

Written Statement

Ealing Council Statement 3: Housing LPA3

Wednesday 2nd November 2011



1 Introduction

1.1 The issues to be addressed in this hearing statement are:

- 1. Does the Core Strategy make appropriate provision for the effective delivery of new housing, including affordable housing, in terms of the amount, distribution, location, phasing, size and tenure of new housing development, having regard to national policy, and is it fully justified and supported by an up-to-date, credible and robust evidence base?**
- 2. Are there sufficient identified sites to demonstrate that there is an identified 5 year supply plus an additional 20%? Large and small sites need to be identified; if they are to come from windfall sites the provisions of PPS3 would not be met. Is there any reliance on garden land to meet the housing provision?**
- 3. Key policy 1.2(a) sets a 50% affordable housing target in accordance with the London Plan and while the supporting text sets out that is the level required, is this viable on all sites?**
- 4. Would it be viable for affordable housing to be provided by means of a contribution on some sites where 10 units would not be developed and therefore is the supporting text too prescriptive?**
- 5. What is the overall number of affordable houses to be sought on an annual basis, so that the effectiveness of the policy can be monitored in the annual monitoring report?**
- 6. Key policy 1.2(l) the lack of additional provision for Gypsy and Traveller accommodation departs from the London Borough's Gypsy and Travellers Accommodation Assessment. Is the approach fully justified and consistent with national policy?**
- 7. Should the CS refer to the provision of lifetime homes and properties to meet the needs of disabled people in line with The London Plan policy 3.8(c)?**

2. Housing Provision

- 1. Does the Core Strategy make appropriate provision for the effective delivery of new housing, including affordable housing, in terms of the amount, distribution, location, phasing, size and tenure of new housing development, having regard to national policy, and is it fully justified and supported by an up-to-date, credible and robust evidence base?**
- 2.1 The Development Strategy makes appropriate provision for the effective delivery of new housing over the plan period, with the amount, distribution and location specified graphically in the Key Diagram and in tabular format showing housing potential by area on page 11 of the Strategy. Map 4 of the Strategy further illustrates the spatial distribution of the housing growth in the borough over the plan period through indicating the broad development corridors where new homes will be concentrate.
- 2.2 The two development corridors are highly sustainable locations, providing access to transport, services, infrastructure, and amenity space along with opportunities for decentralised energy networks. The spatial strategy clearly directs the majority of new homes to the development corridors, with the purpose of both protecting the character of the suburban areas of the borough while supporting the viability and vitality of centres.
- 2.3 The neighbourhood profiles and accompanying maps in Appendix 2 of the Strategy summarise housing growth in each of the eight key areas, with housing potential from strategic development sites within the development corridors highlighted within individual policies of the Strategy where appropriate. Further detail on potential quantum and indicative phasing of strategic sites will be provided in the Development Sites DPD.
- 2.4 The evidence base in terms of the amount, distribution, location and phasing of provision includes the GLA-led Strategic Housing Land Availability Assessment (REG6, October 2009), on which Ealing worked closely with the GLA and therefore supports the London Plan 2011 target of 890 new homes per annum.
- 2.5 The London-wide SHLAA informed the site-by-site capacity figures included in the Development Sites DPD Initial Proposals (EB6, September 2010) and the housing trajectory in the most recent 2009-10 Annual Monitoring Report (EB12, December 2010). The Development Sites DPD Initial Proposals included a limited number of sites additional to the SHLAA, and where appropriate capacities were also updated from the SHLAA to reflect the most up-to-date information available at borough level.
- 2.6 The relationship of housing supply targets to provision is outlined within EB21 Background Paper 2 – Housing (September 2010). EB21 confirms that that the policies relating to provision of new housing are in accordance with national and regional policy, and are supported by an up-to-date, credible and robust evidence base. In particular, sites within the first five years of the plan have been assessed as deliverable (available, suitable and achievable) and sites from years 6 to 15 of the plan have been assessed as developable.

- 2.7 Since this data was collated, further work on refining the figures in the housing trajectory has been carried out in preparation for submission of the Core Strategy; information regarding the amount of housing to be built over the plan period and how this relates to London Plan 2011 targets is provided in the updated housing trajectory, included here as Appendix 1. Because the identified capacity remained relatively unchanged from the 2009-10 AMR/Development Sites DPD Initial Proposals, an update to EB21 Background Paper 2 – Housing was not considered necessary.
- 2.8 The evidence base in regards to size and tenure of new housing development is provided by the borough's Strategic Housing Market Assessment (EB22, August 2009) and Affordable Housing Viability Assessment (EB23, October 2010).

3. Five Year Supply

2. Are there sufficient identified sites to demonstrate that there is an identified 5 year supply plus an additional 20%? Large and small sites need to be identified; if they are to come from windfall sites the provisions of PPS3 would not be met. Is there any reliance on garden land to meet the housing provision?

- 3.1 A five-year supply of deliverable sites, in accordance with PPS3 requirements and SHLAA best practice guidance (2007), has been identified as part of Ealing's Housing Trajectory (published within the borough's Annual Monitoring Reports). An updated version of the Housing Trajectory, completed in June 2011, is included as Appendix 1.
- 3.2 For the 15-year plan period, the housing trajectory anticipates that a total of over 15,600 new homes will be delivered, against the cumulative target of 13,350 units set out in the London Plan 2011. This equates to 17 percent above the London Plan 2011 target of 13,350 units and 12 percent above the Development Strategy target of 14,000. This represents a significant contingency for housing supply within the borough.
- 3.3 Ealing's five-year requirement is 4,450 units; an additional 20 percent would raise this to 5,340 units. The housing trajectory anticipates that 4,813 units would be delivered from 2011/12 – 2015/16, 8 percent above the five-year requirement.
- 3.4 The five year supply is largely made up of sites currently under construction (16 percent); those with planning permission but not yet started, where the estimated completions fall within the five year period (39 percent); and those within the planning pipeline (23 percent).
- 3.5 The five-year supply also includes an annual allowance for delivery on small sites, informed by past trends of delivery and confirmed by the SHLAA; Appendix Two of the London SHLAA (REG6) details the methodology underlying the small sites capacity estimate. The figure of 217 per annum from small sites is considered conservative; net permissions on small sites totalled 323 units in

- 2009/10, 470 units in 2008/09 and 408 units in 2007/08 (as reported in the respective Annual Monitoring Reports).
- 3.6 This is in accordance with paragraph 59 of PPS3 which states: *"Allowances for windfalls should not be included in the first 10 years of land supply unless Local Planning Authorities can provide robust evidence of genuine local circumstances that prevent specific sites being identified. In these circumstances, an allowance should be included but should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends."*
- 3.7 Prior to the June 2011 update of the housing trajectory, it was anticipated that 5,267 units would be delivered in the first five years (an 18 percent surplus); however completions on three estate regeneration schemes have been pushed back in light of delays to delivery programmes and current economic conditions.
- 3.8 While the housing trajectory does not identify a 20 percent surplus, it demonstrates that Ealing has a sufficient supply of deliverable housing sites to meet and exceed its five-year target, and there is a significant contingency forecast over the plan period, with no reliance on large windfall sites. Moreover, the Council is currently preparing an Opportunity Area Planning Framework for Southall, in partnership with the GLA, which will unlock significant development potential for the delivery of additional residential units.
- 3.9 Housing trajectories should be based on a robust and realistic projections of delivery, but by their nature provide only a snapshot based on the most up-to-date information available at the time. The Council does not consider that it would be beneficial to artificially bring forward phasing on estate regeneration sites nor to include additional sites that have a marginal deliverability in order to demonstrate a 20 percent surplus. The NPPF is in draft form only and the five-year land supply as identified in the housing trajectory is in conformance with both PPS3 and the London Plan 2011.
- 3.10 The London-wide SHLAA assumed a theoretical reduction of 90 percent in the small site capacity derived from garden land development; therefore there is no strategic reliance on garden land to meet the housing provision target. Annex Three of the London SHLAA details the annual small sites adjustment for garden land.

4 Affordable Housing

3. Key policy 1.2(a) sets a 50% affordable housing target in accordance with the London Plan and while the supporting text sets out that is the level required, is this viable on all sites?

- 4.1 Key Policy 1.2(a) sets the strategic target for provision of affordable homes, based on EB23 Affordable Housing Viability Assessment (October 2010). The results of the assessment indicate that in a range of circumstances across the borough, 50 percent affordable housing could be achieved.

- 4.2 Paragraph 7.17 and 7.18 confirm that EB23 is fully compliant with paragraph 29 of PPS3, which states that the overall target for affordable housing to be provided “...reflect an assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery and drawing on informed assessments of the likely level of finance available for affordable housing, including public subsidy and the level of developer contribution that can reasonably be secured.”
- 4.3 Paragraph 7.6 of EB23 concludes that the delivery of 50 percent affordable housing on every single site coming forward is an ambitious target that not all sites will be able to achieve; some sites will be able to meet the strategic affordable housing target and others will not, due to site specific circumstances and the cyclical nature of the housing market. Moreover, some sites may deliver more than 50 percent affordable housing, for example estate regeneration schemes. It is important to consider the affordable housing target in its proper context, as the strategic delivery target for delivery from all sites in the borough.
- 4.4 However, the variable pattern of viability can be addressed providing policies are drafted with sufficient flexibility to address situations where targets are unviable. This flexibility is already provided within Policy 3.12 of the London Plan 2011, and further detail on the application of the strategic target of 50 percent provision on a site-by-site basis will be provided within the Development Management DPD.
- 4.5 The precise number, tenure, size and type of affordable units will be negotiated to reflect identified needs, site suitability and economic viability. In circumstances where site specific or market factors affect scheme viability, developers will be expected to provide viability assessments to demonstrate an alternative affordable housing provision. The SHMA provides guidance on the tenure and size of affordable housing borough-wide to 2014, at which time the evidence base will be updated.
- 4.6 As shown in Table 6.3.1, adopting a target lower than 50 percent would only very marginally increase the range of viable scenarios. Conversely, adopting a target of 40 percent would result in a significant number of sites that could have provided 50 percent affordable housing only providing 40 percent.

4. Would it be viable for affordable housing to be provided by means of a contribution on some sites where 10 units would not be developed and therefore is the supporting text too prescriptive?

- 4.7 EB23 Affordable Housing Viability Assessment (October 2010) considered the ability of sites providing 10 units or less to make on-site contributions and in-lieu contributions. Replacing on-site affordable housing with a financial contribution does not make an unviable site viable; the ability of developments under the 10-unit threshold to make financial contributions towards affordable housing will be dependent on scheme viability.
- 4.8 As stated in paragraph 5.16 of EB23, the results of the viability assessment indicate that there are some circumstances where affordable housing could be delivered below the 10 unit threshold without adversely affecting development viability, however the appraisal results will be affected by other requirements, for

example Code for Sustainable Homes levels. Taken overall, the results provide a reasonably clear indication that the threshold of 10 units is robust.

- 4.9 Further analysis at paragraphs 5.17 to 5.21 regarding in-lieu contributions on sites under 10 units EB23 indicates that there is unlikely to be a single formula that can be applied to all sites under 10 units without rendering many developments as unviable. Financial contributions on sites under 10 units would therefore need to be calculated on a site by site basis, taking full account of individual site circumstances.
- 4.10 The Council therefore considers that the evidence base does not provide sufficient justification to seek contributions on sites below 10 units, although it is acknowledged that in certain cases viability may not be adversely affected. A reduction below the current 10 unit threshold would not significantly contribute to affordable housing supply, but would place an additional burden on small developments of conducting viability assessment which, in combination with other requirements, could adversely impact delivery on small sites.

5. What is the overall number of affordable houses to be sought on an annual basis, so that the effectiveness of the policy can be monitored in the annual monitoring report?

- 4.11 Key Policy 1.2(a) of the Development Strategy states that at least 50 percent of the housing developed up to 2026 will be affordable housing. This is in line with Policy 3.11D of the London Plan, which states that affordable housing targets may be expressed in absolute or percentage terms in light of local circumstances.
- 4.12 It would be inappropriate to indicate the overall number of affordable houses sought on an annual basis for monitoring purposes, when the policy in question is expressed in percentage terms. The effectiveness of the policy will be monitored against the achievement of 50 percent of the total quantum of housing delivered in any given year as being affordable housing.

5 Provision for Gypsies and Travellers

6. Key policy 1.2(l) the lack of additional provision for Gypsy and Traveller departs from the London Borough's Gypsy and Traveller Accommodation Assessment. Is the approach fully justified and consistent with national policy?

- 5.1 The recent CLG consultation document Planning for Traveller Sites (2011) indicates the impact of provision to meet the accommodation needs of Gypsies and Travellers is essentially local, and proposes that local authorities are best placed for determining the right level of site provision in their area, and setting targets for additional site provision based on evidence of local need.
- 5.2 Additionally, Policy 3.8B(i) of the London Plan 2011 does not provide London or borough-level targets for additional pitch provision, and in line with national proposals confirms that boroughs are best placed to assess the needs of, and

- make provision for Gypsies and Travellers, whether through new pitch provision, protection or enhancement of existing pitches, or by other means.
- 5.3 The Council does not endorse the results of the London Gypsy and Traveller Accommodation Assessment, and does not consider that it provides a robust evidence base for additional pitch provision in Ealing. As stated in the justification for Key Policy 1.2(l) of the Development Strategy, local evidence of need does not demonstrate requirement for any additional sites in the short to medium term.
- 5.4 Protection of the existing site at Bashley Road, in combination with the commitment to consider additional provision subject to evidence of need, is justified and supported by an up-to-date local evidence base, and accordingly consistent with national policy and regional policy. There is significant churn on the Bashely Road site, with three pitches having been re-let since April 2009. The waiting list at September 2011 is for four families, however one of these families is waiting for a certain pitch to become available.
- 5.5 The level of churn on the site in combination with the quality of support provided by the Council for families facing accommodation issues is therefore sufficient to address the current level of need evidenced by the waiting list. Furthermore, the borough has no unauthorized pitches or encampments, nor past precedence of such types of development. The Development Management DPD will contain a criteria based policy for the determination of planning applications for Gypsy and Traveller sites.
- 5.6 For the purposes of clarity and to better reflect to London Plan 2011 and emerging national guidance on provision of sites for Gypsies and Travellers, the Council suggests Policy 1.2(l) be revised as follows to emphasize the importance of provision based on an assessment of local needs:

1.2(l) To protect the existing Gypsy and Traveller site at Bashley Road, Park Royal, and to consider additional provision subject to local evidence of need.

The Council's reputation as a local and regional support hub for gypsies and travellers facing accommodation related issues is based on the high quality of service provision in supporting gypsies and travellers looking for accommodation suited to their needs. Historical trends show that there is sufficient churn at the Bashley Road site to cope with the current waiting list as of 2011, with no need for provision of an additional site in the short to medium term. The Council will therefore only contribute towards the provision of additional pitches in Ealing based on strong evidence of need, balanced against general housing priorities, availability of funding and the feasibility of identifying an appropriate site. Planning applications for the provision of additional Gypsy and Traveller sites will be determined against the criteria based policy included in the Development Management DPD.

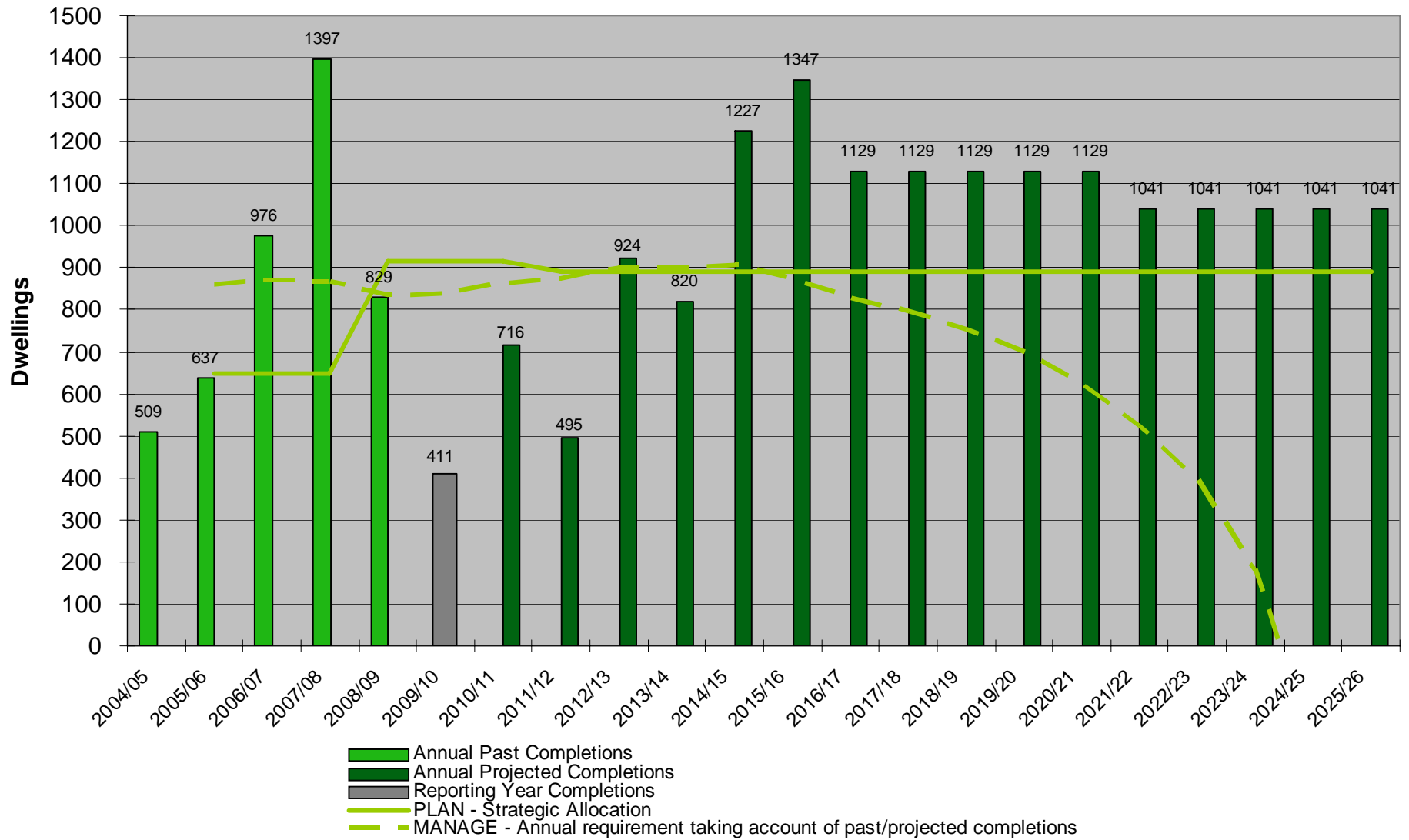
6 Lifetime Homes

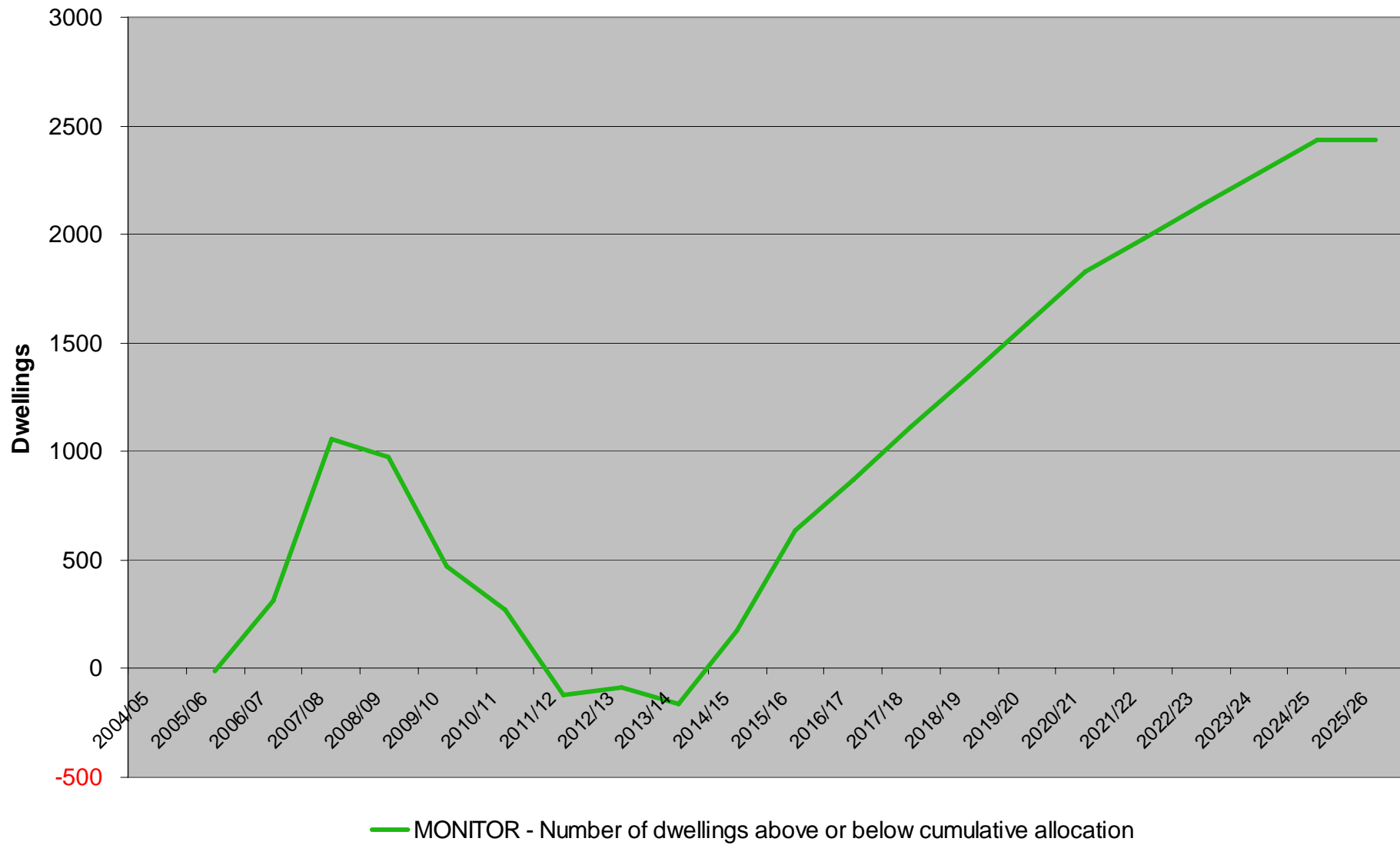
7. Should the CS refer to the provision of lifetime homes and properties to meet the needs of disabled people in line with London Plan Policy 3.8(c)?

- 6.1 Reference to provision of lifetime homes and wheelchair accessible/adaptable homes, in line with Policy 3.8B(c) and 3.8B(d) of the London Plan 2011, is provided within the borough's forthcoming Development Management DPD. The Council considers that this is the most appropriate document for inclusion of policies that relate to the detail of planning decisions.

Appendix 1 Housing Trajectory (updated June 2011)

Year of Trajectory	2004/05	2005/06	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21
Annual Past Completions	509	637	976	1397	829																	
Reporting Year Completions						411																
Annual Projected Completions							716	495	924	820	1227	1347	1129	1129	1129	1129	1129	1041	1041	1041	1041	1041
Cumulative Completions		637	1613	3010	3839	4250	4966	5461	6385	7205	8432	9779	10908	12036	13165	14293	15422	16463	17504	18546	19587	19587
PLAN - Strategic Allocation		650	650	650	915	915	915	890	890	890	890	890	890	890	890	890	890	890	890	890	890	890
MONITOR - Number of dwellings above or below cumulative allocation		-13	313	1060	974	470	271	-124	-90	-160	177	634	873	1111	1350	1588	1827	1978	2129	2281	2432	2432
MANAGE - Annual requirement taking account of past/projected completions		859	870	865	835	836	862	872	899	897	903	874	827	793	751	697	625	525	395	180	-250	-1542





Summary of Ealing's five-year supply, 2011/12 to 2015/16

Status	2011/12 Completions	2012/13 Completions	2013/14 Completions	2014/15 Completions	2015/16 Completions
Under Construction	37	181	138	208	207
Planning Permission Not Started or Subject to Legal	226	370	331	420	422
Planning Application Awaiting Decision	15	70	0	0	0
Planning Pipeline	0	86	134	382	501
Forecast Major Completions	278	707	603	1010	1130
Forecast Minor Completions (SHLAA Small Sites Capacity)	217	217	217	217	217
TOTAL DELIVERABLE COMPLETIONS	495	924	820	1227	1347
TOTAL AREA (HECTARES)	7.74	10.23	11.03	16.64	18.04

Major sites (10+ units) under construction

Sites DPD Ref	Application No.	Site Area (ha)	Site Name	Address	Net Gain	Permission Date	2011/12	2012/13	2013/14	2014/15	2015/16	Notes
ACT01	P/2011/2635 and previous	26.5	South Acton Housing Estate	Acton W3	862	2004	0	0	0	141	141	Previous phasing was 285 units in Phase 1, 287 in Phase 2 and 290 in Phase 3
EAL04	P/2008/0156	1.8	Dickens Yard	Longfield Avenue/New Broadway W5 2XA	698	Nov-09	0	0	67	67	66	Previous phasing was 200 units in Phase 1 and 498 units in Phase 2
EAL14 (part)	P/2010/0647	0	Westel House and Craven House	Uxbridge Road, Ealing W5 2BS	8	Jul-10	8	0	0	0	0	Previous phasing was 30 units in Phase 1
GREZ01	P/2008/1576	0.16	White Hart Public House	37 Greenford Road UB6 9AY	14	Nov-10	14	0	0	0	0	
HANZ02	P/2009/4174	0.18	Car Park	Highland Avenue/Hanway Road	15	Feb-10	15	0	0	0	0	
SOU08	P/2009/3160	0.9	Former Featherstone Road Primary School	Featherstone Road, Southall UB2 5AG	143	Dec-10	0	72	71	0	0	
TOTAL UNITS							37	181	138	208	207	

Major Sites (10+ units) with planning permission, not started or subject to legal agreement

Sites DPD Ref	Application No.	Site Area (ha)	Site Name	Address	Net Gain	Permission Date	2011/12	2012/13	2013/14	2014/15	2015/16	Notes
ACT05	P/2009/1648	0.4	Acton Bus/Tram Depot	283-303 Uxbridge Road W3 9QU	85	Appeal Allowed Dec 2009	0	85	0	0	0	Previous phasing was 85 units in Phase 1
ACTZ01	P/2007/1071	1.2	41-159 Bromyard Avenue	W3 7JS	281	May-08	32	100	149	0	0	Previous phasing was 281 units in Phase 1
ACTZ09	P/2008/2344	0.1	48 Lynton Road	W3 9HW	10	Sep-10	10	0	0	0	0	Previous phasing was 10 units in Phase 1
ACTZ11	P/2009/2975	0.2	Acton Central Industrial Estate	Rosemont Road W3 9HT	45	Feb-10	45	0	0	0	0	Previous phasing was 45 units in Phase 1
ACTZ12	P/2007/1154		The Creative Studios	Church Path, Acton, W4 5BJ	11	Feb-10	11	0	0	0	0	Previous phasing was 11 units in Phase 1
EAL01	P/2010/0419 P/2010/0418	4.9	Green Man Lane Housing Estate	Green Man Lane, West Ealing W13 0UF	242	Pending Legal	0	60	60	60	62	Previous phasing was 242 units in Phase 1
EAL14 (part)	P/2010/2266	0.9	Westel House and Craven House	32-38 Uxbridge Road, Ealing W5 2BS	22	Sep-10	20	0	0	0	0	Previous phasing was 30 units in Phase 1
EAL15 (part)	P/2009/3436	0.3	45A St Mary's Road/Warwick Plan	W5 5RG	7	Jun-10	7	0	0	0	0	
EAL17	P/2010/3704	0.9	Cinema	59-63 New Broadway, W5 5AH	190	n/a	0	0	0	0	0	Previous phasing was 8 units in Phase 1 and 182 units in Phase 3
EAL18 (part)	P/2009/0938		48 The Mall	Ealing W5 3TJ	9	Oct-09	9	0	0	0	0	
HAN02	P/2010/2539	1	Hanwell Locks	St Margaret's Road/Trumpers Way, Hanwell W7 2HF	77	Oct-10	0	0	77	0	0	Previous phasing was 77 units in Phase 1
NORZ01	P/2010/1583	0.5	Phase 12 Grand Union Village	Broadmead Road UB5 6RJ	83	Apr-10	0	85	0	0	0	
NORZ02	P/2009/4007	0.2	631-635 Whitton Avenue West	Greenford UB6 ODZ	28	Aug-10	28	0	0	0	0	

NORZ03	P/2010/1380		Peel House	32-34 Church Road UB5 5AB	12	Jun-10	12	0	0	0	0		
NORZ04	P/2009/3722	0.4	Britannia Close	Northolt UB5 6JY	19	Jan-10	19	0	0	0	0		
SOU02	P/2010/3879	4.5	Golf Links Housing Estate	Fleming Road, Southall UB1 3PE	23	Mar-11	23	0	0	0	0		
SOU03	P/2008/3981	37.2	Southall Gas Works	The Straight, Southall UB1 1QZ	3750	Mar-10	0	0	0	360	360	Previous phasing was 720 units Phase 1, 950 units Phase 2 and 950 units Phase 3	
SOU09	P/2010/1567	0.8	Salisbury Depot	Salisbury Road, Southall UB2 5QJ	85	Pending Legal	0	40	45	0	0		
SOUZ06	P/2007/4416	0.3	Top Lock Depot/Norwood Yard	Melbury Avenue/Popular Avenue	10	Pending Legal	10	0	0	0	0		
							TOTAL UNITS	226	370	331	420	422	

Major sites (10+ units) undecided applications

Sites DPD Ref	Application No.	Site Area (ha)	Site Name	Address	Net Gain	Permission Date	2011/12	2012/13	2013/14	2014/15	2015/16	Notes	
ACT06	P/2009/3548	1	Colonial Drive/2 Bollo Lane	W4 5LE	48	Appeal pending (56 units)	0	48	0	0	0		
EAL12	P/2010/3471	0.3	Former St Helena's Home	51 Drayton Green Road	22	n/a	0	22	0	0	0	Previous phasing was 22 units in Phase 2	
SOUZ03	P/2009/3255	0.1	75 High Street/2-8 North Road	UB1 3DB	15	n/a	15	0	0	0	0		
							TOTAL UNITS	15	70	0	0	0	

Major sites (10+ units) in the planning pipeline and where the principle of development has been accepted

Sites DPD Ref	Site Area (ha)	Site Name	Address	2011/12	2012/13	2013/14	2014/15	2015/16	Total Plan Period	Notes
ACT04	1.4	Acton Town Hall Complex	W3 6NE	0	0	0	0	120	120	Previous phasing was 60 units in Phase 1 and 60 units in Phase 2
GRE01	1.1	Allen Court Housing Estate	Ridding Lane, Greenford UB6 0LA	0	0	10	0	0	10	
NOR01	4.5	Rectory Park Housing Estate	Northolt UB5 6BU	0	0	0	132	131	263	
NOR02	0.5	Former Mandeville School	Eastcote Lane North, Northolt UB5 4AB	0	0	50	0	0	50	
PAR01	9.9	Southern Gateway	Park Royal W3 6UP	0	0	0	250	250	1500	Previous phasing was 500 units in Phase 1, 500 units in Phase 2 and 500 units in Phase 3
SOU07	8.3	Suterwalla	Queens Road/Southbridge Way/The Green/Featherstone Road, Southall UB2 4AX	0	75	74	0	0	310	Previous phasing was 150 units Phase 1 and 160 units Phase 3
SOU16	0.3	57B Beresford Road	Southall UB1 1NL	0	11	0	0	0	11	Previous phasing was 11 units in Phase 2
TOTAL UNITS				0	86	134	382	501	6614	