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MELKSHAM WITHOUT PARISH COUNCIL

Clerk: Mrs Teresa Strange

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Tuesday 22 November 2022

To all members of the Council Planning Committee: Councillors Richard Wood (Chair of Committee), Alan Baines (Vice Chair of Committee), David Pafford (Acting Chair of Council), Mark Harris, Terry Chivers, Andy Russell (Acting Vice Chair of Council)

You are invited to attend the Planning Committee Meeting which will be held on **Monday, 28 November 2022 at 7.00pm** at **Melksham Without Parish Council Offices (First Floor), Melksham Community Campus, Market Place, SN12 6ES** to consider the agenda below:

TO ACCESS THE MEETING REMOTELY, PLEASE FOLLOW THE ZOOM LINK BELOW. THE LINK WILL ALSO BE POSTED ON THE PARISH COUNCIL WEBSITE WHEN IT GOES LIVE SHORTLY BEFORE 7PM.

Click link here:

<https://us02web.zoom.us/j/2791815985?pwd=Y2x5T25DRIVWVU54UW1YWWE4NkNrZz09>

Or go to www.zoom.us or Phone 0131 4601196 and enter: **Meeting ID: 279 181 5985**
Passcode: 070920. Instructions on how to access Zoom are on the parish council website www.melkshamwithout.co.uk. If you have difficulties accessing the meeting please call (do not text) the out of hours mobile: 07341 474234

Yours sincerely,

A handwritten signature in cursive script that reads "T. Strange".

Teresa Strange, Clerk

Serving rural communities around Melksham

AGENDA

1. **Welcome, Announcements & Housekeeping**
2. **To receive Apologies and approval of reasons given**
3. **Declarations of Interest**
 - a) **To receive Declarations of Interest**
 - b) **To consider for approval any Dispensation Requests received by the Clerk and not previously considered.**
 - c) **To note standing Dispensations relating to planning applications.**
4. **To consider holding items in Closed Session due to confidential nature**

Under the Public Bodies (Admission to Meetings) Act 1960, the public and representatives of the press and broadcast media be excluded from the meeting during consideration of business, where publicity would be prejudicial to the public interest because of the confidential nature of the business to be transacted.
5. **Public Participation**
6. **To consider the following Planning Applications:**
 - [PL/2022/06389](#):** Land to the rear of 52E Beanacre, Chapel Lane, Beanacre. Erection of three dwellings, with access, parking, and associated works including landscaping (outline application with all matters reserved). Applicants Ian Taylor and John Lee (**Comments by 13 December**)
 - [PL/2022/07557](#):** Snarlton Farm, Snarlton Lane, Melksham. Variation of condition 2 (approved plans) of planning permission 21/02276/VAR to make amendments to the approved scheme. Applicant Sandridge Battery Storage (**Comments by 30 November**)
 - [PL/2022/07951](#):** Redstocks Cottage, 423 Redstocks, Melksham. Two Storey Side Extension. Applicant Sarah Bussey (**Comments by 30 November**)
 - [PL/2022/08155](#):** Land to the West of Semington Road, Melksham. Outline planning permission for up to 53 dwellings including formation of access and associated works, with all other matters reserved. Applicant Terra Strategic (**Comments 6 December**)
 - [PL/2022/08300](#):** 254 Sandridge Common, Melksham. Removal of old extensions to the rear and a porch at the side of the original cottage. Replace with new extension. Remove and replace existing dormer window to rear roof. Modification of first floor window in rear elevation. New window in second floor side elevation. Applicant Clive Stell (**Comments by 19 December**)

PL/2022/08518: Kays Cottage, 489 Semington Road, Melksham. Build over part of the existing single-storey rear extension. The proposed first floor extension extends to the end of the two-storey dwelling immediately to the north (488 Semington Road). The elevations will be rendered, and the roof will be covered using Spanish slates to match the existing dwelling. Applicant Paul Williams **(Comments by 15 December)**

PL/2022/08544: 19 Lancaster Road, Bowerhill (ABC Nursery). Construction of new single storey building to the rear of the property to provide new classroom, staffroom and WC. New access to the site from the main road that includes a larger dropped kerb and part removal of verge in front of building. Applicant ABC Nursery. **(Comments by: 12 December)**

PL/2022/08762: The Willows, Lower Woodrow, Forest, Melksham. Erection of a New Garage and Storage Building. Applicant Darren Fletcher **(Comments By 19 December)**

7. **Revised Plans** To comment on any revised plans received within the required timeframe (14 days)
8. **Decision Notices:**
 - a) **New Inn (Planning Application PL/2022/07374).** To note extension to New Inn was approved and to consider a way forward with regard to Informative to contact Building Regulations.
 - b) **Land to the west of the A350 (Beanacre Road) North of Dunch Lane (Planning Application: PL/2021/05391).** Outline planning application for up to 150 dwellings. To note application has been withdrawn by the applicant.
9. **Planning Enforcement:** To note any new planning enforcement queries raised and updates on previous enforcement queries.
10. **Planning Policy**
 - a) **WALPA Update**
 - b) **Neighbourhood Planning**
 - i) Update on the Neighbourhood Plan Review and to consider any time critical requests before next Steering Group meeting
 - ii) To note Housing Needs Assessment has now been published.
 - c) **5 Year Land Supply.** To consider a request from Wiltshire Councillor Nick Holder to lobby central government to remove the erroneous 5 year land supply figure.
 - d) **Wilts & Berks Canal, Melksham Link.** To note Wiltshire Council Planning have agreed to call a meeting with the Environment Agency and the Wilts & Berks Canal Trust to discuss their outstanding objections to the current planning application.

- e) To consider including in comments back to Wiltshire Council and a policy in the Neighbourhood Plan that proposals for new housing need to increase ecological mitigation and enhancements in order to increase biodiversity and wildlife.

11. S106 Agreements and Developer meetings: (Standing Item)

a) To note update on ongoing and new S106 Agreements

i) Hunters Wood/The Acorns:

- To note update on Footpath to rear of Melksham Oak School

ii) Bowood View:

- To receive update on village hall, play area.
- To note, notes of residents meeting held on 9 November
- To approve undertaking letter/leaflet drop to residents seeking approval for a footbridge over brook into adjacent development for 144 dwellings (PL/2022/02749), permission for patio/terraced area outside village hall and permission for green space designation in the Neighbourhood Plan.

iii) Pathfinder Way:

- To receive update on Pathfinder Place Lights
- To receive update on Play Area
- To receive update following residents meeting on 29 November

iv) Townsend Farm (Rear of), Semington Road (20/07334/OUT). Appeal site for 50 affordable homes. To consider where the play area contributions should be allocated, following submission of planning application (PL/2022/08155) for 53 homes on adjacent site.

b) To note any S106 decisions made under delegated powers

c) Contact with developers.

- i) **Update on meeting held on 17 November with Living Spaces & Sovereign Housing regarding site to rear of Townsend Farm on Semington Road (20/07334/OUT) for 50 affordable Homes**
- ii) **Update on meeting to be held on 24 November to review the current housing allocation in the current Melksham Neighbourhood Plan**

Copy to all Councillors

Melksham Neighbourhood Plan Site assessment report

Prepared for: Melksham Neighbourhood Plan Steering Group

AECOM

4.21 Site 21: Beanacre: Land east of Chapel Lane

4.21.1 Site Development Potential

'Beanacre: Land east of Chapel Lane' is approximately 0.46 ha in size, and has the potential to deliver eleven dwellings. This former agricultural site is currently accessible from the existing highway network via a turning from Chapel Lane. Development of the site would result in the northern expansion of the village of Beanacre.

Topographically the site is flat, and there are short views in from residential properties at the southern boundary of the site. There are long views to the north and north-east, across the surrounding agricultural land. Long views to the west are screened by a hedgerow.

The site is not constrained by the water environment, and is outside of the boundary of any flood risk zones. Additionally, there are no heritage assets directly in or within the setting of the site, with the nearest listed building approximately 100 m to the south of the site, and screened from view by hedgerow and existing residential properties.

4.21.2 Key Constraints

In terms of access, Chapel Lane is a narrow road with a number of 'pinch points' for road access. Additionally, it exits onto a corner section of the A350, one of the busiest routes through Melksham, with safety concerns relating to poor visibility where Chapel Lane joins the A350. As such, there are a number of accessibility issues at this location.

The site is located outside of the built-up area of Melksham town and away from local shops and amenities, local schools and health centre facilities. However, there is a bus stop with regular services into the town centre located within 400 m of the site, located on the A350.

Hedgerows along the eastern and western boundary of the site provide important linkages to woodland areas to the north and west of the site.

Although the site is not constrained by flood risk issues, it is important to note that there is currently no mains drainage available within Beanacre, presenting an additional constraint to development.

4.21.3 Recommendations

Constraints to development include associated with access issues, the absence of any mains drainage, and the site's location away from the key services and facilities in Melksham town. However the site is relatively accessible by public transport. As such the site may be appropriate for taking forward for the purposes of the Neighbourhood Plan.

Site 21: Beanacre: Land east of Chapel Lane

Potentially The main constraints to development surround the access issues, its location away from the main built-up area of Melksham, possible changes to the village-scape, and the potential ecological importance of the site. Nonetheless, it is potentially suitable for development if the constraints can be resolved.

The Town and Country Planning Act 1990
Approval of Variation of Conditions
Application Reference Number: 21/02276/VAR
Decision Date: 28 April 2021

Applicant: Immersa Ltd
c/o RCA Regeneration Limited, Unit 6 De Salis Court,
Hampton Lovett, Droitwich, WR9 0QE

Particulars of Development: Variation of condition 2 of planning permission
20/06780/VAR to make amendments to the approved
scheme.

At: Snarlton Farm, Snarlton Lane, Melksham, Wiltshire, SN12
7QP

In pursuance of its powers under the above Act, the Council hereby **GRANT PLANNING PERMISSION** for variation or non-compliance with a condition or conditions imposed on an earlier permission in accordance with the application and plans submitted by you.

In accordance with paragraph 38 of the National Planning Policy Framework, Wiltshire Council has worked proactively to secure this development to improve the economic, social and environmental conditions of the area.

Subject to compliance with the following conditions:

Conditions: (12)

1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

2 The development hereby permitted shall be carried out in accordance with the following approved plans: SITE LOCATION PLAN - Drawing No 18-047/SF01 Rev A received 10.08.2020; BLOCK PLAN - Drawing No 18-047/SF02 Rev E - received 12.03.2021; ESS CONTAINERS & LV SUBSTATION PLANS & ELEVATIONS - Drawing No 647 Rev B - received 12.03.2021; SUBSTATION ELEVATIONS - Drawing No 110 Rev B - received 12.03.2021; 132v SUBSTATION PLANS & SECTIONS INCLUDING FENCING DETAIL - Drawing 109 Rev A - received 12.03.2021; CABLING DETAILS - Drawing Q20 0292_ Sandridge_05 Rev C - received 12.03.2021; Substation Specification - Plate Mounted Axial Fans

- received 22.03.2019;

REASON: For the avoidance of doubt and in the interests of proper planning.

- 3 The permission hereby granted is for a temporary period and shall expire on 29 September 2051. Within 6 months of the date of expiry of this planning permission, or sooner should the use of the site cease for a continuous period of 6 months, the battery storage units together with all the supporting and associated infrastructure including the substation and security equipment, poles and fencing shall be removed from the land and the land be restored to its former agricultural condition in accordance with a scheme of work to be submitted to, and approved in writing by, the local planning authority. The scheme of work, including a restoration plan and a decommissioning scheme shall take into account of a contemporaneous ecological survey, and shall be submitted to the local planning authority not less than six months before the removal of the installation.

REASON: To define the terms of this temporary planning permission.

- 4 No development hereby permitted shall commence until a construction traffic management plan (CTMP) has been submitted to and approved in writing by the local planning authority and the construction shall be undertaken in accordance with the approved details. The CTMP shall include:
- A) A condition survey of the site access onto the A3102 and Praters Lane Bridleway, along with a detailed programme of measures to be employed to maintain the highway/PRoW from damage. Should any damage accrue attributable to the development, all damage shall be remedied in accord with details submitted to the local planning authority within 3 months and approved in writing;
 - B) Details of the numbers, types and timing of delivery vehicles to the site;
 - C) The procedures to be employed to ensure that vehicle wheels are free of mud before entering to the highway;
 - D) Details of all deliveries entering and exiting the site involving large HGV and other large vehicles to ensure safe access and egress at the site;
 - E) Details of the site management co-ordinator who will ensure compliance with the CTMP;
 - F) How users of public right of way Bridleway shall be protected during the construction phase of works; and,
 - G) Details of how construction workers' traffic and lorry traffic shall be accommodated (including turning provision) on the site.

REASON - In the interests of highway safety and environmental protection and to define the terms of the consent.

20/07334/OUT: Land West of Semington Road, Melksham. Outline planning permission for up to 50 dwellings and formation of access and associated works (outline application to consider access with all other matters reserved). Applicant Terra Strategic

Extract from the Minutes of 5 October 2020:

Members had raised a number of concerns at the meeting with the developers on 30 September as follows:

- Highway safety with regards to pedestrians crossing the A350 both on the light-controlled crossing to the East and the informal crossing to the West of this site, both of which are dangerous. With various near misses, some involving children, being reported to the Parish Council.
- Loss of Grade 2 Agricultural land.
- The unsustainability of the site.
- Outside the settlement boundary.
- The need for proposed affordable housing to be tenant blind.
- Impact traffic calming measures will have on vehicles accessing/egressing the site.
- The impact this application would have on proposals for the Wilts & Berks canal "Melksham Link" project.
- Increased traffic using the A350, particularly since the temporary closure of Cleveland Bridge, Bath to HGVs with the potential for this application to exacerbate this further.
- That further development could take place on the piece of land currently in the developer's ownership adjacent this site, if this application were approved.
- It was noted that some residents of Townsend Farm accessed their properties to the rear and used the 'green' lane adjacent to gain access and it would appear this may be hindered by proposals for this site.

Councillor Pafford raised a concern at the impact of Wiltshire Council allowing planning approval for the Pathfinder Way development in Bowerhill, which had set a precedent for development in inappropriate locations and allowed for opportunistic applications by developers.

Councillor Pafford also felt some of the comments in the report provided by the developer were over optimistic with regards to the level of facilities available within Melksham at the current time.

Members reiterated concerns regarding the safety of pedestrians crossing the busy A350 to access Aloeric School and the town centre and the impact these plans would have on the Wilts & Berks Canal project. It was noted that the access road to this site may impact proposals for an access road to Berryfield which was included in the canal plans, with potential for two roads to be adjacent to one another.

It was understood that any significant development on the West side of Semington Road would have to contribute towards the canal, however, if this development were to go ahead this could set a precedent for future development taking place and therefore not contributing towards the canal, given the current delay in the plans.

Members felt the site was unsustainable for various reasons, including the lack of public transport serving this area.

It was noted some parents may wish to send their children to St George's, Semington and be tempted to go through the 'bus gate' rather than via the A350.

Discussion ensued on what Members would like to see included on the site, if Wiltshire Council were minded to approve the application.

Concern was raised at some inaccuracies within the Design & Access Statement ie.

1.3.20: Further to the West is the River Avon, which forms part of the Wilts & Berks Canal. As part of the Council's Melksham Link project.

The Melksham Link has not been created yet, however, it is anticipated that the River Avon will form part of the canal link. The project is also not a project of 'the Council'.

Whilst page 30 shows an indicative layout of the plans to be submitted, on page 35 it shows a site layout similar to that submitted previously for 160 dwellings on the whole site.

The Clerk informed the meeting Wiltshire Council had refused another application on this site by Terra Strategic (17/01095/OUT) in May 2017 for 160 dwellings on the following grounds:

- 'The site is located in open countryside outside the limits of development defined for Melksham in the Core Strategy.
- The proposal conflicted with the Council's plan-led approach to the delivery of new housing sites outside of the identified limits of development, as set out in Core Policy 2 of the Wiltshire Core Strategy, which seeks to provide new housing sites to deliver the identified needs in Melksham Community Area through a Site Allocations DPD and/or Neighbourhood Plan.
- The proposal would create a large block of housing isolated from other development by surrounding fields.
- The application would result in the loss of Grade II Best and Most Versatile Agricultural land where the loss of land is not considered to be necessary.
- Increase in pedestrians crossing the Western arm of the A350 roundabout where there is no formal crossing and such a crossing facility could not be safely provided due to the proximity of the roundabout.
- The various constraints on the site and the impact on the character of the locality.
- The proposal does not provide for the delivery of the necessary infrastructure (eg affordable housing, education provision, and open space) required to mitigate the direct impacts of the development.'

Comment: To Object to this application on the following grounds:

- The proposal is outside of the settlement boundaries for both the village of Berryfield and Melksham Town, and as such would be development in the open countryside which would erode the rural buffer between these two settlements.
- This is an inappropriate site for development and could possibly prejudice some of the enabling development required for the Wilts & Berks Canal Link. The route of the canal is protected under Core Policy 16 of the Core Strategy.

This application threatens any road access into Berryfield as proposed in the Wilts & Berks Canal Plans and could result in two roads adjacent to one another.

- The proposed site entrance is very close to the entrance to the Mobile Home Park, and in addition to the road calming measures already in place this could lead to congestion and traffic issues, especially on the Semington Road roundabout on the A350. The A350 is a primary route with 20,000 vehicles a day using it.
- The site is considered to be inaccessible from Town. There are concerns over how children would get to primary schools, such as Aloeric Primary, St Georges in Semington, Bowerhill and any new school forming part of the Pathfinder Way application and to secondary school - Melksham Oak.
- Highway safety. Several near misses on the light-controlled crossing on the A350 have been reported to the Parish Council, some of these near misses have involved children attending Aloeric School.
- This development would result in the loss of Grade 2 agricultural land.
- The unsustainability of the site and lack of public transport.
- The reasons planning application 17/01095 was refused by Wiltshire Council in May 2017 for a development of 160 dwellings still stand.
- In the Case Officer's report for another application in Berryfield, 16/11901/OUT, which was approved on 23 March, 2017, under the Assessment of the Principle Development, the Officer stated the following:

"Appendix F of the Wiltshire Core Strategy sets out that Berryfield is a Small Village with no settlement boundary therefore a judgement has to be made as to whether the application site is "within the existing built area" of Berryfield.

Berryfield is considered to form a large group of dwellings located mainly to the West of Semington Road leading to the A350.

The application site is located on the northeast edge of the village forming part of a spur of residential development that extends North out of the village. Residential development is located to the South and North of the application site

(489A Semington Road and 490 Semington Road) and opposite (West) is a public house.

To the East lie open fields however this site has outline permission for 150 dwellings (16/00497/OUT). The application site is therefore bordered by development on three sides and proposed development on the fourth. Due to the location of the site between existing development it is considered that the application site lies within the existing built area of Berryfield. Due to the location of the application site between existing residential development it is also considered that the development would be considered infill development. The proposed development therefore complies with Core Policy 2 of the Wiltshire Core Strategy”.

The Council therefore considers, taking into account the evidence for the approval of application 16/11901/OUT, that this application does not fall “within the existing built area” of Berryfield, having only a small area of development to the East of the application site, open fields to the South and West of the site and the A350 to the North; neither does it fall within the settlement boundary of Melksham Town.

This application therefore does not comply with Core Policy 2 of the Wiltshire Core Strategy, in that it is outside of the defined limits of development and has not been brought forward through the Site Allocations DPD or the emerging Melksham Neighbourhood Plan.

Should Wiltshire Council be minded to approve this application the Parish Council would like to see the following conditions included in the Heads of Terms for the S106 Agreement:

- The development is tenant blind.
- There are practical art contributions.
- A LEAP (Local Equipped Area of Play) is provided which includes bins and benches as well as public open space and the regular emptying of bins to be reflected in any future maintenance contribution.
- The Parish Council wish to enter into discussions on being the nominated party for any equipped play area for the site, and the associated maintenance contribution.
- Bus shelters to be provided in Semington Road with WiFi connectivity to provide Real Time Information.
- The road layout is such that there are no dead ends in order that residents and refuse lorries do not need to reverse out of roads.
- There is a visible delineation between the pavement and the road.
- As no community facility is being provided from this application, that a contribution is made towards the running costs of the new village hall being provided as part of planning application 16/00497/OUT on Semington Road.
- A contribution is made to public transport.
- A contribution towards the canal scheme.
- Equipment is provided for teenagers, such as a teen shelter with WiFi connectivity.

- The provision of circular walking routes with the provision of benches and bins.

Councillor Holder following the comments raised above stated he would 'call in' this application to be considered at Committee.

In order to give context, the comments raised by residents under Public Participation are below:

Two residents of Townsend Farm and one resident of Berryfield attended the meeting to voice their objections to proposals for 50 dwellings on land West of Semington Road by Terra Strategic. The objections raised were as follows:

- The red line indicating the extent of the application appeared to take in an area of land around Townsend Farm which residents had a right of way over.
- Proposed parking for the site was adjacent to Townsend Farm boundary.
- The plans appeared to include the access road for Townsend Farm.
- The fields within the site often flooded, particularly this time of year, which did not appear to be taken into consideration in the Flood report, with regards to what measures would be put in place to mitigate against this.
- Loss of part of Grade 2 agricultural land.
- The loss of farmland in general.
- Melksham has met its housing allocation.
- Lack of infrastructure, such as schools and health care.
- Whilst this application is for half the site, once approved the rest of the site could be put forward for development and the extra impact this would have on current facilities within the town.
- Road safety – The nearest primary school would be Aloeric School. People would be tempted to cross the A350 using the crossing to the West rather than the light-controlled crossing to the East of the site, both crossings are dangerous however. There have been several near misses, on the East crossing, some of which have involved children where vehicles have not stopped on a red light.
- Impact on Berryfield and the destruction of the area due to inappropriate development.
- Impact on local wildlife, adders, which are a protected species are known to inhabit areas of the site.
- Impact the extra traffic will have on Semington Road.
- The lack of a holistic approach to development in the area, resulting in the lack of new infrastructure being delivered.
- Lack of a footpath along the A350, particularly for students wishing to access Melksham Oak or other primary schools in the area.
- Traffic is already busy on the A350, particularly at rush hour and the impact this development will have on traffic.
- The impact this development will have on the Right of Way residents of Townsend Farm have to the rear of their properties.

Councillor Wood stated that current development taking place in Berryfield would not have taken place, if it had not been for a previous lack of 5 year land supply by Wiltshire Council.

Regarding the Right of Way currently enjoyed by residents, he felt it was important to draw this to the attention of the developers and asked that the Clerk contact the developers regarding this.

Also at the same meeting, a Road Safety Report relating to a planning application in Semington Road (20/01938) was also discussed therefore, I am forwarding an extract of the minutes referring to this item, as Members' concerns regarding road safety will be relevant to this application:

A copy of the Road Safety Report relating to the proposed development for 144 dwellings off Semington Road, Berryfield had been forwarded to the Parish Council, following a concern raised when discussing this application previously, at the safety of children having to cross the A350 to access education facilities.

Councillor Baines raised concern there appeared to be several omissions from the report as it did not refer to several other roads having to be crossed to access Aloeric School, such as Longford Road and Lewington Close. He also noted that the footpath between Peel Court and Lewington Close was often obstructed by vehicles parking on the footpath.

Other observations:

- *Reference had been made by the Road Safety Officer that whilst undertaking the assessment they witnessed an unaccompanied child travelling by scooter to Aloeric Primary School waiting at the barriered central refuge at the double toucan crossing, pressing the wait button and then not wait for the 'green flashing safe to walk lights' as there were no oncoming vehicles.*
- *Poor visibility when approaching the toucan crossing via vehicle from the East due to an overgrown hedge, with the writer of the report noting this had obscured their view of several cyclists waiting at the crossing.*

It was noted the Parish Council had made several requests for this hedge to be cut back due to poor visibility.

- *The shortest direct route crossing the A350 is via the West informal crossing, which the Road Safety Officer felt was not a safe option.*

It was noted the Parish Council had also raised this as a concern.

Members also raised a concern at the safety of pedestrians using the light-controlled crossing to the East, which was felt to be very dangerous. Having received several reports of near misses whereby vehicles had not stopped at a red light, the Parish Council had asked at a recent Community Area Transport meeting (CATG) that extra safety measures be installed at this crossing.

- *The report only referenced children accessing Aloeric School, however, children from this development could attend other primary schools in the area such as Bowerhill, St George's in Semington and the proposed new school at Pathfinder Way.*

- *The report stated the walk to Aloeric School from this site was safe if accompanied by an adult, however, older primary school children often walked and cycled to school on their own.*

It was noted there is no preschool provision at Aloeric School and therefore, it needed to be borne in mind where preschool children would attend and what walking route would be used.

Standing Orders were suspended to allow Members of public to speak to this item.

A resident of Berryfield expressed their concern at how dangerous crossing the A350 is and stated they had previously made the Parish Council aware of a near miss when attempting to cross the Eastern crossing when traffic was on a red light.

Another resident reiterated concerns regarding crossing the A350 and stated adults were more aware of their surroundings, however, children often were not and expressed a concern at the potential dangers of unaccompanied children crossing the A350.

Standing Orders were reinstated.

Recommendation: *To forward the above comments to the Wiltshire Council Road Safety Team and to remind them that a report on safe walking routes to other schools in the vicinity had also been requested and to ask that they bear in mind where preschool children would attend in their report.*

4.5 Site 5: Land West of Semington Road, to the rear of Townsend Farm



4.5.1 Site Development Potential

'Land West of Semington Road, to the rear of Townsend Farm' is approximately 5.39 ha in size, and has the potential to deliver 121 dwellings. The site is currently undeveloped, and is used for agricultural purposes. The site is not constrained by historic environment constraints.

Topographically the site is flat and is screened on all boundaries by trees. As such, there are no medium or long distance views from the site, although the site is visible from some properties to the east at Townsend Farm.

4.5.2 Key Constraints

From an ecological perspective, there is deciduous woodland BAP priority habitat located directly beyond the north western corner of the site. This woodland habitat is potentially suited for bats, with connecting hedgerow providing suitable foraging grounds. Additionally, the ponds located to the west of the site might be suitable for Great Crested newts.

Whilst there is existing access into the eastern section of the site via a turning from Berryfield Lane, the current access into the site is not adequate for any proposed development, and Berryfield Lane is unsuitable for motorised traffic. At the northern boundary of the site, Western Way is a significant barrier for pedestrians and cyclists accessing the town centre, and existing crossing points of the road are poor.

Whilst the site has not recently been surveyed, given the presence of such land on adjoining land, the site is likely to comprise land classified as the best and most versatile agricultural land.

In May 2017, application 17/01095/OUT for the development of 160 residential developments was refused permission.

4.5.3 Recommendations

The site is located outside of the existing settlement boundary of Melksham town, and whilst the site has not recently been surveyed, the site is likely to comprise land classified as the best and most versatile agricultural land.

Western Way is a significant barrier for pedestrians and cyclists accessing the town centre, and existing crossing points of the road are poor. Access to the site via Berryfield Lane is insufficient given the current unsuitability of the road for motorised traffic.

Access, safety and traffic issues therefore provide significant constraints to what is an otherwise relatively unconstrained site. As such the site is less appropriate for taking forward for the purposes of the Neighbourhood Plan.

Site 5: Land West of Semington Road,
to the rear of Townsend Farm

Potentially Whilst in many respects the site is relatively unconstrained, it is located outside of the settlement boundary for Melksham Town. Due to its location, the site has significant access and safety issues for pedestrians, cyclists and vehicles. These issues would need to be overcome before development takes place.

Strategic Environmental Assessment for the Joint Melksham Neighbourhood Plan

Scoping Report

Joint Melksham Neighbourhood Plan Steering Group

September 2022

Delivering a better world

Current baseline

Soil resources

- 7.4 The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural land' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' (BMV) land and Grades 3b to 5 are of poorer quality. In this context, there is a need to avoid loss of higher quality BMV agricultural land.
- 7.5 As shown in the left-hand image in **Figure 7.1** below, the majority of the neighbourhood area is underlain with Grade 3 'Good to Moderate' agricultural land, with areas of Grade 4 'Poor' land around Beanacre and to the east of Melksham Town. There are areas of Grade 2 'Very Good' land on the eastern boundary and along the A350 to the north of Melksham Town, as well as an area of Grade 1 'Excellent' land around Berryfield to the south. Melksham Town is classified as 'land predominantly in urban use'⁴².
- 7.6 **Figure 7.1** also shows the results of Natural England's 'Predictive Best and Most Versatile (BMV) Land Assessment' for the South West region in the right-hand image. It indicates the majority of the undeveloped land within the neighbourhood area has a low likelihood of being BMV land, with areas of moderate likelihood located towards the north, north-east and north-west of the neighbourhood area, and areas of high likelihood around Berryfield to the south and along the A350 to the west. Melksham, Berryfield, Bowerhill, Beanacre and Whitely are classified as 'urban / industrial'⁴³.

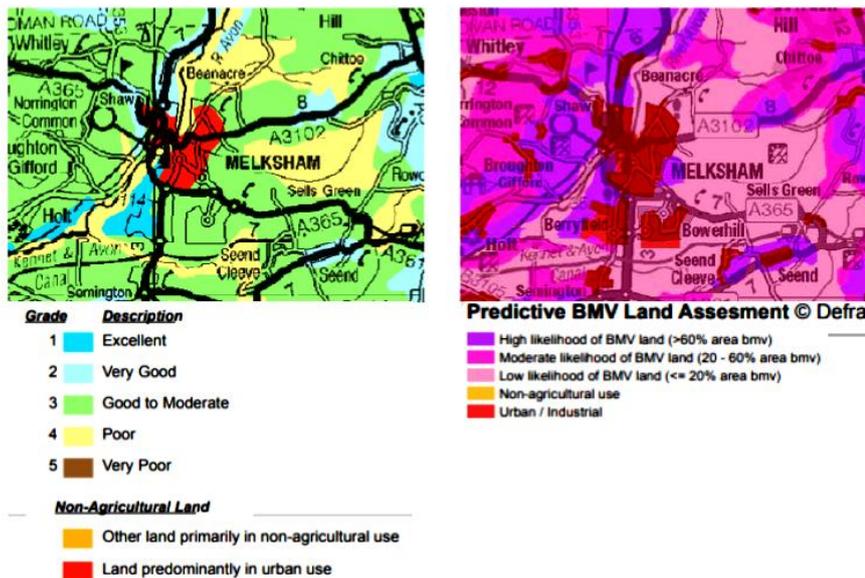


Figure 7.1: ALC and the likelihood of BMV land within the neighbourhood area

⁴² Natural England (2010) 'Agricultural Land Classification Map South West Region' can be accessed [here](#).

⁴³ Natural England (2017) 'Likelihood of Best and Most Versatile (BMV) Agricultural Land – Strategic scale map South West Region' can be accessed [here](#).

Mineral resources

- 7.7 Mineral resources are defined as natural concentrations of minerals or bodies of rock that have the potential to be of economic interest in the present or the future due to their inherent properties. As minerals are a non-renewable resource, minerals safeguarding is deployed as the process through which it is ensured that non-minerals development does not needlessly prevent the future extraction of mineral resources⁴⁴.
- 7.8 With regards to mineral resources, the western part of the neighbourhood area appears to be within a mineral resource zone⁴⁵. However, the Wiltshire and Swindon Minerals and Waste Development Framework Policies Map does not have the clearest resolution; as such, Wiltshire Council may need to be consulted for development in the neighbourhood area to ensure key areas for minerals are not negatively affected through development.

Water quality

- 7.9 The neighbourhood area is located within the Severn Basin District. Specifically, within the Avon Bristol and Somerset North Streams Management Catchment and the Avon Bristol Rural Operational Catchment. There are several waterbodies within the neighbourhood area (which can be viewed on the Catchment Data Explorer⁴⁶):
- South BK – source to conf R Avon (Brist) Water Body⁴⁷ is a tributary of the River Avon. It was awarded a good ecological status in 2019 but failed the chemical status test for the presence of priority hazardous substances including mercury and its compounds and polybrominated diphenyl ethers (PBDE).
 - Avon (Brist) conf R Marden to conf Semington Bk Water Body⁴⁸ is a section of the River Avon and a tributary located in Berryfield. It was awarded a moderate ecological status in 2019 but failed the chemical status test for the presence of priority hazardous substances including mercury and its compounds, perfluorooctane sulphonate (PFOS) and PBDEs.
 - Forest Brook Water Body⁴⁹ is a tributary of the River Avon. It was awarded a poor ecological status in 2019 and failed the chemical status test for the presence of mercury and its compounds and PBDEs.
 - Clackers Bk – source to conf R Avon (Brist) Water Body⁵⁰ was awarded a poor ecological status in 2019 and failed the chemical status test for the presence of mercury and its compounds and PBDEs.
- 7.10 Nitrate Vulnerable Zones (NVZs) represent areas at risk from agricultural nitrate pollution, identifying rules in relation to the use of fertilisers and manures as well as a requirement to prevent water pollution from farming areas⁵¹. According to the interactive map⁵² the north-western part of the neighbourhood

⁴⁴ UK Government (2014) 'Guidance: Minerals' can be accessed [here](#).

⁴⁵ Wiltshire Council (2013) 'Wiltshire and Swindon Minerals and Waste Development Framework: Policies Map' can be accessed [here](#).

⁴⁶ Environment Agency (2022) 'Catchment Data Explorer' can be accessed [here](#).

⁴⁷ Environment Agency (2022) 'South BK – source to conf R Avon (Brist) Water Body' can be accessed [here](#).

⁴⁸ Environment Agency (2022) 'Avon (Brist) conf R Marden to conf Semington Bk Water Body' can be accessed [here](#).

⁴⁹ Environment Agency (2022) 'Forest Brook Water Body' can be accessed [here](#).

⁵⁰ Environment Agency (2022) 'Clackers Bk – source to Conf R Avon (Brist) Water Body' can be accessed [here](#).

⁵¹ UK Government (2018) Nitrate vulnerable zones can be accessed [here](#).

⁵² UK Government (2021) Nitrate vulnerable zone designations and appeals 2021 to 2024 can be accessed [here](#).

area (west of the A350 and Beanacre) is within the Surface Water S559 – S bk – source to conf R Avon (Brist) NVZ.

7.11 Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes, and springs that are used for public drinking water supply⁵³. There is a small section of the neighbourhood area around Brittle Wood that is within Zone I – Inner Protection Zone and Zone II – Outer Protection Zone.

Future baseline

7.12 New development in the neighbourhood area has the potential to impact areas of BMV agricultural land. In this context there could potentially be opportunities to avoid developing Grade 3a agricultural land by directing development toward areas of Grade 3b land where this is available. Additionally, the regeneration of brownfield sites is encouraged, wherever possible.

7.13 Future development has the potential to affect water quality and availability through increased consumption and pollution, wastewater discharges, water runoff and modification. Wessex Water are likely to maintain adequate water services over the plan period; therefore, it will be important for new development to avoid negative impacts on water quality, and instead contribute to reducing consumption and improving efficiency.

Key issues

7.14 Considering the baseline information and policy context review, the following key issues are identified in relation to land, soil, and water resources:

- The provisional ALC and BMV data indicates the majority of the undeveloped land within the JMNP2 area has a low likelihood of being BMV land. Areas of high likelihood of BMV land are located around Berryfield and along the A350 to the west. Development should therefore minimise the loss of productive agricultural land, prioritising the redevelopment and regeneration of underutilised brownfield land wherever possible.
- There is a mineral resource zone within the western section of the neighbourhood area and as such Wiltshire Council may need to be consulted for development in this part of the neighbourhood area.
- The River Avon is the main waterbody in the JMNP2 area, with some of its tributaries running through the neighbourhood area. According to the Catchment Data Explorer, the River Avon has a varying ecological status, but has a failed chemical status in 2019. As the River Avon is the main waterbody it is more likely to be impacted by development, as Melksham Town is likely to be a focus area for growth during the plan period). It is acknowledged the tributaries of the River Avon may also be impacted by new development in some locations, particularly to the east of Melksham Town. Development should therefore avoid impacts to water quality for the River Avon and its tributaries and within the identified source protection zones and surface water safeguard zone.

⁵³ UK Government (2017) 'Groundwater Protection' can be accessed [here](#).

- Plan making should consider how local decisions affect water supply, such as water accessibility issues, and ensure that appropriate drainage infrastructure is in place to accommodate new development areas.

Proposed SEA objective

7.15 Based on the key issues discussed above, it is proposed that the SEA should include the following objectives:

SEA theme	SEA objective
Land, soil, and water resources	Ensure the efficient and effective use of land, and protect and enhance water quality, using water resources in a sustainable manner.

7.16 Supporting assessment questions include (will the option/proposal...):

- Promote the use of previously developed land, including the regeneration of underutilised brownfield land?
- Identify and avoid the development of the best and most versatile agricultural land?
- Support the minimisation, reuse, and recycling of waste?
- Avoid any negative impacts on water quality and support improvements to water quality?
- Ensure appropriate drainage and mitigation is delivered alongside proposed development?
- Protect waterbodies from pollution?
- Maximise water efficiency and opportunities for water harvesting and/or water recycling?
- Protect SPZs and NVZs in the neighbourhood area?

Lorraine McRandle

Subject: FW: More houses for Semington Road - Terra Strategic

From:

Sent: 13 November 2022 19:41

To: Lorraine McRandle <office@melkshamwithout.co.uk>; Teresa Strange <clerk@melkshamwithout.co.uk>

Subject: More houses for Semington Road - Terra Strategic

Hi Both

Well that was a surprise...not! Development along this road is now becoming a bad joke.

I presume the MWPC will oppose this but what about Wiltshire Council? Will they throw in the towel and let this developer ride roughshod over the wishes of the local population.

Enough is enough. The Berryfield community is being destroyed by these rogue developers bending planning rules for their own commercial interests.

The so called cycleway along Semington Road will have another significant amount of cars emptying onto it making even less viable as a safe cycleway.

The residents of Semington Road have had enough. Surely this application can be rejected this time.

Regards

Lorraine McRandle

Subject: FW: Kays Cottage, 489 Semington Road, Melksham, SN12 6DR : Consultation - PL/2022/08518

From: [REDACTED] >

Sent: 18 November 2022 13:22

To: Lorraine McRandle <office@melkshamwithout.co.uk>

Subject: Re: Kays Cottage, 489 Semington Road, Melksham, SN12 6DR : Consultation - PL/2022/08518

Hi Lorraine

My concern with this application for 489 Semington Road is the complete lack of parking provision. This property is a house of multiple occupancy and the current residents park along Semington Road causing an obstruction and road safety hazard. Without proper off highway parking this situation will get even worse if this application is granted without suitable parking provision being made. I would urge the Parish Council to challenge this application and to highlight the lacking of parking. Thanks.

Regards

[REDACTED]



The Town and Country Planning Act 1990
Approval of Full Planning Permission with Conditions

Application Reference Number: PL/2022/07374

Decision Date: 08 November 2022

Applicant: The Wiltshire Pub Company The New Inn Semington Road, Wiltshire, Melksham, SN12 6DT
Particulars of Development: Demolition of existing open covered areas and construction of new lounge area serviced from existing bar (retrospective)
At: The New Inn, Semington Road, Melksham, SN12 6DT

In pursuance of its powers under the above Act, the Council hereby **GRANT PLANNING PERMISSION** for the above development to be carried out in accordance with the application and plans submitted (listed below).

In accordance with paragraph 38 of the National Planning Policy Framework, Wiltshire Council has worked proactively to secure this development to improve the economic, social and environmental conditions of the area.

Subject to the following conditions:

Conditions: (1)

- 1 The retrospective development hereby permitted is subject to the following approved plans and supporting documents

Application form received 22/09/2022

Design and access statement received 22/09/2022

Location plan and block plan Drg no 2205/01 Rev A received 06/10/2022

Plans and elevations Drg no 2205-01 Rev A received 06/10/2022

REASON: For the avoidance of doubt and in the interests of proper planning.

Parvis Khansari - Corporate Director, Place

NOTES

- 1 **Other Necessary Consents.** This document only conveys permission for the proposed development under Part III of the Town and Country Planning Act 1990 and the applicant must also comply with all the byelaws, regulations and statutory provisions in force in the area and secure such other approvals and permissions as may be necessary under other parts of the Town and Country Planning Act 1990 or other legislation.
 - 1.1 the need in appropriate cases to obtain approval under Building Regulations. **(The Building Regulations may be applicable to this proposal. Please contact the Council's Building Control team before considering work on site);**
 - 1.2 the need to obtain an appropriate order if the proposal involves the stopping up or diversion of a public right of way or other highway (including highway verge);
 - 1.3 the need to obtain a separate "Listed Building Consent" to the demolition, alteration or extension of any listed building of architectural or historic interest;
 - 1.4 the need to make any appropriate arrangements under the Highways Act 1980, in respect of any works within the limits of a highway. The address of the Highway Authority is County Hall, Trowbridge, BA14 8JD (It is the responsibility of the applicant to ascertain whether the proposed development affects any listed building or public right of way / other highway, including highway verge).
- 2 **Appeals.** If the applicant is aggrieved by the decision of the local planning authority to grant permission subject to conditions, he may appeal to the Secretary of State for the Environment in accordance with Section 78(1) of the Town and Country Planning Act 1990 within six months of the date of this decision. (Information and forms relating to the appeals process can be found at the Planning Portal - <http://www.planningportal.gov.uk/planning/appeals>).

Lorraine McRandle

From: Teresa Strange
Sent: 22 November 2022 18:16
To: Lorraine McRandle
Subject: FW: WALPA - A Glimmer of Good News?
Attachments: rules078.pdf; 221029-Botterill.Donelan reply.pdf

Not sure if the planning agenda pack has gone to councillors, this can be added please, or if already sent to them, then please email as a late paper. – the attachments too.

Thanks, Teresa

From: Steve Siddall <[REDACTED]>
Sent: 22 November 2022 17:35
To: Subject: RE: WALPA - A Glimmer of Good News?

Hello Campbell, I don't know if you have already spotted this report in today's Telegraph with Michael Gove stating categorically that plans have primacy over targets. I have attached a scan as well as the link to the paper. I am hoping to see Michelle Donelan MP on Friday who is already engaged with our battle with Gladman. I have also attached a response from Wilts Council to a letter from Michelle re the proposed development in Holt.

<http://digitaleditions.telegraph.co.uk/data/1162/reader/reader.html?social#!preferred/0/package/1162/pub/1162/page/6/article/NaN>

Steve Siddall
Holt Parish Council

From: Campbell Ritchie <
Sent: 08 August 2022 17:07
To: Cc:
Subject: WALPA - A Glimmer of Good News?

Dear All

A Glimmer of Good News?

For those communities reeling from having their Neighbourhood Plans undone because of the 5 Year Housing Land Supply (5YHLS) shortfall in Wiltshire it is essential developments which are given permission are of the best possible quality.

Following a decision by Northern Area Planning Committee on Wednesday 5th August there is a better chance this might be the case.

In May 2020 Outline Permission was given by the Strategic Planning Committee to build 71 houses on a site at Filands, Malmesbury in May 2020 (19/11569/OUT). (With a site in Lyneham it was the first to be approved in Wiltshire because of the 5YHLS shortfall). Bloor Homes bought the site and while the Reserved Matters application (PL/2021/05209) was being considered they also got permission on appeal for development at an adjacent site they owned. Both the Wiltshire Council Planning team and ourselves were clear the overall design for both sites would be



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Rigid planning targets eased in rural areas

Local authorities that have 'outperformed' do not have to stick to housing plans, says Gove

By **Daniel Martin**
 DEPUTY POLITICAL EDITOR

RURAL areas that have exceeded housing targets in the past will not have to build as many homes in future, Michael Gove has pledged in a bid to see off a potential Tory rebellion.

The Levelling-Up Secretary told MPs that he wanted to ensure that local

authorities that had "outperformed expectations" in recent years did not have to stick to rigid targets to build many more.

And he denied that his department was seeking a "power-grab" where national planning policies should override locally-agreed plans.

He said: "Quite rightly it should be the case that if a local community has invested time and care in making sure it has a robust local plan, that should prevail."

Mr Gove's promise came after Tory MP Paul Holmes said the Government's target to build 300,000 homes made the "blood drain" from many faces in local

communities. The Levelling-Up Secretary also revealed that Jeremy Hunt, the Chancellor, is working on reforms to the council tax system, which could be unveiled in the new year.

He said local government finance must be made "simpler and clearer", and described council tax as the "second most unpopular tax for a variety of reasons".

However, he did not give any details and said he was not worried about "relatively wealthy" people paying more in council tax as a result of the Autumn Statement.

Mr Gove has promised to rewrite local planning rules following Tory

grassroots anger at a target to build 300,000 new homes a year. Appearing before the Levelling-Up select committee, he said it was a "manifesto ambition".

He added: "There's been a lively debate about how those numbers are generated, and how we make judgments about household formation and population growth overall."

"My own view is that whatever figures you arrive at nationally, and how it's broken down authority by authority, a greater proportion of housing need should be met in urban areas on brown-field sites.

"Many of our cities are significantly

less dense than their counterparts elsewhere and that is bad for everything from transport to economic growth.

"Second, I do believe that we need to have in plan-making a judgment about the likely level of new housing required.

"I also think that in plan-making we should have a system whereby once a plan has been adopted, a community can feel confident that you don't get speculative development undermining the commitment to local democratic control."

The minister also said it was not the case that national planning policies would override local plans, adding that any robust local plan should prevail.

20th October 2022

Michelle Donelan MP
House of Commons
London
SW1A 0AA

Cabinet Office
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

Your Ref: MD34068
Our Ref: NB/CD/221029

Dear Michelle

Planning Application no. PL/2022/03315 – Land off Melksham Road, Holt

Thank you for your letter dated 18 August 2022 regarding the above planning application. I apologise for the long day in replying.

You will appreciate that as this is a live planning application, I must limit my response to matters of fact, and not opinions on the merits of the proposed development. Your concerns, and those of Holt Parish Council, are of course noted, and will be shared with the application case officer to be taken into account.

You refer to the earlier planning application for a not dissimilar description of development at the site. It was refused in 2015 for reasons relating to the principle and to matters of detail including landscape impact and insufficient drainage information. An appeal was lodged, but withdrawn before determination. The outcome of this earlier application will be material to the consideration of the current application.

You refer to the Holt Neighbourhood Plan which was 'made' in 2017. The Neighbourhood Plan supports development elsewhere in Holt (notably at the Old Tannery site which has now been developed). The Neighbourhood Plan does not support development outside of the defined 'Large Village' settlement boundary. As the Neighbourhood Plan forms part of the Development Plan both it, and the Wiltshire Core Strategy, will form the starting point for the determination of the current application. However, in accordance with the National Planning Policy Framework (NPPF) the Council will have to also have regard to the fact there is not a 5-year supply of housing across the county at this time. In such circumstances the NPPF states that relevant housing delivery policies of the development plan must be considered out of date, and a Neighbourhood Plan which is more than 2 years old must also be given less weight. Instead, the presumption in favour of sustainable development as set out in the NPPF will apply. These are changed circumstances since 2015.

The above said, the landscape/visual impact of the proposal remains relevant, and also its scale – up to 90 units in a 'large village' – continues to be a material consideration. It will be for the decision maker to give the various considerations weight as is deemed appropriate, in accordance with the NPPF.

There is no scheduled date for the determination of the planning application at this time, but your interest is now registered.

I trust this is useful.

Yours sincerely



CLLr Nick Botterill
Cabinet Member for Finance, Development Management and Strategic Planning
Wiltshire Council
Direct Office Line: 01225 718577
E-mail: nick.botterill@wiltshire.gov.uk



Melksham Neighbourhood Plan Update



Thank you to everyone who took part in the consultations and evidence gathering exercises that have taken place over the summer months as part of the Melksham Neighbourhood Plan review.

We are taking the opportunity to feedback to you here on what happened next, and to let you know that the next round of community engagement will start on Saturday 3rd December and run to the end of the year.

Housing: Assessment and Information to inform

The steering group undertook a Call for Sites exercise in the Spring, advertising widely locally, with several page adverts in the Melksham News, a social media presence, we also contacted everyone who has ever been in contact in previous consultations or visited an event.

In addition, land owners who have their land registered as available with Wiltshire Council have all been contacted. This produced a list of some 90 sites that land owners have put forward to be considered for housing allocation in the next version of the Melksham Neighbourhood Plan. National independent company AECOM are now sifting and assessing the individual sites, with a report to follow at the end of the year which will then lead to the site allocation work by the Housing Task Group who will be shortlisting sites before engaging with land owners. There will be the opportunity for some

informal community engagement on the shortlist of sites. The next version of the Plan will include housing site allocations for small and medium sites, whereas the Local Plan being produced by Wiltshire Council will be allocating large, strategic sites.

Running alongside this work, a Housing Needs Assessment has also been undertaken by AECOM for the Neighbourhood Plan area of Melksham Town and Melksham Without; this incorporates the local Housing Needs Survey that was undertaken by ourselves and advertised in the Melksham News. This looks at the type and tenure of the housing mix requirements in the area, and is the evidence for housing mix policy in the reviewed Plan; ensuring that future housing meets the needs of local people. Thankyou to the 136 local residents who responded to the Local Housing Needs survey in May and June; the results of this have now been published.

SEE www.melkshamneighbourhoodplan.org

Protecting Values Local Green Space

There is the opportunity through the Plan to give a Local Green Space planning designation to protect spaces that are important to the local community.

Thank you to those of you that put forward local green spaces that were important due to their historic significance, their beauty, their recreational value, their richness in wildlife or their tranquillity. This designation can only apply to small, local spaces and not large tracts of land. The volunteer task group is now working through the 50+ sites that the public put forward to ensure that they meet the necessary criteria and eligibility to produce a shortlist, we are currently making contact with the local landowners. You can view the sites put forward on the Neighbourhood Plan website.

Green Gaps Designation

As you may be aware, there has been a recent Appeal Hearing upheld for a site on Semington Road, behind Townsend Farm, for 50 affordable dwellings.

One of the things highlighted by the Planning Inspector was the lack of a policy on green gaps, to prevent the coalescence of villages to the town and other villages, and this is being addressed in the review of the Neighbourhood Plan. We are working to secure the appropriate technical support to aid this piece of work, with the aim of consulting the community on this during the assessment period over the next few months.

Addressing Climate Change

A separate task group is working on the broad topic of Climate Issues, including analysis of other Neighbourhood Plans that have recently been examined and adopted to see if there are further policies that can be included in the next version of the Plan, as this is a rapidly changing topic.

Policy updates have been drafted with background information to be revised next. The group working on this brief are closely aligned with the Town Council's Environment & Climate Working Group.

Planning for the future vitality of the town centre

AECOM have also been appointed to look at the Town Centre Master Plan work, and will be taking a holistic, independent approach at the Town Centre, looking at its Economy and Vitality, its Culture and Distinctiveness, its Connections and Accessibility, the quality of its Public Realm, and its Heritage and Townscape; all set against the pressing agenda of Sustainability and Climate Change.

There is also the possibility of some Town Centre Regeneration Site opportunities with vacant sites in the

town centre, including those recently vacated as part of the Campus project; they may provide identified/allocated housing to meet local needs. This is a fantastic opportunity for some revised town centre policies in the revised Plan, and for a Master Plan evidence document to sit alongside the Neighbourhood Plan as a practical separate stand-alone document. AECOM have been fully briefed by the Neighbourhood Plan team and are working with the Town Council and Wiltshire Council on the publicly owned assets aspects.

Protecting our Local Heritage

Whilst not giving as much protection as the Local Green Spaces, there is still the opportunity to list in the Neighbourhood Plan heritage assets that don't have Listed status but still have an important historical value to the local community.

Again, thank you to those of you who responded to this survey. A small group of volunteers is looking at the evidence for these sites, it's a short list but valuable nevertheless, and the next step is to contact landowners. You can view the list of those sites put forward on the Neighbourhood Plan website.

Strengthening locally distinctive design

For new housing, and other development, it's not just about where it is, and whether its two or three bedrooms, or rented or for purchase; it's about what it looks like and this is where the Design Codes come in.

AECOM have been appointed to do this work, and are looking at what "good design" looks like for the Melksham Plan area and all future planning applications will have to adhere to the Code when the Plan is adopted. From designing out anti-social behaviour, to brick colours, to solar panels, this is all covered in the Design Code. It covers local identity and character, access and movement incorporating the Priority for People work, green and blue infrastructure (eg. trees/fields and rivers/floodplains), sustainability and energy efficiency and the built form. There will be some community engagement on this piece of work as we seek your views.

Ensuring that Local Priorities are addressed

As the proposed Bypass and Melksham Link Canal projects progress

The Neighbourhood Plan is all about planning policy, and to be referred and adhered to when planning applications are considered.

There are a couple of proposed large infrastructure projects that are in the Melksham Neighbourhood Plan area and there are separate task groups looking into these projects to ensure that the Plan is reviewed in line with the latest updates on these projects. The Plan will have Priority Statements on these projects, but they will be light touch as the Neighbourhood Plan is not the place for decision making on these projects; and therefore cannot have policies relating to them. Volunteer task groups have met with the project teams on these separate projects to review the current statement with them.

Who is working on this project?

The Melksham Neighbourhood Plan is a joint project of Melksham Town Council and Melksham Without Parish Council but is community led, and the Steering Group and Task Groups are made up from a wide range of volunteers from the community.

Planning expertise is provided by Place Studio, who guide us through the process. The group has been successful in obtaining grant funding from the Government to contribute to the costs, and some technical support from AECOM who are also provided by Locality, directly funded by central Government.

How do I get involved?

Information on the progress on the review of the Melksham Neighbourhood Plan can be viewed on the dedicated website

<https://www.melkshamneighbourhoodplan.org/> and dedicated facebook page. You can sign up to the mailing list by contacting any officer at the Town or Parish Council or by clicking the link on the website. If you are not online, please contact either of the councils who can provide written updates. Look out for further consultation and engagement opportunities advertised in the Melksham News too.

Look out for the Neighbourhood Plan stall at the Christmas Market on Saturday 3rd December

To find out details of the new opportunities to help shape your local community.

Melksham Town Council
townhall@melksham-tc.gov.uk • Tel: 01225 704187

Melksham Without Parish Council
clerk@melkshamwithout-pc.gov.uk • Tel: 01225 705700

Melksham & Melksham Without

Housing Needs Assessment (HNA)

July 2022

Quality information

Prepared by	Checked by	Approved by
Olivia Carr Graduate Housing Consultant	Paul Avery Principal Housing Consultant	Paul Avery Principal Housing Consultant

Revision History

Revision	Revision date	Details	Authorized	Name	Position
1	June 2022	First Draft	OC	Olivia Carr	Graduate Housing Consultant
2	June 2022	Internal Review	PA	Paul Avery	Principal Housing Consultant
3	July 2022	Group Review	TS	Teresa Strange	Clerk Melksham Without PC
4	July 2022	Locality Review	HB	Hannah Barter	Urban Vision
5	July 2022	Final Report	OC	Olivia Carr	Graduate Housing Consultant

Prepared for: Melksham & Melksham Without Neighbourhood Plan Steering Group

Prepared by:

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List of acronyms used in the text:

DLUHC	Department for Levelling Up, Housing and Communities (formerly MHCLG)
HMA	Housing Market Area
HNA	Housing Needs Assessment
HRF	Housing Requirement Figure (the total number of homes the NA is expected to plan for, usually supplied by LPAs)
HLIN	Housing Learning and Improvement Network
HRP	Household Reference Person
LHN	Local Housing Need
LHNA	Local Housing Needs Assessment
LPA	Local Planning Authority
NA	Neighbourhood Area
NP	Neighbourhood Plan
NPPF	National Planning Policy Framework
ONS	Office for National Statistics
PPG	Planning Practice Guidance
PRS	Private Rented Sector
RQ	Research Question
SHMA	Strategic Housing Market Assessment
VOA	Valuation Office Agency

1. Executive Summary

1. The Office for National Statistics (ONS) mid-2020 population estimate for Melksham & Melksham Without is 24,117 people, showing an increase of 2,210 individuals since the 2011 Census.
2. There has been significant development in Melksham & Melksham Without since 2011, with Wiltshire Council providing dwelling completions data from 2011/12 to present which showed the development of 1,653 dwellings. Of these, it is estimated that 28.7% were delivered as Affordable Housing. The total quantity of dwellings using 2011 dwelling stock and completions data in the NA is estimated to be 11,017, with this further updated by Wiltshire Council's electoral services to 11,363 in June 2022.

Conclusions- Tenure and Affordability

Current dwelling stock

3. In 2011, the majority of households in Melksham & Melksham Without owned their own home at 72.4%, significantly above both local authority wide and national levels. The private rented sector is limited, with the levels of social/affordable rented housing also below national levels. Data provided by Wiltshire Council indicates that there were 1,653 net dwelling completions between 2011/2012 and 2020/2021 and 474 Affordable Housing completions. Of these Affordable Housing completions, 83.1% were for affordable/social rent, with 16.9% for affordable home ownership.
4. It is also helpful to look at the sub area tenure splits. Melksham Town & Bowerhill sub area has very similar proportions of tenures to the wider NA. The most notable differences to the NA area seen in the Large Village of Whitley/Shaw, where a significantly higher proportion of households own their own home, and a significantly lower proportion of households live in social rented housing. The wider countryside area's proportional tenure split generally lies between Melksham Town & Bowerhill and Whitley & Shaw. The tenure mix across the sub areas suggests that households with greater wealth are likely to reside in Whitley & Shaw, with owner occupation dominating and very little provision of Affordable Housing. The greatest proportion of Affordable Housing is located in the more urban sub area of Melksham Town & Bowerhill.
5. Median and lower quartile house prices in Melksham & Melksham Without rose relatively steadily between 2012 and 2021, with little fluctuation. The median increased by 47.1% in this time, with the lower quartile price increasing by 51.3%. These prices peak at £250,000 and £205,000 respectively. Semi-detached dwellings experienced the greatest house price growth, but house prices overall were highest for detached properties.

Affordability

6. Local households on average incomes are unable to access even entry-level homes in Melksham & Melksham Without unless they have the advantage of a large deposit. Private renting is generally only affordable to average earners, with households made up of two

lower quartile earners only able to afford the given rental thresholds for entry-level (1-bedroom) private rented housing.

7. Turning to affordable home ownership, it is recommended that First Homes in the NA are delivered at a 40% discount, which extends ownership accessibility to households on below average (mean) incomes. Shared ownership appears to be similarly affordable to First Homes and is broadly accessible to the same groups. Shared ownership at 25% equity is considered to be marginally affordable to households with two lower quartile earners, with 10% equity also accessible to this group.
8. Affordable rented housing is generally affordable to households with two lower earners. However, households with a single lower earner appear unable to afford any of the tenures considered including the smallest socially rented units.

Affordable Housing need

9. AECOM have calculated an estimate of the total need for Affordable Housing in Melksham & Melksham Without over the plan period. This study estimates that the NA over the plan period would meet the need for affordable rented housing through turnover of existing homes, and that there is the demand for around 882 units of affordable home ownership. The report suggests that both forms of Affordable Housing appear to be valuable in meeting the needs of people on various incomes, and the potential surplus of affordable rented units does not mean that affordable housing for rent should not be brought forward.
10. In order to balance the needs of the significant number of households currently on the Housing Register in need and take into account the fact that modelling suggests the need for affordable rented housing generated in the NA would be met over the plan period, it is suggested that 45% of new Affordable Housing is affordable rented tenures, either affordable or social rent. It is suggested that the remaining 55% is delivered as affordable home ownership in the following split:
 - 25% First Homes (at 40% discount); and
 - 30% shared ownership (at a flexible range between 25% and 10% equity).
11. This mix should be viewed as a starting point, based primarily on secondary evidence, which should be reconsidered in light of considerations explored further in the report, the potential variation in need and demand in the sub-areas, and in particular the views and objectives of the community.
12. Table 4-10 summarises Melksham & Melksham Without's position with regards to the expected delivery of Affordable Housing, and how this might ideally be apportioned among sub-categories of tenure to meet local needs over the Plan period. This exercise simply applies the housing requirement figure for the area to the Local Plan policy expectation and shows the quantities of affordable housing for rent and sale that would be delivered if the tenure mix proposed in this HNA were to be rigidly enforced. In this sense it is hypothetical, and the outcomes in practice may differ, either as a result of measures taken in the neighbourhood plan (e.g. if the group plan for more housing (and therefore more affordable housing) than the local plan, or if the group decide to influence the tenure mix in other ways), or as a result of site-specific constraints.

13. In addition to the expected delivery in the NA as a whole, the sub-areas of Melksham & Bowerhill and Whitley & Shaw are also considered as they have individual housing requirement figures in the emerging Local Plan. This therefore gives an indication of the level of delivery that could be expected in these two sub-areas.
14. This expected level of delivery does not meet the quantity of demand identified in estimates for affordable home ownership due to the high demand identified. However, as previously discussed in the report, the need for affordable home ownership is not as acute as for affordable rented housing as it is assumed that on the whole these households are adequately housed elsewhere, such as in the private rented sector. Whilst the expected delivery of affordable rented housing exceeds the need identified in modelling, delivery will help to contribute to the significant backlog of need identified by the local Housing Register for the NA.
15. If the community wish to encourage further delivery of Affordable Housing, it is recommended that the policy requirement be met wherever possible, and for further avenues for delivering greater quantities of Affordable Housing (such as exception sites) to be explored. If the group considered exceeding the Local Plan policy requirement in the neighbourhood plan then it must be noted that an extremely high standard of justification is required which goes beyond the scope of this HNA, in particular around the issue of what level of Affordable Housing delivery can be financially viable in the NA. Raising the percentage of Affordable Housing required could have the effect of discouraging new building from coming forward altogether. Should the group wish to consider such an option, it is advisable to discuss this with the LPA in the first instance.
16. Affordable housing is typically provided and made financially viable by its inclusion as a proportion of larger market developments, as guided by Local Plan policy. However, if the community wishes to boost the supply of affordable housing, there are other, more proactive routes available for its provision. For example, using community development orders, identifying exception sites or developing community land trusts are all ways of boosting the supply of affordable housing.

Conclusions- Type and Size

17. This study provides an indication of the likely need for different types and sizes of homes based on demographic change. It is important to remember that other factors should be considered in determining the dwelling mix that is desirable in the parish or on any particular site. These include the specific characteristics of the nearby stock of housing (such as its condition and design), the role of the NA or site within the wider housing market area (linked to any Local Authority strategies or plans) and site-specific factors which may justify a particular dwelling mix.

Current dwelling mix

18. The greatest proportion of dwellings in the NA in both 2011 and 2021 was semi-detached dwellings, followed by detached dwellings. Dwelling completions data from 2011/12 to 2020/21 showed that 13.1% of completions were flats, with the vast majority (86.9%) being houses. The proportion of bungalows in Melksham & Melksham Without is above

levels for England but below Wiltshire. The proportion of terraced dwellings in the NA is below national levels whilst the proportion of semi-detached and especially detached dwellings, is significantly higher in Melksham & Melksham Without than nationally.

19. Looking at sub-areas, the most notable difference to the NA average is the fact that the vast majority of dwellings in Whitley & Shaw in 2011 were detached, at 60.4% compared to 29.1% across the NA as a whole. This is indicative of a settlement lacking smaller more affordable properties, with detached dwellings often the largest and the most expensive. It could therefore be surmised that a large amount of the wealth in the NA is concentrated in this sub-area and there is a clear lack of Affordable Housing here.
20. It is also important to look at dwelling sizes. In 2011, 3-bedroom dwellings dominated the NA, followed by smaller 2-bedroom dwellings. The majority of development in the last decade, at 33.2%, was for larger 4-bedroom dwellings. In 2021, the majority of dwellings were still 3-bedroom, although at a lower proportion than in 2011. The proportion of smaller dwellings remained similar to 2011 levels but there was an increase in the proportion of 4-bedroom dwellings. The proportion of smaller dwellings in the NA is significantly below national levels, and more in line with Wiltshire as a whole.
21. The proportion of mid-sized dwellings is relatively even across all comparator areas whilst the proportion of larger 4-bedroom dwellings is significantly above the proportion across England. The size mix for Melksham & Bowerhill closely aligns with the NA as a whole. Larger dwelling sizes are considerable in Whitley & Shaw, significantly above the levels of the other sub areas and the wider NA. The Wider Countryside Area has a greater proportion of 2-bedroom dwellings and a smaller proportion of 3-bedroom dwellings than the NA, and the sub areas of Melksham & Bowerhill, and Whitley & Shaw.

Demographics

22. The overall NA population is estimated to have grown from 21,907 in 2011 to 24,117 in 2020. In 2011 the majority of the population was aged 45-64, followed by those aged 25-44, indicative of a predominance of family households. Looking to 2020, the proportion of the population aged 45+ grew in all categories. The population structure of Melksham & Melksham Without closely aligns with the population breakdown of the wider Wiltshire local authority area. The proportion of the population aged 45 and over is greater in the NA and local authority area than England, indicative of a more rapidly aging local population than nationally. Population growth to the end of the plan period can be expected to be driven by the oldest households, with 72% growth expected in households with a household reference person aged 65 and over.
23. Looking at the sub-areas, whilst Melksham & Bowerhill aligns with the NA, there is more significant variation when looking at Whitley & Shaw and the wider countryside area. The Whitley & Shaw sub-area is characterised by an older population than the NA as a whole. Melksham & Bowerhill had the largest proportion of young people. It may be that younger people and families tend to reside in the Market Town whilst those with older families or looking to retire live in Whitley & Shaw or the wider countryside.
24. Under-occupancy is relatively common in the NA, with 77.0% of households living in a dwelling with at least one extra bedroom in relation to their expected needs. This is most

common in family households aged 65+ and family households under 65 with no children, suggesting that larger housing is being occupied by households with the most wealth or by older people who have not chosen to or been able to move to smaller properties.

Future size mix

25. AECOM modelling suggests that the target mix at the end of the plan period should remain dominated by mid-sized 3-bedroom dwellings, but to a lesser extent than in 2011. It is also suggested that this is followed by 2-bedroom dwellings and then 4-bedroom dwellings. This mix may require some adjustment for the sub-areas based on the existing dwelling mixes and populations in these areas. For example, the Steering Group may prefer to adjust the size mix when looking Whitley & Shaw, increasing the proportion of smaller dwellings. In order to reach the target mix shown in the model, it is suggested that new development is brought forward in a relatively even split for 2-bedroom, 3-bedroom, and 4-bedroom dwellings. As discussed, depending on what the Steering Group wish to achieve in each sub-area, this will likely need to be adjusted to account for the already existing imbalances in the size mix throughout the NA.
26. It would be unwise for any new housing that does come forward to be delivered in an unbalanced way. Those wishing to move within or relocate to the area will have a range of circumstances and preferences, and they should be offered a range of choices. As such, it is recommended that priority is given to mid-sized homes but that this is done to a degree that aligns with the wider objectives of the community and does not limit choice or threaten viability. The evidence in this section represents a starting point for further thought and consultation.

Conclusions- Specialist Housing for Older People

27. The existing stock of specialist older persons housing in Melksham & Melksham Without consists entirely of retirement housing, with no provision for extra-care. Just over half of this provision is for social rent, with the rest a mix of leasehold purchase, shared ownership, and market rent.
28. It is projected that there will be an increase of 1,768 individuals in the 75+ age category between 2011 and 2026 in Melksham & Melksham Without, increasing the proportion of those aged 75+ in the population from 8.6% to 14.5% by the end of the plan period, in line with the existing and projected proportions across Wiltshire.
29. The potential need for specialist housing with some form of additional care for older people can be estimated by bringing together data on population projections, rates of disability, and what tenure of housing the current 55-75 cohort occupy in the NA. This can be sense-checked using a toolkit based on national research and assumptions.
30. These two methods of estimating the future need in Melksham & Melksham Without produce a range of 444 to 616 specialist accommodation units that might be required during the Plan period. These estimates are based on the projected growth of the older population, thereby assuming that today's older households are already well

accommodated. If this is found not to be the case, it would justify aspiring to exceed the range identified here.

31. It is important to take into consideration the breakdown of levels of care and tenure within the need for specialist housing for older persons. When considering the AECOM calculation outlined in Table 6-6, the majority of the need, at 73.1%, is identified for market specialist housing. Slightly more need is identified for sheltered housing at 55.8% compared to 44.2% extra-care. The greatest sub-category of need was identified for market sheltered housing at 43.5% of the total need.
32. However, this need is for individuals with less severe mobility limitations and market housing is considered the most appropriate for adaptations, so at least some of this need could be met through adaptations or through ensuring that all new housing is accessible and adaptable for people with lower support needs. It is worth noting that the adopted Local Plan for Wiltshire expects proposals for extra-care schemes in the local authority area to provide an Affordable Housing contribution in line with other forms of development.
33. Given that there is unlikely to be a large volume of additional specialist supply during the Plan period, another avenue open to the Neighbourhood Planning groups is to discuss the standards of accessibility and adaptability in new development to be met in the Local Plan with the LPA. Groups could also explore site allocations or promoting this type of residential development. The local level evidence supplied in this report could be used to influence local authority level policies. Groups may also be able to encourage the adaptation of existing properties through grant schemes and other means (though it is acknowledged that Neighbourhood Plans may have limited influence over changes to the existing stock).
34. The adopted Local Plan Core Policy 46 (Meeting the needs of Wiltshire's vulnerable and older people) provides explicit encouragement for development to accommodate specific groups such as older people. However, it does not set specific targets for the proportion of new housing that might be required to meet national standards for accessibility and adaptability (Category M4(2)), or for wheelchair users (Category M4(3)). The evidence gathered here would appear to justify the Steering Group approaching the LPA to discuss setting requirements on accessibility and adaptability at a local authority level. It is unclear whether Neighbourhood Plans can set their own requirements for the application of the national standards of adaptability and accessibility for new housing and so discussions with the LPA are advised if this is a key priority.
35. It is relatively common for Local Plans to require that all or a majority of new housing meets Category M4(2) standards in response to the demographic shifts being observed nationwide, and the localised evidence gathered here would further justify this. The proportion of new housing that might accommodate those using wheelchairs might be set with reference to the proportion of affordable housing applicants in the local authority area falling into this category.

36. While it is important to maximise the accessibility of all new housing, it is particularly important for specialist housing for older people to be provided in sustainable, accessible locations, for a number of reasons, as follows:
- so that residents, who often lack cars of their own, are able to access local services and facilities, such as shops and doctor's surgeries, on foot;
 - so that any staff working there have the choice to access their workplace by more sustainable transport modes; and
 - so that family members and other visitors have the choice to access relatives and friends living in specialist accommodation by more sustainable transport modes.
37. Alongside the need for specialist housing to be provided in accessible locations, another important requirement is for cost effectiveness and economies of scale. This can be achieved by serving the specialist elderly housing needs arising from a number of different locations and/or Neighbourhood Areas from a single, centralised point (i.e. what is sometimes referred to as a 'hub-and-spoke' model).
38. It is considered that Melksham & Melksham Without is, in broad terms, a suitable location for specialist accommodation on the basis of the accessibility criteria and the considerations of cost-effectiveness above. As such, there is potential for such accommodation to be provided within the Neighbourhood Area (while noting there is no specific requirement or obligation to do so if there is potential to meet need arising from Melksham & Melksham Without in other suitable locations near to but outside the Plan area boundaries). Where it is considered for any reason desirable to meet some of the specialist need outside the Neighbourhood Area, there will be a degree of overlap between the number of specialist dwellings to be provided and the overall dwellings target for the Neighbourhood Area itself.
39. It is important to note the differences in the settlements of Melksham & Melksham Without. Whilst the provision of specialist housing for older persons would likely be appropriate in Melksham & Bowerhill due to public transport links and access to amenities, it would likely be less appropriate in the smaller settlements of Beanacre and Berryfield. Therefore, it may be appropriate that specialist older persons housing is focussed on the more built-up areas of Melksham & Bowerhill, and potentially at a smaller scale in Whitley & Shaw. Due to the greater suitability of Melksham Town for the provision of specialist older persons housing, the need figures have not been pro-rated for the sub areas as it is likely that regardless of the location of need, the provision would be delivered in the larger settlement.
40. Wherever specialist housing is to be accommodated, partnership working with specialist developers is recommended, so as to introduce a greater degree of choice into the housing options for older people who wish to move in later life.

2. Context

Local context

41. Melksham & Melksham Without is a Neighbourhood Area located in Wiltshire, in the South West of England. The Neighbourhood Area (NA) aligns with the boundary of the parish of Melksham and the parish of Melksham Without in their entirety. This was designated and then amended in November 2017 due to a Community Governance Review. This led to several changes to the boundary between Melksham and Melksham Without, with no changes to the NA as a whole. In addition, there was an external change to the boundary between Melksham Without and Broughton Gifford, although there were no dwellings recorded within this area so there is no effect on the data in this report.
42. The NA is split into three main sub-areas for the purposes of this report, the main urban settlement of Melksham & Bowerhill, the villages of Whitley & Shaw, and the wider countryside area, which is comprised of the small villages of Beanacre and Berryfield as well as smaller hamlets and clusters of dwellings. Melksham Town is located around 13 miles east of Bath and c. 25 miles south-west of Swindon.
43. In terms of transport links, there are regular bus links in the NA locally as well as the National Express to London. Melksham also has a train station which provides connection to Swindon, Chippenham, Bristol, and London. The A350 runs north/south through the NA whilst the A3102 runs east/west. Melksham & Bowerhill are home to the majority of the amenities in the NA, including a secondary school, multiple primary schools, and a variety of high street shops. The Steering Group are however aware of a lack of some amenities such as GPs and dentists. It is also important to note that parts of the NA are not connected to mains gas and therefore tend to rely on oil, with potential cost of living implications.
44. The proposed Neighbourhood Plan period starts in 2022 and extends to 2036, therefore comprising a planning period of 14 years. The evidence supplied in this report will look forward to the Plan end date of 2036, but where possible will also provide annualised figures which can be extrapolated to a different term if the Plan period changes.
45. For Census purposes, the Neighbourhood Area is made up, like the rest of England, of statistical units called Output Areas (OAs). These make up Lower Layer Super Output Areas (LSOAs), which in turn make up Middle Layer Super Output Areas (MSOAs). The Plan area equates to the following areas, which have been used throughout as a statistical proxy for the NA boundary and which can be interrogated for data from both the 2001 and the 2011 Censuses:
 - MSOA E02006680
 - MSOA E02006678
 - LSOA E01032044
 - LSOA E01032070
 - LSOA E01032071

- LSOA E01032072

46. The statistics show that in the 2011 Census the NA had a total of 21,907 residents, formed into 9,151 households and occupying 9,364 dwellings. The Office for National Statistics (ONS) produces mid-year population estimates. The mid-2020 population estimate for Melksham & Melksham Without is 24,117 – indicating population growth of around 2,210 individuals since 2011. It is worth noting that this figure is an estimate only, based on data which is mostly available at local authority level such as administrative registers of births and deaths, data on moves between local authorities, small-area population estimates and official population projections, and not based on a survey count.

47. Data provided by Wiltshire Council indicated 1,653 net dwellings completions between 2011/12 and 2020/21, bringing the estimated total number of dwellings in 2021 to 11,017. This increase is broadly in line with the population growth between 2011 and 2020 outlined above.

48. A map of the Neighbourhood Area appears below in Figure 2-1.

Figure 2-1: Map of the Melksham & Melksham Without Neighbourhood Area¹



Source: Wiltshire Council

49. The Steering Group are also aware that there is some variation in the housing market and demographics within the Melksham & Melksham Without Neighbourhood Area. Therefore, throughout this report, in appropriate places, the data has been

¹ Available at <https://www.wiltshire.gov.uk/media/900/Designation-of-Melksham-Neighbourhood-Area-decision-notice/pdf/sppnp-melksham-2017-area-designation-report.pdf?m=637105533813030000>

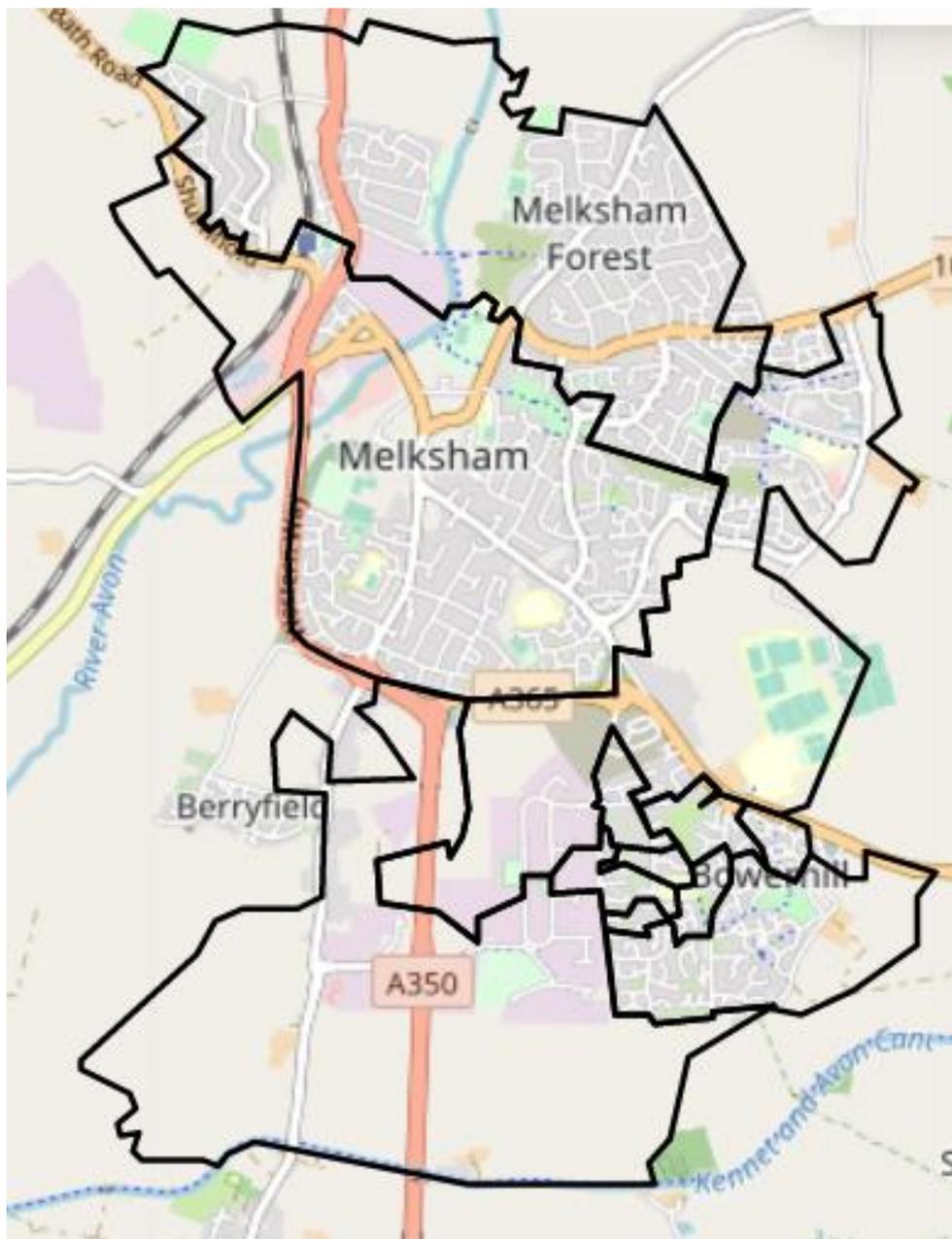
disaggregated into three key sub areas. These sub-areas, as agreed with the Steering Group and broadly based on the Local Plan settlement categorisation, are:

- Melksham Town & Bowerhill;
- Whitley & Shaw; and
- Wider Countryside Area (covering the areas not included in the above two categories. This includes the settlements of Beanacre and Berryfield).

50. There are some limitations to how the sub-areas can be broken down using the Census and so the best proxy areas have been used. For example, the two built-up areas on the right of Figure 2-2 cannot be included in the sub-area for Melksham & Bowerhill as including this area would also include a large area of open countryside, not fitting to the area. A similar issue arises when looking at splitting Berryfield from Bowerhill. Therefore, the best-fit approaches have been taken here and this should be taken into consideration when looking at sub-area data.

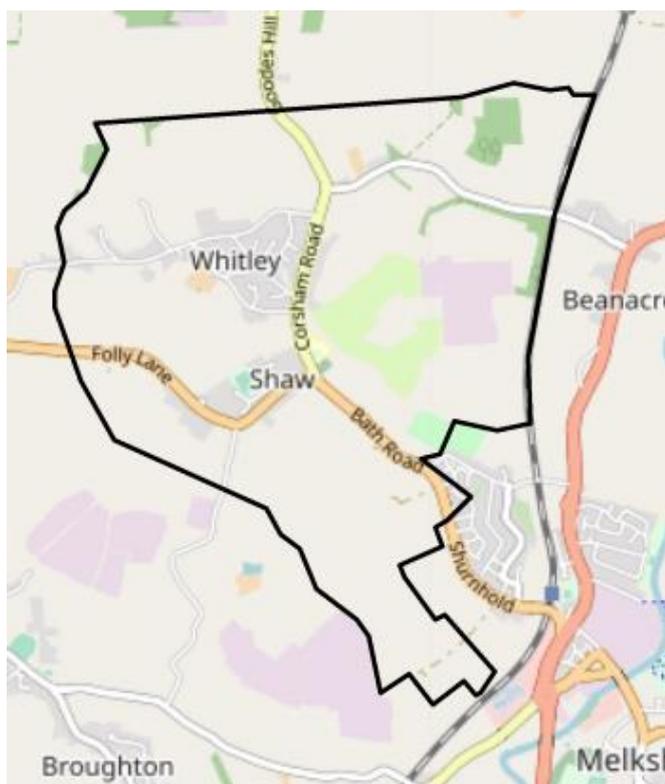
51. These areas being used for data collection in relation to these sub-areas are outlined in Figures 2-2, 2-3, and 2-4.

Figure 2-2: Map of Melksham Town & Bowerhill sub-area



Source: ONS

Figure 2-3: Map of Whitley & Shaw sub-area



Source: ONS

Figure 2-4: Map of Wider Countryside Area sub-area



Source: ONS

The Housing Market Area Context

52. Whilst this HNA focuses on Melksham & Melksham Without neighbourhood area it is important to keep in mind that neighbourhoods are not self-contained housing market areas. Housing market areas are usually wider than local authority areas and often stretch across a number of districts or boroughs. This is because housing market areas are inherently linked to the labour market, employment patterns and travel to work areas. In the case of Melksham & Melksham Without, the parishes sit within the Chippenham Housing Market Area which covers a range of settlements within the Wiltshire Unitary Authority including Chippenham, Devizes, Calne, and Malmesbury. This means that when households who live in these authorities move home, the vast majority move within this geography.
53. The housing market area also has links to other neighbouring areas however, including Trowbridge HMA. The 2019 Swindon Borough Council & Wiltshire Council LHNA identifies that whilst Melksham and Melksham Without fall within the Chippenham HMA, Melksham Rural falls within the Trowbridge HMA. It is therefore expected that there are close links between these housing market areas and movement between the two is likely to be relatively common.
54. At the neighbourhood scale it is not possible to be definitive about housing need and demand because neighbourhoods, including Melksham & Melksham Without, are closely linked to other areas. In the case of Melksham & Melksham Without, changes in need or demand in settlements nearby is likely to impact on the neighbourhood.
55. In summary, Melksham & Melksham Without functions within a wider strategic area. As well as fostering good working relationships with the local planning authority (Wiltshire Council), it is therefore useful to think about the *role* of the neighbourhood within the wider area. This HNA can provide evidence to understand this role and the specific features of the neighbourhood within this wider context. Neighbourhood Plans can have a significant impact in shaping their neighbourhoods, enhancing the positive role the neighbourhood play within the wider housing market, or developing policies to change entrenched patterns and improve housing outcomes in the neighbourhood and wider area.

Planning policy context

56. Neighbourhood Plans are required to be in general conformity with adopted strategic local policies.² In the case of Melksham & Melksham Without, the relevant adopted and emerging Local Plans for Wiltshire Council are outlined below.
57. The adopted Local Plan for Wiltshire is the Wiltshire Core Strategy 2006-2026, adopted in 2015³. The settlement of Melksham & Bowerhill is identified in the adopted Local Plan as a Market Town, with Whitley/Shaw jointly identified as a Large Village and the smaller settlements of Beanacre and Berryfield individually identified as Small Villages.

² A description of the Basic Conditions of Neighbourhood Planning is available at <https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum>

³ Available at: <http://www.wdwtplan.org.uk/Documents/data/Wiltshire%20adopted-local-plan-jan16.pdf>

58. The Wiltshire Housing Site Allocations Plan⁴, adopted in February 2020, sits alongside the Core Strategy to support delivery. The Melksham Community Area is identified as within the North and West Wiltshire Housing Market Area. It is outlined in the report that the anticipated levels of growth at Melksham & Bowerhill have been exceeded over the first half of the adopted plan period. It also suggests that scales of development in many rural areas have also exceeded those anticipated by the Core Strategy but does not specify whether these relate to the rural areas within the Melksham Community Area.
59. The emerging Local Plan is due to run to 2036 and underwent consultation between January and March 2021, with over 3,500 responses received. The consultation responses⁵ were published once the consultation was complete but a full draft plan reflecting those responses is yet to be published. The consultation documents relevant to housing policy Melksham & Melksham Without are the Emerging Spatial Strategy⁶, Empowering Rural Communities⁷, and Planning for Melksham⁸. The next stage is for Wiltshire Council to produce a draft Plan which will once again be consulted on.

Policies in the adopted local plan

60. Table 2-1 below summarises adopted Local Plan policies that are relevant to housing need and delivery in Melksham & Melksham Without.

Table 2-1: Summary of relevant adopted policies in the Wiltshire Core Strategy (adopted 2015)

Policy	Provisions
Core Policy 1 – Settlement Strategy	<p>This Settlement Strategy identifies the settlements where sustainable development will take place in Wiltshire.</p> <p>Melksham is defined as a Market Town. Market Towns are settlements that have the ability to support sustainable patterns of living in Wiltshire. They have the potential for significant development.</p> <p>The other settlements within the NA are not defined within this Policy. Core Policy 15 identifies Melksham & Bowerhill together as a Market Town, Whitley/Shaw as a Large Village, and the settlements of Beanacre and Berryfield as Small Villages.</p> <p>The full Settlement Hierarchy is as follows:</p> <ul style="list-style-type: none"> Principal Settlements – Chippenham, Trowbridge, and Salisbury. These strategically important centres are a primary focus for development;

⁴ Available at: [*Wiltshire Housing Site Allocations Plan: Adopted February 2020](#)

⁵ Available at: https://www.wiltshire.gov.uk/media/7226/Local-Plan-Review-consultation-statement-2021-final/pdf/LPR_2021_consultation_statement_lpr_jan_mar_2021.pdf?m=637673811404070000

⁶ Available at: https://www.wiltshire.gov.uk/media/5623/Emerging-Spatial-Strategy/pdf/Wiltshire_Local_Plan_Emerging_Spatial_Strategy_FINAL.pdf?m=637471655274170000

⁷ Available at: https://www.wiltshire.gov.uk/media/5624/Empowering-Rural-Communities/pdf/WLP_Empowering_Rural_Communities_FINAL_28-01-2021_.pdf?m=637474434248530000

⁸ Available at: https://www.wiltshire.gov.uk/media/5638/Planning-for-Melksham/pdf/WLP_Market_Town_Planning_for_Melksham_FINAL.pdf?m=637459664963130000

Policy	Provisions
	<ul style="list-style-type: none"> • Market Towns – including Melksham; • Local Service Centres; • Large and Small Villages – large villages have a limited range of employment, services, and facilities. Small villages have a low level of services and facilities, and few employment opportunities.
<p>Core Policy 2 – Delivery Strategy</p>	<p>The Core Strategy seeks to deliver at least 42,000 homes between 2006 and 2026 across Wiltshire.</p> <p>There is the presumption in favour of sustainable development at the Principal Settlements, Market Towns (such as Melksham & Bowerhill), Local Service Centres, and Large Villages (such as Whitley/Shaw).</p> <p>The limits of development may only be altered through the identification of sites for development through subsequent Site Allocations Development Plan Documents and Neighbourhood Plans.</p> <p>To limit the need for development on Greenfield sites, approximately 35% of development will take place on previously developed land.</p>
<p>Core Policy 15 – Spatial Strategy: Melksham Community Area</p>	<p>The spatial strategy outlines the following settlement hierarchy:</p> <ul style="list-style-type: none"> • Market Towns – Melksham & Bowerhill village. • Large Villages – Atworth, Seend, Semington, Whitley/Shaw, and Steeple Ashton. • Small Villages – Beanacre, Berryfield, Broughton Gifford, Bulkington, Great Hinton, Keevil, Poulshot, and Seend Cleeve. <p>Over the plan period approximately 2,370 new homes will be provided of which about 2,240 should occur at Melksham. Approximately 130 homes will be provided in the rest of the Community Area.</p> <p><i>The settlements of Melksham & Bowerhill, Whitley/Shaw, Beanacre, and Berryfield are relevant to this HNA.</i></p>
<p>Core Policy 43 – Providing Affordable Homes</p>	<p>On sites of 5 or more dwellings, affordable housing provision of at least 30% (net) will be provided within the 30% affordable housing zone. Outside of the policy, Melksham is identified as within the 30% affordable housing zone.</p> <p>Only in exceptional circumstances, where it can be proven that on-site delivery is not possible, will a commuted sum be considered.</p> <p>The provision of affordable housing may vary on a site-by-site basis taking into account evidence of local need, mix of affordable housing proposed and, where appropriate, the viability of the development.</p>

Policy	Provisions
Core Policy 44 – Rural Exception Sites	<p data-bbox="405 255 1394 333">Tenure will be negotiated on a site-by-site basis to reflect the nature of the development and local needs.</p> <hr/> <p data-bbox="405 360 1394 607">At settlements defined as Local Service Centres, Large and Small Villages (including Whitley/Shaw, Beanacre, and Berryfield), and those not identified within the settlement strategy, a proactive approach to the provision of affordable housing will be sought in conjunction with parish councils and working with local communities and other parties.</p> <p data-bbox="405 633 1394 712">This exception policy allows housing for local need to be permitted, solely for affordable housing, provided that:</p> <ul style="list-style-type: none"> <li data-bbox="437 734 1310 768">i. the proposal has clear support from the local community; <li data-bbox="437 790 1394 869">ii. the housing is being delivered to meet an identified and genuine local need; <li data-bbox="437 891 1394 969">iii. the proposal is within, adjoining or well related to the existing settlement; <li data-bbox="437 992 1394 1070">iv. environmental and landscape considerations will not be compromised; <li data-bbox="437 1093 1161 1126">v. the proposal consists of 10 dwellings or fewer; <li data-bbox="437 1149 1278 1182">vi. employment and services are accessible from the site; <li data-bbox="437 1205 1394 1283">vii. the scale and type is appropriate to the nature of the settlement and will respect the character and setting of that settlement; <li data-bbox="437 1305 1394 1429">viii. the affordable housing provided under this policy will always be available for defined local needs, both initially and on subsequent change of occupant.
Core Policy 45 – Meeting Wiltshire’s Housing Needs	<p data-bbox="405 1641 1394 1800">New housing, both market and affordable, must be well designed to address local housing need incorporating a range of different types, tenures, and sizes of homes to create mixed and balanced communities.</p> <p data-bbox="405 1827 1394 1951">Housing size and type, including any distinction between flats and houses, will be expected to reflect that of the demonstratable need for the community within which a site is located.</p> <p data-bbox="405 1973 1394 2049">The Wiltshire Strategic Housing Market Assessment identifies the housing needs of Wiltshire. Any variation to this will need to be justified</p>

Policy	Provisions
	through the production of new, sound evidence from either an updated Strategic Housing Market Assessment or other credible evidence source. In relation to affordable housing, other sources of credible evidence include the council’s housing register and local housing needs surveys.
Core Policy 46 – Meeting the Needs of Wiltshire’s Vulnerable and Older People	<p>The provision, in suitable locations, of new housing to meet the specific needs of vulnerable and older people will be required.</p> <p>Housing schemes should assist older people to live securely and independently within their communities. Residential development must ensure that layout, form, and orientation consider adaptability to change as an integral part of design at the outset.</p> <p>The provision of sufficient new accommodation for Wiltshire’s older people will be supported, including extra-care facilities. Proposals for extra-care accommodation will be expected to provide an affordable housing contribution in line with Core Policy 43.</p>

Source: Wiltshire Council

Policies in the emerging local plan

61. As the emerging Wiltshire Local Plan has not yet published a draft, there are no policies available yet. However, these documents outline some of the key ideas that may form the policies in the draft plan. The key content includes:

Emerging Spatial Strategy⁹:

- Forecasts that “Wiltshire will need between 40,840 and 45,630 new homes over the plan period (2016-2036)”¹⁰.
- “Outside of the main settlements, the focus will continue to be on protecting the countryside and only development that meets local needs”¹¹.
- The Settlement Hierarchy will not change as part of the review, but Small Villages will be considered ‘non-strategic’. This will change the status of both Beanacre and Berryfield.
- Chippenham Housing Market Area (which includes the NA) is estimated to “need”¹² between 17,410 and 20,400¹³ additional dwellings between 2016 and 2036. Of all the HMAs, Chippenham HMA is forecast to have by far the largest additional housing figures.

⁹ Available at https://www.wiltshire.gov.uk/media/5623/Emerging-Spatial-Strategy/pdf/Wiltshire_Local_Plan_Emerging_Spatial_Strategy_FINAL.pdf?m=637471655274170000

¹⁰ Quoted from emerging Local Plan (Spatial Strategy). The lower figure of 40,840 is the minimum required by Government using its current standard method.

¹¹ Quoted from emerging Local Plan (Spatial Strategy).

¹² Quoted from emerging Local Plan (Spatial Strategy).

¹³ “Housing need has been calculated in two ways, providing a minimum and higher figure. The lower figure in the range of housing need assessed by the Council represents the minimum that results from using a national standard method (Standard Method)”.

- In the Emerging Strategy (2016-2036), Melksham has an overall housing requirement figure of 3,950, with a residual amount (after completed and pipeline homes are deducted) of 2,585 as of 1st April 2019. The other settlements are assumed to fall into the 'Rest of HMA' for Chippenham, with an overall housing requirement figure of 2,805 and a residual figure of 1,270 as of 1st April 2019.

Empowering Rural Communities¹⁴:

- This section focuses on the strategy and needs for rural settlements, including Small Villages (such as Beanacre and Berryfield), Large Villages (such Whitley/Shaw), and Local Service Centres.
- Within Chippenham HMA, Market Towns are expected to deliver 8,370 dwellings (already noted above as 3,950 for Melksham specifically), Large Villages (which includes Whitley/Shaw) are expected to deliver 1,435 dwellings, and 'Elsewhere' (which is assumed to include Beanacre and Berryfield) is expected to deliver 1,265 dwellings between 2016 and 2036.
- Furthermore, Table 2.4 outlines the baseline indicative housing requirement for 2016 to 2026 for Whitley/Shaw as 95 dwellings. It is also stated that completions (2016-19) and commitments (as of 1st April 2019) total 6 homes.
- It is suggested that in the rural area, the Council will seek 40% Affordable Housing on all schemes of more than 5 dwellings where possible.
- Core Policy 44 from the Core Strategy is suggested to be updated, with the key points as follows:
 - Rural exception sites - at rural settlements, development proposals will be supported where their primary purpose is to provide affordable housing to meet local needs. Proposals must consist of 20 dwellings or fewer and be no greater than 5% of the size of the settlement.
 - The inclusion of up to 25% open market housing on rural exception sites (that would otherwise be for affordable housing only) will only be considered where it can be demonstrated that the site would otherwise be unviable.
 - At rural settlements, proposals brought forward by a Community Land Trust (CLT) will be considered with the inclusion of up to 50% market housing where it can be demonstrated that it would meet an identified local need.

Planning for Melksham¹⁵:

- This document outlines the priorities and growth for Melksham specifically.
- It outlines, as above, that the residual housing requirement to be accommodated up until 2036 for Melksham is 2,585. Both the Local Plan and the Neighbourhood Plan can allocate sites for development.

¹⁴ Available at https://www.wiltshire.gov.uk/media/5624/Empowering-Rural-Communities/pdf/WLP_Empowering_Rural_Communities_FINAL_28-01-2021_.pdf?m=637474434248530000

¹⁵ Available at: https://www.wiltshire.gov.uk/media/5638/Planning-for-Melksham/pdf/WLP_Market_Town_Planning_for_Melksham_FINAL.pdf?m=637459664963130000

- The document outlines potential proposed sites for development around Melksham & Bowerhill.

Quantity of housing to provide

62. The NPPF 2021 (paragraphs 66 and 67) requires Local Authorities to provide neighbourhood groups upon request with a definitive or an indicative number of houses to plan for over the Neighbourhood Plan period.
63. Wiltshire Council has fulfilled that requirement by providing Melksham & Melksham Without with an indicative figure of 2,674 dwellings to be accommodated within the Neighbourhood Area by the end of the Plan period¹⁶. This is the combination of the residual housing requirements in the emerging Local Plan for Melksham & Bowerhill and Whitley/Shaw. The Steering Group are aware that this figure may be subject to change. It is unknown at this stage in the Local Plan process whether there will be separate housing requirements for the Small Villages of Beanacre and Berryfield.

¹⁶ As per emerging Local Plan. Group have 2,585 pencilled in as of 18/05/2022 inception call (this is the figure for Melksham specifically).

3. Approach

Research Questions

64. The following research questions were formulated at the outset of the research through discussion with the Melksham & Melksham Without Neighbourhood Plan Steering Group. They serve to direct the research and provide the structure for the HNA.

Tenure and Affordability

65. The Steering Group would like to understand the needs of the community for housing of varying tenures, as well as the relative affordability of those tenures that should be provided to meet local need now and into the future.
66. This evidence will allow Melksham & Melksham Without to establish the right conditions for new development to come forward that is affordable, both in the broader sense of market housing attainable for first-time buyers, and as Affordable Housing for those who may be currently priced out of the market.

RQ 1: What quantity and tenures of Affordable Housing should be planned for over the Neighbourhood Plan period?

Type and Size

67. The Steering Group is seeking to determine what size and type of housing would be best suited to the local community. The Steering Group identified that although no prevalent need group has been identified as of yet, it is expected that adult children living at home are in need of housing options.
68. The aim of this research question is to provide the Steering Group with evidence on the types and sizes needed by the local community. This will help to shape future development so that it better reflects what residents need.
69. While this study is not able to advise on space standards or home configurations, it may reveal imbalances between the available stock and demographic trends.
70. Note, however, that the evidence gathered here takes the current population as its starting point and projects forward trends that exist today. It therefore risks embedding features of the housing stock and occupation patterns that the community may actually wish to change. In that sense, the findings in this report might be viewed as the baseline scenario on top of which the community's objectives and primary evidence should be layered to create a more complete picture and vision for the future.

RQ 2: What type (terrace, semi, bungalows, flats and detached) and size (number of bedrooms) of housing is appropriate for the Neighbourhood Area over the Neighbourhood Plan period?

Specialist Housing for Older People

71. This chapter supplements the demographic evidence relating to Type and Size, including the potential demand for downsizing, to consider the quantity and characteristics of need for housing for older people with some form of additional care.

RQ 3: What provision should be made for specialist housing for older people over the Neighbourhood Plan period?

Relevant Data

72. This HNA assesses a range of evidence to ensure its findings are robust for the purposes of developing policy at the Neighbourhood Plan level and is locally specific. This includes data from the 2011 Census and a range of other data sources, including:

- Other Office of National Statistics (ONS) datasets providing more up-to-date demographic information;
- ONS population and household projections for future years;
- Valuation Office Agency (VOA) data on the current stock of housing;
- Land Registry data on prices paid for housing within the local market;
- Rental prices from Rightmove.co.uk;
- Local Authority housing waiting list data; and
- Swindon Borough Council & Wiltshire Council Local Housing Needs Assessment (LHNA) 2019¹⁷.

73. More recent data sources for the population and existing housing stock will be used wherever possible in this report. However, Census datasets providing, for example, the breakdown of households (as opposed to individuals) by age and the tenure of dwellings, cannot be accurately brought up to date in this way. Such patterns are instead generally assumed to persist to the present day.

¹⁷ Available at: https://www.wiltshire.gov.uk/media/5688/Swindon-and-Wiltshire-Local-Housing-Needs-Assessment-April-2019/pdf/Swindon_Wilts_Local_Housing_Needs_Assessment_April_2019.pdf?m=637459763804370000

4. RQ 1: Tenure, Affordability and the Need for Affordable Housing

RQ 1: What Affordable Housing (e.g. social housing, affordable rented, shared ownership, discounted market sale, intermediate rented) and other market tenures should be planned for in the housing mix over the Neighbourhood Plan period?

Introduction

74. This section approaches the question of affordability from two perspectives. First, it examines what tenure options are currently available in the NA and which of them might be most appropriate going forward, based on the relationship between how much they cost and local incomes. Second, it estimates the quantity of Affordable Housing that might be required during the Neighbourhood Plan period. The scale of need for these homes can justify planning policies to guide new development.
75. Tenure refers to the way a household occupies their home. Broadly speaking, there are two categories of tenure: market housing (such as homes available to purchase outright or rent from a private landlord) and Affordable Housing (including subsidised products like social rent and shared ownership). We refer to Affordable Housing, with capital letters, to denote the specific tenures that are classified as affordable in the current NPPF. A relatively less expensive home for market sale may be affordable but it is not a form of Affordable Housing.
76. The definition of Affordable Housing set out in the NPPF 2021 makes clear the Government's commitment to home ownership by broadening the definition to include a range of low-cost housing opportunities for those aspiring to own a home. As part of this effort, the Government has recently introduced a new product called First Homes.¹⁸
77. Because the First Homes product is new and expected to be an important part of the strategy for improving access to home ownership, it is worth summarising its key features and implications:
- First Homes should be available to buy with a minimum discount of 30% below their full market value (i.e. the value of an equivalent new home);
 - The discount level can be set higher than 30% – at 40% or 50% – where this can be suitably evidenced. The setting and justifying of discount levels can happen at neighbourhood as well as local authority scale;
 - After the discount is applied the initial sale price must not exceed £250,000 (or £420,000 in Greater London), and lower caps can be set locally;

¹⁸ The shape that the new First Homes product will take is set out in a Ministerial Statement issued in May 2021, available here: <https://questions-statements.parliament.uk/written-statements/detail/2021-05-24/hlws48>. The relevant update to PPG is available here: <https://www.gov.uk/guidance/first-homes#contents>.

- Purchasers must be first-time buyers with an income less than £80,000 (or £90,000 in Greater London), and First Homes can be prioritised for local people and/or key workers;
- They will be subject to legal restrictions ensuring the discount is retained for future occupants, and renting out or sub-letting will not normally be permitted;
- In addition to setting the discount level, local authorities and neighbourhood planning groups can apply additional criteria, such as a lower income cap, local connection test or prioritisation for key workers through adopted plans, emerging policy or Supplementary Planning Documents.
- 25% of all homes delivered through section 106 developer contributions on sites enabled through the planning process should be sold as First Homes. In simpler terms, 25% of all subsidised Affordable Housing on mainstream housing developments should be First Homes. This is likely to mean that First Homes will take the place of shared ownership housing in many circumstances, and in some cases may also displace social or affordable rented homes.

Current tenure profile

78. The current tenure profile is a key feature of the Neighbourhood Area (NA). Patterns of home ownership, private renting and affordable/social renting reflect demographic characteristics including age (with older households more likely to own their own homes), and patterns of income and wealth which influence whether households can afford to rent or buy and whether they need subsidy to access housing.
79. Table 4-1 presents data on tenure in Melksham & Melksham Without compared with Wiltshire and England from the 2011 Census, which is the most recent available source of this information. It shows that the majority of households owned their own home at 72.4%, significantly above both local authority wide and national levels. This has an impact on the proportion of rented and affordable housing in the NA. This is most notable in the private rented sector, with 11.8% of households living in the private rented sector in Melksham & Melksham Without compared to 16.8% across England. The proportion of households living in social rented dwellings is relatively similar in the NA and across Wiltshire, but both of these figures are below national levels.
80. Data provided by Wiltshire Council indicates that there were 1,653 net dwelling completions between 2011/2012 and 2020/2021 and 474 Affordable Housing completions, with 28.7% of completions being affordable. Based on the levels of Affordable Housing in 2011, it can be assumed that the overall proportion has grown in the NA as a result of recent development. Of these Affordable Housing completions, 83.1% were for affordable/social rent, with 16.9% for affordable home ownership (mainly shared ownership). In addition to this Affordable Housing delivered, a further 46 were noted as schemes such as First Buy and Home Buy which allow access to home ownership but do not necessarily create a new unit.
81. There is no current data on the proportion of housing that is rented because the choice to let out a property does not require planning permission or other changes that would

be recorded centrally. The 2021 Census will provide the most robust and up-to-date picture of this when the results are released in the coming months. However, it is interesting to observe the change recorded between the 2001 and 2011 Census: in Melksham & Melksham Without the private rented sector expanded by 130.9% in that period, a rate of growth that was significantly greater than national increases of 82.4%. Despite this, the 2011 private rented sector in the NA was smaller than across England.

Table 4-1: Tenure (households) in Melksham & Melksham Without, 2011

Tenure	Melksham & Melksham Without	Wiltshire	England
Owned	72.4%	67.5%	63.3%
Shared ownership	0.5%	0.8%	0.8%
Social rented	14.4%	14.7%	17.7%
Private rented	11.8%	15.4%	16.8%

Sources: Census 2011, AECOM Calculations

82. It is also helpful to look at the NA tenure split in 2011 compared to the sub-areas discussed earlier in the report. Due to the NA being mainly comprised (in terms of population and dwelling stock) of the Melksham Town & Bowerhill sub-area, the proportions of different tenure types are similar between these two areas. The most notable differences to the NA area seen in the Large Village of Whitley/Shaw, where a significantly higher proportion of households own their own home, at 84.9% compared to 72.4% across the wider NA. This has a knock-on impact on the remaining tenures, with a significantly lower proportion of social rented housing in Whitley & Shaw compared to the whole NA and the other comparator areas. This is also well below both Wiltshire and national levels at just 7.2%. The wider countryside area's proportional tenure split generally lies between Melksham Town & Bowerhill and Whitley & Shaw. However, the proportion of households living in shared ownership dwellings is higher than any of the other areas, in line with national levels. The tenure mix across the sub areas suggests that households with greater wealth are likely to reside in Whitley & Shaw, with owner occupation dominating and very little provision of Affordable Housing. The greatest proportion of Affordable Housing is located in the more urban sub-area of Melksham Town & Bowerhill, which is not unusual when looking at the provision of Affordable Housing nationally.

Table 4-2: Tenure (households) in NA compared to sub-areas, 2011

Tenure	NA	Melksham Town & Bowerhill	Whitley & Shaw	Wider Countryside Area
Owned	72.4%	71.3%	84.9%	75.3%
Shared ownership	0.5%	0.5%	0.2%	0.8%
Social rented	14.4%	15.1%	7.2%	12.1%
Private rented	11.8%	12.2%	6.8%	10.6%

Sources: Census 2011, AECOM Calculations

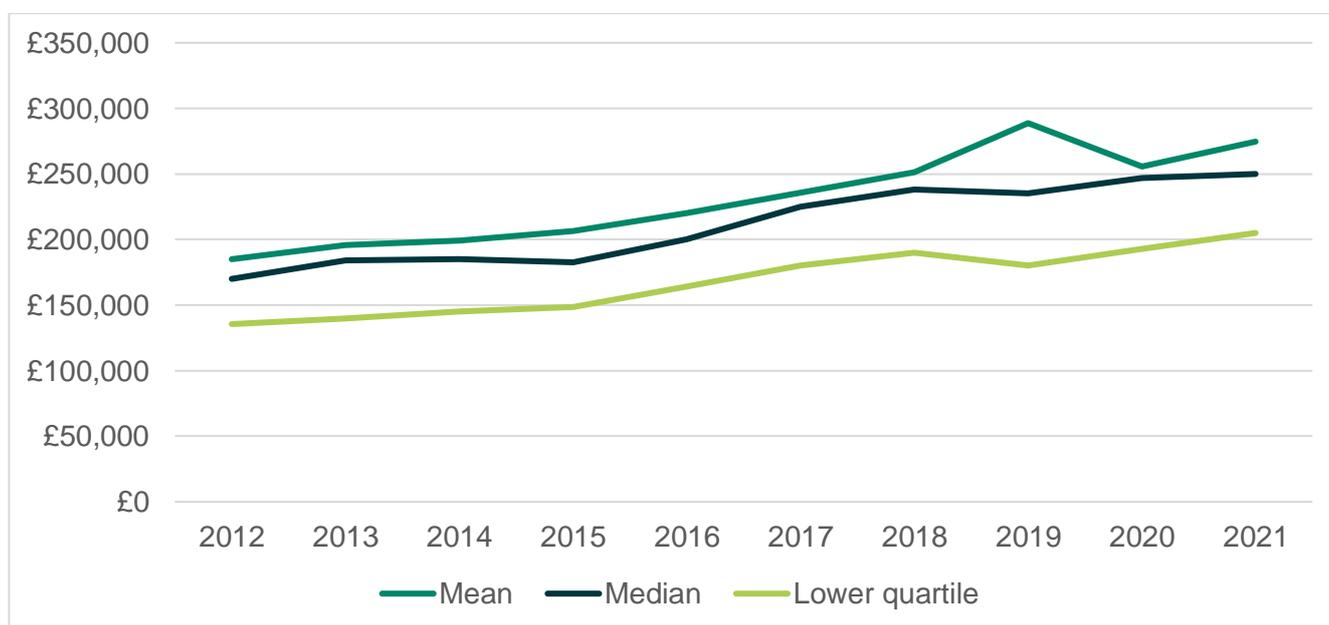
Affordability

House prices

83. House prices provide an indication of the level of demand for homes within an area. The relationship between house prices and incomes determines whether housing is affordable to local households and, to a large extent, what tenure, type and size of home they occupy. Changes in affordability over time can indicate pressures in the housing market. As such, it is useful for the evidence base for plans to examine trends in prices and consider what this reveals about the local housing market.

84. Figure 4-1 looks at the average and lower quartile house prices in Melksham & Melksham Without based on sales price data published by the Land Registry. It shows that median and lower quartile house prices in Melksham & Melksham Without rose relatively steadily between 2012 and 2021, with little fluctuation. The mean, which captures the average of all house prices (high and low) with outlying datapoints causing it to increase, shows a peak in 2019 but this is not noticeable in the median as this is the middle number when all the data is sorted from smallest to largest. The median increases by 47.1% between 2012 and 2021, from £170,000 to £250,000. The lower quartile house prices follow the same trends as the median but sees slightly greater growth, at 51.3%, to a peak of £205,000 in 2021.

Figure 4-1: House prices by quartile in Melksham & Melksham Without, 2012-2021



Source: Land Registry PPD

85. Table 4-3 breaks down house prices by type, presenting the median within each type. It shows that semi-detached dwellings experienced the greatest house price growth at 52.0% between 2012 and 2021. House prices overall are highest for detached dwellings, increasing from £236,000 in 2012 to £337,500 in 2021. These prices rose steadily, with a slight decline in 2019. Semi-detached and terraced prices also experienced very little fluctuation, likely due to substantial sample sizes. There was more significant fluctuation

in the prices of flats, peaking in 2018 at £175,414, likely due to variation within a smaller sample, such as the size of the flat, location, and condition of the property.

Table 4-3: Median house prices by type in Melksham & Melksham Without, 2012-2021

Type	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	Growth
Detached	£236,000	£249,998	£250,000	£271,250	£284,995	£291,995	£320,000	£312,000	£323,498	£337,500	43.0%
Semi-detached	£159,000	£167,500	£177,725	£179,975	£200,000	£224,995	£230,000	£235,000	£232,500	£241,750	52.0%
Terraced	£135,000	£141,000	£145,000	£155,000	£173,000	£182,000	£188,768	£185,500	£190,000	£205,000	51.9%
Flats	£87,500	£81,500	£75,000	£95,000	£124,500	£112,950	£175,414	£113,250	£120,000	£123,750	41.4%
All Types	£170,000	£183,995	£185,000	£182,500	£200,000	£225,000	£237,995	£235,000	£247,000	£250,000	47.1%

Source: Land Registry PPD

Income

86. Household incomes determine the ability of households to exercise choice in the housing market, and consequently the level of need for affordable housing products. Two sources of data are used to examine household incomes in the NA.
87. The first source is ONS's estimates of incomes in small areas. This is locally specific but limited to the overall average income (i.e. it does not provide the average income of lower earners). The average total household income before housing costs locally was £42,533 in 2018. A map of the area to which this data applies is provided in Appendix A.
88. The second source is ONS's annual estimates of UK employee earnings. This provides lower quartile average earnings (i.e. the income of the lowest 25% of earners). However, it is only available at the Local Authority level. It also relates to individual earnings. While this is an accurate representation of household incomes where there is only one earner, it does not represent household income where there are two or more people earning. Wiltshire's gross individual lower quartile annual earnings were £13,788 in 2020. To estimate the income of households with two lower quartile earners, this figure is doubled to £27,576.
89. It is immediately clear from this data that there is a large gap between the spending power of average earning households and those earning the lowest 25% of incomes, particularly where the household in question has one earner only.

Affordability Thresholds

90. To gain a clearer understanding of local affordability, it is useful to understand what levels of income are required to afford different tenures. This is done using 'affordability thresholds': the estimated amount of annual income required to cover the cost of rent or a mortgage given local housing prices.
91. AECOM has determined thresholds for the income required in Melksham & Melksham Without to buy a home in the open market (average and entry-level prices), and the income required to afford private rent and the range of Affordable Housing tenures as set out in the NPPF. These calculations are detailed and discussed in more detail in Appendix A.

92. The key assumptions made in assessing the affordability of different tenures are explained alongside the calculations, but it is worth noting here that we have assumed that the maximum percentage of household income that should be spent on rent is 30% and that mortgage financing will be offered at a maximum of 3.5 times household income. These are standard assumptions across housing needs assessments at neighbourhood and local authority scale although different approaches are sometimes taken and a case can be made for alternatives.
93. The mortgage multiplier is particularly variable, with multipliers up to 4.5 or even above 5 times income increasingly available, although the actual average in practice tends to be lower, particularly where applicants are dual earning. The Financial Conduct Authority uses 3.5 or more as its standard assumption for single applicants and 2.75 or more for dual applicants.
94. The percentage of income to be spent on rent also varies considerably for individuals, and it is increasingly common for households to dedicate a larger proportion of their earnings to rent. When considering affordability, it is considered good practice to be conservative, and the 30% benchmark is used as ONS's current standard assumption.
95. While larger mortgages and higher rents may be feasible for individuals, this creates vulnerability to changing economic circumstances and may not be a possibility for many people with the most acute housing needs. Different assumptions would, however, alter the picture of affordability that emerges here. This is another reason to interpret the findings with a degree of flexibility.
96. Although not a factor in the calculations to assess affordability locally below, it is also important to take into consideration the rising cost of living, in particular in relation to fuel. Household costs, whether this is in relation to heating, electricity, car fuel, or food, have an impact on housing affordability, with the rising cost of living meaning that households are required to spend a greater proportion of their income on these necessities and may therefore have smaller budgets for rent or mortgages. This will most likely have the greatest impact when looking at households that may be able to 'marginally' afford different tenures as outlined in Table 4-4.
97. When looking at the different tenures, 2020 statistics¹⁹ show that 13.2% of households nationally were fuel poor. This was by far the highest in the private rented sector at 25.0% of households considered to be fuel poor, followed by the social rented sector at 18.7%, and the owner occupied sector at 8.4%. It may be initially surprising that fuel poverty is lower in the social rented sector than the private rented sector but it may be that households in the social rented sector have greater access to benefits and support with household bills. Additionally, their housing costs are lower and if they are in receipt of housing benefit, they may be spending a smaller proportion of their income on direct housing costs (e.g. rent).

¹⁹ Available here - <https://www.gov.uk/government/statistics/fuel-poverty-detailed-tables-2022>

98. Fuel costs are currently a key issue for households. The Annual Fuel Poverty Statistics in England (2022)²⁰ assess fuel poverty across the country in 2020. Whilst this is the most recent set of reporting, the data refers to 2020. The past 6 months have seen a significant spike in utilities costs (especially fuel) and the situation continues to evolve rapidly. It is therefore safe to assume that the current picture of fuel poverty is significantly worse than 2020. The trends across household and dwelling types may however remain largely the same. Some key findings from the report include:
- Households living in end terraces have the highest likelihood of living in fuel poverty, with households living in detached properties having the lowest likelihood. Despite this, those that are in fuel poverty in detached dwellings are likely to have the largest fuel poverty gap. This is due to factors such as larger floor areas and more exposed walls. Other factors such as the age of the property and the energy efficiency will also impact this.
 - The report categorises households' main fuel into electricity, gas, and other, with oil and coal falling into the 'other' category. This latter category has the highest average fuel poverty gap of the fuels at £585 (although households reliant on electricity as their main fuel have the highest likelihood of being in fuel poverty). Additionally, it notes that of households living off the gas grid, 19.4% are fuel poor, compared to 12.3% with access to mains gas.
 - This is important to note as the Steering Group are aware that a number of settlements within the NA are not on the gas mains and therefore rely on alternative fuels, mainly oil. The group note that the small pockets in the NA without main gas include parts of Woodrow, parts of Beanacre, Lopes Close, Sandridge Lane, and Redstocks. These areas also tended to not have access to mains drainage. This is not uncommon in rural areas and may mean that the cost of living has a greater impact on housing affordability in the rural sub areas of the NA compared to the main town.
 - The South West in 2020 had the largest average fuel poverty gap at £287.
99. Table 4-4 summarises the estimated cost of each tenure, the annual income required to support these costs within the NA, and whether local incomes are sufficient. The income required column assumes the household already has access to a deposit (which we have assumed to be 10% of the value to be purchased) but does not reflect the possibility that households may already hold equity from an existing property. Although the factors discussed above may be crucial to whether housing will be affordable, they are highly dependent on individual circumstances that cannot be anticipated here.
100. The same information is presented as a graph in Figure 4-2 on a subsequent page, with selected measures from the table presented for clarity.

²⁰ Available here - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1056777/annual-fuel-poverty-statistics-lilee-report-2022-2020-data.pdf

Table 4-4: Affordability thresholds in Melksham & Melksham Without (income required, £)

Tenure	Mortgage value (90% of price)	Annual rent	Income required	Affordable on average incomes? £42,533	Affordable on LQ earnings (single earner)? £13,788	Affordable on LQ earnings (2 earners)? £27,576
Market Housing						
Median House Price	£225,000	-	£64,286	No	No	No
NA Median New Build House Price	£238,500	-	£68,143	No	No	No
NA LQ New Build House Price	£202,183		£57,767	No	No	No
LQ/Entry-level House Price	£184,500	-	£52,714	No	No	No
Average Market Rent	-	£8,972	£29,906	Yes	No	No
Entry-level Market Rent	-	£6,846	£22,820	Yes	No	Yes
Affordable Home Ownership						
First Homes (-30%)	£141,528	-	£40,437	Yes	No	No
First Homes (-40%)	£121,310	-	£34,660	Yes	No	No
First Homes (-50%)	£101,091	-	£28,883	Yes	No	Marginal
Shared Ownership (50%)	£101,091	£2,808	£38,244	Yes	No	No
Shared Ownership (25%)	£50,546	£4,212	£28,482	Yes	No	Marginal
Shared Ownership (10%)	£20,218	£5,055	£22,625	Yes	No	Yes
Affordable Rented Housing						
Affordable Rent	-	£6,682	£22,251	Yes	No	Yes
Social Rent	-	£5,261	£17,519	Yes	No	Yes

Source: AECOM Calculations

101. Before considering each tenure category in turn, it is important to stress that these affordability thresholds have been calculated to give a sufficiently robust indication of the costs of various tenures to inform Neighbourhood Plan policy choices. These figures rely on existing data and assumptions, and it is not possible to estimate every possible permutation. The income figures also disguise a large degree of variation. For simplicity the analysis below speaks in terms of tenure products being ‘affordable’ or ‘not affordable’ for different groups, but individual circumstances and the location, condition and other factors of specific properties in each category have a large impact. These conclusions should therefore be interpreted flexibly.

Market housing for purchase and rent

102. Thinking about housing for purchase on the open market, it appears that local households on average incomes are unable to access even entry-level homes unless they have the advantage of a large deposit. Market housing, even with the benefit of a higher than average income, is likely to remain out of reach to most. The median house price would require an annual income 51.1% higher than the current average.

103. Private renting is generally only affordable to average earners. Households made up of two lower quartile earners can afford the given rental thresholds for entry-level (1-

bedroom) private rented housing. Affordability is improved if households are able or willing to dedicate a larger proportion of their incomes to rental costs, although this has repercussions for other quality of life aspects and cannot be assumed to suit all individuals' circumstances.

Affordable home ownership

104. There is a relatively large group of households in Melksham & Melksham Without who may be able to afford to rent privately but cannot afford home ownership. They are typically earning between around £22,820 per year (at which point entry-level rents become affordable) and £52,714 (at which point entry-level market sale homes become affordable). This 'can rent, can't buy' cohort may benefit from the range of affordable home ownership products such as First Homes and shared ownership.
105. First Homes are to be offered at a discount of at least 30% on equivalent market prices (i.e. new build, entry-level properties). Local authorities and neighbourhood plan qualifying bodies will have discretion to increase the discount on First Homes to 40% or 50% where there is evidence to suggest this is appropriate.
106. This report has estimated the income required to afford First Homes and tested the implications of 30%, 40% and 50% discount levels. If First Homes in Melksham & Melksham Without are delivered at a 30% discount then the product becomes accessible to households on mean incomes. Increasing the discount to 50% would make First Homes marginally affordable to households with two lower quartile earners. However, this may have adverse impacts on the viability of sites and the ability to deliver social/affordable rented dwellings. It is therefore recommended that First Homes is delivered at 40% as although this discount level does not make home ownership accessible to households on two lower quartile incomes (who could benefit from other products such as shared ownership), it does increase the opportunity for ownership past households on mean incomes (to those earning over £34,660).
107. Table 4-5 shows the discount required for First Homes to be affordable to the three income groups. Alongside using the 2021 lower quartile new build house price, which has been used to calculate the First Homes and shared ownership purchase thresholds, it is helpful to look at additional price benchmarks. To get a complete picture locally, alongside this price benchmark, median and entry-level (lower quartile) house prices are used. The discount levels required for these alternative benchmarks are given below.

Table 4-5: Discount on sale price required for households to afford First Homes

House price benchmark	Mean household income	Single LQ earner	Dual LQ earning household
NA median house price	34%	79%	57%
NA LQ new build house price	26%	76%	52%
NA entry-level house price	19%	74%	48%

Source: Land Registry PPD; ONS MSOA total household income

108. Shared ownership appears to be similarly affordable to First Homes, and is broadly accessible to the same groups, with those on mean incomes able to access all shared ownership equity levels analysed. Shared ownership at 25% equity is considered to be marginally affordable to households with two lower quartile earners. Government has recently announced that the minimum equity share for shared ownership will fall to 10% of the property value.²¹ If this is delivered in the NA, it will make shared ownership easier to access for more people, with it accessible to households with two lower quartile earners. However, while the income threshold for a 10% equity shared ownership home is lower, this product may not necessarily be more attractive than the alternatives (such as shared ownership at higher equity shares and First Homes) for those who can afford them.
109. The transition from 10% to 100% ownership would be long, and during this period the rent on the 90% unsold value would not be subsidised, meaning that monthly costs for occupants will remain relatively high and the build-up of equity will be relatively slow. This product would therefore only be a realistic route to full ownership for households prepared to take a long-term view.
110. The income required to access Rent to Buy, a product designed to allow residents to transition from renting to ownership by allowing a discount on the market rent to be used to save a deposit, is assumed to be the same as that required to afford market rents. On that basis, First Homes at 50% discount and shared ownership at 25% and 10% equity are more affordable options.
111. These three products need to be considered in relation to what they offer occupants in the long term beyond simply being affordable to access or not.
- First Homes allow for a greater ownership stake in the property, enabling occupiers to benefit from price appreciation over time. Monthly outgoings are also limited to mortgage costs alone, which tend to be cheaper than renting.
 - Shared ownership at high equity shares performs a similar function to First Homes, but there are additional costs associated with the rented portion.
 - Shared ownership at low equity shares can usually be accessed by lower earning households (than First Homes) and requires a smaller deposit. However, this is a potentially less attractive route to eventual ownership because monthly outgoings remain high. The occupant has to pay a significant monthly rent as well as service charges and other costs, so it can be harder for them to save funds to buy out a greater share in the property over time.
 - Rent to Buy requires no deposit, thereby benefitting those with sufficient incomes but low savings. It is more attractive than renting but results in a much slower accumulation of the funds that can provide an eventual route to ownership than the other tenures discussed above.

²¹ The previous minimum equity share was 25%. This change took effect from 28 June 2021 and transitional arrangements are in place for planning policy documents that are prepared during the implementation timeframe. Changes are also introduced to make the process of staircasing to full ownership more gradual with lower minimum increments of 1%. The ministerial statement confirming and detailing the changes is available here: <https://questions-statements.parliament.uk/written-statements/detail/2021-05-24/hws48>.

112. In conclusion, all of these products would provide value to different segments of the local population, with shared ownership at a 25% equity share and lower potentially allowing lower earning households to get a foot on the housing ladder, while Rent to Buy is helpful to those with little or no savings for a deposit, and First Homes may provide a better long-term investment to those who can afford to access it.

Affordable rented housing

113. Affordable rented housing is generally affordable to households with two lower earners depending on their household size (average earning households are unlikely to be eligible). However, households with a single lower earner appear unable to afford any of the tenures considered including the smallest socially rented units. Many such individuals will, if unable to secure a social rented dwelling require additional subsidy through Housing Benefit to access housing.

114. The evidence in this chapter suggests that the affordable rented sector performs a vital function in Melksham & Melksham Without as the only option for a large segment of those in the greatest need. Social rents are cheaper and would therefore leave households on lower earnings better off and better able to afford their other living costs, such as food and fuel etc. Where households are supported by housing benefit the difference in the cost of affordable and social rents may be irrelevant as the level of housing benefit flexes according to the rent. This mean that households supported by housing benefit may be no better off in social rented accommodation because they receive a lower rate of housing benefit to cover their rent.

Community Opinion

115. It is important to take into consideration community opinion, with the Steering Group undertaking community consultation in May and June 2022 via a housing survey. It is necessary to caveat that although community surveys provide valuable and useful evidence in relation to the local wants and needs, they only represent a segment of the population. For example, of the respondents that provided information on their current housing status, 79% indicated that they owned their own home, with 7% indicating that they live in housing association or local authority rented dwellings (social and affordable rent). Comparing this to the tenure split in the NA in 2011, 72% of households owned their own home, with 14% living in social rented accommodation. This suggests that a smaller proportion of those in the greatest need of Affordable Housing answered the survey, a factor that should be kept in mind when interpreting the findings.

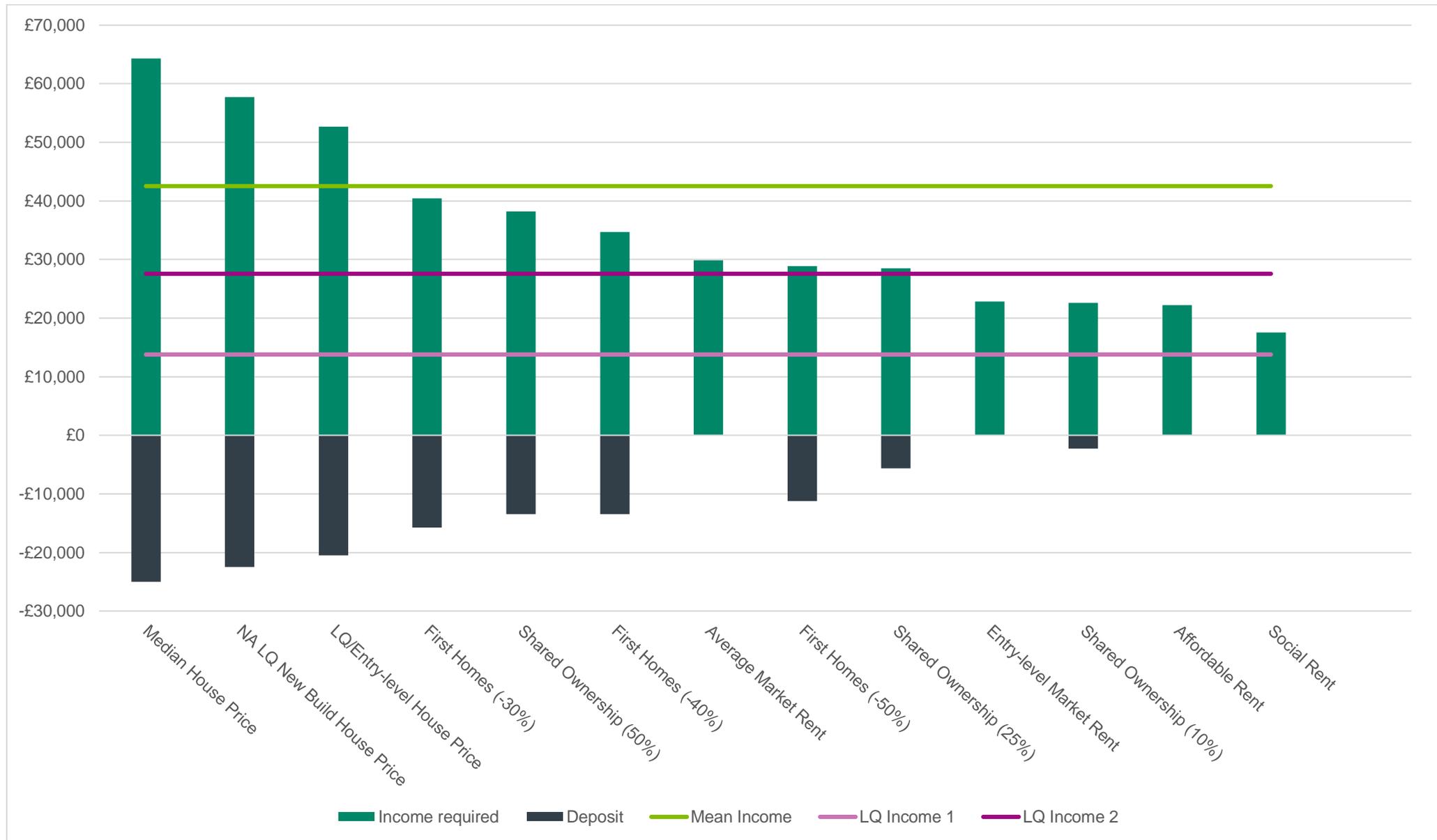
116. When looking at the findings of the survey, only 35% of respondents indicated that they were 'satisfied' or 'very satisfied' with existing housing provision in Melksham & Melksham Without, suggesting a clear need for a review of the stock and needs of the NA. When looking at reasonings for their responses to this question, 26% recorded that housing in the NA is too expensive to buy, with 25% suggesting that there is a shortage of availability to buy or rent. This indicated shortage may be further worsening affordability issues if there is a greater demand than supply of stock available on the market. Therefore, some provision of housing being brought forward in the plan period may help to address this.

117. The community was asked what type of housing they felt would best meet local needs. The five most common responses are as follows:

- Discounted open market / First Homes – 40%
- Bungalows – 33%
- Open market family homes – 28%
- Shared ownership – 25%
- Housing association & local authority rented jointly with community-led & co-ops – 24%

118. This shows that the community is aware of and concerned about the affordability challenges in the NA relating to home ownership specifically, with both First Homes and shared ownership identified as key areas of need for local people. It is also noted that almost a quarter of respondents answered that there is a need for housing association or local authority rented housing, as well as a potential desire for community-led schemes within the NA.

Figure 4-2: Affordability thresholds in Melksham & Melksham Without, income required (additional cost of deposit in black)



Source: AECOM Calculations

Affordable housing- quantity needed

119. The starting point for understanding the need for affordable housing in Melksham & Melksham Without is the Local Housing Need Assessment (LHNA). An LHNA was undertaken for Swindon Borough Council and Wiltshire Council in 2019²². This study updated the overall housing figure for the Housing Market Area (HMA) determined in the 2017 Swindon & Wiltshire Strategic Housing Market Assessment (SHMA)²³ in line with updated NPPF and PPG requirements but does not estimate the need for affordable housing in the area. Whilst the LHNA updates the SHMA, it also states that the analysis within the 2017 SHMA may continue to provide useful evidence. This report therefore estimates the affordable housing need in Melksham & Melksham Without based on the 2017 SHMA findings as a starting point.
120. The SHMA estimates the need for affordable housing in the local authority area based on analysis of the Council's waiting list and analysis of other data sets in line with Planning Practice Guidance at the time. The SHMA identifies a need for 718.8 additional affordable homes each year in Wiltshire as a whole. When the SHMA figures are pro-rated to Melksham & Melksham Without based on its fair share of the population (4.78% of the LPA's population (based on mid-2020 population estimates)) this equates to 34.4 affordable homes per annum or 481.0 affordable homes over the Neighbourhood Plan period 2022-2036. Local authority level figures are likely to represent higher needs in the urban areas of the area where there is a large social housing stock and larger numbers of households living in the private rented sector on housing benefit. Both of these factors tend to generate higher needs. By contrast, in rural villages, the lack of social housing means there is no need generated from households already living in the sector. Due to Melksham & Melksham Without covering both rural areas and more built-up settlements, this method of providing an estimate of affordable housing need in the NA could be considered appropriate. It is also worth noting that the SHMA indicates that the figures provided should be considered a minimum for affordable housing need as the assessment focusses only on those with the most acute housing needs.
121. Due to the 2017 SHMA for Wiltshire and Swindon being relatively dated, and the fact that it has in part been updated by the 2019 LHNA, AECOM have also undertaken calculations to determine the quantity of affordable housing need in the NA. The methodology and results are outlined below. The AECOM figures are used in this report as the most up to date. They also provide estimates for housing need split between affordable rent and affordable home ownership.
122. In Table 4-6 we have calculated, using PPG as a starting point,²⁴ an estimate of the total need for affordable rented housing in Melksham & Melksham Without over the Plan period. It should, however, be noted that the accuracy of

²² Available here: [Swindon Wilts Local Housing Needs Assessment April 2019.pdf \(wiltshire.gov.uk\)](https://www.wiltshire.gov.uk/downloads/file/5010/swindon-and-wiltshire-strategic-housing-market-assessment-shma-report-2017)

²³ Available here:

<https://www.swindon.gov.uk/downloads/file/5010/swindon-and-wiltshire-strategic-housing-market-assessment-shma-report-2017>

²⁴ Paragraphs 024-026 Reference ID: 2a-026-20140306, at <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

the findings generated by the model is only as strong as the evidence we have available to us. For example, Census 2011 data is increasingly out-of-date. However, given the test of proportionality for evidence supporting neighbourhood plans, and the need to be in general conformity with Local Authority strategic policies, the calculations set out here are considered a reasonable basis for understanding and planning for neighbourhood-level affordable housing need.

123. It should also be noted that figures in Table 4-6 are largely dependent on information provided by Wiltshire Council in its capacity as manager of the local housing waiting list. The current backlog of need on the Housing Register for households identifying Melksham & Melksham Without as their first preference, as of May 2022, is 201 households. The vast majority of this need, at 198 households, is related to Melksham parish. It is worth noting that there is likely to be further hidden housing need within the NA, of households who are either not considered eligible or have not applied based on low expectations of being housed.
124. Although not included in the Affordable Housing calculations, it is also interesting to note that the Wiltshire Open Market Register identified 40 households not currently in need in Melksham & Melksham Without but that may be eligible for intermediate housing (affordable home ownership such as shared ownership).
125. The table shows that there are currently about 201 households in Melksham & Melksham Without unable to access affordable rented homes suitable to their needs. The table also suggests that, over the Plan period, 196.0 additional households in the Neighbourhood Area will fall into need. However, the total estimated need for affordable rented homes is -23.1 dwellings per annum, indicating that the need for affordable rented housing in Melksham & Melksham Without specifically would be met by the current stock when looking to the end of the plan period.
126. The result, which suggests that there is estimated to be little outstanding need in future years, may initially be surprising since there is understood to be a current backlog of need (in the region of 201 households). The reason for the apparent surplus over the long-term is that model assumes a rate of turnover in the existing affordable housing stock of 3.0%. So, of the 1,715 assumed units of affordable rented accommodation existing currently, it can be expected that around 51.5 will come vacant in any given year as their current occupants move to a new location, pass away or cease to be eligible as their circumstances change. This satisfies the projected newly arising need as well as some of the backlog, which is effectively spread out over the plan period to produce an annualised figure.
127. An important caveat to this finding is that there are almost certainly households currently in need in the NA, and to 'spread them out' over the Plan period suggests that some of them can be accommodated in ten or fifteen years' time once a sufficient surplus has been built up through new supply and turnover of the existing stock. While possible, this is not favourable to the individuals

involved. In practice, it would be better to frontload any future affordable rented provision to meet those needs as soon as possible, leaving newly arising need in future to be met by turnover in the existing stock.

128. A further caveat worth emphasising is that one unit of Affordable Housing does not necessarily service one household worth of need, since the unit might have 2-bedrooms while the applicant household might require 4-bedrooms, may be located in an inappropriate location, or be otherwise unsuitable.
129. As such, it is recommended that Melksham & Melksham Without considers encouraging the delivery of some affordable rented housing, particularly early in the Plan period, with the understanding that if this results in oversupply in future years, the vacancies created when existing occupants leave their properties may need to satisfy new need from elsewhere in Wiltshire.
130. It is worth considering the role of the affordable rented housing sector in Melksham & Melksham Without in relation to the wider local authority area. Due to the NA including the Market Town of Melksham, this may be a preferred location for the Council to provide social/affordable rented housing (as opposed to in small rural villages). It is therefore likely that the town provides affordable rented housing for those in the rest of the parish, Melksham Without, and potentially outside of the NA. It is likely that the NA not only caters for the need generated locally but also some of the need of surrounding parishes or areas within Wiltshire where the development of affordable rented housing may not be possible or appropriate for the residents (e.g. poor public transport or access to amenities). The role of the NA within the Council area may be a further a reason to continue to ensure delivery of social/affordable housing within the plan period. Discussions with Wiltshire Council would be required to determine to what extent Melksham & Melksham Without plays this role.

Table 4-6: Estimate of need for Affordable Housing for rent in Melksham & Melksham Without

Stage and Step in Calculation	Total	Description
STAGE 1: CURRENT NEED		
1.1 Current households in need	201.0	Waiting list data provided by Wiltshire Council. List for Melksham & Melksham Without as of 04/05/2022. Households with either of the parishes as their first preference.
1.2 Per annum	14.4	Step 1.1 divided by the plan period to produce an annualised figure.
STAGE 2: NEWLY ARISING NEED		
2.1 New household formation	971.1	DLUHC 2018-based household projections for the LA between start and end of plan period. % increase applied to NA.
2.2 Proportion of new households unable to rent in the market	20.2%	(Steps 1.1 + 2.2.1 + 2.2.2) divided by number of households in NA.
2.2.1 Current number of social renters in parish	1715.0	2011 Census social rented stock + social/affordable rented completions 2011/12 – 2021/22.
2.2.2 Number of private renters on housing benefits	154.9	Housing benefit caseload May 2018. Pro rata for NA.
2.3 New households unable to rent	196.0	Step 2.1 x Step 2.2.
2.4 Per annum	14.0	Step 2.3 divided by plan period.
STAGE 3: TURNOVER OF AFFORDABLE HOUSING		
3.1 Supply of social/affordable re-lets (including transfers) %	3.0%	Assumed proportion of stock re-let each year.
3.2 Supply of social/affordable re-lets (including transfers)	51.5	Step 3.1 x NA social rented stock (2.2.1).
NET SURPLUS OF RENTED UNITS PER ANNUM		
Overall surplus per annum	23.1	Step 1.2 + Step 2.4 - Step 3.2

Source: AECOM model, using Census 2011, English Housing Survey 2018, DLUHC 2018 based household projections and net additions to affordable housing stock. 2018 is the latest reliable data for some datasets so is used throughout for consistency. Figures may not sum due to rounding.

131. Turning now to Affordable Housing providing a route to home ownership, Table 4-7 estimates the potential demand in Melksham & Melksham Without. This model aims to estimate the number of households that might wish to own their own home but cannot afford to – the ‘can rent, can’t buy’ group described in the previous section. The model is consistent with methods used at Local Authority scale in taking as its starting point households currently living in or expected to enter the private rented sector who are not on housing benefit.

132. There may be other barriers to these households accessing home ownership on the open market, including being unable to save for a deposit, or being unable to afford a home of the right type/size or in the right location. The model also discounts 25% of households potentially in need, assuming a proportion

will be renting out of choice. This assumption is based on consistent results for surveys and polls at the national level which demonstrate that most households (typically 80% or more) aspire to home ownership.²⁵ No robust indicator exists for this area or a wider scale to suggest aspirations may be higher or lower in the NA.

133. The result of the calculation is 63 households per annum who may be interested in affordable home ownership (or 882 for the entirety of the Plan period).
134. Again, this assumes a rate of turnover in the existing stock will satisfy some need, though this is extremely minimal because of the lack of shared ownership in the NA currently.
135. It is important to keep in mind that the households identified in this estimate are, by and large, adequately housed in the private rented sector, Affordable Housing, or living in other circumstances. They do not necessarily lack their own housing but would prefer to buy rather than rent. They have been included in the national planning definition of those in need of Affordable Housing, but their needs are less acute than those on the waiting list for affordable rented housing.

²⁵ <http://www.ipsos-mori-generations.com/housing.html>

Table 4-7: Estimate of the potential demand for affordable housing for sale in Melksham & Melksham Without

Stage and Step in Calculation	Total	Description
STAGE 1: CURRENT NEED		
1.1 Current number of renters in parish	1,311.6	Census 2011 number of renters x national % increase to 2018.
1.2 Percentage renters on housing benefit in LA	11.8%	% of renters in 2018 on housing benefit.
1.3 Number of renters on housing benefits in parish	154.9	Step 1.1 x Step 1.2.
1.4 Current need (households)	867.5	Current renters minus those on housing benefit and minus 25% assumed to rent by choice. ²⁶
1.5 Per annum	62.0	Step 1.4 divided by plan period.
STAGE 2: NEWLY ARISING NEED		
2.1 New household formation	971.1	LA household projections for plan period (2018 based) pro rated to NA.
2.2 % of households unable to buy but able to rent	9.7%	(Step 1.4 + Step 3.1) divided by number of households in NA.
2.3 Total newly arising need	93.8	Step 2.1 x Step 2.2.
2.4 Total newly arising need per annum	7.2	Step 2.3 divided by plan period.
STAGE 3: SUPPLY OF AFFORDABLE HOUSING		
3.1 Supply of affordable housing	124.0	Number of shared ownership homes in parish (Census 2011 + completions 2011/12 – 2021/22).
3.2 Supply - intermediate resales	6.2	Step 3.1 x 5% (assumed rate of re-sale).
NET SHORTFALL PER ANNUM		
Overall shortfall per annum	63.0	(Step 1.5 + Step 2.4) - Step 3.2.

Source: AECOM model, using Census 2011, English Housing Survey 2018, DLUHC 2018 based household projections and net additions to affordable housing stock. 2018 is the latest reliable data for some datasets so is used throughout for consistency.

136. There is no policy or legal obligation on the part either of the Local Authority or Neighbourhood Plan to meet affordable housing needs in full, though there are tools available to the Steering Group that can help ensure that it is met to a greater extent if resources permit (e.g. the ability to allocate sites for affordable housing).

137. It is also important to remember that even after the Neighbourhood Plan is Made, the assessment of need for Affordable Housing, the allocation of

²⁶ The assumption of approximately 25% preferring to rent and 75% preferring to buy is AECOM's judgement, based on national level polls which consistently reveal that most households who prefer home ownership eg <http://www.ipsos-mori-generations.com/housing.html> and informed by our experience across numerous neighbourhood level HNAs. The assumption is based on the fact that some households choose to rent at certain stages in their life (e.g. when young, when needing flexibility in employment market, or when new migrants move into an area). While most households prefer the added security and independence of owning their own home, private renting is nevertheless a tenure of choice at a certain points in many households' journey through the housing market. The actual percentage of preference will differ between areas, being higher in large metropolitan areas with younger households and more new migrants, but lower in other areas. 25% is used as a reasonable proxy and for consistency across HNAs and similar assumptions are used in some larger scale assessments such as LHNA's and SHMA's. If the neighbourhood planning group feel this is not an appropriate assumption in their particular locality they could use the results of a local residents survey to refine or confirm this calculation.

affordable rented housing to those in need, and the management of the housing waiting list all remain the responsibility of the Local Authority rather than the neighbourhood planning group.

Additional SHMA findings

138. The Swindon & Wiltshire Strategic Housing Market Assessment (SHMA) 2017 highlights a number of findings relevant to tenure and affordability in the Neighbourhood Area. These are outlined below:

- House prices across Wiltshire were consistently higher than England (2001-2015). For Chippenham HMA in particular (where the NA is located), the lower quartile house prices were below the overall level for Wiltshire but higher than the neighbouring Swindon HMA. This pattern is also seen when looking at the private rented sector. Rents have however increased at a faster rate than across the local authority area.
- In terms of affordability, the report identifies that Wiltshire has been consistently less affordable than the England average.

Affordable Housing policy guidance

139. Wiltshire's adopted policy on this subject Policy 43 (Providing Affordable Homes) requires 30% of all new housing (on sites of 5 or more dwellings) to be affordable. Given that affordable/social rented housing and dwellings for affordable home ownership made up 28.7% of new housing in Melksham & Melksham Without over the last decade according to Wiltshire's completions figures, it is understood that this target is not quite met on sites in the NA.

140. The overall proportion of housing that must be affordable is not an area of policy that a Neighbourhood Plan can usually influence, but it is worth emphasizing that the HNA finds there to be robust evidence of need for Affordable Housing in the NA, and every effort should be made to maximise delivery where viable.

141. How the Affordable Housing that comes forward through mainstream development sites is broken down into specific tenures – such as the balance between rented tenures and routes to home ownership – is not specified in the adopted or emerging Local Plan. The adopted Local Plan for Wiltshire specifies that tenure is to be negotiated on a site by site basis. This HNA can supply more localised evidence, and this section summarises the factors that might be taken into account before proposing a suggested Affordable Housing tenure mix that might be suitable for Melksham & Melksham Without specifically.

142. The following evidence and considerations may be used as a starting point in the development of policy concerning the Affordable Housing mix:

- A. Evidence of need for Affordable Housing:** This study estimates that Melksham & Melksham Without may have an excess of affordable rented housing based on the calculations above demonstrating that the need specifically in the NA for social/affordable rent is estimated to be met over the plan period. The study also estimates that the NA could require around

63 units of affordable home ownership per annum, or 882 over the Plan period (2022-2036). Both forms of Affordable Housing appear to be valuable in meeting the needs of people on various incomes, and the surplus of affordable rented units to meet needs within the NA does not mean that no affordable housing for rent should be brought forward.

The figures from both models combined give an estimated overall Affordable Housing need of 558.6 dwellings over the plan period. As a sense check, these can be compared to the somewhat dated 2017 SHMA figures. When the local authority need in the SHMA was pro-rated to the population of Melksham & Melksham Without, it gave an estimated need for 481.0 dwellings, not hugely dissimilar to the AECOM calculation, although they refer to different types of need. This method of pro-rating also does not take into account local housing stock, present day local Housing Register figures, or the fact that Melksham & Melksham Without may satisfy some of the Affordable Housing need of the wider local authority area.

Table 4-8 considers the potential demand for Affordable Housing in the NA's sub areas per annum. This has been calculated by pro-rating the NA figures above based on 2011 population figures, with Melksham & Bowerhill accounting for 87.2% of the NA population, Whitley & Shaw 6.3% of the population, and the Wider Countryside Area 6.5%. It is important to note that this is not calculated on individual need for these sub-areas as a number of the datasets used above could be disaggregated to a smaller level and is simply a pro-rating exercise. Other factors, such as Affordable Housing stock (which was notably low in Whitley & Shaw in 2011) should also be taken into consideration when determining the location of future Affordable Housing.

Table 4-8: Estimate of the potential demand for Affordable Housing in the NA per annum, pro-rated to sub-areas

Area	Affordable Rented Housing (per annum)	Affordable Rented Housing (2022-2036)	Affordable Home Ownership (per annum)	Affordable Home Ownership (2022-2036)
NA	-23.1	-323.4	63.0	882.0
Melksham & Bowerhill	-20.1	-281.4	54.9	768.6
Whitley & Shaw	-1.5	-21.0	4.0	56.0
Wider Countryside Area	-1.5	-21.0	4.1	57.4

Source: Census 2011, AECOM Calculations

The relationship between the AECOM calculated figures suggests that most new Affordable Housing should offer a route to home ownership. However, as noted above, these figures are not directly equivalent: the former expresses the identified need of a group with acute needs and no alternative options; the latter expresses potential demand from a group who are generally adequately housed in rented accommodation and may not be able to afford the deposit to transition to ownership.

- B. Can Affordable Housing needs be met in full?** How far the more urgently needed affordable rented housing should be prioritised in the tenure mix depends on the quantity of overall housing delivery expected.

If the adopted Local Plan target of 30% was achieved on every site (based on the NA's indicative HRF of 2,674), up to around 802.2 affordable homes might be expected in the NA. It is likely that in the wider rural area, at least some of the HRF will come forward in the form of small infill developments, which may not be large enough to meet the threshold of 5 dwellings, above which the Affordable Housing policy applies. If that is the case, the potential delivery of Affordable Housing is likely to be lower. It is important to note that in June 2022, planning permission was granted for a development between Melksham and Berryfield which is expected to deliver 50 affordable dwellings (the entirety of the site) within the plan period, which will go some way to addressing local needs.

This level of delivery is not sufficient (even with the 50-dwelling site in the pipeline) to satisfy the potential demand for Affordable Housing identified here, especially when considering the demand for affordable home ownership. However, as discussed above, this is a less acute need than for affordable rented housing as it is assumed that these households are already adequately housed in the private rented sector.

- C. Government policy (e.g., NPPF) requirements:** current NPPF policy requires 10% of all homes to be delivered for affordable home ownership. For 10% of all housing to be affordable ownership in Wiltshire, where 30% of all housing should be affordable, 1/3 of Affordable Housing should be for affordable ownership. The Local Plan does not specify a tenure split so whilst it does not explicitly comply, there is nothing to prevent the 10% requirement being met.

There can be exceptions to this requirement if it would prevent the delivery of other forms of Affordable Housing. Based on the findings of this HNA, there is no evidence that meeting the 10% threshold in Melksham & Melksham Without would prejudice the provision of affordable rented homes.

- D. Local Plan policy:** As noted above, the adopted Local Plan does not seek a specific tenure split, instead negotiating the split on a site-by-site basis.
- E. First Homes policy:** the Government recently concluded a consultation on the introduction of First Homes (to provide at least 30% discount on new build home prices). The proposals have now been enacted through a

ministerial statement. A minimum of 25% of all Affordable Housing secured through developer contributions are now required to be First Homes.

This new minimum requirement may have the effect of displacing other products in any established tenure mix and will reduce the amount of social or affordable rent if this was proposed to be more than 75% of Affordable Housing. This does not appear to be an issue currently in Wiltshire as the adopted Local Plan does not specify a specific tenure split on sites.

National policy dictates that after the 25% First Homes requirement has been met, the remaining 75% of Affordable Housing units should as a first priority protect the provision for social rent set out in the relevant Local Plan, with any remaining units allocated to other tenure products in the relative proportions set out in the Local Plan.

AECOM is aware that some Local Planning Authorities are considering 'top slicing' their affordable housing quota to provide 25% First Homes and then allocating the remaining proportion according to their existing policy tenure split. If this approach is taken, all other things being equal, it would reduce the provision of rented forms of affordable housing since it would effectively protect the provision of other forms of affordable home ownership alongside First Homes. Some LPAs are considering this approach because of the existing business models of registered providers which have relied on shared ownership to cross subsidise affordable rented housing and uncertainty over whether First Homes could replace this model.

This guidance generally applies to district-level policy, and there may still be potential for a neighbourhood plan tenure mix to deviate from how the other tenures are rebalanced if appropriate.

- F. **Viability:** HNAs cannot take into consideration the factors which affect viability in the neighbourhood area or at the site-specific level. Viability issues are recognised in the Local Plan and it is acknowledged that this may affect the provision of affordable housing, the mix of tenures provided and the discounts that can be sought on First Homes properties.
- G. **Funding:** the availability of funding to support the delivery of different forms of Affordable Housing may also influence what it is appropriate to provide at a particular point in time or on any one site. The neighbourhood planning group may wish to keep this in mind so that it can take up any opportunities to secure funding if they become available.
- H. **Existing tenure mix in Melksham & Melksham Without:** As of 2011, Affordable Housing, whether this is social/affordable rent or shared ownership, accounted for just 19.1% of housing in Melksham & Melksham Without, despite adopted policy requiring 30% of housing to be delivered as Affordable Housing. Data provided by Wiltshire Council from 2011/12 to present shows the development of 474 affordable dwellings (and an additional 46 dwellings made available for affordable ownership). Of these 474 dwellings, 83.1% were for affordable/social rent and 16.9% for affordable home ownership (shared ownership). Some additional provision

of Affordable Housing would offer a wider choice of homes for local residents and, importantly, may allow those on lower incomes including newly forming households and younger families to remain in or move to the area.

- I. **Views of registered providers:** It is not within the scope of this HNA to investigate whether it would be viable for housing associations (registered providers) to deliver and manage affordable rented homes in the parish. The funding arrangements available to housing associations will determine rent levels.
- J. **Wider policy objectives:** the neighbourhood planning group may wish to take account of broader policy objectives for Melksham & Melksham Without and/or the local authority area. These could include, but are not restricted to, policies to attract younger households, families or working age people to the NA. These wider considerations may influence the mix of Affordable Housing provided.

143. On the basis of the considerations above, Table 4-9 proposes an indicative Affordable Housing tenure mix that might be sought through Neighbourhood Plan policy.

144. This indicative mix is chiefly a response to the demand for affordable home ownership and the affordable rented housing need potentially already being met over the length of the plan period. However, it also takes into account the significant backlog of need in Melksham & Melksham Without of 201 households from the Wiltshire Council Housing Register. This list includes households with an immediate need for rented accommodation that have indicated the NA as their preferred location. In this context, it is important that there is still substantial provision of affordable rented tenures to meet the needs of those in the present day and those most in need of Affordable Housing. The adopted Local Plan does not suggest a guideline mix so AECOM provides an indicative mix which also complies with the various minimum requirements mandated nationally.

145. In order to balance the needs as mentioned above, it is suggested that 45% of new Affordable Housing is affordable rented tenures, either affordable or social rent. It is suggested that the remaining 55% is delivered as affordable home ownership in the following split:

- 25% First Homes (at 40% discount); and
- 30% shared ownership (at a flexible range between 25% and 10% equity).

It is recommended that First Homes are delivered in line with national requirements, at 25% of Affordable Housing delivery. It is suggested that these are delivered at a 40% discount as this makes the product accessible to households on mean incomes. This also protects viability for the delivery of other forms of Affordable Housing. In terms of shared ownership, it is recommended that this product is delivered at both 25% and 10% equity, with both affordable to households on mean incomes. The former is marginally accessible to households with two lower quartile earners, with the latter more

comfortably affordable to this group. Rent to Buy does not feature in this recommended mix as the two shared ownership products are more affordable options.

146. This mix should be viewed as a starting point, based primarily on secondary evidence, which should be reconsidered in light of considerations F to J above, and in particular the views and objectives of the community.

147. Where the neighbourhood planning group wish to develop policy that deviates from that outlined in the Local Plan – either by differing from the headline split between renting and ownership or by specifying a greater level of detail around sub-tenures, it is important that they liaise with Wiltshire to gather more detailed income and viability information, and to ensure that departures from the local policy context have their support.

148. Another option when developing Neighbourhood Plan policies on tenure splits is to add caveats to the policy in question, to the effect that the precise mix of affordable housing will be considered on the basis of site-by-site circumstances in addition to this evidence.

Table 4-9: Indicative tenure split (Affordable Housing)

Tenure	Indicative mix	Considerations and uncertainties
Routes to home ownership, of which	55%	
First Homes	25%	Product untested so uncertainties around viability, developer, lenders and buyer appetite etc.
Shared ownership	30%	Recently confirmed changes to the model to allow purchases of 10% share - impact on viability unknown. RPs business plans currently reliant on shared ownership model. Impact of displacement by First Homes unknown.
Rent to Buy	0%	Emerging product with popularity and effectiveness as yet unknown. Impact of displacement by First Homes unknown.
Affordable Housing for rent, of which	45%	
Social rent	To be set by Registered Providers	Uncertain how much funding available to support this tenure in local area. Uncertain whether RPs willing to own/manage stock in this area.
Affordable rent	To be set by Registered Providers	Uncertain whether RPs willing to own/manage stock in this area.

Source: AECOM calculations

Conclusions- Tenure and Affordability

Current dwelling stock

149. In 2011, the majority of households in Melksham & Melksham Without owned their own home at 72.4%, significantly above both local authority wide and national levels. The private rented sector is limited, with the levels of social/affordable rented housing also below national levels. Data provided by Wiltshire Council indicates that there were 1,653 net dwelling completions between 2011/2012 and 2020/2021 and 474 Affordable Housing completions. Of these Affordable Housing completions, 83.1% were for affordable/social rent, with 16.9% for affordable home ownership.
150. It is also helpful to look at the sub area tenure splits. Melksham Town & Bowerhill sub area has very similar proportions of tenures to the wider NA. The most notable differences to the NA area seen in the Large Village of Whitley/Shaw, where a significantly higher proportion of households own their own home, and a significantly lower proportion of households live in social rented housing. The wider countryside area's proportional tenure split generally lies between Melksham Town & Bowerhill and Whitley & Shaw. The tenure mix across the sub areas suggests that households with greater wealth are likely to reside in Whitley & Shaw, with owner occupation dominating and very little provision of Affordable Housing. The greatest proportion of Affordable Housing is located in the more urban sub area of Melksham Town & Bowerhill.
151. Median and lower quartile house prices in Melksham & Melksham Without rose relatively steadily between 2012 and 2021, with little fluctuation. The median increased by 47.1% in this time, with the lower quartile price increasing by 51.3%. These prices peak at £250,000 and £205,000 respectively. Semi-detached dwellings experienced the greatest house price growth, but house prices overall were highest for detached properties.

Affordability

152. Local households on average incomes are unable to access even entry-level homes in Melksham & Melksham Without unless they have the advantage of a large deposit. Private renting is generally only affordable to average earners, with households made up of two lower quartile earners only able to afford the given rental thresholds for entry-level (1-bedroom) private rented housing.
153. Turning to affordable home ownership, it is recommended that First Homes in the NA are delivered at a 40% discount, which extends ownership accessibility to households on below average (mean) incomes. Shared ownership appears to be similarly affordable to First Homes and is broadly accessible to the same groups. Shared ownership at 25% equity is considered to be marginally affordable to households with two lower quartile earners, with 10% equity also accessible to this group.
154. Affordable rented housing is generally affordable to households with two lower earners. However, households with a single lower earner appear unable to afford any of the tenures considered including the smallest socially rented units.

Affordable Housing need

155. AECOM have calculated an estimate of the total need for Affordable Housing in Melksham & Melksham Without over the plan period. This study estimates that the NA over the plan period would meet the need for affordable rented housing through turnover of existing homes, and that there is the demand for around 882 units of affordable home ownership. The report suggests that both forms of Affordable Housing appear to be valuable in meeting the needs of people on various incomes, and the potential surplus of affordable rented units does not mean that affordable housing for rent should not be brought forward.
156. In order to balance the needs of the significant number of households currently on the Housing Register in need and take into account the fact that modelling suggests the need for affordable rented housing generated in the NA would be met over the plan period, it is suggested that 45% of new Affordable Housing is affordable rented tenures, either affordable or social rent. It is suggested that the remaining 55% is delivered as affordable home ownership in the following split:
- 25% First Homes (at 40% discount); and
 - 30% shared ownership (at a flexible range between 25% and 10% equity).
157. This mix should be viewed as a starting point, based primarily on secondary evidence, which should be reconsidered in light of considerations F to J previously, the potential variation in need and demand in the sub-areas, and in particular the views and objectives of the community.
158. Table 4-10 summarises Melksham & Melksham Without's position with regards to the expected delivery of Affordable Housing, and how this might ideally be apportioned among sub-categories of tenure to meet local needs over the Plan period. This exercise simply applies the housing requirement figure for the area to the Local Plan policy expectation and shows the quantities of affordable housing for rent and sale that would be delivered if the tenure mix proposed in this HNA were to be rigidly enforced. In this sense it is hypothetical, and the outcomes in practice may differ, either as a result of measures taken in the neighbourhood plan (e.g. if the group plan for more housing (and therefore more affordable housing) than the local plan, or if the group decide to influence the tenure mix in other ways), or as a result of site-specific constraints.
159. In addition to the expected delivery in the NA as a whole, the sub-areas of Melksham & Bowerhill and Whitley & Shaw are also considered as they have individual housing requirement figures in the emerging Local Plan. This therefore gives an indication of the level of delivery that could be expected in these two sub-areas. Due to the affordability analysis being for the NA as a whole, steps D and F remain the same.

Table 4-10: Estimated delivery of Affordable Housing in Melksham & Melksham Without

	Step in Estimation	Expected delivery (NA)	Expected delivery (Melksham & Bowerhill)	Expected delivery (Whitley/Shaw)
A	Provisional capacity figure (emerging Local Plan)	2,674	2,585	89
B	Affordable housing quota (%) in adopted Local Plan	30%	30%	30%
C	Potential total Affordable Housing in NA (A x B)	802.2	775.5	26.7
D	Rented % (e.g. social/affordable rented)	45%	45%	45%
E	Rented number (C x D)	361.0	349.0	12.0
F	Affordable home ownership % (e.g. First Homes, Rent to Buy)	55%	55%	55%
G	Affordable home ownership number (C x F)	441.2	426.5	14.7

Source: AECOM estimate based on LPA's affordable housing policies, AECOM's indicative tenure mix

160. This expected level of delivery does not meet the quantity of demand in estimates for affordable home ownership due to the high demand identified. This is the case even when a recent pipeline wholly affordable scheme of 50 dwellings is included in addition to Step C in the table. However, as previously discussed in the report, the need for affordable home ownership is not as acute as for affordable rented housing as it is assumed that on the whole these households are adequately housed elsewhere, such as in the private rented sector. Whilst the expected delivery of affordable rented housing exceeds the need identified in modelling, delivery will help to contribute to the significant backlog of need identified by the local Housing Register for the NA.
161. If the community wish to encourage further delivery of Affordable Housing, it is recommended that the policy requirement be met wherever possible, and for further avenues for delivering greater quantities of Affordable Housing (such as exception sites) to be explored. If the group considered exceeding the Local Plan policy requirement in the neighbourhood plan then it must be noted that an extremely high standard of justification is required which goes beyond the scope of this HNA, in particular around the issue of what level of Affordable Housing delivery can be financially viable in the NA. Raising the percentage of

Affordable Housing required could have the effect of discouraging new building from coming forward altogether. Should the group wish to consider such an option, it is advisable to discuss this with the LPA in the first instance.

162. Affordable housing is typically provided and made financially viable by its inclusion as a proportion of larger market developments, as guided by Local Plan policy. However, if the community wishes to boost the supply of affordable housing, there are other, more proactive routes available for its provision. For example, using community development orders, identifying exception sites or developing community land trusts are all ways of boosting the supply of affordable housing.

5. RQ 2: Type and Size

RQ 2: What type (terrace, semi, bungalows, flats and detached) and size (number of bedrooms) of housing is appropriate for the Neighbourhood Area over the Neighbourhood Plan period?

Introduction

163. The evidence in this chapter is intended to give a snapshot of the existing dwelling stock in Melksham & Melksham Without in terms of type and size, as well as some of the population characteristics that tend to influence housing needs. From this, it is possible to develop an understanding of what sort of housing would be appropriate going forward.
164. It is worth emphasising that this evidence assumes that existing demographic and occupation patterns will persist into the future. It can therefore be thought of as the baseline or default scenario, into which the community may wish to intervene – for example to attract a different or more balanced demographic. The recommendations in this chapter, particularly the final suggested size mix, are a starting point that may be adjusted in light of other community objectives and primary evidence.

Existing types and sizes

Background and definitions

165. Before beginning to explore issues of dwelling type and size, it is important to note that the demand for housing by size and type tends to be determined primarily by wealth – with those having more buying power choosing to occupy larger homes, and often preferring detached properties to denser types, such as flats.
166. This study is concerned primarily with need rather than demand. Need for homes of different sizes is chiefly determined by the number of people occupying the home. In the strict sense, there is no ‘need’ for dwellings of any particular type, other than the specific needs of those with certain disabilities for level access properties, for example.
167. The best proxy for the number of people in a household is age or ‘life stage’, with younger and then older households tending to have one or two people, and those in between these poles more likely to have larger families including children. Life stage is therefore a main indicator considered here for the size of housing needed. But it is worth pointing out that wealth is also correlated with age, so it is not possible to attain a pure view of what is needed from the secondary data alone.
168. It is also useful to clarify the terminology around dwellings and households. Dwellings are counted in the Census by combining address information with Census returns on whether people’s accommodation is self-contained. As such,

all dwellings are classified as either shared or unshared dwellings. Households are groups of people who live together as a coherent unit (such as a family), and a dwelling is shared where there is more than one household occupying it (e.g. two families or a group of individual students). Hence, there is usually a different number of households and dwellings in any given area. The number of dwellings can also exceed that of households in areas with large numbers of holiday or second homes.

169. As noted in the Context section of this report, there is no perfect data source for the current mix of dwellings in the NA. For some aspects, such as the size mix of homes, adding together Census figures and completions data for the intervening period is highly accurate. For others, such as the type mix of homes, this method is not available and Valuation Office Agency (VOA) must be used. The most appropriate combination of approaches is used in this section. It is important to note that because the NA is made up of MSOAs and LSOAs, VOA data has been collated for an area that precisely matches the Melksham & Melksham Without Neighbourhood Area.

Dwelling type

170. Table 5-1 shows the dwelling type split in 2011 and 2021. The data cannot be used to fully understand the changes in this time period as 2011 Census data counts bungalows within each of the other categories as opposed to independently.
171. The table shows that the proportions of flats and terraced dwellings remained relatively stable over the decade, whilst the changes in the detached and semi-detached dwellings is likely due to the inclusion of bungalows as a separate category in the VOA data. Despite this apparent decline, the greatest proportion of dwellings in both time periods was semi-detached dwellings, followed by detached dwellings. Dwelling completions data from 2011/12 to 2020/21 provided by Wiltshire Council did not break the data down fully into dwelling type but did give an indication of the split between flats and houses. It showed that in this time frame, 13.1% of completions were flats, with the vast majority of dwelling completions, at 86.9%, being houses.

Table 5-1: Accommodation type, Melksham & Melksham Without, 2011 and 2021

Dwelling type	2011 (Census)		2021 (VOA)	
Bungalow	-	-	1,190	10.7%
Flat	1,010	10.8%	1,290	11.6%
Terrace	2,087	22.3%	2,510	22.6%
Semi-detached	3,502	37.4%	3,260	29.3%
Detached	2,722	29.1%	2,740	24.7%
Unknown/other	-	-	120	1.1%
Total	9,364		11,110	

Source: ONS 2011, VOA 2021, AECOM Calculations

172. Table 5-2 looks at the sub-areas of the NA and how the dwelling type varies across these. 2011 Census data is relied upon here as VOA is not broken down

to a small enough level to separate the sub-areas. As mentioned previously in the report, the housing stock is relatively similar between the NA and the Melksham & Bowerhill sub area due to the majority of the housing in the NA being located here.

173. Table 5-2 shows that whilst Melksham & Bowerhill has a greater proportion of flats than the NA, the proportion is significantly lower in the more rural Whitley & Shaw and the Wider Countryside Area. Most notable is the fact that the vast majority of dwellings in Whitley & Shaw in 2011 were detached, at 60.4% compared to 29.1% across the NA as a whole, even significantly higher than the wider countryside (at 44.0%). This suggests that Whitley & Shaw may therefore lack other types of housing, particularly terraced dwellings according to the table. This is indicative of a settlement lacking smaller more affordable properties, with detached dwellings often the largest and the most expensive. It could therefore be surmised that a large amount of the wealth in the NA is concentrated in this sub-area and, as shown in Table 4-2, there is a clear lack of Affordable Housing here. The Wider Countryside Area is also dominated by detached dwellings, although to a lesser extent, followed by semi-detached dwellings at 36.4%, just below NA overall levels. There is also seemingly a lack of terraced dwellings here, again indicative of affordability challenges as there would be fewer entry-level properties available.

Table 5-2: Accommodation type, NA and comparator areas, 2011

Dwelling type	NA	Melksham & Bowerhill	Whitley & Shaw	Wider Countryside Area
Bungalow	-	-	-	-
Flat	10.8%	12.0%	2.8%	2.5%
Terrace	22.3%	24.1%	7.2%	11.7%
Semi-detached	37.4%	38.0%	29.5%	36.4%
Detached	29.1%	25.7%	60.4%	44.0%

Source: ONS 2011, AECOM Calculations

174. It is interesting to compare the mix with the wider local authority area and the country. Table 5-3 uses VOA data to allow for accurate comparison of dwelling types. This shows that the proportion of bungalows in Melksham & Melksham Without is above levels for England but below Wiltshire. The dominant proportion in the NA is, as discussed above, semi-detached dwellings, whilst detached dwellings dominate in Wiltshire and terraced dwellings are the largest category across England. The proportion of terraced dwellings in the NA is therefore below national levels whilst the proportion of semi-detached and especially detached dwellings, is significantly higher in Melksham & Melksham Without than nationally. As expected, due to the rural nature of the NA, the proportion of flats is below levels for the country, relatively in line with the local authority area as a whole.

Table 5-3: Accommodation type, various geographies, 2021

Dwelling type	Melksham & Melksham Without	Wiltshire	England
Bungalow	10.7%	11.7%	9.2%
Flat	11.6%	12.2%	23.7%
Terrace	22.6%	23.4%	26.1%
Semi-detached	29.3%	24.8%	23.7%
Detached	24.7%	26.1%	15.8%
Unknown/other	1.1%	1.8%	1.4%

Source: VOA 2021, AECOM Calculations

Dwelling size

175. It is also important to look at dwelling sizes, with Table 5-4 showing the 2011 dwelling size mix alongside the net completions between 2011 and 2021 provided by Wiltshire Council. In 2011, 3-bedroom dwellings dominated the NA at 45.1% of all dwellings, followed by smaller 2-bedroom dwellings. Development in the last decade indicates that the majority of development, at 33.2%, was for larger 4-bedroom dwellings. There was also significant development of 2-bedroom and 3-bedroom dwellings, with limited development of the smallest and largest dwellings. Looking specifically at the 2021 size mix, the majority of dwellings were still 3-bedroom, although at a smaller proportion than in 2011. The proportion of 1-bedroom and 2-bedroom dwellings remained very similar to 2011 levels but there was an increase in the proportion of 4-bedroom dwellings from 19.1% to 21.3%.

Table 5-4: Dwelling size (bedrooms), Melksham & Melksham Without, 2011 and 2021

Number of bedrooms	2011 (Census)		Completions 2011-2021 (Wiltshire Council)	2021 total (Census + completions)	
Studio	15	0.2%	-	15	0.1%
1	617	6.7%	109	726	6.7%
2	2,293	25.1%	469	2,762	25.6%
3	4,131	45.1%	498	4,629	42.9%
4	1,748	19.1%	548	2,296	21.3%
5+	347	3.8%	27	374	3.5%
Total	9,151		1,651	10,802	

Source: ONS 2011, VOA 2021, AECOM Calculations

176. Table 5-5 again considers the dwellings size mix of the NA against the sub areas selected. As with the dwelling type mix, the size mix for Melksham & Bowerhill closely aligns with the NA as a whole. Both Whitley & Shaw and the Wider Countryside Area have a smaller proportion of 1-bedroom dwellings and a larger proportion of 5+ bedroom dwellings than the other two comparator areas. Larger dwelling sizes are more common in Whitley & Shaw, with 39.8% of

dwellings having 4 or more bedrooms, significantly above the levels of the other sub areas and the wider NA. This is in line with the findings in Table 5-2, with Whitley & Shaw characterised by larger, detached, executive dwellings. The Wider Countryside Area has a greater proportion of 2-bedroom dwellings and a smaller proportion of 3-bedroom dwellings than the NA, Melksham & Bowerhill, and Whitley & Shaw. This may suggest that families favour living in the Market Town or Large Village with easier access to amenities such as schools.

Table 5-5: Dwelling size, NA and comparator areas, 2011

Dwelling size	NA	Melksham & Bowerhill	Whitley & Shaw	Wider Countryside Area
Studio	0.2%	0.2%	0.2%	0.0%
1	6.7%	7.2%	1.6%	5.6%
2	25.1%	25.2%	16.8%	30.6%
3	45.1%	46.2%	41.6%	34.8%
4	19.1%	18.1%	30.8%	22.1%
5+	3.8%	3.2%	9.0%	7.0%

Source: ONS 2011, AECOM Calculations

177. Again, it is useful to look at the percentage breakdown of dwelling sizes in comparison with the wider district and country. Table 5-6 shows that the proportion of smaller 1-bedroom and 2-bedroom dwellings in the NA is significantly below national levels, and more in line with Wiltshire as a whole. The proportion of mid-sized 3-bedroom dwellings is relatively even across all comparator areas whilst the proportion of larger 4-bedroom dwellings is significantly above the proportion across England.

Table 5-6: Dwelling size (bedrooms), various geographies, 2021

Number of bedrooms	Melksham & Melksham Without (Census & Completions)	Wiltshire (VOA)	England (VOA)
1	6.7%	7.4%	12.6%
2	25.6%	25.6%	28.4%
3	42.9%	43.6%	43.0%
4	21.3%	18.4%	12.1%
5+	3.5%	4.8%	3.3%

Source: VOA 2021, AECOM Calculations

Age and household composition

178. Having established the current stock profile of Melksham & Melksham Without and identified recent changes to it, the evidence gathered below examines the composition and age structure of households living in the NA. Many of these indicators have a bearing on what housing might be needed in future years.

Age structure

179. Table 5-7 shows the most recent estimated age structure of the NA population, alongside 2011 Census figures. The overall population is estimated to have grown from 21,907 in 2011 to 24,117 in 2020. The table shows that in 2011, the majority of the population was aged 45-64, at 27.0%, followed by those aged 25-44 at 24.6%, indicative of a predominance of family households. Looking to 2020, the proportion of the population aged 45+ grew in all categories. This was most noticeable in the 65-84 age category, with the proportion of the population in this category increasing from 16.1% to 19.2%. Also of note is the decline from 10.0% to 8.0% of the proportion of people aged 16-24 in the NA. This could be indicative of a lack of affordable housing and increasing house prices as young people leaving home may have to move to more affordable areas or for reasons of employment.
180. Note that ONS advises exercising caution with population estimates by single year of age (from which this 2020 data has been derived), as patterns of variance and bias make it relatively less accurate compared to Census data.
181. It is also worth noting that only the age structure of the population (individuals) can be brought up to date in this way. The life stage of households, which forms the basis of the subsequent analysis of future dwelling size needs, is not estimated each year. The 2011 Census therefore remains the most accurate basis to use in those areas, and the brief comparison here demonstrates that the change from 2011-2020 has not been so significant as to invalidate the 2011 household data used in modelling later in this chapter.

Table 5-7: Age structure of Melksham & Melksham Without population, 2011 and 2020

Age group	2011 (Census)		2020 (ONS, estimated)	
0-15	4,320	19.7%	4,627	19.2%
16-24	2,201	10.0%	1,918	8.0%
25-44	5,396	24.6%	5,405	22.4%
45-64	5,924	27.0%	6,795	28.2%
65-84	3,535	16.1%	4,641	19.2%
85 and over	531	2.4%	731	3.0%
Total	21,907	-	24,117	-

Source: ONS 2011, ONS mid-2020 population estimates, AECOM Calculations

182. Table 5-8 compares the NA 2011 population structure to the three sub areas of Melksham & Bowerhill, Whitley & Shaw, and the wider countryside area. This has to be presented using 2011 Census data due to the ONS population projections not being available at a small enough scale to determine populations for the sub-areas.
183. This shows that whilst Melksham & Bowerhill aligns with the NA, there is more significant variation when looking at Whitley & Shaw and the wider countryside area. This is most clear when looking at the population structure of Whitley & Shaw. This sub-area is characterised by an older population than the NA as a whole, with 29.6% of the population aged 65 and over compared to 18.5%

across the wider NA. Also notable is the proportion of the population aged 25-44 in Whitley & Shaw, at 14.8% compared to 24.6% in Melksham & Melksham Without. This may be due to the perceived affordability challenges discussed previously in the Large Village due to a dominance of larger, detached properties. Melksham & Bowerhill had the highest proportion of young people in 2011 at 20.4%, likely due to the public transport links and amenities associated with a larger settlement. It may be that younger people and families tend to reside in the Market Town whilst those with older families or looking to retire (and therefore likely to have greater existing equity) live in Whitley & Shaw or the wider countryside.

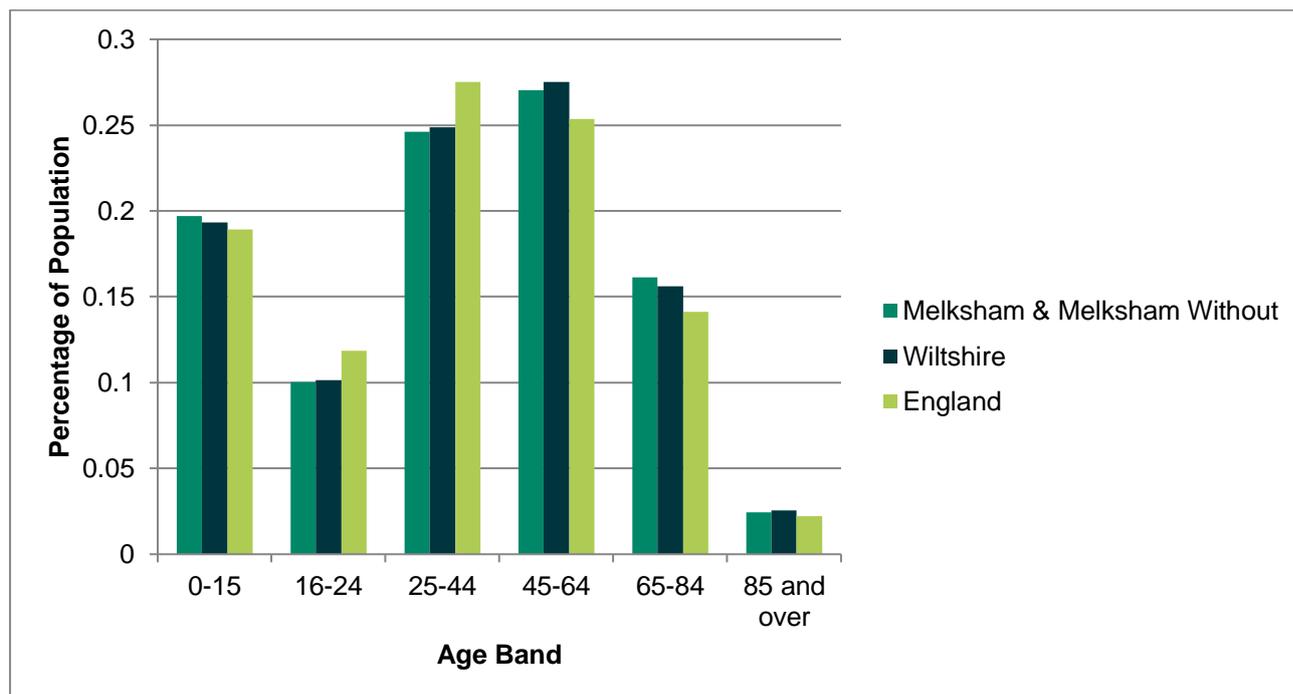
Table 5-8: Age structure of the NA and sub-areas, 2011

Age group	NA	Melksham & Bowerhill	Whitley & Shaw	Wider Countryside Area
0-15	19.7%	20.4%	14.8%	15.9%
16-24	10.0%	10.3%	8.6%	8.5%
25-44	24.6%	25.5%	14.8%	22.2%
45-64	27.0%	26.4%	32.2%	30.8%
65-84	16.1%	15.2%	24.4%	21.2%
85 and over	2.4%	2.3%	5.2%	1.4%

Source: ONS 2011, ONS mid-2020 population estimates, AECOM Calculations

184. For context, it is useful to look at the NA population structure alongside that of the local authority area and country. Figure 5-1 (using 2011 Census data) shows that the population structure of Melksham & Melksham Without closely aligns with the population breakdown of the wider Wiltshire local authority area. The graph shows that both the NA and Wiltshire have a greater proportion of the population aged 0-15 than the country, but a smaller proportion aged 16-24 and 25-44, perhaps indicating that young people leave the area when looking for their own home, potentially due to affordability challenges. The proportion of the population aged 45 and over is however greater in Melksham & Melksham Without and Wiltshire than England, indicative of a more rapidly aging local population than nationally.

Figure 5-1: Age structure in Melksham & Melksham Without, 2011



Source: ONS 2011, AECOM Calculations

Household composition

185. Household composition (i.e. the combination and relationships of adults and children in a dwelling) is an important factor in the size (and to an extent, the type) of housing needed over the Neighbourhood Plan period. Table 5-9 shows that the NA had a smaller proportion of single person households than Wiltshire, and to a greater extent, England. Despite this, there was a greater proportion of single person households aged 65 and over in Melksham & Melksham Without than the comparator areas, indicative of an older skew to the population. The proportion of family households in the NA was significantly above national levels, with this trend also seen in families aged over 65, families with dependent children, and to the greatest extent, families with no children. The greater proportion of family households in the NA may suggest the need for a greater proportion of mid-sized and larger dwellings than nationally.

186. Although the data is relatively dated at this point, it is interesting to look at the changes in household composition between 2001 and 2011. Notably, the proportion of single persons aged 65 and over and of families aged 65 and over grew by 3.1% and 10.7% respectively whilst these proportions fell by 7.3% and 2.0% nationally in this time. This is indicative of a more rapidly aging population in Melksham & Melksham Without than across the country.

Table 5-9: Household composition, Melksham & Melksham Without, 2011

Household composition		Melksham & Melksham Without	Wiltshire	England
One person household	Total	27.1%	26.7%	30.2%
	Aged 65 and over	13.1%	12.7%	12.4%
	Other	14.0%	14.0%	17.9%
One family only	Total	67.5%	68.1%	61.8%
	All aged 65 and over	10.1%	10.1%	8.1%
	With no children	20.1%	21.3%	17.6%
	With dependent children	28.0%	28.0%	26.5%
	With non-dependent children ²⁷	9.3%	8.7%	9.6%
Other household types	Total	5.4%	5.2%	8.0%

Source: ONS 2011, AECOM Calculations

Occupancy ratings

187. The tendency of households to over- or under-occupy their homes is another relevant consideration to the future size needs of the NA. A person is considered to under-occupy their home when there are more bedrooms in their home than a family of their size and composition would normally be expected to need. This is expressed as an occupancy rating of +1 or +2, indicating that there is one surplus bedroom or at least two surplus bedrooms (respectively). Over-occupancy works in the same way, with a rating of -1 indicating at least one bedroom too few.

188. Under-occupancy is relatively common in Melksham & Melksham Without, with 77.0% of households living in a dwelling with at least one extra bedroom in relation to their needs. This is most common in family households aged 65+, at 96.4% under-occupancy, and family households under 65 with no children, at 96.1% under-occupancy. This may suggest that larger housing in the NA isn't therefore being occupied by households with the most family members, but by households with the most wealth or by older people who have not chosen to or been able to move to smaller properties. There is also some over-occupancy in the NA, with 5.4% of family households under 65 with dependent children living in a dwelling with too few bedrooms for their needs. Overall, 20.4% of households are considered to be living in a dwelling of appropriate size based on their household size.

²⁷ Refers to households containing children who are older than 18 e.g students or young working people living at home.

Table 5-10: Occupancy rating by age in Melksham & Melksham Without, 2011

Household type	+2 rating	+1 rating	0 rating	-1 rating
Family 65+	69.5%	26.9%	3.6%	0.0%
Single person 65+	44.8%	38.7%	16.6%	0.0%
Family under 65 - no children	71.3%	24.8%	3.9%	0.0%
Family under 65 - dependent children	18.7%	41.1%	34.8%	5.4%
Family under 65 - adult children	23.8%	46.1%	27.8%	2.4%
Single person under 65	43.6%	35.9%	20.5%	0.0%
All households	41.5%	35.5%	20.4%	2.6%

Source: ONS 2011, AECOM Calculations

Dwelling mix determined by life-stage modelling

Suggested future dwelling size mix

189. As noted above, there is a strong link between the life stage of a household and the size of dwelling that household can be expected to need. The final part of this chapter presents the results of a model that aims to estimate the dwelling size needs of the NA at the end of the Neighbourhood Plan period. The steps involved in this model are not presented in full, but can be summarised – along with the underpinning assumptions and some limitations – as follows:

- The starting point is the age distribution of Melksham & Melksham Without households in 2011.
 - The life stage of a household is determined by the age of the household reference person (HRP), a more modern term for the head of household.
 - As noted above, household life stages are not estimated annually, so the older Census data must be used.
- This life stage data is then projected forward to the end of the Plan period by applying the growth rates for each household age group as suggested by the latest household projections. This allows for an estimate of how the parish population might evolve in future.
 - ONS household projections are produced every two years but are only available at Local Authority level. The growth rates are therefore applied to the 2011 starting household age profile of the NA.
- Next, we turn to a Census dataset that shows the occupation patterns or preferences of each household life stage (e.g. what proportion of households aged under 24 tend to live in 1 bedroom homes as opposed to 2, 3 or 4 bedroom homes). This data is mapped to the distribution of the projected NA population for each life stage and each dwelling size category to form a picture of what mix of homes might be appropriate in future.
 - This occupation data is again only available at Local Authority scale, so it does risk embedding any unusual characteristics present in the area.

- The model also assumes that today's occupation patterns persist into the future, which is not a given, particularly with the change in preferences for home working space and other features arising from the Covid-19 pandemic. However, there is no better indication of what those patterns might look like. It is considered more appropriate to adjust the end mix that results from this model to reflect such trends than to build further speculative assumptions into the model.
 - Finally, this 'ideal' future mix of dwelling sizes can be compared to the current stock of housing in the NA. From this we can identify how future development might best fill the gaps.
 - The 2011 dwelling size mix is used for consistency, so any imbalances in new development since then may justify adjustments to the final results.
190. It is important to keep in mind that housing need is not an exact science and this exercise provides an estimate based on demographic trends and occupancy patterns alone. It does not take into account income and wealth, other than in an indirect way through the tendency of households to occupy more or less space than they 'need'. It also does not anticipate changes in how people may wish to occupy their homes in response to social and technological change.
191. The approach therefore embeds existing patterns of occupancy which may or may not be desirable. As such, it is appropriate for the result of this model to be taken as a baseline scenario – what would occur if current trends persisted. It may well be the intention of the community to intervene to produce a different outcome more in line with their interpretation of emerging trends and their place- and community-shaping objectives. Layering these factors on top of the indicative picture provided by this model is considered entirely appropriate for the purpose of drafting neighbourhood plan policy.
192. Before presenting the results of this exercise, it may be interesting to review two of the inputs described above.
193. The first, given as Figure 5-2, sets out the relationship between household life stage and dwelling size for Wiltshire in 2011. This shows how the youngest households occupy the smallest dwellings, before rapidly taking up larger homes as their families expand, and then more gradually downsizing to smaller homes again as they age.

Figure 5-2: Age of household reference person by dwelling size in Wiltshire, 2011



Source: ONS 2011, AECOM Calculations

194. The second dataset of note is the result of applying Local Authority level household projections to the age profile of Melksham & Melksham Without households in 2011 and the updated estimates of household numbers described in the bullets above. Table 5-11 makes clear that population growth can be expected to be driven by the oldest households, with the greatest growth expected to be in households with a household reference person aged 65 and over, with this category increasing by 72% in the plan period. In this circumstance, households with a household reference person aged 65 and over would increase from 29.1% of households in 2011 to 41.1% of households in 2036. There is also expected to be an increase in the proportion of households with a household reference person aged 55 to 64 of 12%. There is little change in the proportion of households with a household reference person aged 25-54 and a decline in the proportion of households with a household reference person aged under 24. This is indicative of an aging population alongside a decline in families with dependent children.

Table 5-11: Projected distribution of households by age of HRP, Melksham & Melksham Without

Year	Age of HRP 24 and under	Age of HRP 25 to 34	Age of HRP 35 to 54	Age of HRP 55 to 64	Age of HRP 65 and over
2011	249	982	3,638	1,619	2,663
2036	214	1,048	3,493	1,817	4,584
% change 2011-2036	-14%	7%	-4%	12%	72%

Source: AECOM Calculations

195. The final result of this exercise is presented in Table 5-12. The model suggests that the target mix at the end of the plan period should remain dominated by mid-sized 3-bedroom dwellings, but to a lesser extent than in 2011. It is also suggested that this is followed by 2-bedroom dwellings at 25.2% of the mix, and then 4-bedroom dwellings at 19.6% of the mix.
196. This suggested mix is for the whole Melksham & Melksham Without NA and it is therefore also important to take into consideration the existing dwelling mixes and populations in the sub-areas. Some adjustment to the mix outlined in Table 5-12 will likely be necessary when creating policy for the sub areas, particularly the Large Village of Whitley/Shaw. As discussed earlier in the report, the dwelling mix in Whitley & Shaw is weighted towards larger dwellings at 39.8% of dwellings having 4 or more bedrooms, with the lowest levels of 1 and 2-bedroom dwellings. Therefore, the Steering Group may prefer to adjust the size mix when looking at this sub-area specifically, increasing the proportion of smaller dwellings. The population in Whitley & Shaw is also more heavily dominated by older persons and so the demand for downsizing may be greater here.
197. In order to reach the target mix shown in Table 5-12, it is suggested that new development is brought forward in a relatively even split for 2-bedroom, 3-bedroom, and 4-bedroom dwellings, at 25.4%, 23.7%, and 21.5% respectively. Delivery in these size categories would likely serve a large proportion of the population and household types, including older persons looking to downsize, young couples purchasing their first home, and growing families. As discussed, depending on what the community wish to achieve in each sub-area, this will likely need to be adjusted to account for the already existing imbalances in the size mix throughout the NA.
198. Table 5-12 looks at the suggested size mix of all dwellings in the NA, both market and affordable. It may therefore be helpful to also look at the current Housing Register waiting list size mix, even though this is a snapshot of present day affordable rented housing need as opposed to projecting to the end of the plan period. The data provided by Wiltshire Council indicates that the majority of need for affordable rented housing in Melksham & Melksham Without is for 1-bedroom dwellings, at 34.8%, emphasising the need for increased delivery of smaller dwellings in the NA. This is followed closely by 3-bedroom dwellings at 32.3%, indicating a significant demand from family households. The smallest need, as expected within this tenure, is in the larger dwellings with 4, 5, and 6+ bedrooms. It is likely that social and affordable rented dwellings would be delivered in the more built-up sub-area of Melksham & Bowerhill as there is greater access to amenities and public transport, as well as a higher likelihood of larger developments over the Affordable Housing threshold.

Table 5-12: Suggested dwelling size mix to 2036, Melksham & Melksham Without

Number of bedrooms	Current mix (2011)	Target mix (2036)	Balance of new housing to reach target mix
1 bedroom	6.7%	7.8%	12.4%
2 bedrooms	25.1%	25.2%	25.4%
3 bedrooms	45.1%	41.3%	23.7%
4 bedrooms	19.1%	19.6%	21.5%
5 or more bedrooms	3.8%	6.2%	17.1%

Source: AECOM Calculations

199. The result of this model is a relatively blunt measure of what could be beneficial given population change and existing imbalances in housing options. It is a starting point for thinking about how best to address the more nuanced needs of the future population.
200. Once again, it is important to consider the community consultation undertaken in May and June 2022. This found that, in line with Table 5-12, the greatest need is for 2-bedroom dwellings in Melksham & Melksham Without, followed by 3-bedroom dwellings. AECOM modelling suggests a greater need for larger dwellings than found in the survey but as mentioned in the previous chapter, surveys such as this only represent a segment of the population, and it is important to still deliver some larger dwellings to meet the needs of family households in the NA and households that may require larger affordable dwellings.
201. While the provision of Affordable Housing (subsidised tenure products) is one way to combat affordability challenges, another is to ensure that homes come forward which are of an appropriate size, type and density for local residents' budgets. Continuing to provide smaller homes with fewer bedrooms would help to address this situation, as demonstrated by the Housing Register size mix.
202. Variety should be sought within the mid-sized homes that come forward in future to attract both newly forming households on lower budgets and older households with substantial equity from their existing larger homes. Facilitating downsizing among older households may release those larger homes for use by families who need more bedrooms. However, it may not be realistic to expect growing families to be able to afford the larger detached homes that are currently under-occupied in the parish. Reducing the issue of dwelling size to a number of bedrooms is potentially unhelpful in this case. There may be a strong justification to continue supplying larger homes despite their abundance in some areas because a different kind of larger home is needed to accommodate growing families with less buying power. This is too speculative to quantify in a percentage size mix but is among the good reasons not to inhibit any size of dwelling entirely.

The SHMA findings

203. The Swindon & Wiltshire Strategic Housing Market Assessment (SHMA) 2017 highlights a number of findings relevant to the type and size of dwellings:

- It was identified that most of the market housing need is for houses, with the need for flats at just over 2%. However, when looking at Affordable Housing, flats accounted for around 28% of need.
- Overall, the findings suggest that the majority of housing needed (specifically for houses) is 3-bedroom at 58.8%, followed by 1/2-bedroom at 19.5%. When looking at flats specifically, over half (51.1%) of the need is for 1-bedroom dwellings.
- The Chippenham HMA was identified as having the lowest levels of overcrowding of the HMAs, at less than half the national average. This may be indicative of larger dwellings in the NA.

Conclusions- Type and Size

204. This study provides an indication of the likely need for different types and sizes of homes based on demographic change. It is important to remember that other factors should be considered in determining the dwelling mix that is desirable in the parish or on any particular site. These include the specific characteristics of the nearby stock of housing (such as its condition and design), the role of the NA or site within the wider housing market area (linked to any Local Authority strategies or plans) and site-specific factors which may justify a particular dwelling mix.

Current dwelling mix

205. The greatest proportion of dwellings in the NA in both 2011 and 2021 was semi-detached dwellings, followed by detached dwellings. Dwelling completions data from 2011/12 to 2020/21 showed that 13.1% of completions were flats, with the vast majority (86.9%) being houses. The proportion of bungalows in Melksham & Melksham Without is above levels for England but below Wiltshire. The proportion of terraced dwellings in the NA is below national levels whilst the proportion of semi-detached and especially detached dwellings, is significantly higher in Melksham & Melksham Without than nationally.

206. Looking at sub-areas, the most notable difference to the NA average is the fact that the vast majority of dwellings in Whitley & Shaw in 2011 were detached, at 60.4% compared to 29.1% across the NA as a whole. This is indicative of a settlement lacking smaller more affordable properties, with detached dwellings often the largest and the most expensive. It could therefore be surmised that a large amount of the wealth in the NA is concentrated in this sub-area and there is a clear lack of Affordable Housing here.

207. It is also important to look at dwelling sizes. In 2011, 3-bedroom dwellings dominated the NA, followed by smaller 2-bedroom dwellings. The majority of development in the last decade, at 33.2%, was for larger 4-bedroom dwellings. In 2021, the majority of dwellings were still 3-bedroom, although at a lower

proportion than in 2011. The proportion of smaller dwellings remained similar to 2011 levels but there was an increase in the proportion of 4-bedroom dwellings. The proportion of smaller dwellings in the NA is significantly below national levels, and more in line with Wiltshire as a whole.

208. The proportion of mid-sized dwellings is relatively even across all comparator areas whilst the proportion of larger 4-bedroom dwellings is significantly above the proportion across England. The size mix for Melksham & Bowerhill closely aligns with the NA as a whole. Larger dwelling sizes are considerable in Whitley & Shaw, significantly above the levels of the other sub areas and the wider NA. The Wider Countryside Area has a greater proportion of 2-bedroom dwellings and a smaller proportion of 3-bedroom dwellings than the NA, and the sub areas of Melksham & Bowerhill, and Whitley & Shaw.

Demographics

209. The overall NA population is estimated to have grown from 21,907 in 2011 to 24,117 in 2020. In 2011 the majority of the population was aged 45-64, followed by those aged 25-44, indicative of a predominance of family households. Looking to 2020, the proportion of the population aged 45+ grew in all categories. The population structure of Melksham & Melksham Without closely aligns with the population breakdown of the wider Wiltshire local authority area. The proportion of the population aged 45 and over is greater in the NA and local authority area than England, indicative of a more rapidly aging local population than nationally. Population growth to the end of the plan period can be expected to be driven by the oldest households, with 72% growth expected in households with a household reference person aged 65 and over.
210. Looking at the sub-areas, whilst Melksham & Bowerhill aligns with the NA, there is more significant variation when looking at Whitley & Shaw and the wider countryside area. The Whitley & Shaw sub-area is characterised by an older population than the NA as a whole. Melksham & Bowerhill had the largest proportion of young people. It may be that younger people and families tend to reside in the Market Town whilst those with older families or looking to retire live in Whitley & Shaw or the wider countryside.
211. Under-occupancy is relatively common in the NA, with 77.0% of households living in a dwelling with at least one extra bedroom in relation to their expected needs. This is most common in family households aged 65+ and family households under 65 with no children, suggesting that larger housing is being occupied by households with the most wealth or by older people who have not chosen to or been able to move to smaller properties.

Future size mix

212. AECOM modelling suggests that the target mix at the end of the plan period should remain dominated by mid-sized 3-bedroom dwellings, but to a lesser extent than in 2011. It is also suggested that this is followed by 2-bedroom dwellings and then 4-bedroom dwellings. This mix may require some adjustment for the sub-areas based on the existing dwelling mixes and populations in these areas. For example, the Steering Group may prefer to

adjust the size mix when looking Whitley & Shaw, increasing the proportion of smaller dwellings. In order to reach the target mix shown in the model, it is suggested that new development is brought forward in a relatively even split for 2-bedroom, 3-bedroom, and 4-bedroom dwellings. As discussed, depending on what the Steering Group wish to achieve in each sub-area, this will likely need to be adjusted to account for the already existing imbalances in the size mix throughout the NA.

213. It would be unwise for any new housing that does come forward to be delivered in an unbalanced way. Those wishing to move within or relocate to the area will have a range of circumstances and preferences, and they should be offered a range of choices. As such, it is recommended that priority is given to mid-sized homes but that this is done to a degree that aligns with the wider objectives of the community and does not limit choice or threaten viability. The evidence in this section represents a starting point for further thought and consultation.

6. RQ 3: Specialist housing for older people

RQ 3: What provision should be made for specialist housing for older and disabled people over the Neighbourhood Plan period?

Introduction

214. This chapter considers in detail the specialist housing needs of older and disabled people in Melksham & Melksham Without. The level of care associated with specialist housing products can vary widely, and is broadly categorised, in descending order from highest to lowest care level, as follows

- Specialist schemes that have 24-hour onsite care and support, typically including onsite catering (e.g. extra care, flexicare, and enhanced care);
- Specialist housing that is designed with the relevant group in mind. This may be suitable for receiving care or support, but this is not typically provided onsite or at all times of day (e.g. sheltered housing); and
- Mainstream housing that is adapted or capable of adaptation so that the inhabitant can live independently and care or support can be provided in the home.

215. People experience ageing differently. Much depends on their health, lifestyle and relationship with work. Some people live healthy and active lives into advanced old age while others may need support and care much earlier in their lives. Some will be interested in moving to a suitable home closer to services while for others ageing independently in place will be key to their wellbeing.

216. Because of the wide variation in the level of support needed, as well as the financial capabilities of those affected, the estimates of need presented here should be viewed with caution – as an idea of the broad scale of potential need rather than an obligatory target that must be met.

217. The specialist housing needs of older people (75+) are assessed below using two methods. The first is a tenure-led projection, based on rates of mobility limitation among this age group and the tenure of housing they currently occupy. The second, included for the purposes of comparison, is based on the Housing Learning and Improvement Network (HLIN) Strategic Housing for Older People (SHOP) tool,²⁸ which is based on best practice nationally and sets a recommended level of provision per 1,000 head of population.

218. It is important to note that the need for housing for particular groups of people may well exceed, or be proportionally high in relation to, the total housing need or requirement. This is because the needs of particular groups will often be calculated having consideration to the whole population of an area as a baseline

²⁸ Available at <https://www.housinglin.org.uk/Topics/browse/HousingExtraCare/ExtraCareStrategy/SHOP/SHOPv2/>

as opposed to the projected new households which form the baseline for estimating housing need overall.²⁹

219. This study covers the need for housing, i.e. buildings that the planning system classifies as Use Class C3 (private dwellings).³⁰ Residences that fall into Use Class C2 (institutions including prisons, boarding schools and some care homes for the elderly) are not within the scope of this research. Unfortunately, however, the dividing line between care homes for older people that fall into use class C2 and those where accommodation is counted as C3 is blurred. As such, the findings of this chapter may justify the provision of extra-care C3 housing and/or C2 care home units, but it is not possible to state definitively how much of each would be required.

Current supply of specialist housing for older people

220. When determining a final target for the need for specialist dwellings, it is necessary first to take account of current supply. Information on the current stock is collated manually using the search function on the Elderly Accommodation Counsel's Website: <http://www.housingcare.org>.
221. Table 6-1 counts a total of 447 units of specialist accommodation in the NA at present, around half of which (52.6%) are available for social rent for those in financial need. Around 40.7% are available for leasehold market purchase, with the remaining 6.7% available for leasehold market purchase, shared ownership, and market rent, with no clear split between these tenures. It is important to note that all of these schemes are for retirement housing, with no extra-care housing currently available in the NA.
222. ONS 2020 population estimates suggest that there are currently around 2,591 individuals aged 75 or over in Melksham & Melksham Without. This suggests that current provision is in the region of 173 units per 1,000 of the 75+ population (a common measure of specialist housing supply).

²⁹ See Paragraph: 017 Reference ID: 2a-017-20190220, at <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>)

³⁰ For a full description of Planning Use Classes, please refer to https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use

Table 6-1: Existing specialist housing for the elderly in Melksham & Melksham Without

Name	Description	Units	Tenure	Type	
1	Crown House	Mix of 1-bedroom and 2-bedroom flats, accepting residents from 55 years of age.	42	Leasehold	Retirement Housing
2	Dorset Crescent	2-bedroom bungalows.	30	Rent (social landlord)	Retirement Housing
3	Giffords Court	Mix of 1-bedroom and 2-bedroom flats.	43	Leasehold	Retirement Housing
4	Kestrel Court & Dowding Court	A mix of 1-bedroom, 2-bedroom, and 3-bedroom flats and bungalows.	61	Rent (social landlord)	Retirement Housing
5	Ludlow Hewitt Court	1-bedroom and 2-bedroom flats. Accepts residents from 55 years of age.	23	Rent (social landlord)	Retirement Housing
6	Meadowsweet Place	1-bedroom and 2-bedroom flats accepting residents from 60 years of age.	30	Leasehold, rent (market), and shared ownership	Retirement Housing
7	Orchard Gardens	Mix of 1-bedroom and 2-bedroom bungalows.	34	Rent (social landlord)	Retirement Housing
8	Rowley Place	Mix of 1-bedroom and 2-bedroom flats and bungalows.	57	Rent (social landlord)	Retirement Housing
9	Thornbank	1-bedroom and 3-bedroom studios.	30	Rent (social landlord)	Retirement Housing
10	Thornleigh	Mix of 1-bedroom and 2-bedroom flats and bungalows. Accepts new residents from 55 years of age.	21	Leasehold	Retirement Housing
11	Wharf Court	2-bedroom flats including mobility standard properties.	76	Leasehold	Retirement Housing
Total		-	447	-	-

Source: <http://www.housingcare.org>

Tenure-led projections

223. Turning to determining future need for specialist housing, the first step is to review data on the tenure of households aged 55-75 across Wiltshire, as this is

the most recent and smallest geography for which tenure by age bracket data is available.

224. The 2011 55-75 age bracket is considered the best proxy for the group likely to fall into need for specialist accommodation during the Plan period to 2036. It is assumed that those currently occupying their own home will wish to do so for as long as practicably possible in future, even where downsizing or moving into specialist accommodation. Equally, those who currently rent, either in the private or social sectors, are projected to need affordable rented specialist accommodation.

225. According to Table 6-2, the majority of households aged 55-75 in Wiltshire in 2011 owned their own home at 80.2%, with 19.8% renting their home. It is important to note that of the older households renting in Wiltshire, the majority lived in social rented dwellings, at 11.7% of all households. It may be surmised that the existing stock of specialist older persons housing in the NA does not cater enough for the owner occupied sector based on the tenure split in Table 6-2. However, this is before taking into consideration mobility limitations specific to the NA and the fact that home adaptations may be more suitable for households that own their own home than those living in the social rented or private rented sector.

Table 6-2: Tenure of households aged 55-75 in Wiltshire, 2011

All owned	Owned		All Rented	Social rented	Private rented	Living rent free
	Owned outright	(mortgage) or Shared Ownership				
80.2%	56.2%	24.1%	19.8%	11.7%	6.6%	1.4%

Source: Census 2011

226. The next step is to project how the overall number of older people in Melksham & Melksham Without is likely to change in future, by extrapolating from the ONS Sub-National Population Projections for Wiltshire at the end of the Plan period. The figure must be extrapolated from the Local Authority level data because such projections are not available at neighbourhood level. The results are set out in Table 6-3. The table shows that in both 2011 and 2036, the NA and Wiltshire have the same proportion of the population aged 75+. This is projected to increase significantly in this time from 8.6% of people aged 75+ to 14.5% by the end of the plan period.

Table 6-3: Modelled projection of elderly population in Melksham & Melksham Without by end of Plan period

Age group	2011		2036	
	Melksham & Melksham Without	Wiltshire	Melksham & Melksham Without	Wiltshire
All ages	21,907	470,981	25,167	541,068
75+	1,875	40,418	3,643	78,539
%	8.6%	8.6%	14.5%	14.5%

Source: ONS SNPP 2020, AECOM Calculations

227. A key assumption for the next stages of the calculation is that the older people living in the NA currently are already suitably accommodated, either because they occupy the existing stock of specialist accommodation, have made appropriate adaptations to their own homes or do not require support or adaptations. This is unlikely to be completely true, but it is not possible to determine how many such individuals are inadequately housed without evidence from a household survey (which itself may not give a complete picture).

228. The people whose needs are the focus of the subsequent analysis are therefore the additional 1,768 individuals expected to join the 75+ age group by the end of the Plan period. This figure should also be converted into households with reference to the average number of people per household with a life stage of 75+ in Wiltshire in 2011 (the smallest and most recent dataset to capture households). In 2011 there were 40,418 individuals aged 75+ and 28,655 households headed by a person in that age group. The average household size is therefore 1.41, and the projected growth of 1,768 people in Melksham & Melksham Without can be estimated to be formed into around 1,253 households.

229. The next step is to multiply this figure by the percentages of 55-75 year olds occupying each tenure (shown in Table 6-2). This is set out in Table 6-4. This provides a breakdown of which tenures those households are likely to need.

Table 6-4: Projected tenure of households aged 75+ in Melksham & Melksham Without to the end of the Plan period

Owned	Owned			All rented	Social rented	Private rented	Living rent free
	Owned outright	(mortgage) or shared ownership					
1,006	704	302	248	147	83	17	

Source: Census 2011, ONS SNPP 2020, AECOM Calculations

230. Next, rates of disability by tenure are considered. The tendency for people in rented housing to have higher disability levels is well established. It arises partly because people with more limiting disabilities tend to have lower incomes. It also reflects the fact that as people develop support and care needs they may find that the only suitable and affordable option to them is available in the social

rented sector. Table 6-5 presents this data for Melksham & Melksham Without from the 2011 Census. Note that the closest proxy for the 75+ age group in the Census is the 65+ age group. This shows, as expected, that the greatest proportion of those with their day-to-day activities limited a lot falls within the social rented sector at 38.4% compared to 18.1% for those that own their home.

Table 6-5: Tenure and mobility limitations of those aged 65+ in Melksham & Melksham Without, 2011

Tenure	Day-to-day activities limited a lot		Day-to-day activities limited a little		Day-to-day activities not limited	
All categories	831	21.2%	1,073	27.3%	2,025	51.5%
Owned Total	593	18.1%	872	26.6%	1,808	55.2%
Owned outright	520	18.2%	768	26.9%	1,572	55.0%
Owned (mortgage) or shared ownership	73	17.7%	104	25.2%	236	57.1%
Rented Total	238	36.3%	201	30.6%	217	33.1%
Social rented	196	38.4%	168	32.9%	147	28.8%
Private rented or living rent free	42	29.0%	33	22.8%	70	48.3%

Source: DC3408EW Health status

231. It is now possible to multiply the projected number of 75+ households occupying each tenure by the rates of mobility limitation for that tenure to arrive at the final tenure-led estimate for specialist housing needs. The number of households falling into potential need for specialist accommodation over the Plan period is 616.

232. These findings are set out in the table, based on the assumption that those whose day-to-day activities are limited a lot may need housing with care (e.g. extra care housing, with significant on-site services, including potentially medical services), while those with their day to day activities limited only a little may simply need adaptations to their existing homes, or alternatively sheltered or retirement living that can provide some degree of oversight or additional services. However, it is important to note that, even those people who have high support or care needs can often be supported to live in their own homes. This is often reflected in policy of local authorities, with explicit aim to reduce the need to commission increasing numbers of care home beds.

Table 6-6: AECOM estimate of specialist housing need in Melksham & Melksham Without by the end of the Plan period

Type	Affordable	Market	Total (rounded)
Housing with care (e.g. extra care)	Multiply the number of people across all rented tenures (not just social rent as those aged 65+ who need to rent are overwhelmingly likely to need Affordable Housing) by the percent of occupiers in that tenure who have day to day activity limitations limited a lot	Multiply the number of people across all owner-occupied housing by the percent of occupiers in that tenure who have day to day activity limitations limited a lot	272
	90	182	
Adaptations, sheltered, or retirement living	Multiply the number of people across all rented housing by the percent of occupiers in that tenure who have day to day activity limitations limited a little	Multiply the number of people across all owned housing by the percent of occupiers in that tenure who have day to day activity limitations limited a little	344
	76	268	
Total	166	450	616

Source: Census 2011, AECOM Calculations

Housing LIN-recommended provision

233. It is worth comparing these findings with the recommendations of the Housing Learning and Improvement Network (HLIN), one of the simplest and widely used models estimating for the housing needs of older people. Table 6-7 reproduces the key assumptions of HLIN's Strategic Housing for Older People (SHOP) toolkit. The table serves as a guide to the numbers of specialist dwellings for older people that should be provided given the increase in their numbers over the Plan period, and how these should be split into the different tenures.

234. It is worth highlighting that the HLIN model suggests that the level of unmet demand for specialist housing for older people of all kinds is approximately 251 units per 1,000 of the population aged 75+.

Table 6-7: Recommended provision of specialist housing for older people from the SHOP toolkit

FORM OF PROVISION	ESTIMATE OF DEMAND PER THOUSAND OF THE RELEVANT 75+ POPULATION
Conventional sheltered housing to rent	60
Leasehold sheltered housing	120
Enhanced sheltered housing (divided 50:50 between that for rent and that for sale) ³⁶	20
Extra care housing for rent	15
Extra care housing for sale	30
Housing based provision for dementia	6

Source: Housing LIN SHOP Toolkit

235. As Table 6-3 shows, Melksham & Melksham Without is forecast to see an increase of 1,786 individuals aged 75+ by the end of the Plan period. According to the HLIN tool, this translates into need as follows:

- Conventional sheltered housing to rent = $60 \times 1.768 = 106$
- Leasehold sheltered housing = $120 \times 1.768 = 212$
- Enhanced sheltered housing (divided 50:50 between that for rent and that for sale) = $20 \times 1.768 = 35.4$
- Extra care housing for rent = $15 \times 1.768 = 26.5$
- Extra care housing for sale = $30 \times 1.768 = 53.1$
- Housing based provision for dementia = $6 \times 1.768 = 10.6$

236. This produces an overall total of 444 specialist dwellings which might be required by the end of the plan period.

237. Table 6-8 sets out the HLIN recommendations in the same format as Table 6-6. It is important to stress that the SHOP toolkit embeds assumptions that uplift the provision of specialist accommodation compared to current rates.

Table 6-8: HLIN estimate of specialist housing need in Melksham & Melksham Without by the end of the Plan period

Type	Affordable	Market	Total
Housing with care (e.g. extra care)	Includes: enhanced sheltered housing for rent + extra care housing for rent + housing based provision for dementia	Includes: enhanced sheltered housing for sale + extra care housing for sale	126
	55	71	
Sheltered housing	Conventional sheltered housing for rent	Leasehold sheltered housing	318
	106	212	
Total	161	283	444

Source: Housing LIN, AECOM calculations

SHMA findings

238. The Swindon & Wiltshire Strategic Housing Market Assessment (SHMA) 2017 highlights a number of findings relevant to older persons specialist housing:

- The modelled demand for older persons housing suggests a need for 2,010 extra-care dwellings, 900 sheltered dwellings, 270 dementia dwellings, and 5,340 leasehold schemes for the elderly within Wiltshire Unitary Authority over the plan period. This totals 8,520. If this figure is pro-rated to the NA based on mid-2020 population estimates, it suggests a need for 407.3 units of older persons housing in the NA between 2016 and 2036, not dissimilar to the HLIN figure calculated above specifically for Melksham & Melksham Without. The pro-rated figure does not consider local factors such as the projected age profile of the NA specifically or the mobility limitations experienced by residents but is a good benchmark for comparison.

Conclusions- Specialist Housing for Older People

239. The existing stock of specialist older persons housing in Melksham & Melksham Without consists entirely of retirement housing, with no provision for extra-care. Just over half of this provision is for social rent, with the rest a mix of leasehold purchase, shared ownership, and market rent.

240. It is projected that there will be an increase of 1,768 individuals in the 75+ age category between 2011 and 2026 in Melksham & Melksham Without, increasing the proportion of those aged 75+ in the population from 8.6% to 14.5% by the end of the plan period, in line with the existing and projected proportions across Wiltshire.

241. The potential need for specialist housing with some form of additional care for older people can be estimated by bringing together data on population projections, rates of disability, and what tenure of housing the current 55-75

- cohort occupy in the NA. This can be sense-checked using a toolkit based on national research and assumptions.
242. These two methods of estimating the future need in Melksham & Melksham Without produce a range of 444 to 616 specialist accommodation units that might be required during the Plan period. These estimates are based on the projected growth of the older population, thereby assuming that today's older households are already well accommodated. If this is found not to be the case, it would justify aspiring to exceed the range identified here.
243. It is important to take into consideration the breakdown of levels of care and tenure within the need for specialist housing for older persons. When considering the AECOM calculation outlined in Table 6-6, the majority of the need, at 73.1%, is identified for market specialist housing. Slightly more need is identified for sheltered housing at 55.8% compared to 44.2% extra-care. The greatest sub-category of need was identified for market sheltered housing at 43.5% of the total need.
244. However, this need is for individuals with less severe mobility limitations and market housing is considered the most appropriate for adaptations, so at least some of this need could be met through adaptations or through ensuring that all new housing is accessible and adaptable for people with lower support needs. It is worth noting that the adopted Local Plan for Wiltshire expects proposals for extra-care schemes in the local authority area to provide an Affordable Housing contribution in line with other forms of development.
245. Given that there is unlikely to be a large volume of additional specialist supply during the Plan period, another avenue open to the Neighbourhood Planning groups is to discuss the standards of accessibility and adaptability in new development to be met in the Local Plan with the LPA. Groups could also explore site allocations or promoting this type of residential development. The local level evidence supplied in this report could be used to influence local authority level policies. Groups may also be able to encourage the adaptation of existing properties through grant schemes and other means (though it is acknowledged that Neighbourhood Plans may have limited influence over changes to the existing stock).
246. The adopted Local Plan Core Policy 46 (Meeting the needs of Wiltshire's vulnerable and older people) provides explicit encouragement for development to accommodate specific groups such as older people. However, it does not set specific targets for the proportion of new housing that might be required to meet national standards for accessibility and adaptability (Category M4(2)), or for wheelchair users (Category M4(3)). The evidence gathered here would appear to justify the Steering Group approaching the LPA to discuss setting requirements on accessibility and adaptability at a local authority level. It is unclear whether Neighbourhood Plans can set their own requirements for the application of the national standards of adaptability and accessibility for new housing and so discussions with the LPA are advised if this is a key priority.

247. It is relatively common for Local Plans to require that all or a majority of new housing meets Category M4(2) standards in response to the demographic shifts being observed nationwide, and the localised evidence gathered here would further justify this. The proportion of new housing that might accommodate those using wheelchairs might be set with reference to the proportion of affordable housing applicants in the local authority area falling into this category.
248. While it is important to maximise the accessibility of all new housing, it is particularly important for specialist housing for older people to be provided in sustainable, accessible locations, for a number of reasons, as follows:
- so that residents, who often lack cars of their own, are able to access local services and facilities, such as shops and doctor's surgeries, on foot;
 - so that any staff working there have the choice to access their workplace by more sustainable transport modes; and
 - so that family members and other visitors have the choice to access relatives and friends living in specialist accommodation by more sustainable transport modes.
249. Alongside the need for specialist housing to be provided in accessible locations, another important requirement is for cost effectiveness and economies of scale. This can be achieved by serving the specialist elderly housing needs arising from a number of different locations and/or Neighbourhood Areas from a single, centralised point (i.e. what is sometimes referred to as a 'hub-and-spoke' model).
250. It is considered that Melksham & Melksham Without is, in broad terms, a suitable location for specialist accommodation on the basis of the accessibility criteria and the considerations of cost-effectiveness above. As such, there is potential for such accommodation to be provided within the Neighbourhood Area (while noting there is no specific requirement or obligation to do so if there is potential to meet need arising from Melksham & Melksham Without in other suitable locations near to but outside the Plan area boundaries). Where it is considered for any reason desirable to meet some of the specialist need outside the Neighbourhood Area boundaries, there will be a degree of overlap between the number of specialist dwellings to be provided and the overall dwellings target for the Neighbourhood Area itself.
251. It is important to note the differences in the settlements of Melksham & Melksham Without. Whilst the provision of specialist housing for older persons would likely be appropriate in Melksham & Bowerhill due to public transport links and access to amenities, it would likely be less appropriate in the smaller settlements of Beanacre and Berryfield. Therefore, it may be appropriate that specialist older persons housing is focussed on the more built-up areas of Melksham & Bowerhill, and potentially at a smaller scale in Whitley & Shaw. Due to the greater suitability of Melksham Town for the provision of specialist older persons housing, the need figures have not been pro-rated for the sub areas as it is likely that regardless of the location of need, the provision would be delivered in the larger settlement.

252. Wherever specialist housing is to be accommodated, partnership working with specialist developers is recommended, so as to introduce a greater degree of choice into the housing options for older people who wish to move in later life.

7. Next Steps

Recommendations for next steps

253. This Neighbourhood Plan housing needs assessment aims to provide Melksham & Melksham Without with evidence on a range of housing trends and issues from a range of relevant sources. We recommend that the neighbourhood planners should, as a next step, discuss the contents and conclusions with Wiltshire Council with a view to agreeing and formulating draft housing policies, bearing the following in mind:

- All Neighbourhood Planning Basic Conditions, but in particular Condition E, which is the need for the Neighbourhood Plan to be in general conformity with the strategic policies of the adopted development plan;
- The views of Wiltshire Council;
- The views of local residents;
- The views of other relevant local stakeholders, including housing developers and estate agents; and
- The numerous supply-side considerations, including local environmental constraints, the location and characteristics of suitable land, and any capacity work carried out by Wiltshire Council.

254. This assessment has been provided in good faith by AECOM consultants on the basis of housing data, national guidance and other relevant and available information current at the time of writing.

255. Bearing this in mind, it is recommended that the Neighbourhood Plan steering group should monitor carefully strategies and documents with an impact on housing policy produced by the Government, Wiltshire Council or any other relevant party and review the Neighbourhood Plan accordingly to ensure that general conformity is maintained.

256. At the same time, monitoring on-going demographic or other trends over the Neighbourhood Plan period will help ensure the continued relevance and credibility of its policies.

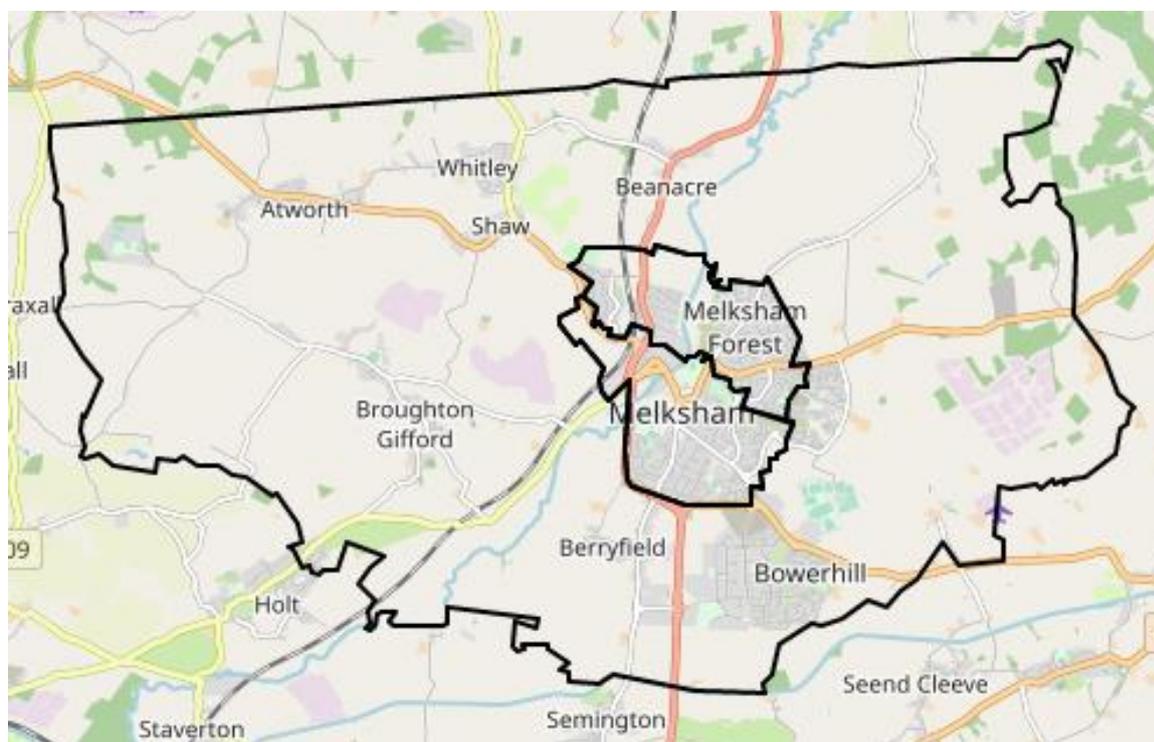
Appendix A : Calculation of Affordability Thresholds

A.1 Assessment geography

257. As noted in the Tenure and Affordability chapter above, affordability thresholds can only be calculated on the basis of data on incomes across the Neighbourhood Area. Such data is available at MSOA level but not at the level of Neighbourhood Areas.

258. As such, when calculating affordability thresholds, an MSOA needs to be selected that is a best-fit proxy for the Neighbourhood Area. In the case of Melksham & Melksham Without, it is considered that the MSOAs of E02006680, E02006678, and E02006679 are the closest realistic proxy for the Neighbourhood Area boundary when looking at income data, and as such, this is the assessment geography that has been selected. A map of these appears in Figure A-1. It is worth noting that MSOAs E02006680 and E02006678 are wholly part of the NA, covering most of the built-up town of Melksham, with MSOA E02006679 covering Melksham Without as well as the settlements of Atworth and Broughton Gifford which are outside of the NA. However, this area is the best geographical proxy that can be used for income data.

Figure A-1: MSOA E02006680, MSOA E02006678, and MSOA E02006679 used as a best-fit geographical proxy for the Neighbourhood Area



Source: ONS

A.2 Market housing

259. Market housing is not subsidised and tends to be primarily accessible to people on higher incomes.
260. To determine affordability in market housing, this assessment considers two primary indicators: income thresholds, which denote the maximum share of a family's income that should be spent on accommodation costs, and purchase thresholds, which denote the standard household income required to access mortgage products.

i) Market sales

261. The starting point for calculating the affordability of a dwelling for sale (i.e. the purchase threshold) from the perspective of a specific household is the loan to income ratio which most mortgage companies are prepared to agree. This ratio is conservatively estimated to be 3.5.
262. To produce a more accurate assessment of affordability, the savings required for a deposit should be taken into account in addition to the costs of servicing a mortgage. However, unlike for incomes, data is not available for the savings available to households in Melksham & Melksham Without, and the precise deposit a mortgage provider will require of any buyer will be determined by their individual circumstances and the state of the mortgage market. An assumption is therefore made that a 10% purchase deposit is required and is available to the prospective buyer. In reality it is possible that the cost of the deposit is a greater barrier to home ownership than the mortgage costs.
263. The calculation for the purchase threshold for market housing is as follows:
- Value of a median NA house price (2021) = £250,000;
 - Purchase deposit at 10% of value = £25,000;
 - Value of dwelling for mortgage purposes = £225,000;
 - Divided by loan to income ratio of 3.5 = purchase threshold of £64,286.
264. The purchase threshold for an entry-level dwelling is a better representation of affordability to those with lower incomes or savings, such as first-time buyers. To determine this threshold, the same calculation is repeated but with reference to the lower quartile rather than the median house price. The lower quartile average in 2021 was £205,000, and the purchase threshold is therefore £52,714.
265. Finally, it is worth assessing the purchase threshold for new build homes, since this most closely represents the cost of the new housing that will come forward in future. Land Registry records 67 sales of new build properties in the NA in 2021. The lower quartile (entry-level) new build house price in the NA in 2021 was £224,648, with a purchase threshold of £57,767. Additionally, the median new build house price in the NA in 2021 was £265,000, with a purchase threshold of £68,143.

ii) Private Rented Sector (PRS)

266. Income thresholds are used to calculate the affordability of rented and affordable housing tenures. It is assumed here that rented housing is affordable if the annual rent does not exceed 30% of the household's gross annual income.
267. This is an important assumption because it is possible that a household will be able to afford tenures that are deemed not affordable in this report if they are willing or able to dedicate a higher proportion of their income to housing costs. It is becoming increasingly necessary for households to do so. However, for the purpose of planning it is considered more appropriate to use this conservative lower benchmark for affordability on the understanding that additional households may be willing or able to access housing this way than to use a higher benchmark which assumes that all households can afford to do so when their individual circumstances may well prevent it.
268. The property website Rightmove.co.uk shows rental values for property in the Neighbourhood Area. According to Rightmove.co.uk, there were 23 properties for rent at the time of search in May 2022, with an average monthly rent of £748. There were 10 one-bed properties listed, with an average price of £571 per calendar month.
269. The calculation for the private rent income threshold for entry-level (1-bedroom) dwellings is as follows:
- Annual rent = £571 x 12 = £6,846;
 - Multiplied by 3.33 (so that no more than 30% of income is spent on rent) = income threshold of £22,820.
270. The calculation is repeated for the overall average to give an income threshold of £29,906.

A.3 Affordable Housing

271. There are a range of tenures that constitute the definition of Affordable Housing within the NPPF 2021: social rent and affordable rent, discounted market sales housing, and other affordable routes to home ownership. More recently, a new product called First Homes has been introduced in 2021. Each of the affordable housing tenures are considered below.

i) Social rent

272. Rents in socially rented properties reflect a formula based on property values and average earnings in each area, resulting in substantial discounts to market rents. As such, this tenure is suitable for the needs of those on the lowest incomes and is subject to strict eligibility criteria.
273. To determine social rent levels, data and statistical return from Homes England is used. This data is only available at the LPA level so must act as a proxy for Melksham & Melksham Without. This data provides information about rents and

the size and type of stock owned and managed by private registered providers and is presented for Wiltshire in the Table A-1.

274. To determine the income needed, it is assumed that no more than 30% of income should be spent on rent. This is an assumption only for what might generally make housing affordable or unaffordable – it is unrelated to the eligibility criteria of Affordable Housing policy at Local Authority level. The overall average across all property sizes is taken forward as the income threshold for social rent.

Table A-1: Social rent levels (£)

Size	1 bed	2 beds	3 beds	4 beds	All
Average social rent per week	£86.42	£98.54	£108.83	£120.82	£101.17
Annual average	£4,494	£5,124	£5,659	£6,283	£5,261
Income needed	£14,964	£17,063	£18,845	£20,921	£17,519

Source: Homes England, AECOM Calculations

ii) Affordable rent

275. Affordable rent is controlled at no more than 80% of the local market rent. However, registered providers who own and manage affordable rented housing may also apply a cap to the rent to ensure that it is affordable to those on housing benefit (where under Universal Credit the total received in all benefits to working age households is £20,000).

276. Even an 80% discount on the market rent may not be sufficient to ensure that households can afford this tenure, particularly when they are dependent on benefits. Registered Providers in some areas have applied caps to larger properties where the higher rents would make them unaffordable to families under Universal Credit. This may mean that the rents are actually 50-60% of market levels rather than 80%.

277. Data on the most realistic local affordable rent costs is obtained from the same source as social rent levels for Wiltshire. Again, it is assumed that no more than 30% of income should be spent on rent, and the overall average is taken forward.

278. Comparing this result with the average 1-bedroom annual private rent above indicates that affordable rents in the NA are in line with the maximum of 80% of market rents at 79.2%. This feature is necessary to make them achievable to those in need.

Table A-2: Affordable rent levels (£)

Size	1 bed	2 beds	3 beds	4 beds	All
Average affordable rent per week	£104.25	£123.75	£148.93	£182.59	£128.50
Annual average	£5,421	£6,435	£7,744	£9,495	£6,682
Income needed	£18,052	£21,429	£25,789	£31,617	£22,251

Source: Homes England, AECOM Calculations

iii) Affordable home ownership

279. Affordable home ownership tenures include products for sale and rent provided at a cost above social rent, but below market levels. The three most widely available are discounted market housing (a subset of which is the new First Homes product), shared ownership, and Rent to Buy. These are considered in turn below.
280. In paragraph 65 of the NPPF 2021, the Government introduces a recommendation that “where major housing development is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership.” The recently issued Ministerial Statement and updates to PPG state that 25% of all Affordable Housing should be First Homes – the Government’s new flagship discounted market sale product. When the NPPF is next updated, it is expected that the 10% affordable home ownership requirement referenced above may be replaced by the First Homes requirement.

First Homes

281. Whether to treat discounted market housing as affordable or not depends on whether discounting the asking price of new build homes of a size and type suitable to first time buyers would bring them within reach of people currently unable to buy market housing.
282. The starting point for these calculations is therefore the average cost of entry level new build housing in Melksham & Melksham Without, noted above of £224,648.
283. For the minimum discount of 30% the purchase threshold can be calculated as follows:
- Value of a new home (NA LQ) = £224,648;
 - Discounted by 30% = £157,253;
 - Purchase deposit at 10% of value = £15,725;
 - Value of dwelling for mortgage purposes = £141,528;
 - Divided by loan to income ratio of 3.5 = purchase threshold of £40,437.
284. The income thresholds analysis in the Tenure and Affordability chapter also compares local incomes with the costs of a 40% and 50% discounted First Home. This would require an income threshold of £34,660 and £28,883 respectively.
285. All of the income thresholds calculated here for First Homes are below the cap of £80,000 above which households are not eligible. All of the discounted prices are also below the £250,000 cap.
286. Note that discounted market sale homes may be unviable to develop if the discounted price is close to (or below) build costs. Build costs vary across the country but as an illustration, the build cost for a 2-bedroom home (assuming

70 sq. m and a build cost of £1,500 per sq. m) would be around £105,000. This cost excludes any land value or developer profit. This may be an issue with First Homes at a 50% discount in Melksham & Melksham Without, with the discounted value of £112,324.

Shared ownership

287. Shared ownership involves the purchaser buying an initial share in a property, typically of between 25% and 75% (but now set at a minimum of 10%), and paying rent on the share retained by the provider. Shared ownership is flexible in two respects, in the share which can be purchased and in the rental payable on the share retained by the provider. Both of these are variable. The share owned by the occupant can be increased over time through a process known as 'staircasing'.
288. In exceptional circumstances (for example, as a result of financial difficulties, and where the alternative is repossession), and at the discretion of the provider, shared owners may staircase down, thereby reducing the share they own. Shared equity is available to first-time buyers, people who have owned a home previously and council and housing association tenants with a good credit rating whose annual household income does not exceed £80,000.
289. To determine the affordability of shared ownership, calculations are again based on the average cost of new build housing as discussed above. The deposit available to the prospective purchaser is assumed to be 10% of the value of the dwelling, and the standard loan to income ratio of 3.5 is used to calculate the income required to obtain a mortgage. The rental component is estimated at 2.5% of the value of the remaining (unsold) portion of the price. The income required to cover the rental component of the dwelling is based on the assumption that a household spends no more than 30% of the income on rent (as for the income threshold for the private rental sector).
290. The affordability threshold for a 25% equity share is calculated as follows:
- A 25% equity share of £224,648 is £56,162;
 - A 10% deposit of £5,616 is deducted, leaving a mortgage value of £50,546;
 - This is divided by the loan to value ratio of 3.5 to give a purchase threshold of £14,442;
 - Rent is charged on the remaining 75% shared ownership equity, i.e. the unsold value of £168,486;
 - The estimated annual rent at 2.5% of the unsold value is £4,212;
 - This requires an income of £14,041 (annual rent multiplied by 3.33 so that no more than 30% of income is spent on rent).
 - The total income required is £28,482.
291. The same calculation is repeated for equity shares of 10% and 50% producing affordability thresholds of £22,625 and £38,244 respectively.
292. All of the income thresholds are below the £80,000 cap for eligible households.

Rent to Buy

293. Rent to Buy is a relatively new and less common tenure, which through subsidy allows the occupant to save a portion of their rent, which is intended to be used to build up a deposit to eventually purchase the home. It is therefore estimated to cost the same as private rents – the difference being that the occupant builds up savings with a portion of the rent.

Help to Buy (Equity Loan)

294. The Help to Buy Equity Loan is not an affordable housing tenure but allows households to afford market housing through a loan provided by the government. With a Help to Buy Equity Loan the government lends up to 20% (40% in London) of the cost of a newly built home. The household must pay a deposit of 5% or more and arrange a mortgage of 25% or more to make up the rest. Buyers are not charged interest on the 20% loan for the first five years of owning the home.

295. It is important to note that this product widens access to market housing but does not provide an affordable home in perpetuity.

Appendix B : Housing Needs Assessment Glossary

Adoption

This refers to the final confirmation of a local plan by a local planning authority.

Affordability

The terms 'affordability' and 'affordable housing' have different meanings. 'Affordability' is a measure of whether housing may be afforded by certain groups of households. 'Affordable housing' refers to particular products outside the main housing market.

Affordability Ratio

Assessing affordability involves comparing housing costs against the ability to pay. The ratio between lower quartile house prices and the lower quartile income or earnings can be used to assess the relative affordability of housing. The Ministry for Housing, Community and Local Governments publishes quarterly the ratio of lower quartile house price to lower quartile earnings by local authority (LQAR) as well as median house price to median earnings by local authority (MAR) e.g. income = £25,000, house price = £200,000. House price: income ratio = £200,000/£25,000 = 8, (the house price is 8 times income).

Affordable Housing (NPPF Definition)

Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

a) Affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

b) Discounted market sales housing: is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.

c) Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low-cost homes for sale (at a price equivalent to at least 20% below local market value) and

Rent to Buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision or refunded to Government or the relevant authority specified in the funding agreement.

Affordable rented housing

Rented housing let by registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is not subject to the national rent regime but is subject to other rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable). The national rent regime is the regime under which the social rents of tenants of social housing are set, with particular reference to the Guide to Social Rent Reforms (March 2001) and the Rent Influencing Regime Guidance (October 2001). Local market rents are calculated using the Royal Institution for Chartered Surveyors (RICS) approved valuation methods³¹.

Age-Restricted General Market Housing

A type of housing which is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens but does not include support or care services.

Annual Monitoring Report

A report submitted to the Government by local planning authorities assessing progress with and the effectiveness of a Local Development Framework.

Basic Conditions

The Basic Conditions are the legal tests that are considered at the examination stage of neighbourhood development plans. They need to be met before a plan can progress to referendum.

Backlog need

The backlog need constitutes those households who are eligible for Affordable Housing, on account of homelessness, over-crowding, concealment or affordability, but who are yet to be offered a home suited to their needs.

Bedroom Standard³²

The bedroom standard is a measure of occupancy (whether a property is overcrowded or under-occupied, based on the number of bedrooms in a property and the type of household in residence). The Census overcrowding data is based on occupancy rating (overcrowding by number of rooms not including bathrooms and hallways). This tends to produce higher levels of overcrowding/ under occupation. A detailed definition of the standard is given in the Glossary of the EHS Household Report.

³¹ The Tenant Services Authority has issued an explanatory note on these methods at <http://www.communities.gov.uk/documents/planningandbuilding/pdf/1918430.pdf>

³² See <https://www.gov.uk/government/statistics/english-housing-survey-2011-to-2012-household-report>

Co-living

Co-living denotes people who do not have family ties sharing either a self-contained dwelling (i.e., a 'house share') or new development akin to student housing in which people have a bedroom and bathroom to themselves, but share living and kitchen space with others. In co-living schemes each individual represents a separate 'household'.

Community Led Housing/Community Land Trusts

Housing development, provision and management that is led by the community is very often driven by a need to secure affordable housing for local people in the belief that housing that comes through the planning system may be neither the right tenure or price-point to be attractive or affordable to local people. The principal forms of community-led models include cooperatives, co-housing communities, self-help housing, community self-build housing, collective custom-build housing, and community land trusts. By bringing forward development which is owned by the community, the community is able to set rents and/or mortgage payments at a rate that it feels is appropriate. The Government has a range of support programmes for people interested in bringing forward community led housing.

Community Right to Build Order³³

A community right to build order is a special kind of neighbourhood development order, granting planning permission for small community development schemes, such as housing or new community facilities. Local community organisations that meet certain requirements or parish/town councils are able to prepare community right to build orders.

Concealed Families (Census definition)³⁴

The 2011 Census defined a concealed family as one with young adults living with a partner and/or child/children in the same household as their parents, older couples living with an adult child and their family or unrelated families sharing a household. A single person cannot be a concealed family; therefore one elderly parent living with their adult child and family or an adult child returning to the parental home is not a concealed family; the latter are reported in an ONS analysis on increasing numbers of young adults living with parents.

Equity Loans/Shared Equity

An equity loan which acts as a second charge on a property. For example, a household buys a £200,000 property with a 10% equity loan (£20,000). They pay a small amount for the loan and when the property is sold e.g. for £250,000 the lender receives 10% of the sale cost (£25,000). Some equity loans were available for the purchase of existing stock. The current scheme is to assist people to buy new build.

³³ See <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>

³⁴ See http://webarchive.nationalarchives.gov.uk/20160107160832/http://www.ons.gov.uk/ons/dcp171776_350282.pdf

Extra Care Housing or Housing-With-Care

Housing which usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24 hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are included in retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.

Fair Share

'Fair share' is an approach to determining housing need within a given geographical area based on a proportional split according to the size of the area, the number of homes in it, or its population.

First Homes

The Government has recently confirmed the introduction of First Homes as a new form of discounted market housing which will provide a discount of at least 30% on the price of new homes. These homes are available to first time buyers as a priority but other households will be eligible depending on agreed criteria. New developments will be required to provide 25% of Affordable Housing as First Homes. A more detailed explanation of First Homes and its implications is provided in the main body of the HNA.

Habitable Rooms

The number of habitable rooms in a home is the total number of rooms, excluding bathrooms, toilets and halls.

Household Reference Person (HRP)

The concept of a Household Reference Person (HRP) was introduced in the 2001 Census (in common with other government surveys in 2001/2) to replace the traditional concept of the head of the household. HRPs provide an individual person within a household to act as a reference point for producing further derived statistics and for characterising a whole household according to characteristics of the chosen reference person.

Housing Market Area

A housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. It might be the case that housing market areas overlap.

The extent of the housing market areas identified will vary, and many will in practice cut across various local planning authority administrative boundaries. Local planning authorities should work with all the other constituent authorities under the duty to cooperate.

Housing Needs

There is no official definition of housing need in either the National Planning Policy Framework or the National Planning Practice Guidance. Clearly, individuals have their own housing needs. The process of understanding housing needs at a population scale is undertaken via the preparation of a Strategic Housing Market Assessment (see below).

Housing Needs Assessment

A Housing Needs Assessment (HNA) is an assessment of housing needs at the Neighbourhood Area level.

Housing Products

Housing products simply refers to different types of housing as they are produced by developers of various kinds (including councils and housing associations). Housing products usually refers to specific tenures and types of new build housing.

Housing Size (Census Definition)

Housing size can be referred to either in terms of the number of bedrooms in a home (a bedroom is defined as any room that was intended to be used as a bedroom when the property was built, any rooms permanently converted for use as bedrooms); or in terms of the number of rooms, excluding bathrooms, toilets halls or landings, or rooms that can only be used for storage. All other rooms, for example, kitchens, living rooms, bedrooms, utility rooms, studies and conservatories are counted. If two rooms have been converted into one they are counted as one room. Rooms shared between more than one household, for example a shared kitchen, are not counted.

Housing Type (Census Definition)

This refers to the type of accommodation used or available for use by an individual household (i.e. detached, semi-detached, terraced including end of terraced, and flats). Flats are broken down into those in a purpose-built block of flats, in parts of a converted or shared house, or in a commercial building.

Housing Tenure (Census Definition)

Tenure provides information about whether a household rents or owns the accommodation that it occupies and, if rented, combines this with information about the type of landlord who owns or manages the accommodation.

Income Threshold

Income thresholds are derived as a result of the annualisation of the monthly rental cost and then asserting this cost should not exceed 35% of annual household income.

Intercensal Period

This means the period between the last two Censuses, i.e. between years 2001 and 2011.

Intermediate Housing

Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low-cost homes for sale and intermediate rent, but not affordable rented housing. Homes that do not meet the above definition of affordable housing, such as 'low-cost market' housing, may not be considered as affordable housing for planning purposes.

Life Stage modelling

Life Stage modelling is forecasting need for dwellings of different sizes by the end of the Plan period on the basis of changes in the distribution of household types and key age brackets (life stages) within the NA. Given the shared behavioural patterns associated with these metrics, they provide a helpful way of understanding and predicting future community need. This data is not available at neighbourhood level so LPA level data is employed on the basis of the NA falling within its defined Housing Market Area.

Life-time Homes

Dwellings constructed to make them more flexible, convenient adaptable and accessible than most 'normal' houses, usually according to the Lifetime Homes Standard, 16 design criteria that can be applied to new homes at minimal cost: <http://www.lifetimehomes.org.uk/>.

Life-time Neighbourhoods

Lifetime neighbourhoods extend the principles of Lifetime Homes into the wider neighbourhood to ensure the public realm is designed in such a way to be as inclusive as possible and designed to address the needs of older people, for example providing more greenery and more walkable, better connected places.

Local Development Order

An Order made by a local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a specific development proposal or classes of development.

Local Enterprise Partnership

A body, designated by the Secretary of State for Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area.

Local housing need (NPPF definition)

The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 61 of this Framework).

Local Planning Authority

The public authority whose duty it is to carry out specific planning functions for a particular area. All references to local planning authority apply to the District Council, London Borough Council, County Council, Broads Authority, National Park Authority or the Greater London Authority, to the extent appropriate to their responsibilities.

Local Plan

This is the plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current core strategies or other planning policies form part of the Local Plan and are known as 'Development Plan Documents' (DPDs).

Lower Quartile

The bottom 25% value, i.e. of all the properties sold, 25% were cheaper than this value and 75% were more expensive. The lower quartile price is used as an entry level price and is the recommended level used to evaluate affordability; for example, for first time buyers.

Lower Quartile Affordability Ratio

The Lower Quartile Affordability Ratio reflects the relationship between Lower Quartile Household Incomes and Lower Quartile House Prices, and is a key indicator of affordability of market housing for people on relatively low incomes.

Market Housing

Market housing is housing which is built by developers (which may be private companies or housing associations, or Private Registered Providers), for the purposes of sale (or rent) on the open market.

Mean (Average)

The mean or the average is, mathematically, the sum of all values divided by the total number of values. This is the more commonly used "average" measure as it includes all values, unlike the median.

Median

The middle value, i.e. of all the properties sold, half were cheaper and half were more expensive. This is sometimes used instead of the mean average as it is not subject to skew by very large or very small statistical outliers.

Median Affordability Ratio

The Lower Quartile Affordability Ratio reflects the relationship between Median Household Incomes and Median House Prices and is a key indicator of affordability of market housing for people on middle-range incomes.

Mortgage Ratio

The mortgage ratio is the ratio of mortgage value to income which is typically deemed acceptable by banks. Approximately 75% of all mortgage lending ratios fell below 4 in recent years³⁵, i.e. the total value of the mortgage was less than 4 times the annual income of the person who was granted the mortgage.

Neighbourhood Development Order (NDO)

An NDO will grant planning permission for a particular type of development in a particular area. This could be either a particular development, or a particular class of development (for example retail or housing). A number of types of development will be excluded from NDOs, however. These are minerals and waste development, types of development that, regardless of scale, always need Environmental Impact Assessment, and Nationally Significant Infrastructure Projects.

Neighbourhood plan

A plan prepared by a Parish or Town Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).

Older People

People over retirement age, including the active, newly-retired through to the very frail elderly, whose housing needs can encompass accessible, adaptable general needs housing for those looking to downsize from family housing and the full range of retirement and specialised housing for those with support or care needs.

Output Area/Lower Super Output Area/Middle Super Output Area

An output area is the lowest level of geography for publishing statistics, and is the core geography from which statistics for other geographies are built. Output areas were created for England and Wales from the 2001 Census data, by grouping a number of households and populations together so that each output area's population is roughly the same. 175,434 output areas were created from the 2001 Census data, each containing a minimum of 100 persons with an average of 300 persons. Lower Super Output Areas consist of higher geographies of between 1,000-1,500 persons (made up of a number of individual Output Areas) and Middle Super Output Areas are higher than this, containing between 5,000 and 7,200 people, and made up of individual Lower Layer Super Output Areas. Some statistics are only available down to Middle Layer Super Output Area level, meaning that they are not available for individual Output Areas or parishes.

Overcrowding

There is no single agreed definition of overcrowding, however, utilising the Government's bedroom standard, overcrowding is deemed to be in households where there is more than one person in the household per room (excluding kitchens, bathrooms, halls and storage areas). As such, a home with one bedroom and one

³⁵ See <https://www.which.co.uk/news/2017/08/how-your-income-affects-your-mortgage-chances/>

living room and one kitchen would be deemed overcrowded if three adults were living there.

Planning Condition

A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.

Planning Obligation

A legally enforceable obligation entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.

Purchase Threshold

Purchase thresholds are calculated by netting 10% off the entry house price to reflect purchase deposit. The resulting cost is divided by 4 to reflect the standard household income requirement to access mortgage products.

Proportionate and Robust Evidence

Proportionate and robust evidence is evidence which is deemed appropriate in scale, scope and depth for the purposes of neighbourhood planning, sufficient so as to meet the Basic Conditions, as well as robust enough to withstand legal challenge. It is referred to a number of times in the PPG and its definition and interpretation relies on the judgement of professionals such as Neighbourhood Plan Examiners.

Private Rented

The Census tenure private rented includes a range of different living situations in practice, such as private rented/ other including households living “rent free”. Around 20% of the private rented sector are in this category, which will have included some benefit claimants whose housing benefit at the time was paid directly to their landlord. This could mean people whose rent is paid by their employer, including some people in the armed forces. Some housing association tenants may also have been counted as living in the private rented sector because of confusion about what a housing association is.

Retirement Living or Sheltered Housing

Housing for older people which usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services, but provides some support to enable residents to live independently. This can include 24 hour on-site assistance (alarm) and a warden or house manager.

Residential Care Homes and Nursing Homes

Housing for older people comprising of individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually

include support services for independent living. This type of housing can also include dementia care homes.

Rightsizing

Households who wish to move into a property that is a more appropriate size for their needs can be said to be rightsizing. This is often used to refer to older households who may be living in large family homes but whose children have left, and who intend to rightsize to a smaller dwelling. The popularity of this trend is debatable as ties to existing communities and the home itself may outweigh issues of space. Other factors, including wealth, health, status and family circumstance also need to be taken into consideration, and it should not be assumed that all older households in large dwellings wish to rightsize.

Rural Exception Sites

Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. Small numbers of market homes may be allowed at the local authority's discretion, for example where essential to enable the delivery of affordable dwellings without grant funding.

Shared Ownership

Housing where a purchaser part buys and part rents from a housing association or local authority. Typical purchase share is between 25% and 75% (though this was lowered in 2021 to a minimum of 10%), and buyers are encouraged to buy the largest share they can afford. Generally, applies to new build properties, but re-sales occasionally become available. There may be an opportunity to rent at intermediate rent level before purchasing a share in order to save/increase the deposit level

Sheltered Housing³⁶

Sheltered housing (also known as retirement housing) means having your own flat or bungalow in a block, or on a small estate, where all the other residents are older people (usually over 55). With a few exceptions, all developments (or 'schemes') provide independent, self-contained homes with their own front doors. There are many different types of scheme, both to rent and to buy. They usually contain between 15 and 40 properties, and range in size from studio flats (or 'bedsits') through to 2 and 3 bed roomed. Properties in most schemes are designed to make life a little easier for older people - with features like raised electric sockets, lowered worktops, walk-in showers, and so on. Some will usually be designed to accommodate wheelchair users. And they are usually linked to an emergency alarm service (sometimes called 'community alarm service') to call help if needed. Many schemes also have their own 'manager' or 'warden', either living on-site or nearby, whose job is to manage the scheme and help arrange any services residents need. Managed schemes will also

³⁶ See <http://www.housingcare.org/jargon-sheltered-housing.aspx>

usually have some shared or communal facilities such as a lounge for residents to meet, a laundry, a guest flat and a garden.

Strategic Housing and Economic Land Availability Assessment

A Strategic Housing and Economic Land Availability Assessment (SHELAA) is a document prepared by one or more local planning authorities to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing and economic needs over the Plan period. SHELAA's are sometimes also called SHLAA's (Strategic Housing Land Availability Assessments), LAAs (Land Availability Assessments), or HELAA's (Housing and Economic Land Availability Assessments) so as to integrate the need to balance assessed housing and economic needs as described below.

Strategic Housing Market Assessment (NPPF Definition)

A Strategic Housing Market Assessment (SHMA) is a document prepared by one or more local planning authorities to assess their housing needs under the 2012 version of the NPPF, usually across administrative boundaries to encompass the whole housing market area. The NPPF makes clear that SHMAs should identify the scale and mix of housing and the range of tenures the local population is likely to need over the Plan period. Sometimes SHMAs are combined with Economic Development Needs Assessments to create documents known as HEDNAs (Housing and Economic Development Needs Assessments).

Specialist Housing for the Elderly

Specialist housing for the elderly, sometimes known as specialist accommodation for the elderly, encompasses a wide range of housing types specifically aimed at older people, which may often be restricted to those in certain older age groups (usually 55+ or 65+). This could include residential institutions, sometimes known as care homes, sheltered housing, extra care housing, retirement housing and a range of other potential types of housing which has been designed and built to serve the needs of older people, including often providing care or other additional services. This housing can be provided in a range of tenures (often on a rented or leasehold basis).

Social Rented Housing

Social rented housing is owned by local authorities and private registered providers (as defined in Section 80 of the Housing and Regeneration Act 2008.). Guideline target rents for this tenure are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with Homes England.³⁷

³⁷ See <http://www.communities.gov.uk/documents/planningandbuilding/doc/1980960.doc#Housing>

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Teresa Strange

From: Teresa Strange
Sent: 08 November 2022 13:42
To: Holder, Nick
Cc: David Pafford; Richard Wood
Subject: RE: 5 year land supply issue

Dear Nick

Thanks for this, I will add to the next Planning committee agenda for the parish council to consider.

The parish council have the following objective, adopted at their May meeting.

To influence and lobby in conjunction with Wiltshire Area Local Planning Alliance (WALPA) Central Government to change the new NPPF (National Planning Policy Framework) legislation for Neighbourhood Plans protected to a 3-year land supply, to hold for more than 2 years (working with WALPA Wiltshire Area Localism & Planning Alliance)

It's after the same overall effect, the result of the paragraph 14 addition in the NPPF is that a lot of time and resources are being spent by communities in continually updating their Neighbourhood Plans to meet this criteria – which is impossible, it takes nearly a year to get through all the statutory steps from a draft Plan to a made Plan.

Are you and your colleagues working with WALPA? They have been in contact with all the MPs for Wiltshire, with a better response from some than others.

Kind regards, Teresa

From: Holder, Nick <Nick.Holder@wiltshire.gov.uk>
Sent: 08 November 2022 10:47
To: Teresa Strange <clerk@melkshamwithout.co.uk>
Cc: David Pafford <david.pafford@melkshamwithout.co.uk>; Richard Wood <richard.wood@melkshamwithout.co.uk>
Subject: 5 year land supply issue

Hi Teresa, and Dave and Richard,

Some of my colleagues on Wiltshire Council have been working together to lobby central government to remove the erroneous 5 year land supply figure which is being used to override local residents and parish councils. Personally, I am sure developers are culpable in ensuring the 5 year land supply target is manipulated so that they can bring forward unwanted development outside of the local need.

I have attached a letter and wonder if you would consider sending this onto Michelle Donelan as our local MP? For my part I have sent this to her and also to Michael Gove.

Thanks,

Nick

P.S. Sorry I did not mention this last night at the planning meeting.

Nick Holder

Dear [MP's name]

5-Year Land Supply

I write as Chair of [X] Parish Council, concerning the Government's use of the 5 Year Housing Land Supply target.

Our parish contains [X,000] voters and, as a very active community, we work hard to address every local planning application in a fair and logical manner. [Following government guidance, we have spent considerable time and money creating our own Neighbourhood Plan to supplement the planning guidance given in the Wiltshire Core Strategy.]

Our parish, and indeed every town or parish in Wiltshire, is under constant threat from developers, who are using Wiltshire's 5 Year Housing Land Supply figure to gain approval for developments that are contrary to Neighbourhood Plans and the Wiltshire Core Strategy. It appals us to see these comprehensive documents being overruled by a single figure that can be influenced directly by developers.

On behalf of the [X,000] residents in [XXXX] I implore you to make our views known to the appropriate government minister so that the 5-Year Housing Supply figure can be removed from all planning procedures to ensure that all planning approvals are in line with the policies that have the approval of local residents and Wiltshire Council.

If our [X,000] residents are not supported by Government in their collective battle in favour of planned and supported development, they are sure to question the value of their input into documents such as the Neighbourhood Plan.

Your sincerely

Lorraine McRandle

Subject: FW: Planning Application Ref PL/22/08155 Land to the West of Semington Road, Melksham, Wilts

From: [REDACTED]

Sent: 10 November 2022 11:23

To: Teresa Strange <clerk@melkshamwithout.co.uk>

Subject: Planning Application Ref PL/22/08155 Land to the West of Semington Road, Melksham, Wilts

Dear Parish Clerk

Please would you forward our email to your Planning Committee for their consideration of endorsing our comment on the Planning Portal should they support this application. There is a growing issue with the lack of ecological mitigation and enhancements developers provide and this redevelopment offers your parish an opportunity to increase its biodiversity and wildlife. A Built Environment can be wildlife friendly and it is important that as many ecological measures as possible are included such as bird, bat and bee bricks, reptile refugia and hibernacula. Even though this is an outline application it is important to establish the number and type of ecological enhancements at this early stage, with locations marked on Reserved Matters site plans and photographic evidence provided for discharge.

Kind regards

Camilla [REDACTED]

On behalf of Salisbury & Wilton Swifts



A Wiltshire Priority Species

Salisbury & Wilton Swifts (SAWS)

Salisbury & Wilton Swifts has reviewed this outline planning application as we believe all new developments should provide habitat opportunities for those species such as swifts who prefer, or can adapt to, the built environment. Swifts in the UK are on the Birds of Conservation Concern (BoCC) Red List and are classified as Endangered on the IUCN Red List assessment of extinction risk for Great Britain. Their numbers declined by 58% between 1995 and 2018 and by 41% in just 10 years up to 2018, that is over 5% per annum! We are a voluntary group, part of a network of over 119 such groups across the UK, who are trying to preserve known swift nesting sites and promote the inclusion of swift bricks in all new development by engaging with Local Planning Authorities, Architects, Ecologists as well as Developers. Our comments are impartial observations, neither supporting nor objecting to the application.

With the net gain for biodiversity expectations from central government (NPPF **Section 174 (d) states:** *“Planning policies and decisions should contribute to and enhance the natural and local environment by: minimising impacts on and providing **net gains for biodiversity**”*, and the realisation that the ‘Built/Grey Environment’ is an important environment, LAs have a responsibility to protect and enhance our environment by ensuring developments are designed to embrace and encourage wildlife. Simple measures such as bird, bat and bee bricks

and hedgehog highways help to provide access to nature in urban areas and should be a minimum requirement for all new buildings. The Environment Agency's State of the Urban Environment report (07/21) states: "...Some species are considered 'urban specialists' eg swifts.. Urban specialist birds are a good biodiversity indicator for urban areas, because good quality, long-term data is available, and much is known about their ecology and some of the pressures affecting them."

The RSPB's Swift Mapper shows there are reports of low flying swifts in the area which is indicative of nearby nest sites (see RSPB Swift mapper <https://www.swiftmapper.org.uk/> type postcode SN12 6DF).

We welcome the recommendation in the Ecological Impact Assessment "Boxes for swift *Apus apus*, house sparrow *Passer domesticus* and house martin *Deichon urbicum* should be included, as these species are listed as Red on the latest list of Birds of Conservation Concern and have an affinity with the built environment".

Swift bricks are now described as a 'universal' brick for small building dependent species such as swifts, house sparrows, starlings, house martins, blue tits and great tits. The 'universal' nest brick concept is fully supported in the British Standards Institute which recently published BS42021 Integral nest boxes - Selection and installation for new developments (<https://standardsdevelopment.bsigroup.com/projects/2017-03102#/section>). In accordance with Clause 8.4 of BS42021, the number of integral bird boxes installed in new residential development should be at the ratio of one box per dwelling within the development. In practice this means that some dwellings have more than one box while others might contain none as some locations on a development are much more suitable than others. For larger developments, the number of integral nest boxes to be installed shall be "*proportionate to the size and design of the building*".

Some development schemes may also include external nest boxes to support other species, such as kestrels, owls, swallows and house martins. It should be noted that external boxes, while welcome, should be counted as additional to the ratio of 1:1 for integral boxes as specified in the BS42021.

BS42021 has also been endorsed by the NHBC in NF89 Biodiversity in new housing developments https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf

page 42. "*Fitting at a ratio of 1 nest brick per house across the development will ensure sufficient nest sites for colonial species. 3-5 can be located in one house, so helping locate them in suitable locations for access to foraging habitat. The British Standard BS42021 sets out details on nest box installation for the above species into domestic and commercial properties.*"

Results from the third year of studies being undertaken at The Duchy of Cornwall sites (see link: <https://nansledan.com/duchy-nest-brick-project-boosts-endangered-wild-birds/>) are confirming that universal bricks (based on the design of a swift brick) are being used by a variety of small birds. This is particularly good news for the red-listed swift, house sparrow and starling as all three species are undergoing major decline caused mainly by the loss of nesting sites on existing houses due to re-roofing and replacement of soffits and fascias and new builds create a totally sealed space. It is also very good news for developers as it means that one brick type will provide a very cost-effective ecological enhancement for a variety of bird species. Sparrows, like swifts, are colonial birds and observation of their nesting habits has shown that not only do they prefer swift bricks, but that very few sparrow terraces are occupied by more than one pair, possibly because the entrance holes are too close together. Sadly, sparrow bricks and terraces are unsuitable for breeding swifts. Using swift bricks rather than sparrow terraces would increase the variety of birds who would benefit from the nesting provision and the chances of the bricks being used. If there is a need to exclude starlings from a particular area the entrance hole should ideally be no larger than 65mm x 28mm tall. Whilst there is a need to provide nesting provision for the starling, care should be taken where such provision is sited as starlings can be messy birds and perhaps cause a nuisance to residents unless the site of the nesting provision has been thoughtfully chosen.

"Integrated nesting bricks are preferred to external boxes for reasons of longevity, reduced maintenance, better temperature regulation, and aesthetic integration with the building design." (Westminster Environmental Supplementary Planning Document (ESPD)). They are also less prone to predation and confine the nest site to the brick with no access to the roof space. There are also boxes designed to be placed in the soffit and fascia cavity, see Swift Loft from Green & Blue <https://www.greenandblue.co.uk/products/swiftloft?variant=41857561886897> and Action for Swifts are also now producing a soffit box <https://www.actionforswifts.com/>.

The swift was added to Wiltshire’s Biodiversity Action Plan as a Priority Species in 2008 and therefore the inclusion of nesting provision should be considered for all appropriate development. Should Wiltshire Council approve this application we recommend the Council follows the 1:1 nest brick per dwelling guidance and conditions the installation of 53 integrated swift nest bricks in this development preferably in clusters of 2-3 in the north, east and west gable ends or close under the eaves away from windows and doors at a height of 4m+, with clear flight access and no protruding ground floor roofs such as garages. It is extremely important that the bricks are clearly marked on the planning drawings to ensure they are not overlooked during the construction stage. Photographic evidence of installation should be provided to fulfil the condition. It is also important that the number of integrated nesting provisions is included in the outline application, with details of type and location provided in the Reserved Matters application.

Provision of integrated swift bricks in this application would contribute towards demonstrating compliance with government policies and guidance (see below) as the new dwellings can themselves be an important biodiversity enhancer by providing a new habitat in a ‘Built Environment’ that previously didn't exist.

Access to nature is at the heart of Wiltshire’s recently published GBI Strategy and birds in the environment are good for people's wellbeing. Swifts are iconic summer visitors that brighten our skies with their high-speed aerial antics, but they are uniquely dependent on the Built Environment for nest sites. They are faithful to their site and return year after year to the same location. Since they only spend 3 months of the year here to breed, if they no longer have access to their nesting site, they have little time to find another site and are unlikely to breed that season. Swift bricks are easy to include in routine building practices and there are models to suit most construction methods and material finishes ie brick/stone slip or left for rendering. They are not expensive; some are in the region of £40 each, can be made to suit a narrow cavity width if required and even retro fitted. See below ‘Action for Swift’s and ‘Swift Conservation’ for brick details.



Photos courtesy of Hugh Hastings and the Duchy of Cornwall House Martin (L), House sparrow (R) nesting in ‘swift’ bricks



Photo courtesy of Clive Cooper Swift



Photos courtesy of Arc Consulting Blue tit (L), Great tit (R) nesting in ‘swift’ bricks



Photos courtesy of Clarke Brunt - Starlings in the Cambridge Swift Tower when entrances were 70mm x 30mm (since narrowed to 28mm)

Swift bricks in the national and local planning context:

- **National Planning Policy Framework (NPPF, 2021) Section 174 (d) states:** “Planning policies and decisions should contribute to and enhance the natural and local environment by: minimising impacts on and providing **net gains for biodiversity**, including by establishing coherent ecological networks that are more resilient to current and future pressures;”
- **National Planning Policy Framework (NPPF, 2021) Section 179 (b) states:** “To protect and enhance biodiversity and geodiversity, plans should: promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing **measurable net gains** for biodiversity.”
- **NPPF, Natural Environment Guidance, paragraph 023, Reference ID: 8-023-20190721** How can biodiversity net gain be achieved? Provides further guidance stating “...relatively small features can often achieve

important benefits for wildlife, such as incorporating 'swift bricks' and bat boxes in developments and providing safe routes for hedgehogs between different areas of habitat."

- **Government press release (21/07/19)** James Brokenshire, the Communities Secretary at the time of the NPPG Natural Environment publication stated: "For the first time the government has set out its expectations on how developers can protect specific species, including using 'hedgehog highways' and hollow **swift bricks** – which are installed into the walls of new build homes, allowing the birds to nest safely. This follows public interest for protecting these much-loved animals, with one petition receiving support from over half a million people." Thus the Government's support for such measures was stated explicitly.
- **Natural Environment and Rural Communities (NERC) Act 2006 Section 40** states: "Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity."
- **"Living With Beauty" (30/01/20)** the Government's Building Better Building Beautiful Commission report recommends: "**Bricks for bees and birds in new build homes**" (Policy Proposition 33, page 110).
- **National Model Design Code Part 2 Guidance Notes N.3 Biodiversity** states: "Biodiversity can be enhanced through facilitating habits and routes for wildlife, for example, incorporating trees, wildflowers, ponds, bat and bird boxes, bee and bird bricks and hedgehog highways."
- **Environment Agency State of the Urban Environment report (23/07/21)** states: "People are increasingly living in urban areas, globally and in the UK. Around 80% of people in England now live in urban areas"..... "Some species are considered 'urban specialists'. For example, swifts, which nest in cavities in the roofs of older buildings. Urban specialist birds are a good biodiversity indicator for urban areas, because good quality, long-term data is available, and much is known about their ecology and some of the pressures affecting them. Urban specialist birds have declined in abundance in the UK since 1994 (figure 2). Factors contributing to some of these species declines include building demolition, renovation and roof repair." <https://www.gov.uk/government/publications/state-of-the-environment/the-state-of-the-environment-the-urban-environment>
- **Natural England (1401/22) Assess the effect of development on wild birds - Avoidance, mitigation and compensation measures:** The proposal should include measures to replace nesting sites with: nest boxes (ideally integrated into brickwork) for birds in conservation need, such as house sparrow, starling and swift;" <https://www.gov.uk/guidance/wild-birds-advice-for-making-planning-decisions#enhance-biodiversity>

Swift bricks in Wiltshire planning context:

- The swift was listed in Wiltshire's Biodiversity Action Plan in 2008 as a Wiltshire Priority Species.
- Wiltshire Council's Core Strategy policy CP50 states: "All development should seek opportunities to enhance biodiversity. Major development in particular must include measures to deliver biodiversity gains through opportunities to restore, enhance and create valuable habitats, ecological networks and ecosystem services.
- Wiltshire Planning and Building Control - Biodiversity and Development: Examples of habitat enhancement: <https://www.wiltshire.gov.uk/planning-bio-habitat-enhancement> lists swifts amongst other species and suggests 'Incorporating nest boxes into the fabric of a building ensures the longevity and safety of the box and minimises maintenance needs and visual impact.

Examples of the level of nest box provision in new developments

- At least a 1:1 ratio of nest bricks per dwelling is generally accepted now as good practice – a level of provision outlined in the award-winning Exeter City Council Residential Design Guide SPD (2010). The RSPB South West Regional Office has been working with Exeter Planners over a period of 10 years on the implementation of the biodiversity requirements of this guide and there is acceptance that in many cases the most suitable box type for all cavity nesting birds is the swift brick.
- A similar standard was adopted by the Town and Country Planning Association and the Wildlife Trusts in 2012 Planning for a Healthy Environment - Good Practice for Green Infrastructure and Biodiversity and The Royal Institute of British Architects (RIBA) Design for Biodiversity 2nd edition.
- The Duchy of Cornwall adopted the same principles in 2015, and a good example of the provision of a general type of integrated box for all cavity nesting birds is the Nansledan development by The Duchy of Cornwall in Newquay.

- The Cornwall Planning for Biodiversity and Net Gain SPD (2018) gives prescriptive measures for the provision of bat and bird boxes within the structure of the building at a rate of one box/tube per unit. This document also includes a case study on Nansledan mentioned above.
- The Oxford City Council Technical Advice Note on Biodiversity gives an 'expected provision' of bird nest sites for building dependent birds (i.e. swifts) at a rate of 1 per house and 1 per 2 flats, with separate provision for bats at a rate of 1 per 5 houses. Provision of such nest boxes in schools, student accommodation and hotels is addressed by a ratio of 1 per 250 m2 floor space.
- From 1st June 2020 Brighton & Hove City Council will condition a minimum of three swift nest bricks or two per dwelling in all new developments that are five metres high or above and commercial developments will be required to have a minimum of three boxes, or one per 50sqm of floor spaces.
- February 2022 - Cambridge City and South Cambridgeshire District Councils shared planning service has adopted the following Supplementary Planning Document [GCSP Biodiversity Supplementary Planning Document \(greatercambridgeplanning.org\)](https://www.greatercambridgeplanning.org/). Pages 42-44 - *'That on all residential housing developments, there should be an equal number of integrated bird box features as dwellings for building-dependent birds (breeding Swifts, House Sparrows, Starlings and House Martins) provided individually or clustered in appropriate locations within the development)*.
- Taylor Wimpey Building a better world Environment Strategy 2021 Pg10: Include our wildlife enhancements on all suitable new sites: Hedgehog highways from 2021, Bug hotels (at least 20% of homes) from 2021, Bat boxes (at least 5% of homes) from 2022, Bird boxes (at least 80% of homes) from 2023, Wildlife ponds from 2024, Reptile and amphibian hibernation sites from 2025 ([https://www.taylorwimpey.co.uk/-/twdxmedia/files/head-office/corporate/sustainability-reports/2020/taylorwimpey_environment-strategy-2021-\(002\).pdf](https://www.taylorwimpey.co.uk/-/twdxmedia/files/head-office/corporate/sustainability-reports/2020/taylorwimpey_environment-strategy-2021-(002).pdf))

Swift Conservation websites

Swift Conservation - <https://www.swift-conservation.org/>

Action for Swifts - <https://www.actionforswifts.com/>

RSPB - <https://www.rspb.org.uk/birds-and-wildlife/wildlife-guides/bird-a-z/swift/>

RSPB Swift Mapper - <https://www.swiftmapper.org.uk/>

Meeting Summary.

Background

The Chairman welcomed all to the meeting and thanked the Parish Council for hosting the event.

Earlier in the year a number of us met at the New Inn on two occasions at which we discussed Bellway's performance in the context of the care of the common areas around the development and as a result agreed to form a Resident's Committee.

- Since then there has been a raft of correspondence between us, Bellway, Alexander Faulkner and more recently the Highways Authority.
- We politely made Bellway aware of resident's dissatisfaction with the way the development had deteriorated once site management had left at the end of April.
- We requested a face to face meeting with both Bellway and Alexander as sensible way of getting clarification over who is doing what, who is responsible for what and against what standard of service.
- Regrettably, both companies refused our request saying they preferred to communicate by email instead.
- Despite this it is fair to say things have markedly improved over time.
- During our conversations with Alexander Faulkner however they told us they were **not** prepared to recognise our Residents Association and preferred to communicate with those who were members of the yet to be formed Steering Group.

Meeting attendees were reminded by the chair that **ALL** owner/residents automatically became members of the Bowood View (Melksham) Management Company Ltd on contract completion of their home. We are told by Alexander Faulkner that Bellway's Directors will resign their interest in the Bowood View Management Company (to whom Alexander Faulkner are contracted) when things are handed over (possibly this month).

In following this issue up with Bellway, the chairman had established that the fee of £60 per household levied by Bellway at contract completion (estimated at between £6000 and £9000 for the whole estate) for setting up the Management Company, would **not** be transferred when Bellway step away.

Representing Residents.

You may be aware that Alexander Faulkner intend setting up a Steering Group which is their preferred interface with residents. You will know however that we have already commenced setting up a Resident's Association. **BUT** having two groups dealing with the same issues (albeit with probably the same people involved) is probably not sensible.

In that light the Chairman proposed a merger of our embryonic Resident's Committee with the Alexander Faulkner Steering Group.

In summary this prompted a discussion as to how the Steering Group would be structured and managed. In particular some dissatisfaction was registered over Alexander Faulkner's preference for electronic communications and considered unhelpful to those who preferred otherwise.

In the event it was agreed to merge the membership of the residents committee with the yet to be formed Steering Group.

Bowood View (Melksham) Management Company Ltd.

In the period since their online meeting on the 19th October, Alexander Faulkner asked some residents (by way of an email) whether they wish to be nominated as Directors of the Mgt Company (minimum of two).

Some who participated in Alexander Faulkner's online meeting on the 19th October will know that Alexander Faulkner's view is that once the common areas are handed over (sometime this month apparently) they will seek to appoint a minimum of two directors from amongst member residents. Alexander Faulkner stated that if no one volunteered they would be forced pick names out of a hat!

Subsequently Alexander Faulkner have issued an email asking for Director nominations by the 4th November, following which we advised waiting until the outcome of this evening's meeting.

A lengthy commentary on the pros and cons of becoming Directors then took place. In the event it was agreed that that was a matter for individuals to determine for themselves.

Alexander Faulkner will be advised accordingly.

AOB.

Communications

An issue over Alexander Faulkner's method of communication was raised in the context of its apparent hit and miss approach. Examples of non-receipt of documentation, access to email and a preference for written communications was registered. In one case it was stated that a resident had emailed Alexander Faulkner and Bellway on at least six occasions to which no reply had been received.

Additionally, dissatisfaction was raised over Alexander Faulkner's revised invoices. It was explained that due to postage costs Alexander Faulkner preferred to communicate by email but residents felt this was unhelpful to those preferring not to receive information electronically. The chair agreed to write to Alexander Faulkner accordingly.

On the general issue of communications with residents the chairman explained that the leafleting campaign had been carried out due in part to concerns about the effectiveness of electronic communications but that would not have been possible had one of our residents not kindly offered to print 300 leaflets free of charge. In short we should not rely on that being the case in future. In discussion it was agreed we should make full use of the Parish Council Notice Board on display outside the Village Hall foyer.

Estate roads and paths.

The Chairman said he had written to Highways expressing concern about the state of the roads and pavements in places to which he had received a helpful reply from Wiltshire Highways in which they explained the process of handing over to the Highways Authority. In summary all has to be inspected and approved by the Highways Works Inspector before handover. Work is outstanding on the streetlighting at the entrance to the development during which excavations will need to take place on the nearby pavement. It is anticipated that Adoption preliminaries will take place around 12 months from now.

The Meeting closed at 8pm.

Lorraine McRandle

Subject: FW: Copy for Bowood FB page & PC Notice Board

From: Keith Phillips [REDACTED]
Sent: 11 November 2022 18:47
To: [REDACTED]
Cc: Leanne Richards <[REDACTED]>; Teresa Strange <clerk@melkshamwithout.co.uk>; Shona Holt <shona.holt@melkshamwithout.co.uk>
Subject: Copy for Bowood FB page & PC Notice Board

Dear Residents

As agreed at our meeting on the 9th, as temp' chair I wrote to Alexander Faulkner. See summaries of the correspondence below.

1) Residents Representation.

Whilst concerns were registered over communications and how the group would be managed, to avoid duplication of effort it was agreed that the members of the Residents Committee would merge with the yet to be formed Steering Group.

At its first meeting residents will be looking to you to provide detailed information on the standard of service relevant to the Bowood View contract.

2) Bowood View (Melksham) Management Company Ltd.

Some residents were unaware of their automatic membership of the company and likewise over the issue of Directors. Again concern was raised over the effectiveness of communications from both yourselves and Bellway and, how the company would be set up and managed. A preference for face to face meetings was clearly made.

In the event and following a discussion over the pros and cons, it was agreed that Directorships was a matter for individuals.

3) Communications.

Some residents registered significant unhappiness with the way Alexander Faulkner communicates with Bowood householders. It would seem there is a hit and miss approach, especially when electronic media is used. In discussion it became apparent that many have not received your explanatory/information documentation and some not received anything at all. One resident complained that he had emailed you some six times and had yet to receive a reply.

Dissatisfaction was also registered over your preference for email regarding revised invoices. In short we invite you to consider this wont work effectively as many do not either have access to electronic means or prefer hard copy anyway.

Alexander Faulkner's response is part copied below.

Thank you for your email which was very informative. Your comments are noted. Bellway have now handed over the site to the Management Company and Bellway have appointed the one owner who put themselves forward as director. We do however hope more owners will step forward as Directors to make decisions for the site.

In response to the matter of communication , it is sad to hear that communication is still poor but residents who do still need to speak to Bellway about any of their own snagging matters should be contacting them directly. **Secondly, our preferred way of communicating with owners is electronically but I take on board your points about other ways to communicate but AFP do charge £1.50 per page or piece of paper sent out and we are trying to save your service charge this cost and more importantly the environment.**

In view of this response may I invite the Director referred to to take these issues up with Alexander Faulkner.

Regards
Keith Phillips OBE
Former Committee Chair

Teresa Strange

From: Philip Court - TW Bristol <Philip.Court@taylorwimpey.com>
Sent: 15 November 2022 16:30
To: Holder, Nick; Teresa Strange
Cc: Keith Simmons - TW Bristol; Hannah Hart - TW Head Office; Susan Beaton - TW Bristol; Thomas, Dave
Subject: RE: Remedials at Pathfinder Way Melksham plan app-16/01123/out Update as at 7th November

Nick,

Apologies for the delay in reply.

I have added responses to each of the points raised in **red text** below for ease of reference.

Let me know if you need anything else / subsequent updates.

Kind Regards,

Philip

Tel. [REDACTED]

From: Holder, Nick <Nick.Holder@wiltshire.gov.uk>
Sent: 07 November 2022 10:41
To: Philip Court - TW Bristol <Philip.Court@taylorwimpey.com>; Teresa Strange <clerk@melkshamwithout.co.uk>; Keith Simmons - TW Bristol <Keith.Simmons@taylorwimpey.com>
Cc: Hannah Hart - TW Head Office <Hannah.Hart@taylorwimpey.com>; Susan Beaton - TW Bristol <Susan.Beaton@taylorwimpey.com>; Thomas, Dave <Dave.Thomas@wiltshire.gov.uk>
Subject: RE: Remedials at Pathfinder Way Melksham plan app-16/01123/out Update as at 7th November
Importance: High

Warning: This email is from an external sender, please be cautious when opening attachments or links.

Hi Philip, and others,

Since our last exchange, the pedestrian crossings had been working smoothly, however on Friday I was told we have another issue with the crossing over the A365 which comes out of phase two of the development. Clive has been made aware of this, but from my perspective I do have to question the quality of the installation work carried out by Siemens. There are many crossings all over Melksham which seem to function correctly for many years without faults but there seems to be an ongoing issue with the ones at Pathfinder. From memory, this is the second fault at this set in three/four weeks? Can we please be assured the installation and the materials used are of the appropriate standard so as to ensure consistent use for our residents. Given phase two has hardly been occupied it can only be assumed this crossing will have increased usage once more residents move in.

Siemens attended site 7 Nov and checked all four crossings and found them all to be working correctly. We have also liaised with Highways (Andy Balloch) who confirmed that Siemens carry out signal installations throughout the country and that he has no concerns regarding either their equipment or the installation of these crossings.

There are a few other matters I would like to mention to the TW team if that is ok?

- There is still at least one set of street lights, on the Melksham side of the A365 after the main roundabout, which still does not have a permanent fix. Clive is aware, but has not yet been able to let us have a definitive date as to when these will be completed. Is there any update please?

The trenching works for these remaining streetlight columns was complete last week. Centregreat are on site this week to complete the installation of the streetlight columns. SSEN are then scheduled to carry out the cabling by the end of November. SSEN will then follow on with the jointing so the lights should be operational by the first / second week in December.

- Within the planning consent, a cycle path at the top of Tedder Gardens, to connect to the rest of Bowerhill was to be created. At the moment, I cannot see any progress on this path, are you able to update on this please.
We are currently liaising with Wiltshire Highways to install the footpath link between Tedder Gardens and Birch Grove as it goes across their land. Once we have concluded this dialogue we will seek to install the link.
- Susan, I think this is one for you and is really for information. The residents are still having a number of issues with the service provided by Remus who do seem to be reluctant to respond or indeed do very much. The residents have a meeting scheduled for later this month at which they hope to set up a formal RA.
Acknowledged. Thank you for bringing this to our attention. We will liaise further with Remus to ensure their level of service is appropriate.

I look forward to your comments.

Regards,

Nick

Nick Holder
Councillor for Bowerhill
Deputy Chair Melksham Area Board
Portfolio Holder for Adults
Wiltshire Council | County Hall | Trowbridge | Wiltshire | BA14 8JN

Wiltshire Council

Tel: 07931 905520
Email: nick.holder@wiltshire.gov.uk
Web: www.wiltshire.gov.uk
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From: Philip Court - TW Bristol <Philip.Court@taylorwimpey.com>
Sent: 13 October 2022 15:32
To: Holder, Nick <Nick.Holder@wiltshire.gov.uk>; Teresa Strange <clerk@melkshamwithout.co.uk>; Keith Simmons - TW Bristol <Keith.Simmons@taylorwimpey.com>
Cc: Hannah Hart - TW Head Office <Hannah.Hart@taylorwimpey.com>; Susan Beaton - TW Bristol <Susan.Beaton@taylorwimpey.com>; Thomas, Dave <Dave.Thomas@wiltshire.gov.uk>
Subject: RE: Remedials at Pathfinder Way Melksham plan app-16/01123/out Update as at 10th October

Nick,

Further to the below, please find here the replies provided to the questions raised.....

Lorraine McRandle

Subject: FW: Pathfinder Way Melksham plan app-16/01123/out New requests from Melksham Without Parish Council

From: Philip Court - TW Bristol <Philip.Court@taylorwimpey.com>
Sent: 16 November 2022 15:26
To: Teresa Strange <clerk@melkshamwithout.co.uk>
Cc: Keith Simmons - TW Bristol <Keith.Simmons@taylorwimpey.com>; Hannah Hart - TW Head Office <Hannah.Hart@taylorwimpey.com>; Susan Beaton - TW Bristol <Susan.Beaton@taylorwimpey.com>; Thomas, Dave <Dave.Thomas@wiltshire.gov.uk>; Holder, Nick <Nick.Holder@wiltshire.gov.uk>
Subject: RE: Pathfinder Way Melksham plan app-16/01123/out New requests from Melksham Without Parish Council

Dear Teresa,

Thank you for your correspondence below. I have added comments in **red text** against each point for ease of reference.

Let me know if you have any further questions.

Kind Regards,
Philip
Tel. [REDACTED]

From: Teresa Strange <clerk@melkshamwithout.co.uk>
Sent: 15 November 2022 17:19
To: Philip Court - TW Bristol <Philip.Court@taylorwimpey.com>
Cc: Keith Simmons - TW Bristol <Keith.Simmons@taylorwimpey.com>; Hannah Hart - TW Head Office <Hannah.Hart@taylorwimpey.com>; Susan Beaton - TW Bristol <Susan.Beaton@taylorwimpey.com>; Thomas, Dave <Dave.Thomas@wiltshire.gov.uk>; Holder, Nick <Nick.Holder@wiltshire.gov.uk>
Subject: Pathfinder Way Melksham plan app-16/01123/out New requests from Melksham Without Parish Council

Warning: This email is from an external sender, please be cautious when opening attachments or links.

Dear Philip

I write with a couple of new requests for some planting please and a couple of requests for updates on things outstanding from the parish council point of view.

1. The parish council are planting some 10-12ft high trees in the parish to commemorate the Queen's Jubilee Year in 2022 and wondered if you would be happy for one to be planted on the Pathfinder Place development as its been mainly occupied in the Jubilee year.

We would certainly support this request. We just need to be careful where the tree is planted subject to the species so that we can ensure its mature state does not cause any problems with adjacent elements such as homes, roads, footpaths, sewers, drainage, services, etc.... Given the amount of Public Open Space at Pathfinder I am sure we will be able to find a suitable location to suit all of the necessary considerations. If you can let me know if you have any specific locations in mind and the type of tree being proposed so that we can move this request forward.

2. The parish council have received a complaint about the proximity/rear appearance of the public art on Pathfinder Place to a neighbouring property in your development, and residents have expressed an opinion

that the public art would look better with some dark background behind it to set it off. The parish council would therefore like to request some dark green evergreen planting to go behind the public art, thus providing a backdrop to improve the aesthetics of the art, and to provide a barrier between the art and the road. Would this be something that Taylor Wimpey would be happy to do when on site replacing dead planting? **Again we would not have any objections to this request. I'll liaise with the necessary parties to gauge their views in anticipation for implementing the additional planting to provide a 'backdrop' for this art feature.**

3. Where are we with the adoption of the play area by the parish council? we understand that a couple of bits need doing, but otherwise we are ready to adopt

The final elements requested have already been instructed. The contractor undertaking the works has ordered the items to be installed with an anticipated delivery date of end Jan. Once the items are received they will be installed which is likely to be early February following which the final inspection by yourselves / Wiltshire will be undertaken with the anticipation of a 'Certificate of Completion' (or similar) being issued to trigger the legal transfer of the Play Space to the Parish.

4. Where are we with the provision of some life buoy rings at the attenuation pond, as agreed with Clive Aveyard?

The life buoy rings have been ordered and we are currently seeking an installation date from the contractor.

With many thanks, Teresa



Teresa Strange
Clerk

PLEASE NOTE THE NEW ADDRESS:
Melksham Without Parish Council
First Floor
Melksham Community Campus
Market Place

Teresa Strange

From: Teresa Strange
Sent: 09 November 2022 14:48
To: Geeson, Daniel
Subject: RE: 20/07334/OUT - Land west of Semington Road, Melksham, Wiltshire
Attachments: renditionDownload.svg

Hi Danny

With regards to this application, the parish council confirmed when they met that they were happy with what I suggested, however, we have just had notification for an outline application for another 53 dwellings for the field behind this one, it had the same developer owner.

We are meeting the developer for the Reserved Matters site next week, so can find out if there is going to be any links/connectivity between the two sites, but to my mind, they are building 100 houses side by side and therefore there might be a need for a play area?

The new site is here <https://development.wiltshire.gov.uk/pr/s/planning-application/a0i3z0000198V4a/pl202208155?tabset-8903c=2>

NB: They have literally just uploaded the documents, so can see that they are linking the two sites – I have attached – in fact they have called the Reserved Matters site, Phase 1. – see attached.

Will keep you posted...

Teresa

From: Geeson, Daniel <Daniel.Geeson@wiltshire.gov.uk>
Sent: 19 October 2022 16:46
To: Teresa Strange <clerk@melkshamwithout.co.uk>
Subject: RE: 20/07334/OUT - Land west of Semington Road, Melksham, Wiltshire

Many thanks

Spoken with Sarah and she agrees with the approach I have put forward so I will communicate to the planner

I had a long conversation with James from FoF the other day, so I need to update you on that

Speak soon

Danny

From: Teresa Strange <clerk@melkshamwithout.co.uk>
Sent: 19 October 2022 15:49
To: Geeson, Daniel <Daniel.Geeson@wiltshire.gov.uk>
Subject: RE: 20/07334/OUT - Land west of Semington Road, Melksham, Wiltshire

Hi Danny

Good to talk to you....

**NOTES OF MEETING WITH LIVING SPACES AND SOVERIEGN HOUSING
ON THURSDAY, 17 NOVEMBER 2022 AT 1.00PM
RE: LAND WEST OF SEMINGTON ROAD (SITE TO REAR OF TOWNSEND
FARM (20/07334/OUT))**

Present: Councillor David Pafford (Chair of Council)
Councillor Richard Wood (Chair of Planning)
Councillor Alan Baines (Vice Chair of Planning)
Councillor Mark Harris (Planning Committee Member)
Teresa Strange (Clerk to Melksham Without)
Lorraine McRandle (Parish Officer, Melksham Without)
Linda Roberts (Town Clerk, Melksham Town Council)
Wiltshire Councillor Jonathon Seed (Melksham Without West & Rural)
Luke Webb, Senior Planning Manager, Living Spaces
Raphael Cohen, Head of Project Management, Sovereign Housing

Luke explained Living Spaces were very keen to work with the Parish Council through the planning process for 100% affordable housing, in order to ease the process as it progressed and noted the parish council had been opposed to the original planning application.

Both Councillor Wood and Baines clarified the reasoning for the parish council opposing the application, particularly as the development was completely in the wrong location, outside the settlement boundary and a distance from local facilities, including schools and shops but recognised needed to work together in order to get the best outcome for everyone involved.

Luke provided an indicative map of the layout of the site and explained the types of houses were still to be finalised, however the site was made up of 60% affordable rental and 40% shared ownership.

Luke explained Living Spaces were a fairly new company and were working with registered providers such as Sovereign to build homes.

The plans showed:

4 x 1 bed maisonettes (Affordable Rental)
3 x 2 bed bungalows (Affordable Rental)
24 x 2 bed houses (19 Affordable Rental, 5 Shared ownership)
14 x 3 bed houses (3 Affordable Rental, 11 Shared ownership)
5 x 4 bed houses (1 Affordable Rental, 4 Shared ownership)
TOTAL 50 Homes

(Affordable rent equating to 65-75% of open market rent)
(Shared ownership equating to 80% of a full-blown mortgage)

Luke explained there would be no 'First Homes', under the new Government initiative as the Section 106 legal agreement was signed before this new Government scheme was introduced.

Raphael explained Sovereign Homes had been established in 1989 and currently had 67,000 homes across the Country with over 2000+ in Wiltshire. These had mainly been delivered through Section 106 Agreements, but had recently been working towards having their own sites, in order to have more control over the design. There were a few smaller sites in Wiltshire, with this site being the largest, which was seen as a flagship site for Sovereign Housing.

Properties provided would be above the National Described Standard, larger, more sustainable and include heat source pumps, PV panels and electric charging points thereby reducing costs for residents.

Raphael explained Sovereign were in the process of collating data on their more sustainable homes to compare to previous homes delivered, in order to establish the benefits of providing such homes.

Councillor Harris asked if batteries for energy storage would be provided.

Raphael explained diverters would be supplied and would be looking into whether batteries could be provided given the extra costs, however, would be looking at ways to capture energy in order not to lose it.

Councillor Seed asked how many dwellings would be above 2 storeys, given some 3 storey dwellings were included in the outline plans.

Raphael clarified it was proposed to have no properties above 2 storeys on the site.

Councillor Seed, whilst noting the properties would be affordable rental, as opposed to social rental, sought clarification if Sovereign would be using the open market list.

Raphael clarified Sovereign would be using 75% of Wiltshire nominations and 25% from Sovereign's database and using local connection criteria.

The Clerk of Melksham Without Parish Council stated the Neighbourhood Plan Steering Group had commissioned an independent Housing Needs Assessment, as part of the review of the Neighbourhood Plan and would forward this on to both Luke and Raphael for information on housing mix (type and tenure) etc.

Councillor Pafford sought clarification on what support would be provided to residents.

Raphael explained Community Development Officers and Employment Trainee Officers would be available to support tenants with things such as community cohesion, integration and assist people with trying to get into employment and access training.

Both Councillor Pafford and the Clerk to Melksham Without Parish Council explained the parish council had experienced problems when residents took occupation in a new development but the management company was not yet in place, which often took several years. However, in the meantime, unhappy residents would contact the

council for help as bins were unemptied, play areas built but not open, and therefore sought assurances this would not happen on this site.

Raphael explained as soon as the site was complete, it would be handed directly to Sovereign to manage and maintain, no management company would be involved and hoped this would not happen. However, if it did, to contact Sovereign directly who would respond.

The Clerk to the Town Council sought clarification if Sovereign had success with 100% affordable housing sites, elsewhere.

Raphael explained Sovereign had other sites elsewhere in the Country which were 100% affordable and these seemed to work, as they tended to be smaller sites. The 60% affordable, 40% shared ownership ratio model also seemed to work well and provided a balanced community.

The Clerk to Melksham Without Parish Council noted there was no provision for a play area or anywhere for children to kick a ball and whilst another play area was available at the nearby Bowood View development, which the parish council were in the process of adopting, noted an outline application had been submitted for another 53 houses adjacent to site, amounting to 100+ houses with a lot of children and asked if there were plans that these two sites would be integrated with one another.

Raphael explained he was currently in discussions on putting in a play area in the north west corner of the site.

Luke explained Living space were part of a group, including Terra Strategic who had submitted the application for the adjacent site, however they were a separate entity and there was no obligation for this site to come through Sovereign.

Raphael explained he would welcome discussions with the developers of the adjacent site, if approval was granted, on how both sites could integrate more effectively.

The Clerk to Melksham Without asked if discussions could take place on the provision of bus shelters along Semington Road, given the other new developments taking place who would also be providing shelters in order to make sure that there was not bus shelters in the same place. Both the town and parish council were currently having discussions on providing real time information in bus shelters and therefore any shelters provided needed to have the capabilities for this to be installed (typically taller than a standard shelter and with electricity supply).

Luke and Raphael were informed the residents of Townsend Farm had their own Residents Association and were concerned they still had a right of access to the rear of their properties and a right to discharge from their septic tanks to the fields and would appreciate engaging with Living Spaces at this stage. The Clerk to Melksham Without Parish Council explained she would forward their contact details in due course, once she had sought their permission.

Raphael highlighted on the plans a gap between the rear gardens of the proposed properties and Townsend Farm and stated he was looking at the possibility of providing some form a gate with a key code at the entrance, in order that only those with the code would be able to access the area, which Members welcomed.

The Clerk asked if new residents could be informed of the new village hall which had just been built nearby at Bowood View which, as of the previous evening, now had a committee to run the facility.

Councillor Pafford asked if the community support team mentioned earlier in the meeting could be operational before residents moved in, bearing in mind issues the council has experienced with residents moving into a new development, which has not been fully handed over to a management company, with residents contacting the parish council to resolve issues.

Wiltshire Councillor Seed stated there should be something included in Section 106s moving forward to bridge this gap. Raphael felt this would be useful, as well as including a condition to get a certain percentage of people into employment from a development, working on the site or employing people locally to work on the site.

Wiltshire Councillor Seed sought clarification if the site would include social rented accommodation. Raphael confirmed it would be affordable rent and sought clarification from Councillor Seed what he understood the difference to be between social and affordable rent.

Councillor Seed confirmed from Wiltshire Council's point of view which band people sit in depending on who could apply, with those on a higher band, not being eligible to apply for social rented accommodation, the equity share mix which comes off the open list was also different.

Councillor Seed explained the biggest problem in Wiltshire, which was unaddressed, was how easy it was for people who qualify for social rented housing to get it. However, those not being helped, were those who have a job, which is low paid on their first rung of advancement in life, but do not qualify for social rented, as they are just above the social rented threshold. However, noted hopefully they would qualify for affordable rented accommodation on this site, which was welcomed. Particularly as those in this category were having to live with their parents for longer than expected.

Councillor Harris raised a concern whilst the site would start off at 100% affordable, as time moved on people could qualify to purchase their homes and therefore the number of affordable homes available on the site would reduce.

Raphael clarified they would only be able to purchase 75%, however, if a rural exception site they would be able to purchase 80%, but would check whether the site was in a rural exception site area and whether it qualified for 80%, however, with shared ownership can eventually have 100% share in a home purchased under the shared ownership scheme. Councillor Seed queried the percentage share, which Raphael agreed to investigate. However, the rented units would remain, with residents having some rights.

Councillor Seed understood there was a ceiling, to enable homes to remain affordable and only be sold at 75% of the current market value. Raphael clarified there was usefulness in both elements i.e., affordable in perpetuity and owning a home outright and understood the latter was relevant to this site, but would investigate.

Councillor Seed felt with these types of schemes, there tended to be more 'buy in' with regard to maintenance and residents having a sense of pride in their neighbourhood.

Luke explained he would investigate the wording in the Section 106 Agreement with regard to tenure mix and get back to the Clerk later in the week.

Clarification was sought if the development was outside the settlement boundary.

Luke confirmed the site was outside the settlement boundary but was approved on appeal.

Councillor Seed stated if outside a settlement boundary a site was classed as development in open countryside and therefore rural exception site rules would apply.

With regard to Section 106, Councillor Seed explained there had been issues with s106 Agreements, which had been brought to the fore at Wiltshire Council at Cabinet level, mainly due to the actions of Melksham Without Parish Council which was welcomed.

Councillor Pafford suggested the Clerk and Councillor Seed check with Wiltshire Council what exactly was included in the Section 106 and what regulations applied, particularly if classed as a rural exception site.

Reassurances was sought that contact would be with the same people going forward, given experience of other developments in the area. Luke explained he would be the point of contact for Living Spaces until they were off site, then it would be handed over to Sovereign who would have one point of contact.

Raphael explained once the site had been handed over to Sovereign, he would be on site at least once a month and was happy to meet up with the parish council to discuss any issues and would also be around at some point during construction.

The Clerk to Melksham Without Parish Council thanked both Luke and Raphael for the meeting to discuss proposals, prior to the reserved matters application being submitted and explained the Housing Needs Assessment for the Neighbourhood Plan had recently been completed. The report, which would be published later in the week, highlighted people in Melksham cannot afford a first house at present, the report also included the tenure mix specific to the area, as well as and size of housing sought in the area.

Having looked at proposals, the Clerk to Melksham Without felt the housing mix would meet the needs of residents, as it included smaller homes, compared to 4 to 5 bed houses, which were not affordable to most people in Melksham as identified in the Housing Needs Assessment.

Luke explained he was currently working up the application pack including type of housing and would share these with the council prior to submission and was happy to answer any questions going forward.

Councillor Seed welcomed proposals for the site with regard to energy efficiency and reducing running costs for residents. It was noted a scheme in Seend included similar energy efficient homes, which the Clerk to Melksham Without agreed to forward details.

The Clerk to Melksham Without explained one of the other developers on Semington Road had to make the pedestrian route across the A350 (Western Arm) less desirable, given the amount of traffic using this route and encourage people to use the main crossing provided on the Eastern arm of the A350.

It was asked if an impermeable hedge be planted, to stop residents from trying to access the Western Arm crossing, across the A350 from the Northern part of the site, particularly children accessing Aloeric School, which is the nearest primary school, as there isn't one in Berryfield. It was noted there were proposals for a primary school in Pathfinder Place in Bowerhill, however, a contract had yet to be awarded.

Luke confirmed there were no proposals to remove any planting adjacent to the A350.

It was noted some parents may wish to send their children to St George's School, Semington, however, it was understood this was currently full. It was unclear if Aloeric School was currently full.

It was noted there was no shop in Berryfield, with the nearest shop being the petrol station on Semington Road in Melksham.

Raphael confirmed the following contributions were included in the Section 106 Agreement:

£206,338 for Primary Education
£70,000 for Highways Improvements
£105,132 for Early Years Education

Luke queried where the early years provision would be provided. The Clerk to Melksham Without Parish Council agreed to investigate this.

Councillor Wood stated some form of early years provision at the new Berryfield Village Hall would be welcome.