

## **Explanatory Memorandum to the Homelessness (Priority Need and Intentionality) (Wales) Regulations 2022**

This Explanatory Memorandum has been prepared by the Climate Change and Rural Affairs Group and is laid before Senedd Cymru in conjunction with the above subordinate legislation and in accordance with Standing Order 27.1

### **Minister's Declaration**

In my view, this Explanatory Memorandum gives a fair and reasonable view of the expected impact of the Homelessness (Priority Need and Intentionality) (Wales) Regulations 2022. I am satisfied that the benefits justify the likely costs.

Julie James MS  
Minister for Climate Change  
27 September 2022

## **PART 1**

### **1. Description**

The Homelessness (Priority Need and Intentionality) (Wales) Regulations 2022 [“the draft Regulations”] amend section 70(1) of the Housing (Wales) Act 2014 (“the 2014 Act”), to include a person who is street homeless, and a person with whom that person who is street homeless may reasonably be expected to reside, as a description of person having a priority need for accommodation under Part 2 of the 2014 Act.

The Homelessness (Intentionality) (Specified Categories) (Wales) Regulations 2015 (“the 2015 Regulations”) provide for specified categories of persons a local authority can choose to have regard to when making a decision on whether or not someone is intentionally homeless. The draft Regulations also add a person who is street homeless, and a person with whom that person who is street homeless may reasonably be expected to reside, as a further specified category of person to the 2015 Regulations.

### **2. Matters of special interest to the Legislation, Justice and Constitution Committee**

None.

### **3. Legislative background**

Priority Need - Section 72(1)(c) of the 2014 Act enables the Welsh Ministers to specify further descriptions of persons as having a priority need for accommodation. There are at present ten descriptions of persons as having priority need for accommodation set out at section 70(1).

Intentionality - Section 78(2) of the 2014 Act provides that when assessing an applicant for help with homelessness, a local housing authority may not have regard to whether or not an applicant has become homeless intentionally for the purposes of sections 68 and 75, unless it has decided to have regard to one or more of the categories of applicants specified by the Welsh Ministers. Section 78(1) of the Act places an obligation on the Welsh Ministers to make regulations to specify such categories.

The 2015 Regulations specify categories of applicants for the purposes of section 78. This list is in regulation 2. It is based on section 70 of the Act, which sets out the list of persons who have a priority need for accommodation.

### **4. Purpose and intended effect of the legislation**

The purpose of the draft Regulations is to amend section 70(1) of the 2014 Act, so that a person who is street homeless, and a person with whom the person who is street homeless may reasonably be expected to reside, will be considered as having priority need for accommodation.

The draft Regulations will rely on the 'street homeless' definition that is currently included in section 71(2) of the 2014 Act. That definition is as follows:

'street homeless' ('digartref ac ar y stryd'), in relation to a person, means that the person has no accommodation available for the person's occupation in the United Kingdom or elsewhere, which the person –

- a) is entitled to occupy by virtue of an interest in it or by virtue of an order of a court,
- b) has an express or implied license to occupy, or
- c) occupies as a residence by virtue of an enactment or rule of law giving the person the right to remain in occupation or restricting the right of another person to recover possession.

The effect of the amendment is that a local authority will be able to continue adopting homelessness assistance policies which closely follow the emergency homelessness response to the coronavirus pandemic. Since March 2020, the 'no-one left out' approach saw local authorities treating people who are street homeless, during the Covid 19 pandemic period, as being vulnerable as a result of some 'special reason' and thereby being in priority need for accommodation. The Covid 19 pandemic being the 'special reason'.

In practice, to reduce the public health risks to those presenting as homeless to a local authority, homelessness assistance has been provided to all.

As a consequence of the draft Regulations, persons who are street homeless, and those persons with whom a person who is street homeless may reasonably be expected to reside will be in priority need. This change will be consistent with the aims of the Welsh Ministers that there will be no going back to homelessness policy and practice that existed before the pandemic<sup>1</sup>.

The draft Regulations will also affect how a local authority, when determining a homelessness application, chooses to have regard to whether a person who is street homeless is intentionally homeless. Making this amendment will ensure consistency of treatment between people who are street homeless, and the other categories of people listed in the 2015 Regulations.

## **5. Consultation**

Section 72(3) of the 2014 Act requires the Welsh Ministers to undertake a consultation if they wish to amend the Priority Need categories. No such requirement is needed for changes to rules affecting intentionality. However, the Welsh Government considered that a consultation exercise should be carried out in relation to amendments affecting the draft Regulations as a whole, as well as a second potential Statutory Instrument covering possible changes to the

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<sup>1</sup> [Plenary 30/11/2021 - Welsh Parliament \(assembly.wales\)](https://www.assembly.wales/plenary/30/11/2021)

Homelessness (Suitability of Accommodation) (Wales) Order 2015 (the latter will be considered at a later date).

A six-week consultation exercise started on 9 May and concluded on 20 June<sup>2</sup>. This shorter consultation period was considered to be appropriate due to the limited changes to policy and practice, which if agreed will reflect a continuation of practical arrangements established since the beginning of the pandemic.

51 responses were submitted during the consultation period with a further five responses coming in after the consultation closed and have been considered by officials. Responses were provided by public sector, third sector and representative organisations as well as individual respondents. 25 responses were provided where no name or organisation was given or where the respondent asked for their response to be treated anonymously.

Feedback from respondents reaffirmed a strong commitment to the Welsh Government's no-one left out policy and to the addition of a 'person sleeping rough' as an 11<sup>th</sup> category of priority need as a means of fulfilling the policy. The definition proposed by the consultation (similar to the definition used for the annual rough sleeping data count) of a person sleeping rough was more contested in responses. This reflected the need for the definition to be more accurate in terms of who that person may be and in describing the practicalities in its use. The concerns were primarily focussed on the unfamiliar terminology, the time period of homelessness and whether sofa surfing and being without access to accommodation should be classified within the definition. There were also concerns about a local authority having sufficient discretion to meet their duties and the significance of developing appropriate guidance to describe a person sleeping rough, how best to verify the provision of services and manage instances of anti-social behaviour within accommodation.

The responses to the consultation have been carefully considered in the development of the draft Regulations. The arguments made against the definition of persons sleeping rough informed our willingness to adopt the description of street homelessness provided by section 71(2) of the 2014 Act. The Welsh Government has also accepted the arguments for guidance to augment the draft regulations in explaining key terms, such as street homelessness and in addressing the provision of services and anti-social behaviour. Guidance will be developed once the draft regulations are agreed.

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<sup>2</sup> [Post pandemic interim homelessness measures | GOV.WALES](#)

## **PART 2 – REGULATORY IMPACT ASSESSMENT**

### **6. Options**

In regard to the draft Regulations, the Welsh Government has considered a number of possible options. These include:

- i. A return to pre-pandemic arrangements as the Covid 19 pandemic as a 'special reason' is of less relevance,
- ii. Removing priority need entirely, and
- iii. Making the legislation (the preferred option) by adding a person who is 'street homeless' as a new priority need category.

### **7. Costs and benefits**

Option 1: A return to pre-pandemic arrangements as the Covid 19 pandemic as a 'special reason' is of less relevance

This option would potentially have the least immediate costs to local authorities and their partners currently providing homelessness assistance in Wales. With local authorities able to apply the current Guidance and possibly determine that the Covid 19 pandemic no longer presents a special reason which renders street homeless persons vulnerable and therefore in priority need. This could result in the obligation to provide temporary accommodation in addition to homelessness assistance being unapplicable. Whilst this might lead to a financial saving, it would result in many returning to the fringes of society and more precarious forms of homelessness or sleeping rough and likely incur a greater cost to public services as a whole.

The pandemic has proven to be one of the most challenging periods ever experienced by teams providing assistance to people at risk or who have been made homeless. However, without the 'no-one left out' approach many individuals, who were unknown to service providers, would not have been eligible to receive temporary accommodation and would have been unlikely to have sought assistance and their life chances might have worsened. There are significant dangers that people ineligible for temporary accommodation 'disperse' into society the benefit and savings through a range of preventative actions, such as in accessing health services, financial and employment support and having the stability of a secure and settled home to reintegrate into communities will be lost. The precise costs associated with these preventative measures are not currently known as they have yet to be evaluated in Wales. However, social research<sup>3</sup> has provided estimates of likely savings made from reduced use of outreach services for people who are rough sleeping and on wider services, such as those for physical and mental health, substance misuse and criminal justice. Over a five-year period, this would lead to a combined average saving of nearly £5m for Welsh local authorities and the wider public sector.

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<sup>3</sup> [Review of Priority Need in Wales \(gov.wales\)](https://gov.wales/review-of-priority-need-in-wales)

Due to the lost opportunities from this option and its inconsistency with the priorities of the Welsh Ministers and the evidence and arguments developed by the Homelessness Action Group<sup>4</sup> to encourage a transformation in homelessness services, we have rejected this option.

#### Option 2: Remove priority need entirely

The ‘no-one left out’ approach took place almost overnight and was an essential change to mitigate the public health emergency created by the pandemic. Since then, local authorities and partners have adapted remarkably in providing homelessness assistance to all who need it. However, the radical changes we have seen has resulted in significant pressures on those local authority teams. We recognise the strong arguments in favour of removing priority need entirely, but for this to happen a more considered evaluation should be completed, which we consider is likely to require primary legislation. This will give local authorities and their partners, those providing front line services, an opportunity to shape the settled working arrangements for homelessness services into the future, which could include alternative and more effective options.

The Welsh Government’s Ending Homelessness Action Plan<sup>5</sup> committed to evaluate existing homelessness prevention legislation, including that relating to priority need. This exercise is expected to examine legislative and non-legislative options. Whilst it may prove possible to remove priority need directly, through a change to legislation, there may be alternative approaches to consider instead, via amendments to subordinate legislation and guidance or a funding mechanism which manages to reduce demand on services. Given these possible options and the significance of ending priority need, careful consideration should be made of the best approach.

For the reasons outlined, we have rejected this option at this time.

#### Option 3: Make the legislation

The emergency homelessness response, put in place in recognition of the potential impact homelessness and rough sleeping could have on the health emergency, involved additional funding to local authorities and partners, to ensure that the provision of accommodation, together with support, was prioritised as part of the wider public health response. Latest management data<sup>6</sup> show that the ‘no-one left out’ approach has resulted in over 24,000 people who were previously homeless being supported into temporary accommodation. Since the beginning of the pandemic to the present day, reported numbers of people who are sleeping rough have varied from a low of 51 in February 2021 to a high of 131 in October 2021.

As outlined in section 4 of this document, the ‘no-one left out’ approach, leading to local authorities adopting a ‘neutral’ approach to priority need for people at

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<sup>4</sup> [Homelessness Action Group: report July 2020 \(gov.wales\)](https://gov.wales/homelessness-action-group-report-july-2020)

<sup>5</sup> [Ending homelessness in Wales: a high level action plan 2021 to 2026 | GOV.WALES](https://gov.wales/ending-homelessness-in-wales-a-high-level-action-plan-2021-to-2026)

<sup>6</sup> [Homelessness accommodation provision and rough sleeping | GOV.WALES](https://gov.wales/homelessness-accommodation-provision-and-rough-sleeping)

risk or experiencing street homelessness and in essence providing homelessness assistance to all, represents a radical transformation of homeless prevention services in Wales. A similar change in Scotland<sup>7</sup>, which took place over a period of years around eight years, via the Homelessness etc. (Scotland) Act 2003, has been achieved almost overnight in Wales.

Comparing arrangements in Scotland with 'no-one left out' in Wales and evaluating the precise effect is challenging given the differences in the speed at which those changes happened as well as the differing policy, practice and circumstance (due to the pandemic) between both countries. However, social research undertaken on behalf of the Welsh Government provided an assessment of potential costs specific to the inclusion of the priority need test for people who are sleeping rough. Although this work was published in October 2020, the research and analysis was undertaken before the pandemic. Nevertheless, we consider that the potential impact calculated provides some insight as to the costs that may result from the amendments. The summary of estimated impacts of treating people who are rough sleeping as having a priority need found that the combined annual cost for all local authorities from:

- Additional demand for temporary accommodation was £157,794
- Additional cost of securing accommodation was £3,434
- Additional housing benefit expenses was £417,096
- Savings from reduced outreach and other services (e.g., health) use £827,396

The estimate was based on an assumption that 178 households would benefit from being in priority need. However, those benefitting from the no-one left out policy have been a significantly larger group than the estimated numbers of rough sleepers and the calculated costs are far less than the funds provided to local authorities through Welsh Government grant schemes since the start of the emergency pandemic response. From April 2020, on average, £2m per month was awarded to local authorities in Wales for the provision of temporary accommodation and related support. An alternative measure of the costs of extending priority need from the social research comes from the calculation for its abolishment over a five-year period, which was estimated as affecting 1,989 households. This concluded the combined annual cost for all local authorities from:

- Additional demand for temporary accommodation was £1,691,304
- Additional cost of securing accommodation was £38,904
- Additional housing benefit expenses was £4,635,924
- Savings from reduced outreach and other services (e.g., health) use £4,970,636

These estimates, which, show the costs that might have occurred had the pandemic not occurred, come more closely to the experience of managing the no-one left out policy. However, looking forward to estimating the probable costs associated with the proposed amendments, a number of the costs

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<sup>7</sup> [Review of Priority Need in Wales \(gov.wales\)](https://gov.wales)

associated with the resulting changes they make will have been incurred during the pandemic, when the no-one left out policy was initiated. For example, expenditure on the recruitment of staff, procurement of and investment in accommodation and broader funding of housing and homelessness services will have been made in differing degrees. Consequently, the impact is more likely to be found through the retention rather than creation of services.

Prior to the pandemic, the Crisis Homelessness monitor<sup>8</sup> estimated that almost 9,000 people made up the total 'core homeless'<sup>9</sup> population in Wales. Future projections suggest that in 2023 homelessness in Wales may peak at more than 10,000 before reducing to around 9,500 up to the mid 2030s. Such estimates come with caveats and a variety of interventions, through increasing housing supply, Housing First models of provision, welfare change and wider economic and social factors, capable of affecting the eventual numbers. A further indicator of demand comes from current local authority management data, which shows that almost 8,000 people are currently living in temporary accommodation<sup>10</sup>.

We consider that a key calculation is understanding the experiences of those who apply for homelessness assistance through the different stages of support required. Whilst individuals will be eligible for the 'full duty', not all require such assistance and for others who present to a local authority, there may be no duty to which they are eligible. However, we consider that a local authority will still be faced with costs associated with dealing with presentations, on account of the amendments, that lead to a full duty (and associated assistance) or none at all.

Calculating the impact of the addition of people who are sleeping rough to the list of people in priority need will therefore not be limited to a relatively small cohort of around 90 people (the recorded average of people sleeping rough since August 2020 based on management data). We expect that the amendments made will result in a larger group who would otherwise have been hidden, now becoming eligible for homelessness assistance. Since the pandemic, local authority homelessness assistance has been provided to individuals in line with their duties to secure accommodation under section 73 of the 2014 Act. We consider that the amendments will mean this provision continues and the numbers provided with assistance through section 73 provide a proxy for assessing the likely costs.

Annual data returns from Stats Wales<sup>11</sup> illustrate the number of households assessed as homeless and owed a duty to help secure accommodation (through the section 73 duty). These data can be used compare experiences before and during the pandemic, for 2018-2019, 2019-2020 and 2021-2021

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<sup>8</sup> [CoreHomelessnessProjections2021\\_TechReport\\_ScWa2\\_002\\_.pdf \(hw.ac.uk\)](#)

<sup>9</sup> The Homelessness Monitor defines the core homelessness population as those who are rough sleeping, living in hostels, etc., living in unsuitable temporary accommodation and sofa surfing

<sup>10</sup> [Homelessness accommodation provision and rough sleeping: April 2022 | GOV.WALES](#)

<sup>11</sup> [Households for which assistance has been provided by outcome and household type \(gov.wales\)](#)



respectively. Unfortunately, the returns to cover 2021-2022, at which point the impacts of the pandemic were starting to ease are not yet available.

	2018-19	2019-20	2020-21
Outcomes	Number	Number	Number
Successfully relieved	4,779	5,088	5,088
Unsuccessful relieved	4,428	4,512	5,139
Assistance Refused	123	123	129
Non-co-operation	585	576	495
Application Withdrawn	591	714	828
Application withdrawn due to loss of contact	1,062	1,221	1,299
Other Reasons	147	165	183
<b>Total Outcomes</b>	<b>11,715</b>	<b>12,399</b>	<b>13,161</b>

The table shows the increase in numbers of households eligible for homelessness assistance through the section 73 duty. The rate of increase for the two years before the pandemic<sup>12</sup> rose respectively by 3% and 4% each year and is noticeably lower than the rate of increase since, which has risen by 6%<sup>13</sup>.

The pandemic has provided a clearer picture of the number of people who are homeless. However, with the easing of public health restrictions and associated public attitudes it is possible that those who were hidden prior to the pandemic, such as people sofa surfing, will revert from being supported by local authorities and partners, to relying instead on social networks to provide somewhere they can live. Given this uncertainty it is difficult to determine whether there will be significant further changes. Consequently, we consider that the core homeless population will remain relatively stable level for the time being.

Although demand for homelessness assistance may not alter significantly, there are multiple factors affecting the capacity and capability of a local authority. These include efforts to recover from the pandemic, cost-of-living pressures, affordability of rents in the private rented sector and arrival of groups of people in the UK, particularly those affected by the war in Ukraine. The combination of these factors means there is little capacity to allow for an immediate acceleration of people from temporary accommodation into settled and secure homes.

<sup>12</sup> 2017-2018 and 2018-2019

<sup>13</sup> 2019-2020 and 2020-2021

Estimates within the Explanatory Memorandum for the Housing (Wales) Act 2014 calculated costs to local authorities providing homelessness services to applicants for the 2015-16 period. These costs have been up-rated to reflect inflation during the intervening period and are used in this RIA to estimate the cost a local authority might incur for those who seek homelessness assistance.

This provision of homelessness services would involve an initial assessment for those applicants that are either not homeless or ineligible for assistance. The cost of this assessment is assumed to be £428.40 per “ineligible” applicant and £214.20 for an individual who was considered as “not homeless”. When fulfilling the prevention duty as prescribed by the 2014 legislation, costs are estimated to be £1,112 per applicant.

There is a duty to relieve homelessness to applicants for whom prevention fails or who are deemed to be homeless upon presentation. The duty to relieve homelessness is assumed to have no additional cost for those applicants who have already been through the prevention duty.

For cases in which the duty to relieve homelessness is not successful, applicants who may be considered as “eligible, homeless, in priority need and unintentionally homeless” and for whom action to relieve homelessness is unsuccessful, will be entitled to a full duty at a cost of £2,274 per applicant (£2,702.40 less the cost of an assessment of £428.40). These higher costs will be incurred for households eligible for homelessness assistance through the section 73 duty and it is necessary to estimate the potential range of increase.

As a precise calculation of costs to local authorities is not made annually, we have estimated based on numbers of people requiring services. These costs are shown in Annex A. It should be noted that there will be variation amongst local authorities, who will experience different costs to reflect the demand on services. This means that, for example, Cardiff will receive a higher number of homelessness applications than Monmouthshire and funding requirements will consequently be larger. Based on the assumption of little further change to service demand and that the amendments will result in a continuation of existing pressures rather than creation of new ones, we believe that the costs to local authorities should be assessed as ranging between a positive range of growth of between 1.5%, 3% or 6% from current levels. This will account for factors affecting growth, such as cost-of-living, migration and rent increases versus potential mitigation of pandemic/public health concerns reducing, various housing interventions like Housing First, rapid rehousing and capital investments in one-bedroom homes making progress.

Based on the three rates of cost increase, the differences resulting range from £30,377,036 in 2021/2022 to £32,241,078 by 2025/2026, based on a 1.5% increase, to an increase of £31,723,801 in 2021/2022 rising to £40,050,568 by 2025/2026, based on the 6% rate. Due to the variety of factors which could impact on the eventual costs to a local authority, we estimate that a final figure may fall within these ranges.

## Benefits

Section 4 of this Explanatory Memorandum describes the benefits which are likely to result from the amendments to be made by the draft Regulations. In a broad sense, we anticipate that the resulting outcome will be a continuity of the type of homelessness assistance provided to those who are street homeless since the beginning of the pandemic period, which is a key priority for the Welsh Ministers, to reduce the risk of homelessness, and should it occur, ensure that it is rare, brief and unrepeatable.

The benefits of preventing homelessness extend well beyond the actual, additional, costs of helping people who are homeless, for example, the cost of providing them temporary accommodation. There have been multiple studies<sup>14151617</sup> examining the costs associated with providing homelessness assistance, which recognise the significant savings which might be made from effective intervention. Effective homelessness services can provide benefits that may last someone's lifetime. They include better health and well-being, child development and education, and adults' participation in the labour market and contribution to economic output. As a result, the demands on some services, local authority homelessness services and the NHS and social care services for example, can be reduced. The benefits have been shown to outweigh the costs, often to a significant degree, particularly given that someone who is street homeless will rarely experience that disadvantage alone. Many individuals will also be negatively affected by their mental health and substance misuse. The longer those experiences are felt, often the harder it will become to recover, which will require even greater support and cost.

Benefits of effective action will contribute to the achievement of several Welsh Government Acts, such as the Social Services and Well-being (Wales) Act 2014, Well-being of Future Generations (Wales) Act 2015, and the Ending Violence against Women and Domestic Abuse (Wales) Act 2015.

## 8. Competition Assessment

Not applicable.

## 9. Post implementation review

The Welsh Government has established an expert review panel to consider housing and homelessness policy and law in Wales. One element of the Panel's remit will be to consider options in connection with rules affecting people with priority need for accommodation. We anticipate that once the work of the Panel has ended, we will have an evidence base to evaluate the Regulations.

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<sup>14</sup> [At what cost? | Crisis UK | Together we will end homelessness](#)

<sup>15</sup> [Better than cure? | Crisis UK](#)

<sup>16</sup> [Hard-Edges-Mapping-SMD-2015.pdf \(lankellychase.org.uk\)](#)

<sup>17</sup> [assessing the costs and benefits of crisis- plan to end homelessness 2018.pdf](#)

**Annex A**

Period	Outcome										
	£428.40 per “ineligible” applicants		£214.20 per applicant considered as “not homeless		£1,112 per applicant eligible to assistance in accordance with the prevention duty		<i>£2,274 per applicant Eligible, homeless, subject to duty to help to secure (Section 73)</i>		£2,274 per applicant who may be considered as eligible, homeless, in priority need and unintentionally homeless (Section 75)		
	Number	Cost	Number	Cost	Number	Cost	Number	Cost	Number	Cost	
2016-2017	450	£192,780	4752	£1,017,878	9231	£10,264,872	10908	£24,804,792	2073	£4,714,002	
2017-2018	387	£165,791	4194	£898,355	9072	£10,088,064	11277	£25,643,898	2226	£5,061,924	
2018-2019	408	£174,787	3819	£818,030	10737	£11,939,544	11715	£26,639,910	2631	£5,982,894	
2019-2020	321	£137,516	3948	£845,662	9993	£11,112,216	12399	£28,195,326	3060	£6,958,440	
2020-2021	303	£129,805	3735	£800,037	7290	£8,106,480	13161	£29,928,114	3792	£8,623,008	
2021-2022	1.5%	308	£131,752	3791	£812,038	7399	£8,228,077	13358	£30,377,036	3849	£8,752,353
	3%	312	£133,699	3847	£824,038	7509	£8,349,674	13556	£30,825,957	3906	£8,881,698
	6%	321	£137,594	3959	£848,039	7727	£8,592,869	13951	£31,723,801	4020	£9,140,388
2022-2023	1.5%	312	£133,729	3848	£824,218	7510	£8,351,498	13559	£30,832,691	3907	£8,883,638
	3%	321	£137,710	3962	£848,759	7734	£8,600,165	13963	£31,750,736	4023	£9,148,149
	6%	340	£145,849	4197	£898,922	8191	£9,108,441	14788	£33,627,229	4261	£9,688,812
2023-2024	1.5%	317	£135,734	3906	£836,581	7623	£8,476,771	13762	£31,295,182	3965	£9,016,893
	3%	331	£141,842	4081	£874,222	7966	£8,858,170	14381	£32,703,258	4144	£9,422,594
	6%	361	£154,600	4448	£952,857	8683	£9,654,947	15675	£35,644,863	4516	£10,270,140
2024-2025	1.5%	322	£137,771	3964	£849,130	7737	£8,603,922	13969	£31,764,609	4025	£9,152,146
	3%	341	£146,097	4204	£900,449	8205	£9,123,915	14813	£33,684,356	4268	£9,705,271
	6%	383	£163,876	4715	£1,010,028	9203	£10,234,244	16615	£37,783,554	4787	£10,886,349
2025-2026	1.5%	326	£139,837	4024	£861,867	7853	£8,732,981	14178	£32,241,078	4085	£9,289,429
	3%	351	£150,480	4330	£927,462	8451	£9,397,632	15257	£34,694,887	4396	£9,996,430
	6%	405	£173,709	4998	£1,070,630	9756	£10,848,299	17612	£40,050,568	5075	£11,539,530

