

# Core Strategy Review - Inspectors' Matters

## Matter 3: The Housing Requirement

July 2020



**Matter 3: The Housing Requirement**

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## **Matter 3: The Housing Requirement**

# **Inspectors' Questions for Matter 3**

### **Relevant policy – SS2**

1. Has the calculation of Local Housing Need been undertaken correctly?
2. Is the base date of 2019/20 appropriate having regard to the use of the 2018 affordability ratio? Should the base date be 2018/19 or, alternatively, should the 2019 affordability ratio be used? If so, what effect would this have on the housing requirement?
3. Are there circumstances which justify an alternative approach to the calculation the housing requirement and the use of a different method? If so, what are they and what would be the resulting housing requirement?
4. Is the use of a consistent annual average housing figure justified and appropriate, particularly having regard to the delivery of the proposed New Garden Settlement? Would a staggered requirement be justified and if so, what should that be?
5. Is the inclusion of housing falling within Class C2 of the Use Classes Order as part of the housing requirement justified?
6. What is the level of need for accommodation falling within Class C2 and how is any such need proposed to be met?
7. Should there be a housing requirement for any designated neighbourhood areas within the District (Paragraphs 65 and 66 of NPPF)? If so, what should these be?

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# **Council's Response to Matter 3 Questions**

### **Question 1**

Has the calculation of Local Housing Need been undertaken correctly?

- 1.1. The minimum local housing need has been calculated as 13,284 dwellings for the period 2019/20 to 2036/37.
- 1.2. Folkestone & Hythe District Council considers that its calculation of the district's local housing need has been undertaken correctly in accordance with National Planning Policy Framework (NPPF) paragraph 60 and Planning Practice Guidance (PPG) paragraph 004<sup>1</sup>.
- 1.3. The Core Strategy Review (CSR) Revised Housing Need and Supply Evidence Paper (Document EB 03.10) sets out in paragraphs 2.6 to 2.14 how each stage of the standard method has been approached and calculated to identify the local housing need figure for Folkestone & Hythe district.

### **Question 2**

Is the base date of 2019/20 appropriate having regard to the use of the 2018 affordability ratio? Should the base date be 2018/19 or, alternatively, should the 2019 affordability ratio be used? If so, what effect would this have on the housing requirement?

- 1.4. The standard method approach for identifying a local housing need figure was introduced alongside revisions to the NPPF and PPG in July 2018. The standard method utilised the latest household projections within its calculation.
- 1.5. The 2016-based household projections were published in September 2018. These projections showed a slower household growth and a resultant lowering

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<sup>1</sup> Reference ID: 2a-004-20190220.

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of the overall housing need calculation across England, including Folkestone & Hythe district.

- 1.6. In response, the government amended the PPG in February 2019 to state that the older 2014-based household projections should continue to be used. Consequently, it was necessary for the council to re-calculate its local housing need figure.
- 1.7. The PPG for Housing and Economic Needs Assessment, paragraph 004<sup>2</sup>, provides a step-by-step guide for undertaking the standard method.
- 1.8. Stage 1 of the standard method sets the base year. The PPG states that the projected average annual household growth should be calculated over a ten year period. It clarifies that this should be ten consecutive years, with the current year [*emphasis added*] being used as the starting point from which to calculate growth over that period.
- 1.9. The council reviewed its local housing need figure in October 2019. As such, officers consider that the use of 2019/20 as the base year is appropriate being the current year at the time of the re-calculation.
- 1.10. Stage 2 of the standard method makes an adjustment to take account of affordability. The PPG is clear that the most recent [*emphasis added*] medium workplace-based affordability ratios, published by the Office for National Statistics (ONS) at a local authority level, should be used.
- 1.11. The Core Strategy Review was submitted for Examination in Public (EiP) on the 10 March 2020. The affordability ratio figure for 2019, was published a little over a week later on the 19 March 2020. Therefore, officers are of the view that the when the calculation was undertaken the most recent affordability ratio was used.

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<sup>2</sup>Reference ID: 2a-004-20190220.

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1.12. In light of the above, officers are confident that both the use of the 2019/20 base date and 2018 affordability ratio is appropriate and in accordance with the PPG.

### **Question 3**

Are there circumstances which justify an alternative approach to the calculation the housing requirement and the use of a different method? If so, what are they and what would be the resulting housing requirement?

1.13. The council considers that the use of the standard method is the most appropriate formula to identify the minimum local housing need for the plan period 2019/20 to 2036/7.

1.14. The PPG for Housing and Economic Needs Assessment, Paragraph 003<sup>3</sup>, states that:

*“There is an expectation that the standard method will be used and that any other method will be used only in exceptional circumstances”.*

1.15. The council considers that there are no known local ‘exceptional circumstances’ that apply to the demographic composition of the Folkestone & Hythe District (such as a prevalent student population), which would justify an alternative approach to the standard method and calculation of the identification of a minimum local housing need figure.

### **Question 4**

Is the use of a consistent annual average housing figure justified and appropriate, particularly having regard to the delivery of the proposed New Garden Settlement? Would a staggered requirement be justified and if so, what should that be?

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<sup>3</sup> Reference ID: 2a-003-20190220.

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- 1.16. Core Strategy Review Policy SS2 currently proposes a consistent annualised housing figure of 738 dwellings per annum to meet a minimum local housing need of 13,284 across the plan period to 2036/37.
- 1.17. This figure represents a significant step change from the existing Core Strategy (2013), which has an objectively assessment housing need of 350 dwellings per annum - an increase of 111 per cent.
- 1.18. The Core Strategy Review proposes to bridge this gap through the proposed delivery of a new garden settlement. It is acknowledged that it will not be straightforward to deliver the new settlement, which will require master-planning, related infrastructure and in some cases significant lead-in times.
- 1.19. A significant change in level of housing requirement, and/or where strategic sites will have a phased delivery or likely to be delivered later in the plan period, are instances recognised by the PPG for Housing Supply and Delivery, Paragraph 021<sup>4</sup>, where a stepped housing requirement may be appropriate.
- 1.20. Throughout the preparation of the Core Strategy Review, the council has endeavoured to work with developers to maintain an up-to-date housing land supply position to both ensure a robust trajectory and if necessary respond and manage the supply. The housing trajectory for the garden settlement has been guided and informed by the site promoters in regards to the expected delivery, together with prospective phasing and build rates. This is discussed in greater detail in Matter 8.
- 1.21. Since the preparation of the Core Strategy Review Submission Draft 2020 (Document EB 1.00), the promoters of the garden settlement have undertaken significant further work on site deliverability as part of their efforts to submit a revised planning application later this year. The outcome has resulted in a refinement of the anticipated project timescales, phasing and delivery rates.
- 1.22. The consequence of this has been that while the overall development potential of the garden settlement over the plan period has increased from 5,925 to 6,097

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<sup>4</sup> Reference ID: 68-021-20190722.

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dwellings, its ability to contribute towards the five-year housing land supply has somewhat diminished. This is due to a combination of first completions being deferred a year from 2022/23 to 2023/24 as well as a preference to opt for a more gradual build-up in delivery rates.

- 1.23. In response, officers have undertaken a recalculation of the council's five year housing land supply, based on the most up-to-date housing land supply information available. Appendix 2 demonstrates that if the council was to keep a housing requirement figure of 738 dwellings per annum that this would result in a five year housing land supply of 4.49 years - the equivalent of an under-delivery of 391 dwellings in the period 2019/20 to 2023/24, or an average of 72 dwellings a year.
- 1.24. Given this, the council concludes that a consistent annual average housing figure is no longer justified or the most appropriate strategy and that there is a justification for introducing a stepped trajectory, meeting the prerequisites laid out in the national Planning Practice Guidance.
- 1.25. In order to deliver a sound plan, and to produce housing targets that are realistic and achievable, the council has considered what requirements could and should realistically be contained within the Core Strategy Review. A stepped approach to housing delivery over the plan period is the most appropriate and realistic approach to meeting development needs over the plan period and ensuring that development remains plan-led. It is also the most appropriate approach to ensure that a significant increase in housing supply can be delivered. It is important to note that in considering a stepped approach, the eventual outcome at the end of the plan period remains the same – that in excess of 13,284 dwellings will be delivered.
- 1.26. Table 1.1 shows a technical approach to the whole plan delivery process and how a stepped approach to housing requirements will be implemented to reflect the fact that housing supply in short term cannot deliver sufficient numbers to meet an annualised total.



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1.27. The nature of the housing supply and the constraints that exist in the district mean that there is anticipated to be a significant peak in delivery between years 2024/25 and 2028/29 of the plan period.

	19/20	24/25	29/30	34/35	19/20
	-	-	-	-	-
	23/24	28/29	33/34	36/37	36/37
<b>Anticipated Housing Supply</b>	3,352	4,578	3,625	2,166	13,717
<b>Average per annum</b>	670	915	725	722	762
<b>F&amp;H adjusted CSR requirements</b>	3,150	4,425	3,600	2,115	13,290
<b>Average per annum</b>	630	885	720	705	
<b>Requirement with 5% buffer</b>	3,308				

Table 1.1: Proposed Stepped Housing Trajectory 2019/20 - 2036/37

1.28. Appendix 1 presents the revised Core Strategy Review housing trajectory. The trajectory can be characterised by three separate phases.

1.29. The first period (years 1 to 5: 2019/20 to 2023/24) is a mix of actual and forecast deliverable dwellings, with levels in the first two years less than the plan target principally because of slower delivery and the time required for larger strategic allocations to navigate through the planning process.

1.30. The second period (years 6 to 10: 2024/25 to 2028/29) represents a peak in housing delivery. The number of anticipated completions is estimated to be greater than 1,000 dwellings in year 6, well in excess of the plan target. It is then expected to reduce slightly in years 7 to 9 but still exceed the annual requirement of 885 dwellings as the garden settlement begins to deliver a significant quantum of housing. The trajectory does show a potential under delivery in year 10; however it is officers are confident that completions overall will remain over the 95% target set by the HDT.

1.31. The final plan period (years 11 to 15: 2029/30 to 2034/35 and beyond to 2036/37) is represented by a gradual tailing-off of developable sites, initially at

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levels at or close to the plan annualised target, before then falling away at the end of the plan period.

### Question 5

Is the inclusion of housing falling within Class C2 of the Use Classes Order as part of the housing requirement justified?

- 1.32. The council considers that the inclusion of housing falling within Class C2 of the Use Classes Order as part of the housing requirement is reasonable and justified by NPPF paragraphs 60 to 61 and the national planning practice guidance.
- 1.33. National planning policy is clear that the standard method should be used to determine the minimum number of homes needed and within [*emphasis added*] this context the size, type tenure of housing for different groups (including older people) in the community assessed and reflected as necessary.
- 1.34. The national planning practice guidance for Housing Needs of Different Groups clarifies this position in paragraph 001<sup>5</sup>, although it acknowledges that it does not break this down into the housing need of individual groups.
- 1.35. Moreover, the planning practice guidance for Housing Supply and Delivery, paragraph 035<sup>6</sup>, requires local planning authorities to count housing provided for older people, including residential institutions in Use Class C2, as part of their housing land supply.
- 1.36. The council appreciates that it may be helpful through the supporting text to Policy SS2 to provide some clarification as to the district's housing need figure, broken down to reflect the proportion that is to be made up from C2 uses in order to address the needs for specialist housing for the elderly.
- 1.37. The planning practice guidance for Housing for Older and Disabled People sets out that the contribution should be based on the amount of accommodation

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<sup>5</sup> Reference ID: 63-001-20190626.

<sup>6</sup> Reference ID: 68-035-20190722.

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released in the housing market. The level of need for accommodation falling within C2, and how this converts into the release of market housing to be counted as a proportion of the identified housing need, is addressed in detail in Question 6.

### **Question 6**

What is the level of need for accommodation falling within Class C2 and how is any such need proposed to be met?

- 1.38. The Strategic Housing Market Assessment (SHMA) (Document EB 3.20) was commissioned during the early stages of the Core Strategy Review to identify the housing Objectively Assessed Need (OAN) of the Folkestone & Hythe District.
- 1.39. The SHMA has been partly superseded by the introduction of the standard method in 2018. However, Part 2: Objectively Assessed Need for Affordable Housing (Document EB 3.30), paragraphs 6.3 to 6.15, remains the most up-to-date evidence available in relation to the housing needs for older people (Use Class C2).
- 1.40. The SHMA (Part 2) estimates that there were 1,360 units in the district in 2014; this is the equivalent to 119 units per 1,000 people aged 75 and over. This baseline was used to model a future requirement of 1,279 specialist units for the period to 2037 to ensure that this ratio is maintained.
- 1.41. The planning practice guidance for Housing for Older and Disabled People (paragraph 010<sup>7</sup>) defines specialist housing as:
  - Age restricted general market housing;
  - Retirement living or sheltered homes;
  - Extra-care housing or housing with care; and

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<sup>7</sup> Reference ID: 63-010-20190626.

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- Residential care homes or nursing homes.

1.42. As outlined in the council's response to Question 5, local planning authorities are required to count specialist housing provided for older people against their overall local housing need figure. The planning practice guidance for Housing for Older and Disabled People (Paragraph 16a<sup>8</sup>) provides the following advice as to how this should be carried out:

*“For residential institutions, to establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of adults living in households, using the published Census data.”*

1.43. The planning practice guidance provides a link to census data showing the number of households by number of adults, which can be used to calculate the average number of adults living in households.

1.44. Appendix 3 presents the census data for Folkestone & Hythe District (formerly Shepway District) where the age of the Household Reference Person (HRP) was aged 16 or over. The total number of adults has then been calculated by multiplying the number of adults per household by the number of households and this figure used to work out the average number of adults per household.

1.45. For Folkestone & Hythe District the calculations show that on average each household where the HRP is 16 or over there are 1.77 adults.

1.46. Therefore, to establish the amount of accommodation released in the housing market (and that can be counted towards the local housing need figure), the following formula has been applied:

*Number of C2 units / 1.77 = Market Housing Released*

1.47. To determine the current level of need for specialist housing for the elderly to be planned for within the remaining plan period, C2 units have been deducted

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<sup>8</sup> Reference ID: 63-016a-20190626.

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that have either been completed or granted planning permission since 2014 from the future requirement of 1,279 that was identified in the SHMA.

1.48. Table 1.2 highlights two substantial schemes.

Application Ref	Description	C2 units	C3 units ≡
Y10/0077/SH Folkestone Care Centre Completed 2018	Outline application for 127 dwellings (Class C3) and an 80 bedroom nursing home (Class C2).	80	45
Y14/0336/SH Terlingham Gardens, Hawkinge Under Construction	Erection of retirement village (C2 use) providing 69 cottages and 52 apartments.	121	68
<b>Total</b>		201	113

Table 1.2: Major planning consents for C2 schemes since 2014

1.49. Accounting for the recent delivery of specialist housing schemes for older people at Folkestone and Hawkinge, the outstanding level of need for accommodation falling within Class C2 for the plan period to 2037 is estimated to be 1,078 units – the equivalent to the release of 609 homes to the market.

1.50. Table 1.3 sets out how it is envisaged that the required quantum of specialist C2 units will be met through the emerging development plan:

Policy Ref	Number of dwellings	% to meet needs of the elderly	C2 units	C3 units ≡
Policy SS6: Garden Settlement	5,925	10% (minimum) of 5,925	1,048	592
Policy CSD9: Sellindge	350	10% (minimum)	62	35

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Policy UA14: Saltwood Care Centre	N/A	100%	82	46
<b>Total</b>				
			<b>1,192</b>	<b>673</b>

Table 1.3: CSR and PPLP site allocations for C2 uses

1.51. The minimum number of C2 units expected to be delivered through the development plan is 1,192, equivalent to 673 market homes. In addition, Table 1.4 list planning applications for C2 units that have been submitted but not yet determined.

Application Ref	Description	C2 units	C3 units ≡
Y19/0071/FH: Smiths Medical UK Boundary Road Hythe	Outline application for up to 97 dwellings (Class C3) up to 153sqm of offices (Class B1) and up to a 66 bed care home (Class C2).	66	37

Table 1.42: Major planning applications for C2 uses - not determined

- 1.52. Overall, the anticipated supply of C2 units over the plan period to 2036/37 is estimated to be 1,258 or the equivalent to 710 market houses. This is an over-provision of 180 units or 101 market homes.
- 1.53. In light of the evidence presented, the council is confident that the Core Strategy Review can meet and even exceed the identified specialist C2 needs in full.

### Question 7

Should there be a housing requirement for any designated neighbourhood areas within the District (Paragraphs 65 and 66 of NPPF)? If so, what should these be?

1.54. The council considers that in the context of the preparation of the Core Strategy Review, it is not necessary to set a housing requirement for any of the designated neighbourhood areas within the district.

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- 1.55. NPPF paragraph 23 sets out the government’s clear expectation that local plans should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs in full over the plan period.
- 1.56. Through the preparation of the Core Strategy Review and the Places and Policies Local Plan, the council has established a preferred spatial strategy for the district that has been informed by the Growth Options Report (Documents EB 04.20 and EB 04.21), and is supported by a range of strategic, medium and small housing allocations. The combination of these allocations exceed the minimum local housing need figure of 13,284 dwellings for the Folkestone & Hythe district.
- 1.57. As part of developing a strategy, NPPF paragraph 65, places a duty on local planning authorities to set out a housing requirement figure for designated Neighbourhood Areas through their local plans, which reflects the overall strategy for the pattern and scale of development and any relevant allocations.
- 1.58. However, the planning practice guidance for Neighbourhood Planning, paragraph 044<sup>9</sup> clarifies that neighbourhood plans should not re-allocate sites that are already allocated through these strategic plans. It also states at paragraph 101<sup>10</sup> that there is “*no set method*” for calculating the housing requirement, and that the general policy-making process approach can continue to be used to direct development.
- 1.59. The council considers from the National Planning Policy Framework and the national planning practice guidance that the principal purpose of identifying a housing requirement figure for a designated neighbourhood area would be for a neighbourhood plan to:
- Allocate sites where only a local plan has or is being prepared and a portion of the housing requirement is still to be identified through the

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<sup>9</sup> Reference ID: 41-044-20190509.

<sup>10</sup> Reference ID: 41-101-20190509.

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preparation of a separate site allocations development plan document; or to

- Allocate 'reserve sites' as a preferred / alternative approach should a future review of the local plan reveal that a site previously allocated is no longer suitable, available or deliverable to ensure that the emerging evidence of housing need is addressed.

- 1.60. Since the introduction of neighbourhood planning by the Localism Act in 2011, the council has received a total of five applications for neighbourhood area designations between 2012 and 2014. Successful applications for neighbourhood area designations were made by Hythe (2012), New Romney (2013), St Mary in the Marsh (2013), Lympne (2013) and Sellindge (2014).
- 1.61. To date, the St Mary in the Marsh Neighbourhood Plan is the district's only adopted Neighbourhood Plan, following a successful examination and referendum in 2018.
- 1.62. The St Mary in the Marsh Neighbourhood Plan allocates no sites for housing development and was prepared alongside the Places and Policies Local Plan. Places and Policies Local Plan Policy RM9 allocates a site within the neighbourhood area for 85 dwellings in accordance with the spatial strategy. The site allocation benefits from planning consent (reference: Y07/1566/SH) and is currently under construction. As a consequence, it is believed that the St Mary in the Marsh Neighbourhood Area is delivering on its housing requirement for the plan period in full. Therefore, the development requirement for St Mary in the Marsh Parish for the plan period has been assumed to be met.
- 1.63. Regarding setting out a housing requirement figure for the Neighbourhood Areas of Sellindge and Lympne, the council considers that this may prove problematic in the context of the proposed garden settlement. The new garden settlement spans the majority of these neighbourhood areas and it could prove difficult to quantify the level of requirement of each parish without limiting flexibility for future masterplanning and phasing of delivery over the plan period.



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- 1.64. For the remaining neighbouring area designations at Hythe, New Romney, Lympne and Sellindge, no progress has been made with the preparation of draft neighbourhood plans for pre-submission consultation. The council understands that neighbourhood plans are not being actively pursued for these areas.
  
- 1.65. Should any of the associated parish councils or neighbourhood forums contact the council in the future with the intention of re-engaging with the process, then the council would seek to provide an indicative figure based on the latest housing requirement figure as would be the case for any new applications for designations in accordance with NPPF paragraph 66.

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**Appendix 1: Core Strategy Review Housing Trajectory (2019/20 to 2036/37)**

	Anticipated Delivery					5 Year Capacity	Anticipated Delivery					6-10 Year Capacity	Anticipated Delivery					11-15 Year Capacity				1-18 Total
	19/ 20	20/ 21	21/ 22	22/ 23	23/ 24		24/ 25	25/ 26	26/ 27	27/ 28	28/ 29		29/ 30	30/ 31	31/ 32	32/ 33	33/ 34		34/ 35	35/ 36	36/ 37	
<b>CSR Allocations: without planning permission – Appendix 2</b>																						
Policy SS6-9: Garden Settlement	-	-	-	-	121	121	264	331	350	423	423	1,791	528	528	557	498	502	2,613	534	534	504	6,097
Policy CSD9: Sellindge Strategy (Phase 2 Site A)	-	-	-	-	-	0	15	20	20	20	20	95	20	20	20	20	13	93	-	-	-	188
<b>Total CSR – W/O Planning Permission</b>	-	-	-	-	121	121	279	351	370	443	443	1,886	548	548	577	518	515	2,706	534	534	504	6,285
<b>Existing Core Strategy and Places and Policies Local Plan – without planning permission – Appendix 3</b>																						
Policy CSD8: New Romney (Part)	-	-	19	45	48	112	32	-	-	-	-	32	-	-	-	-	-	0	-	-	-	144
PPLP (including 5% non-implementation discount)	-	45	101	201	212	559	331	230	111	76	28	776	-	-	-	-	-	0	19	47	39	1,440
<b>Total CS &amp; PPLP – W/O Planning Permission</b>	-	45	120	246	260	671	363	230	111	76	28	808	-	-	-	-	-	0	19	47	39	1,584
<b>Planning Permissions and Under Construction – Appendix 4</b>																						
Planning Permissions: Strategic	162	288	274	296	295	1,315	294	286	343	295	191	1,409	124	80	80	80	80	444	80	80	40	3,368
Planning Permissions 1-10+ Includes 5% NID	438	268	251	64	34	1,055	-	-	-	-	-	0	-	-	-	-	-	0	-	-	-	1,055
<b>Total Planning Permissions Includes 5% NID)</b>	600	556	525	360	329	2,370	294	286	343	295	191	1,409	124	80	80	80	80	444	80	80	40	4,423
<b>Windfalls Allowance</b>	-	-	-	95	95	190	95	95	95	95	95	475	95	95	95	95	95	475	95	95	95	1,425
<b>CSR Plan Total</b>	600	601	645	701	805	3,352	103 1	962	919	909	757	4,578	767	723	752	693	690	3,625	728	756	678	13,717

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### Appendix 2: Five year housing land supply with an annualised housing requirement of 738

Row	Five Year Housing Land Supply 2018/19		Total
Row 1	Annualised Figure across Five Year Period	Calculated using the Standard Methodology which uses the recently updated Housing Projections (updated 20/09/2018)	738
2	Five Year Requirement	Row 1 multiplied by 5	3690
3	Current Shortfall	The new Standard Method used to calculate housing requirements takes into account Current Shortfall past under supply, therefore there is no need to address previous under delivery or a shortfall	0
4	Five-Year Requirement plus Shortfall	Row 2 plus Row 3	3690
5	Annualised Figure with Shortfall	Row 4 divided by 5	738
6	5% buffer	Add 5% buffer as required by paragraph 73 in the NPPF. Calculate as 5% of Row 4	185
7	Total 5 Year Land Supply Figure	Row 4 plus Row 6	3875
8	Total 5 Year Land Supply Figure (Annualised)	Row 7 divided by 5	775
9	Capacity of identified sites	Capacity used is that expected to be delivered within five years, less 5% to allow for non-delivery	792
10	Extant planning permissions	Extant permissions, less 5% to allow for non-delivery.	2,501
11	Windfalls (Years 4 & 5)	This figure is calculated at 95 units per year base on work carried out by the Planning Policy Team as part of the preparation for the new Local Plan	190
12	Total Identified Supply	Total of Rows 9, 10 and 11	3,483
13	Supply Position (Years)	The number of years' supply ((Row 12 minus Row 7) divided by (Row 8)) plus 5	<b>4.49</b>

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### Appendix 3: Conversion of Use Class C2 to C3

Number of Adults per Household	Number of Households	Number of Adults
1 adult in household	18,474	18,474
2 adults in household	23,148	46,296
3 adults in household	4,288	12,864
4 adults in household	1,158	4,632
5 adults in household	244	1,220
6 adults in household	47	282
7 adults in household	12	84
8 adults in household	3	24
9 adults in household	0	0
10 adults in household	1	10
11 adults in household	0	0
12 adults in household	0	0
13 adults in household	0	0
14 adults in household	0	0
15 adults in household	0	0
<b>Total</b>	<b>47,375</b>	<b>83,802</b>
<b>Average Number of Adults per Household</b>	$83,802 / 47,375 = 1.77$	