in the AMR for the wider National Park area are not applicable in East Hampshire. Therefore, the non-discounted housing trajectory presented in Appendix B is used for the assumptions and commitments outlined in this SoCG.
- 5.25 The non-discounted housing trajectory in Appendix B outlines that a total of 1,605 dwellings (84 dwellings per annum (dpa)) are expected to be delivered in the National Park part of East Hampshire between 2017-2036. It should be noted that a further three years (2033-36) has been added to the housing trajectory to account for the emerging East Hampshire Local Plan period. Based on Appendix B, the majority of housing is expected in the early part of the plan period, with some 1,379 (86%) of new homes anticipated between 2017-2027, which is equivalent to 138 dpa. Based on current information (as 1<sup>st</sup> April 2020), only 226 dwellings are expected between 2027-2036, equivalent to 25 dpa.
- 5.26 The South Downs Local Plan was adopted in June 2019 and all local need assumptions were informed by the 2017 HEDNA, the findings of which were endorsed by the Local Plan Inspector following examination. Whilst these requirements remain relevant for the wider South Downs Local Plan and its monitoring, it is agreed that the standard method for calculating local housing need should be the starting point for assessing local housing need associated with the emerging East Hampshire Local Plan and five-year housing supply purposes in that area.
- 5.27 Based on the most recent housing trajectory (Appendix B) derived from the South Downs AMR (2020), an average of 138 dwellings per annum are expected to be delivered in National Park within East Hampshire between 2017-2027. When deducted from the local housing need figure derived from the standard method (624 dpa), there is a residual value of 486 dwellings per annum requirement in the remainder of East Hampshire during that timeframe (i.e. 2017-2027). However, based on current information, only 25 dpa are expected in the National Park within East Hampshire from 2027 to 2036. When deducted from the local housing need figure derived from the standard method, this would leave a requirement of 599 dpa in the remainder of East Hampshire for the period 2027-2036.
- 5.28 It is acknowledged that there will be future housing delivery within the National Park beyond those figures established in the housing trajectories (Appendix A & Appendix B), however,

any quantum is currently unknown. The location of this housing is unlikely to be determined until a review of the South Downs Local Plan and any relevant Neighbourhood Development Plans.

#### Conclusions

- 5.36 Based on the information set out in this SoCG, it is agreed by EHDC and the SDNPA that the standard method should form the basis for calculating the local housing need requirement in East Hampshire (currently 624 dwellings per annum) until it is superseded. However, housing delivery within the National Park part of East Hampshire should be taken into consideration when determining the local housing need figures for those areas outside the National Park.
- 5.37 Based on the most recent non-discounted trajectory (Appendix B), it is expected that a total of 1,605 dwellings will have been delivered in the National Park within East Hampshire between 2017-2036. However, some 1,379 dwellings are expected from 2017-2027, equivalent to 138 dwellings per annum. A further 226 dwellings are expected between 2027-2036, equivalent to 25 dwellings per annum.
- 5.38 Therefore, based on anticipated housing delivery within the National Park part of East Hampshire, it is agreed that the residual housing need for East Hampshire District Council's planning area is 486 dwellings per annum between 2017 to 2027 and 599 dwellings per annum from 2027 to 2036.

**Table 1: Housing Requirement in East Hampshire** 

Local Planning Authority	2017-2027 (dpa)	2027-36 (dpa)
EHDC	486	599
SDNPA <sup>6</sup>	138	25
Total	624	624

- 5.39 It is agreed the above assumptions provide a suitable alternative approach to the PPG where strategic policy-making authorities do not align with local authority boundaries. These assumptions still consider the best available information on anticipated changes in households as well as local affordability ratios, resulting in the district-wide needs derived by the standard method being met across the two separate local planning authorities. In line with the Duty to Cooperate (DtC) there are no unmet housing needs identified.
- 5.40 The above figures will be used to inform the emerging East Hampshire Local Plan and for the purposes of calculating five-year housing land supply (outside of the National Park). For the avoidance of doubt, it is agreed these figures are for the purposes of the current Local Plan preparation and have been developed in line with the current method for calculating housing need and within the context of the current wider planning system. For the purposes of monitoring Policy CP10 in the JCS (in the EHDC AMR), the previous agreement of 492 dwellings per annum in East Hampshire will continue to be used.

<sup>6</sup> Housing provision figure for SDNPA based on anticipated delivery in the National Park

Strategic Matter 2: Meeting the identified need for Gypsy, Traveller and Travelling Showpeople accommodation within the District and wider unmet needs

- 5.41 The identified need for Gypsy and Traveller and Travelling Showpeople accommodation in East Hampshire is set out in the East Hampshire District Gypsy and Traveller Accommodation Assessment (GTAA) 2020. The GTAA identifies the accommodation needs (Traveller pitches and Travelling Showpeople plots) for the area of the South Downs National Park within East Hampshire, and separately for the area of East Hampshire outside of the South Downs National Park. Combined these figures provide the total accommodation needs for East Hampshire District for Gypsy and Travellers and Travelling Showpeople that meet the planning definition, as set out in Planning Policy for Traveller Sites (Annex 1).
- 5.42 The South Downs Local Plan (adopted 2019) set out allocations and future need requirement for the part of the National Park within East Hampshire. The allocations along with granting of planning permission fulfilled the requirement for gypsy and travellers pitches. However, the evidence base unpinning the accommodation needs for East Hampshire has since been updated, and the latest position on need is as set out in the GTAA 2020, for which the base date is March 2020.
- 5.43 The GTAA 2020 identifies a need in the SDNP in East Hampshire for 7 Travelling Showpeople plots (5 of which by 2024), and 0 Traveller pitches by 2036. The identified need in East Hampshire outside the SDNP is far greater; 62 Traveller pitches and 46 Travelling Showpeople plots by 2036.
- 5.44 At the time of writing, the outstanding need identified for SDNP in East Hampshire remains the current position. I.e. no provision has been made against the identified need of 7 Travelling Showpeople plots or 0 Traveller pitches. Monitoring of this position is reported in the SDNP Annual Monitoring Report.
- 5.45 It is noted and agreed that the suitability of any proposal is the key determining factor, not whether there is an identified need.
- 5.46 East Hampshire District Council publishes a five-year supply position statement twice a year (end of March and September) and reports progress against identified need. Since March 2020, some completions of Traveller pitches are recorded in East Hampshire outside the SDNP. To date, no completions are recorded of Travelling Showpeople plots. There remains a significant unmet need for both types of accommodation in East Hampshire outside the SDNP. The latest position on this can be seen in the current five-year supply position statement<sup>7</sup>.
- 5.47 Given the remaining significant need in East Hampshire, and no need being identified in SDNP in East Hampshire, should Traveller pitches be permitted and completed in the SDNP within East Hampshire post March 2020, they will count towards meeting the need identified in East Hampshire outside SDNP. This is until such a time that a new GTAA is prepared, and/or this SOCG is updated to reflect any changing position.

9

<sup>&</sup>lt;sup>7</sup> https://www.easthants.gov.uk/gypsy-traveller-and-travelling-showpeople-five-year-supply

- 5.48 If the identified need for Travelling Showpeople plots in the SDNP in East Hampshire is met (7 plots), any additional provision beyond 7 plots (completions post March 2020) will also count towards meeting the need identified in East Hampshire outside SDNP. Whilst the need in the SDNP for Travelling Showpeople plots originates from one site, it is not considered that need is only met when that specific need is personally met. Provision of any plot for Travelling Showpeople accommodation could meet that need, if it is not personally conditioned. This is also until such a time that a new GTAA is prepared, and/or this SOCG is updated to reflect any changing position.
- 5.49 Combined, the need figures in the GTAA 2020 are for East Hampshire District, and as such any additional provision (above need) should be counted within East Hampshire District prior to any other area within the wider SDNP.

### 6. Governance Arrangements

6.1 This SoCG has been signed by the Planning Portfolio Holder for EHDC and the Director of Planning on behalf of South Downs National Park Authority.

#### 7. Timetable for review and ongoing cooperation

- 7.1 The strategic issues identified in this SoCG (housing and traveller accommodation needs) will be managed on an ongoing basis.
- 7.2 A further comprehensive SoCG will also be prepared by the authorities to address other cross-boundary strategic issues namely landscape and the setting of the National Park, biodiversity and in particular international sites, transport and in particular non-motorised travel routes, tourism and local employment.

Signed on behalf of South Downs National Park Authority:

Tim Slaney, Director of Planning

Tim Steney

Angela & Li Glass

23<sup>rd</sup> March 2021

Signed on behalf of East Hampshire District Council:

23<sup>rd</sup> March, 2021

Cllr Angela Glass, Portfolio Holder for Planning on behalf of East Hampshire District Council.

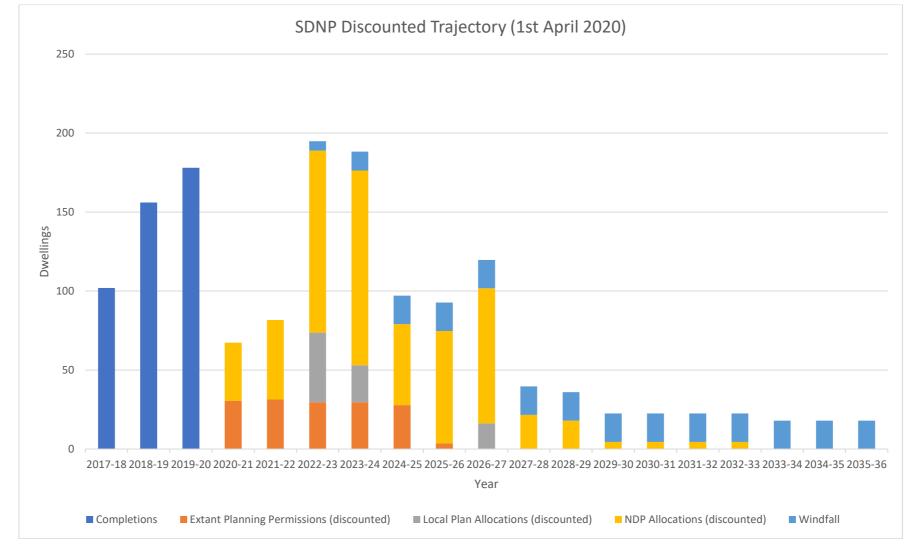
Appendix A – SDNP Discounted Housing Trajectory in East Hampshire (1st April 2020)

SDLP Housing Trajectory Calculations ( <u>Discounted)</u>																				
	2017-	2018-	2019-	2020-	2021-	2022-	2023-	2024-	2025-	2026-	2027-	2028-	2029-	2030-	2031-	2032-	2033-	2034-	2035-	Total
	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	
Completions	102	156	178																	436
Extant Planning				30	31	30	30	28	4											152
Permissions*																				
LP & NDP Allocations**				37	50	159	147	51	71	102	22	18	5	5	5	5				675
Windfall				0	0	6	12	18	18	18	18	18	18	18	18	18	18	18	18	234
Total	102	156	178	67	82	195	188	97	93	120	40	36	23	23	23	23	18	18	18	1497
Cumulative Total	102	258	436	503	585	780	968	1065	1158	1278	1317	1353	1376	1398	1421	1443	1461	1479	1497	

<sup>\*</sup> Discounted (10% large, 20% small)

<sup>\*\*</sup> Discounted (10%)

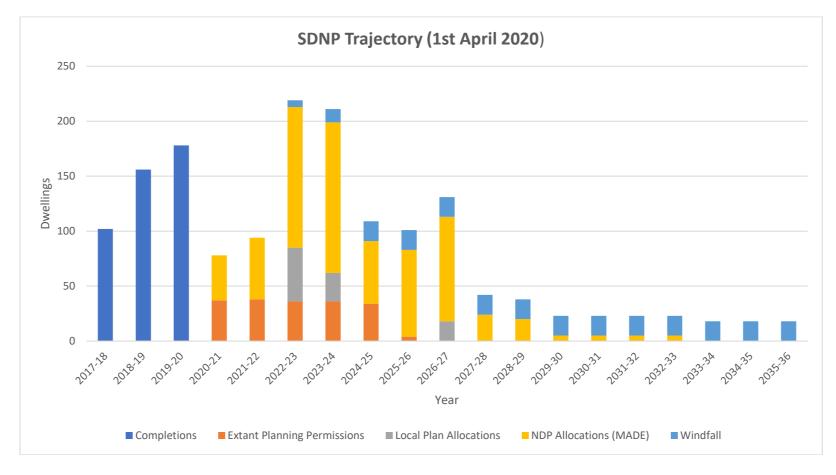
	Total	dpa
Average 2017-2036	1497	79
Average 2017-2027	1287	160
Average 2027-2036	220	20



Appendix B – SDNP Non-Discounted Housing Trajectory in East Hampshire (1st April 2020)

<b>SDLP Housing Trajector</b>	SDLP Housing Trajectory Calculations (Non-Discounted)																			
	2017-	2018-	2019-	2020-	2021-	2022-	2023-	2024-	2025-	2026-	2027-	2028-	2029-	2030-	2031-	2032-	2033-	2034-	2035-	Total
	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	
Completions	102	156	178																	436
<b>Extant Planning Permissions</b>				37	38	36	36	34	4	0	0	0	0	0	0	0	0	0	0	185
Local Plan Allocations				0	0	49	26	0	0	18	0	0	0	0	0	0	0	0	0	93
NDP Allocations (MADE)				41	56	128	137	57	79	95	24	20	5	5	5	5	0	0	0	657
Windfall				0	0	6	12	18	18	18	18	18	18	18	18	18	18	18	18	234
Total	102	156	178	78	94	219	211	109	101	131	42	38	23	23	23	23	18	18	18	1605
<b>Cumulative Total</b>	102	258	436	514	608	827	1038	1147	1248	1379	1421	1459	1482	1505	1528	1551	1569	1587	1605	

	Total	dpa
Average 2017-2036	1605	84
Average 2017-2027	1379	138
Average 2027-2036	226	25



# Appendix C – Lapse Rates in the SDNP part of East Hampshire

Small Sites										
Year	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	Average
Lapsed (net)	8	0	2	7	6	1	4	2	3	4
Outstanding at 1st April (net)	121	138	163	158	138	153	154	126	104	139
%	6.61%	0.00%	1.23%	4.43%	4.35%	0.65%	2.60%	1.59%	2.88%	2.63%
Large Sites										
Year	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	Average
Lapsed	0	0	0	0	0	0	0	0	0	0
Net Outstanding*	89	71	72	116	136	41	346	352	290	168
%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Overall										
Year	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	Average
Total Lapsed	8	0	2	7	6	1	4	2	3	4
Total Outstanding*	210	209	235	274	274	194	500	478	394	308
%	3.81%	0.00%	0.85%	2.55%	2.19%	0.52%	0.80%	0.42%	0.76%	1.19%

<sup>\*</sup> Permissions at start of year