

Dún Laoghaire-Rathdown County Council (dlr)

Housing Delivery Action Plan 2022 - 2026



Rosemount Court, Dundrum: dlr direct build

Introduction

This Housing Delivery Action Plan has been developed in line with the commitment in 'Housing for All, a New Housing Plan for Ireland' and is consistent with the targets set by the Department of Housing, Local Government and Heritage (DHLGH). It has been developed having regard to the National Planning Framework (NPF), the dlr County Development Plan (CDP) 2022 – 2028, the dlr Traveller Accommodation Programme (TAP) 2019 – 2024, the dlr Strategic Plan for Housing Disabled People 2021–2026; and the Annual Social Housing Needs Assessment (SHNA).

We have produced this target driven Housing Delivery Action Plan covering the five-year period 2022 to 2026 against the build target of 1,994 new social homes and the target of 1,057 affordable purchase and cost rental homes to be delivered by dlr. Both the future social and affordable housing delivery programmes include dlr and Approved Housing Bodies (AHBs) and the Land Development Agency (LDA) build, turnkey developments, Part V and Local Infrastructure Housing Activation Fund (LIHAF) housing delivery.

National Policy Objective 27 of the NPF requires Local Authorities to prepare a Housing Needs Demand Assessment (HNDA). The HNDA is a toolkit that allows the modelling of different scenarios to inform key decisions on housing need and supply. At the time of developing the dlr CDP, section 28 guidelines for the implementation of the HNDA were not available. Consequently, a Housing Strategy and Interim HNDA were prepared to inform Housing Policy in the County.

This Plan therefore highlights the Core Strategy and Interim HNDA figures from the CDP 2022-2028 and utilises the HNDA default assessment carried out nationally by the DHLGH.

A revised and updated HNDA is currently being carried out by dlr and is expected to be completed in July 2022.

Working in Partnership

dlr has a strong commitment to build new homes and this Housing Delivery Action Plan is ambitious and can only be delivered if all options for delivery are successful, including the acquisition of turnkey developments and land for dlr's build programme. We will need to continue to build strong strategic partnerships to achieve the targets set. We have already established good working relationships with AHBs and with the LDA to deliver housing schemes and with Private Developers to deliver Part V housing. In addition to these partnerships, 'Housing for All' provides that Local Authorities, including dlr, develop Public Private Partnership (PPP) arrangements with the National Development Finance Agency (NDFA) and AHBs to deliver mixed-tenure schemes.

Consequently, the projected delivery figures set out for social and affordable housing in this Plan include an estimate for homes to be delivered through all of these arrangements.

A revised and updated HNDA is currently being carried out by dlr and is expected to be completed in July 2022 and the Plan updated accordingly.

Population Growth

According to the Census 2016, the population of Dún Laoghaire-Rathdown was c.218,000 in 2016. The Regional Spatial and Economic Strategy for the Eastern and Midland Region projects an increased population of 241,000 (low) and 245,500 (high) by 2026.¹ It should be noted that these figures do not include additional headroom and reallocated growth as set out in the National Planning Framework (NPF). The Housing Strategy and HNDA which forms Appendix 2 of the CDP estimates new household formation based on the 'Louth Model' as required by the legislation. It is important to note that the Louth Model was predicated on the concept of house purchase affordability and does not address the issue of rental affordability. However, it is considered that rental affordability is a key issue in dlr. Assuming a constant rate of population growth between 2016 and 2026, the Housing Strategy and HNDA calculates an additional 1,375 households annually and an increase of 6,875, by 2026.² This means that dlr will continue to require 10 per cent of land zoned for residential use for social housing in accordance with Section 94(4)(d) of the Planning and Development Act 2000, as amended.

Geographical analysis of current projected delivery and approved projects

dlr is the smallest County in the State, extending to 126 square kilometres; with the administrative centre of Dún Laoghaire situated just 10 kilometres south of Dublin City. While dlr has 34.6 hectares of land available for social housing, the availability of serviced land is limited. Of the 34.6 hectares, 31.38 hectares are either not serviced, have difficulty with access or will require existing services to be diverted. In particular, lands identified for social housing in the Rathmichael/Old Connaught area (27.36 hectares) have infrastructural deficits. It will be necessary to address these deficits during the lifetime of this Plan. However, it is not anticipated that these strategic growth areas will deliver housing in the next five years. dlr has provided for the delivery of social housing on serviced land to be acquired over the lifetime of this Plan.

The social housing build target of 1,994 homes was devised by the DHLGH in line with the SHNA. The number of Households on the SHNA for 2021 is 2,458. This compares with a figure of 2,427 in 2020, 2,624 in 2019 and 2,843 in 2018. This shows an increase of 1 per cent on 2020 with an overall reduction from 2018 of 16 per cent. Increased allocations and households utilising the Housing Assistance Payment (HAP) to meet their immediate housing need contribute to this reduction.

The HNDA default assessment carried out nationally by the DHLGH indicates a projected demand for social housing of at least 2,825 new households in dlr in the five years 2022-2026 (Table 1 Column B) For the purposes of the Plan, the projected household eligibility of 2,825 is divided across the three areas in line with identified preference of the SHNA.

Table 1 highlights three geographical areas for the provision of social housing; Area 1 South-West of M50 (Ballyogan, Glencullen, Stepaside); Area 2 between M50 and N11 (Dundrum, Stillorgan, Cherrywood) and Area 3 North-West of N11 (Blackrock, Dun

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¹ Appendix 2: Housing Strategy and HNDA, Table 2.1.4. p. 28

² CDP Appendix 2. p. 58

Laoghaire, Shankill). Projected need and approved delivery of social housing are shown across the three areas which are aligned with the expressed preference of people on the SHNA. The key objective is to meet household need in a manner that facilitates personal choice. Using the information provided in the SHNA, we need to ensure that we are building the right homes in the right places and provide the right mix of properties to meet local need, to build sustainable communities both now and in the future. However, the options for delivery and the associated choices available to applicants must be taken in the context of the small size of the County, the availability of land, the dense urban suburbs in the Northern and Eastern parts of the County and the agricultural and rural areas of the Southern and Western quadrants.

Providing a range of housing options that respond to needs across the community is a priority for dlr. Housing First, Traveller-specific housing, Age Friendly Housing, Housing for Disabled People and housing designed to enable independent living will be considered as part of the household need on housing developments. The continued promotion of our 'Rightsizing' scheme will enable the best use of our housing stock.

Table 1 identifies that dlr is estimating a projected delivery of 2,318 new social homes in the period 2022 - 2026 against the target set of 1,994. When we break the demand down into the 3 dlr districts, it highlights that Area 2 (Dundrum, Stillorgan, Cherrywood) is the area with the highest expressed preference of 64 per cent. However, applicants can choose up to three areas and can therefore be considered for housing across the entire County. This is facilitated by the Choice Based Letting System (CBL).

Housing Typology

While more than 50% of the Council's current housing stock is made up of three and four-bedroom properties, dlr has been cognisant of changing demographics and the need for smaller homes. As a result, approximately 67% of all homes provided directly by dlr in the period from 2014 to 2021 have been 1 and 2-bed dwellings. The SHNA 2021 identifies that 61 per cent of people have a 1-bed housing need with a further 24.5 per cent with a two-bed need and the balance with a 3 or 4 bed need. dlr makes every effort to align delivery with housing need as can be seen on the housing development at Shanganagh Castle for example, where the unit mix is exactly in line with the identified need in the area at the time of design.

dlr will continue to align unit mix with identified need on direct-build schemes. We will also work with AHBs and the private sector through Part V to align delivery of housing with the need identified in the SHNA, where possible. However, these developments are often fully designed out and it is not always possible to match unit mix exactly with identified need.

Housing First

Housing First is a participant-centred model that focuses on ending homelessness for people who have been homeless for many years or who are particularly vulnerable. It provides housing and access to intensive and specialised support services. dlr is proactive regarding the provision of Housing First tenancies and will continue this approach to meet the DHLGH target of 85 Housing First tenancies in dlr during the lifetime of this Plan.

Traveller Accommodation

dlr is committed to meeting the accommodation needs of the Traveller Community and the current Traveller Accommodation Programme provides for an additional 14 new build homes, as well as an extensive refurbishment and improvement programme. These additional homes are included for delivery in the lifetime of this Plan.

Age Friendly Housing

dlr's Age Friendly Strategy 2021-2026 has identified the provision of lifetime-adaptable housing choices and solutions, which enable older people to live independently and safely, for as long as possible as a strategic objective. To deliver on that objective, the Housing Department has committed to increasing the provision of older person accommodation through its own build programme and in partnership with AHBs and with the private sector through Part V. dlr considers the need for Age Friendly accommodation in all its housing schemes aiming to include universal design principles in a minimum of 5% of proposed new homes in housing schemes of ten (10) or more homes. In addition, the continued promotion of rightsizing and development of specific schemes for older persons will enable the best use of our housing stock.

dlr also works to promote the development of lifetime homes by the private sector and engagement with developers commences at pre-planning stage, to encourage the delivery of lifetime homes through Part V of the Planning and Development Act 2000, as amended. This approach has led to a proposal for the delivery of a considerable number of new lifetime homes designed to universal design principles to be delivered through Part V, which is currently with the DHLGH for approval.

Housing for Disabled People

Of the 2,458 applicants on the SHNA 2021, there are 430 applicants (17.5 per cent of households) who have identified as having a disability. This is further broken down into physical (139), sensory (35), mental health (134) and intellectual (122). Not all the applicants who have a disability require individual housing as 42 of these applicants expressed a preference for a community home (usually with 3 other people). Regarding emerging need, the HSE has identified 131 people who will turn 18 over the next 5 years who may want to apply for social housing.³ This Plan is developed in line with the dlr Strategic Plan for Housing Disabled People 2021–2026 which aims to make 10 per cent of new build homes available to disabled people and commits to work in partnership with the HSE to develop community homes for independent living.

dlr will also continue to work closely with AHBs, the LDA and the private sector to increase the provision of housing for disabled persons. Given that approximately 28% of housing has been allocated to disabled persons over the last few years, dlr is committed to continuing to deliver appropriate housing for disabled persons during the lifetime of this Plan.

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³ dlr Strategic Plan for Disabled People 2021 –2026: P.16

Future Programme (Social Housing)

The social housing build programme includes the provision of housing across several schemes. Under the Social Housing Investment Programme (SHIP), dlr constructs homes on its existing land; it purchases land for social housing, where it is economical to do so; it negotiates Part V homes on private schemes; it enters arrangements for construction Turnkey Projects and purchases homes under the Buy and Renew Scheme. AHBs deliver homes under the Capital Advanced Leasing Facility (CALF) and specialist homes to vulnerable persons under the Capital Assistance Scheme (CAS). Mixed tenure schemes are also provided in collaboration with our partners, particularly the LDA and AHBs. The CDP provides that 20 per cent of land zoned for residential use, or for a mixture of residential and other uses shall be reserved for the provision of social and affordable housing as defined in Section 94(4)(a) of the Planning and Development Act 2000, as amended.⁴

Table 2 shows an estimated projected delivery of 2,318 social homes across the delivery methods and is subdivided into the 3 Areas in dlr. It includes Traveller Accommodation as per the dlr Traveller Accommodation Programme 2019-2024. Table 2 indicates that the target of 1,994 is projected to be exceeded in the lifetime of this Plan.

Table 3 shows the estimated projected delivery by year across all the delivery mechanisms. In accordance with Appendix 1 of Circular Housing 32/2021,⁵ 50% of the social housing delivery target set for dlr is to be met by AHBs. As Table 3 indicates, AHBs are projected to deliver 679 of the 2,318 social homes estimated to be delivered over the lifetime of this Plan, which equates to 23%. However, 859 social homes are estimated for delivery through Part V and as is the practice in dlr, AHBs will be nominated to acquire a percentage of these to ensure that they deliver 50% of the overall delivery total.

Addressing Vacancy

The vacancy rate for dlr at 5.5% (Census 2016) is the third lowest in the Country and is consistent with that of a normal functioning housing market. dlr has employed a Vacant Homes Officer (full-time position) to target properties that may be vacant and potentially made available for social housing through the Buy and Renew and Repair to Lease Schemes. A Vacant Homes Plan will be developed by Quarter 3, 2022. While it is not possible to specify exactly the number of vacant properties which may become available for social housing over the lifetime of this Plan, dlr has provided an estimated figure of five (5) properties per year to be delivered through Buy and Renew over the period 2023 – 2026. Dlr will also support AHBs to bring vacant homes back into reuse through the CAS scheme.

Projected HNDA Need and Proposed Delivery

Affordability is a key issue for dlr, both in terms of the ability of households to purchase a home or to rent a home at an affordable price. According to the March 2022 CSO Press Release on the Residential Property Price Index, households paid a median price

⁴ County Development Plan 2022-2028: Appendix 2: Housing Strategy and HNDA p.91

⁵ https://www.opr.ie/wp-content/uploads/2021/10/Circular-32-2021-Housing-Delivery-Action-Plans.pdf

of €280,000 for a residential property in the 12 months to January 2022. The lowest median price paid for a dwelling was €130,000 in Longford, while the highest was €595,000 in Dún Laoghaire-Rathdown.⁶ The rental situation in dlr is also pressurised with the findings from the most recent Residential Tenancy Board (RTB) Rent Report showing that within Dublin, Dún Laoghaire-Rathdown had the highest standardised average rent in Q4 2021 at €2,173 per month, while Fingal had the lowest at €1,836.⁷

The Council is progressing a programme of affordable housing and will make every effort to meet the target set for it of 1,057 new affordable homes to be delivered by the Local Authority (affordable purchase and cost rental) during the lifetime of this Plan. Our commitment is demonstrated in two mixed tenure schemes. The first at Enniskerry Road in collaboration with Respond and Tuath, is providing 50 cost rental homes in the first construction project of its kind in this Country. The second is a partnership with the LDA, which is also a first for this Country, which will deliver 306 cost rental and 91 affordable purchase homes to be delivered in stages, with the first affordable homes expected to be available in 2024.

We are committed to increasing the delivery of affordable homes in dlr through cost rental and affordable purchase options and dlr is estimating projected delivery of more than 1500 new affordable homes in the lifetime of this Plan, as per Table 5. In addition, dlr is estimating the delivery of a further 400 affordable homes by AHBs and the LDA by the end of 2026.

We are committed to increasing the delivery of affordable homes in dlr through cost rental and affordable purchase options and dlr is estimating projected delivery of more than 1500 new affordable homes in the lifetime of this Plan, as per Table 5. In addition, dlr is estimating the delivery of a further 400 affordable homes by AHBs and the LDA by the end of 2026.

The Local Authority Affordable Purchase Scheme will be introduced to allow first time buyers and some other categories to buy homes in Local Authority schemes at reduced prices, with Local Authorities holding an equity stake in the home. This will apply to mixed tenure/affordable schemes as identified during the lifetime of this Plan. Regulations to support the delivery of affordable housing were signed into effect on 13th April 2022.

We are keen to continue working with the private sector to provide additional Part V homes as per the Affordable Housing Act 2021. The Act made amendments to Part V of the Planning and Development Acts 2000 to 2020 to provide for 20 per cent of new developments, with at least 10 per cent social and the remainder for affordable homes for purchase/cost rental or both. The requirement applies to new developments of 5 or more houses where the:

- Land was purchased after 1 August 2021;
- Land was purchased before 1 September 2015 and gets planning permission after 2 September 2021;

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 $\frac{\text{https://www.cso.ie/en/csolatestnews/pressreleases/2022pressreleases/pressstatementresidentialpropertypriceindex}{\text{january2022/}}$

https://www.rtb.ie/images/uploads/general/Final Rent Index Q4 2021 V2-27 04 2022.pdf

• Planning permission is granted after 31st July 2026, regardless of when the land was purchased.

The first two points apply to the timeline of this Plan; however, it is not possible to predict with accuracy the number of affordable homes that can be delivered over the next 5 years as we do not have details of when Developers purchased lands and when/if they intend to apply for planning permission. Nevertheless, an estimate of projected delivery of approximately 100 affordable homes through Part V has been included in this Plan.

The Housing Affordability Analysis in the CDP is based on Section 93(1) of the Planning and Development Act 2000, as amended, which defines an eligible person as someone "who is in need of accommodation and whose income would not be adequate to meet the payments on a mortgage for the purchase of a house to meet his or her accommodation needs, because the payments calculated over the course of a year would exceed 35 per cent of that person's annual income net of income tax and pay related social insurance" (DEHLG, 2000:16)

The affordability analysis in Table 2.4.10 of the CDP (Appendix 2 below) projects the provision of homes required according to affordability thresholds. It highlights that of the 1,375 new households projected to be formed each year from 2022 – 2026, 28.4 per cent (390) of households will face affordability issues annually.

The HNDA default assessment carried out nationally by the DHLGH indicates a projected demand with affordability constraint of at least 3,124 new households in dlr in the five years 2022-2026. (Table 4 column B)

A revised and updated HNDA is currently being carried out by dlr and is expected to be completed in July 2022 and the Plan will be updated accordingly.

Dlr is projecting to deliver 1,549 affordable homes (706 cost rental and 843 affordable purchase) over the lifetime of this Plan. Table 5 breaks down the projected 1,549 affordable homes by the different delivery mechanisms.

It is likely that the Government's 'First Home Scheme' together with increased Part V provision and the AHB/LDA ongoing commitment to delivering affordable homes will help to address some additional affordable need.

We will continue to proactively engage with Developers regarding opportunities for partnership arrangements through un-commenced planning applications or turnkey on site developments that can be made available for affordable purchase/cost rental with the benefit of the Affordable Housing Fund and via the forthcoming shared equity scheme. dlr issued a call in November 2021 inviting expressions of interest from house builders and developers of residential developments not yet commenced in relation to entering advance purchase arrangements with dlr/AHBs for the delivery of mixed tenure schemes. It is hoped that this ongoing call will deliver substantial additional affordable homes over the next 5 years. Options to purchase land that may come to market for the provision of affordable homes will also be fully considered. However, this will be challenging in dlr, due to the scarcity and high cost of land in the County. Provision has been made for both options in the Plan.

We have identified in this Plan that dlr is projecting to exceed both the social and affordable housing targets set by the DHLGH for the period 2022 – 2026. However, the

challenge to deliver on this Plan particularly in relation to affordable housing in dlr should not be underestimated. Furthermore, it is considered that this Plan will need to be reviewed on an annual basis as it includes projected delivery for both social and affordable housing through Turnkey Developments, Part V, direct delivery on land which will have to be acquired by both dlr and AHBs.

Table 1 - Geographical Distribution of Social Housing Demand and Current Approved Delivery

Α	В	C D		Е	F	G	Н
Housing Area	No of Households on SSHA	No of Households on HNDA*	% Demand by Area	2022-2026 Target Distributed by Demand	Approved Delivery	Outstanding Delivery by Housing Area	Estimated Total Social Homes by Housing Area
Area 1	258	297	10.50%	210	376	-166	857
Area 2	1568	1808	64%	1276	253	1023	814
Area 3	632	720	25.50%	508	382	126	647
	2458	2825	100.00%	1994	1011		2318

^{*} Based on the DHLGH HNDA default assessment

See Page 4 for description of Housing Areas

	Table 2 - Future Programme Master Summary (Social Housing)											
Α	B C D E F G H I J											
Housing Area	Part V (Private and LDA)	Existing LA Landbank	Future Land Purchases	LA Turnkey	LA Buy and Renew	AHB CALF	AHB CAS	Social Homes via Mixed Tenure	Estimated Total Social Homes to be delivered			
Area 1	243	200	50	33	5	322	4	0	857			
Area 2	416	210	50	2	10	123	3	0	814			
Area 3	200	215	0	0	5	224	3	0	647			
Total	859	625	100	35	20	669	10	0	2318			

^{*}Note figures are estimated delivery

	Table 3 - Future Programme by Year (Social Housing)										
Α	В	С	D	E	F	G	Н	I			
Year	Part V (Private and LDA)	Existing LA Landbank	Future Land Purchases	LA Turnkey Development	LA Buy and Renew	AHB CALF	AHB CAS	Estimated Total Social Homes to be Delivered			
2022	129	13	0	35	0	284	2	463			
2023	239	82	0	0	5	143	2	471			
2024	200	203	0	0	5	172	2	582			
2025	85	155	50	0	5	70	2	367			
2026	206	172	50	0	5	0	2	435			
Total	859	625	100	35	20	669	10	2318			

^{*}Note figures are estimated delivery

Projected HNDA Need and Proposed Delivery										
A	В	С								
Year	Projected HNDA Need with Affordability Constraint (No. of Households)	Estimated Total Affordable Housing Delivery (No. of Units)								
2022	627	134								
2023	620	284								
2024	633	392								
2025	608	401								
2026	636	338								
Total	3124	1549								

^{*}Based on DHLGH HNDA default assessment

	Table 5 - Future Programme by Year (Affordable Housing)										
Α	B C D E F G H										
Year	LA Build Affordable Purchase LA Cost Rental Build (Affordable Purchase Fund)		AHB Cost Rental (Cost Rental Equity Loan)	LDA Affordable Purchase	LDA Cost Rental	Estimated Total Affordable Dwellings to be Delivered					
2022	0	60	0	74	0	0	134				
2023	0	196	0	88	0	0	284				
2024	103	119	130	40	0	0	392				
2025	40	135	176	50	0	0	401				
2026	64	126	0	50	0	98	338				
Total	207	636	306	302	0	98	1549				

^{*} Note figures are estimated delivery

APPENDIX 1



Draft County Development Plan 2022-2028

Appendix 2: Draft Housing Strategy and Interim HNDA

Table 2.4.8:	Income Distribution of	Annual Additional	Households 2022-2028

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Income	Model		2022			2023			2024			2025	
Band	%	Number	Income	Additional	Number	Income	Additional	Number	Income	Additional	Number	Income	Additional
1	11.57	10,049	€13,884	159	10,208	€14,301	159	10,367	€14,730	159.1	10,526	€15,172	159
2	10.54	9,154	€22,817	145	9,299	€23,501	145	9,444	€24,206	144.9	9,589	€24,933	145
3	9.48	8,233	€32,767	130	8,364	€33,750	130	8,494	€34,762	130.4	8,625	€35,805	130
4	9.60	8,338	€41,749	132	8,470	€43,001	132	8,602	€44,291	132.0	8,734	€45,620	132
5	9.74	8,459	€51,053	134	8,593	€52,585	134	8,727	€54,162	133.9	8,861	€55,787	134
6	9.56	8,303	€60,902	131	8,434	€62,729	131	8,566	€64,611	131.5	8,697	€66,550	131
7	9.81	8,520	€72,197	135	8,655	€74,363	135	8,790	€76,594	134.9	8,925	€78,892	135
8	9.58	8,320	€85,497	132	8,452	€88,062	132	8,584	€90,703	131.7	8,715	€93,425	132
9	9.78	8,494	€103,622	134	8,628	€106,731	134	8,763	€109,933	134.5	8,897	€113,231	134
10	10.34	8,980	€156,782	142	9,123	€161,486	142	9,265	€166,330	142.2	9,407	€171,320	142
	Totals	86,850	- 0	1,375	88,225		1,375	89,601		1,375	90,976		1,375

Income	Model		2026			2027			2028	00
Band	%	Number	Income	Additional	Number	Income	Additional	Number	Income	Additional
1	11.57	10,685	€15,627	159	10,824	€16,096	139	10,963	€16,579	139
2	10.54	9,734	€25,681	145	9,860	€26,451	126	9,987	€27,245	126
3	9.48	8,755	€36,879	130	8,869	€37,986	114	8,982	€39,125	114
4	9.60	8,866	€46,988	132	8,981	€48,398	115	9,096	€49,850	115
5	9.74	8,995	€57,461	134	9,112	€59,185	117	9,229	€60,960	117
6	9.56	8,829	€68,546	131	8,943	€70,603	115	9,058	€72,721	115
7	9.81	9,060	€81,258	135	9,177	€83,696	118	9,295	€86,207	118
8	9.58	8,847	€96,227	132	8,962	€99,114	115	9,077	€102,088	115
9	9.78	9,032	€116,628	134	9,149	€120,127	117	9,267	€123,730	117
10	10.34	9,549	€176,460	142	9,673	€181,753	124	9,797	€187,206	124
	Totals	92,351		1,375	93,551		1,200	94,751		1,200

APPENDIX 2



Draft County Development Plan 2022-2028

Appendix 2: Draft Housing Strategy and Interim HNDA

Table 2.4.10:	Projected Provision	of Housing	Unite according	to Affordability	Throcholde
Table 2.4.10:	Proiectea Provision	or Housing	Units according	to Affordability	Inresnoias

Year	Income Decile	Units Needed	Cumulative	Affordability Threshold	Market Band	Upper Value	% Units Per Band	Units per Market Band	Required per Allocation Band	Shortfall	Shortfall as % of Total	Allocation
ĵ.	1	159	159	€101,252	1	€208,060	2.3	32	378	347	25.2%	
	2	145	304	€166,393	2	€312,090	12.0	165	209	44	3.2%	
	3	130	434	€238,952	3			294	193			0.00182
	4	132	566	€304,453	4	€520,150	22.7	312	176	-136		
2022	5	134	700	€372,308	5	€624,180	12.8	176	63	-113		0.00188
	6	131	832	€444,133	6	€728,210	9.3	128				0.00187
	7	135	967	€526,498	7	€832,240	6.4	88				0.00184
	8	132	1099	€623,488	8	€936,270	4.0	55				
	9	134	1233	€755,669	9	€1,040,300	2.4	33				0.00163
	10	142	1375	€1,143,339	10	€1,040,300	6.7	92				
		1375						1375			28.4%	

Year	Income Decile	Units Needed	Cumulative	Threshold	Market Band	Upper Value	% Units Per Band	Units per Market Band	Required per Allocation Band	Shortfall	Shortfall as % of Total	Allocation
	1	159	159	€104,289	1	€214,302	2.3	32	378	347	25.2%	
	2	145	304	€171,385	2	€321,453	12.0	165	209	44	3.2%	
	3	130	434	€246,120	3			295	197			0.00177
	4	132	566	€313,586	4	€535,755	22.7	312	176	-136		
2023	5	134	700	€383,477	5	€642,905	12.8	176	63	-113		0.00183
	6	131	832	€457,457	6	€750,056	9.3	128				0.00182
	7		967	€542,293	7	€857,207	6.4	88				0.00178
	8	132	1099	€642,192	8	€964,358	4.0	55				
	9	134	1233	€778,339	9	€1,071,509	2.4	33				0.00158
	10	142	1375	€1,177,639	10	€1,071,509	6.7	92				
		1375						1375	1		28.4%	