Affordable Housing Hearing Statement of James Stacey BA (Hons) Dip TP MRTPI

Land West of Milbourne, Malmesbury, Wiltshire

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Outline planning application (all matters reserved except for means of access) for erection of up to 92 dwellings (including 40% affordable housing) together with associated access, parking, pedestrian and cycle routes, public open space, play space, landscaping, drainage and associated infrastructure

Land West of Milbourne, Malmesbury, Wiltshire

Miller Homes

March 2025

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Appendices

Appendix JS1	Consequences of Failing to Meet Affordable Housing Needs
Appendix JS2	Freedom of Information Responses dated 7 May 2024, 5 and 6 February 2025
Appendix JS3	Relevant Extracts from Planning Practice Guidance
Appendix JS4	Right to Buy – Independent New Story (June 2020)
Appendix JS5	Five Year Housing Land Supply – Affordable Housing Analysis

Core Documents

CD1.1	Wiltshire Core Strategy (January 2015)
CD1.2	Wiltshire Housing Site Allocations Plan (February 2020)
CD7.20	Appeal Decision: Westwells Road, Corsham (April 2021)
CD1.3	Malmesbury Neighbourhood Plan: Volume 1 – Main Body (February 2015)
CD2.1	Wiltshire Local Plan Pre-Submission Draft 2020-2038 (Regulation 19) (September 2023)
CD2.14	Wiltshire Planning Obligations SPD (2016)
CD2.18	Wiltshire First Homes Position Statement (2022)
CD2.19	Wiltshire Strategic Housing Market Assessment (2011)
CD2.20	Swindon and Wiltshire Strategic Housing Market Assessment Report of Findings (March 2017)
CD2.21	Wiltshire Local Housing Needs Assessment Update: Volume Two – Establishing the need for all types of housing (February 2023)
CD7.23	Appeal Decision: Land to the west of Semington Road, Melksham (September 2024)
CD7.18	Appeal Decision: North Worcestershire Golf Club Ltd, Handing Lane, Birmingham (July 2019) (Extract)
CD7.7	Appeal Decision: Land at Western Way, Melksham (November 2023)
CD7.17	Appeal Decision: Land at the Corner of Oving Road, Chichester (August 2017)
CD7.19	Appeal Decision: Oxford Brooks University, Wheatley (April 2020)
CD7.14	Appeal Decision: Land at Franklands Drive, Addlestone (July 2006) (Extract)
CD7.1	Appeal Decision: Land at Filands Road/Jenner Lane, Malmesbury (January 2022)
CD5.2	Officer's Report (September 2024)
CD7.10	Appeal Decision: Land off High Street, Sutton Benger, Chippenham (January 2025)
CD7.16	Appeal Decision: Land to the West of Langton Road, Norton (July 2016)
CD7.21	Appeal Decision: Land to the East Highgate Hill and South of Copthall Avenue, Hawkhurst, Kent (March 2022)
CD7.22	Appeal Decision: Land West of Semington Road, Melksham (Phase 1) (May 2022)
CD7.15	Appeal Decision: Land North of Bath Road, Corsham, Wiltshire (May 2015)
CD7.4	Appeal Decision: Land off Coate Road, Devizes (May 2023)

Introduction

Section 1

1.1 This Affordable Housing Hearing Statement has been prepared by **James Stacey** of **Tetlow King Planning** on behalf of the Appellant, **Miller Homes**.

1.2 The proposed development is for up to 92 dwellings, of which 40% (up to 37 dwellings) are to be provided on-site as affordable housing. This level of provision meets the requirements of Core Policy 43 (40%) of the adopted Wiltshire Core Strategy (2015).

1.3 The proposed tenure split will be up to 22 affordable rent dwellings (60%), up to six shared ownership dwellings (15%) and up to nine First Homes (25%). In terms of tenure requirements, Core Policy 43, notes that it will be negotiated on a site-by-site basis to reflect the nature of the development and local needs. The proposed affordable housing will be secured by way of a Section 106 Planning Obligation.

1.4 This Statement specifically with affordable housing and the weight to be afforded to it in this planning decision[1] considering evidence of need in the area.

1.5 My credentials as an expert witness are summarised as follows:

- I hold a Bachelor of Arts (Hons) degree in Economics and Geography from the University of Portsmouth (1994) and a post-graduate diploma in Town Planning from the University of the West of England ("UWE") (1997). I am a member of the Royal Town Planning Institute ("RTPI").
- I have over 30 years professional experience in the field of town planning and housing. I was first employed by two Local Authorities in the South West and been in private practice since 2001.
- During my career I have presented evidence at more than 150 Section 78 appeal inquiries and hearings. I act for a cross-section of clients and advise upon a diverse range of planning housing related matters.

[1] For clarity, the weightings applied are as follows: very limited, limited, moderate, significant, very significant, substantial, and very substantial.

- In December 2022, I was appointed as Managing Director of Tetlow King Planning. Prior to this I held the position of Senior Director. I was first employed by Tetlow King Planning in 2009.

- Both Tetlow King generally and I have acted on a wide range of housing issues and projects for landowners, house builders and housing associations throughout the country. Tetlow King Planning has been actively engaged nationally and regionally to comment on emerging development plan documents and supplementary planning documents on affordable housing throughout the UK.

1.6 In accordance with the Planning Inspectorate's Procedural Guidance, I hereby declare that:

> *"The evidence which I have prepared and provide for this appeal in this Statement is true and has been prepared and is given in accordance with the guidance of the Royal Town Planning Institute. I confirm that the opinions expressed are my true and professional opinions."*

1.7 I further confirm that none of this evidence has been produced with the use of AI technology.

1.8 Providing a significant boost in the delivery of housing, and in particular affordable housing, is a key priority for the Government. This is set out in the most up-to-date version of the National Planning Policy Framework ("NPPF"), the Planning Practice Guidance ("PPG"), the National Housing Strategy and the Government's Housing White Paper.

1.9 Having a thriving active housing market that offers choice, flexibility and affordable housing is critical to our economic and social well-being. The consequences of failing to meet affordable housing needs in any local authority is well documented and acknowledged by the Secretary of State and Inspectors alike. These consequences are important to understand. They are real consequences, afflicted upon many households who are in dire need of assistance with their housing. The consequences affect the ability of households, families, and individuals in leading the best lives that they can. I set out my summary of the consequences at **Appendix JS1**.

1.10 As part of this evidence, reliance has been placed upon a Freedom of Information ("FOI") request submitted to Wiltshire Council on 8 January 2025. A full response was received on 5 February, with additional data provided on 6 February 2025. A previous FOI dated 7 May 2024, has also been used. However, following a review of these FOI's responses, two points of clarification have been raised with regards to affordable

housing data at the Community Area Level and in respect of average waiting times for an affordable housing property. At the time of writing the clarification to these two points has not been received. The appellants reserve the right to update the appeal, if and when the data becomes available. The various FOI responses are attached at **Appendix JS2.**

1.11 This Statement comprises the following six sections:

- Section 2 establishes the importance of affordable housing as an important material consideration;
- Section 3 analyses the development plan and related policy framework including corporate documents;
- Section 4 sets out the identified affordable housing needs;
- Section 5 examines past affordable housing delivery against identified needs;
- Section 6 covers a range of affordability indicators; and
- Section 7 considers the weight to be attached to the proposed affordable housing provision.

Affordable Housing as an Important Material Consideration

Section 2

Introduction

2.1 The provision of affordable housing is a key part of the planning system. A community's need for affordable housing was first enshrined as a material consideration in PPG3 in 1992 and has continued to play an important role in subsequent iterations of national planning policy, including the National Planning Policy Framework ("NPPF").

National Planning Policy Framework (12 December 2024)

2.2 The NPPF was most recently updated on 12 December 2024 and is a material planning consideration. It identifies the role of affordable housing in the plan-making and decision-making processes.

2.3 The NPPF sets a strong emphasis on the delivery of sustainable development. Fundamental to the social objective set out at paragraph 8(b) is to *"support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations."* (My emphasis).

2.4 Chapter 5 of the NPPF focuses on delivering a sufficient supply of homes, in which paragraph 61 is clear that:

> *"to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed* […] ***The overall aim should be to meet an area's identified housing need,*** *including with an appropriate mix of housing types for the local community."* (my emphasis).

2.5 It should be stressed that paragraph 61 identifies the 'overall aim' as to meet an area's identified housing need. Paragraph 62 clarifies that *"to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance."*

2.6 Paragraph 63 also makes clear that *"within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent)…"* (my emphasis).

2.7 The national guidance places a core responsibility on all major developments (involving the provision of housing) to provide an element of affordable housing. In particular, paragraph 66 establishes that *"where major development involving the provision of housing is proposed, planning policies and decisions should expect that the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures."*

2.8 Affordable housing is defined within the glossary of the NPPF (Annex 2) as *"housing for sale or rent, for those whose needs are not met by the market* […] *and which complies within one or more of the following definitions"* before identifying four categories of affordable housing: Social Rent in accordance with Government's conditions and requirements, other affordable housing for rent which is at least 20% below market value, discounted market sales housing which is at least 20% below market value, other affordable routes to home ownership including shared ownership, relevant equity loans, other low-cost homes for sale (at least 20% below local market value) and rent to buy (which includes a period of intermediate rent).

***"Building the Homes We Need"* Written Ministerial Statement (30 July 2024)**

2.9 On 30 July 2024, the Secretary of State, Angela Rayner MP, delivered a Written Ministerial Statement ("WMS") indicating the 'direction of travel' for the new Government's intentions for national planning policy.

2.10 The WMS set out the Government's aspirations to drive the delivery of affordable homes, stating that *"the Government are committed to the biggest growth in social and affordable housebuilding in a generation"* and setting an objective to deliver 1.5 million homes during the current Parliament.

***"Building the Homes We Need"* Written Ministerial Statement (12 December 2024)**

2.11 In a further WMS accompanying the publication of the revised NPPF, the Housing and Planning Minister, Matthew Pennycook MP, referred again to the Government's objective to deliver 1.5 million homes during the current Parliament and made a series of stark observations in respect of housing costs, the use of temporary accommodation, and insufficient new housing coming forward:

> *"This Government has inherited an acute and entrenched housing crisis. The average new home is out of reach for the average worker, housing costs consume a third of private renters' income, and the number of children in temporary accommodation now stands at a historic high of nearly 160,000. Yet just 220,000 new homes were built last year and the number of homes granted planning permission has fallen to its lowest in a decade."* (my emphasis)

Planning Practice Guidance (March 2014, Ongoing Updates) (CD3.2)

2.12 The Planning Practice Guidance ("PPG") was first published online on 6 March 2014 and is subject to ongoing updates. It replaced the remainder of the planning guidance documents not already covered by the NPPF and provides further guidance on that document's application. **Appendix JS3** sets out the paragraphs of the PPG of particular relevance to affordable housing.

Summary and Conclusions

2.13 This section clearly demonstrates that, within national policy, providing affordable housing has long been established as, and remains, a key national priority of successive Governments. It is a fundamental element in the drive to address and resolve the national housing crisis. That it has been part of Government policy for so long is indicative of the length of time over which there has been a deficiency in supply in the national housing market.

The Development Plan and Related Policies

Section 3

Introduction

3.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the application should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

3.2 The relevant Development Plan in respect of affordable housing for the appeal site currently comprises Wiltshire Core Strategy (2015), the Wiltshire Housing Site Allocations Plan (2020) and Malmesbury Neighbourhood Plan (2015).

3.3 Other material considerations relevant to affordable housing include the NPPF (2024) and the PPG (March 2014, ongoing updates), the Planning Obligations Supplementary Planning Document (2015), the emerging Wiltshire Local Plan and a number of corporate documents which support the provision of affordable housing at the corporate level.

The Development Plan

3.4 Wiltshire Council is a Unitary Authority and was created as part of Local Government reorganisation in 2009. It comprises the former Local Authority Districts of Kennet, North Wiltshire, Salisbury and West Wiltshire. Malmesbury was formally part of the North Wiltshire District.

Wiltshire Core Strategy (2015) (CD1.1)

3.5 The Wiltshire Core Strategy was adopted in January 2015 and provides the strategic planning policy for Wiltshire, covering the period 2006 up to 2026.

3.6 Section 2 of the Core Strategy sets out the spatial portrait of Wiltshire and discusses some of the key challenges across the Authority. Paragraph 2.12 sets out that, *"providing decent and affordable homes to complement the economic growth being promoted is a key challenge to improving the self-containment and resilience of Wiltshire's communities".*

3.7 Furthermore, paragraph 2.13 notes, *"the gradual deterioration of affordability in Wiltshire has left many residents experiencing difficulty gaining access to the housing market, especially given the low household based income in certain areas. In 2011, the average house cost approximately 7.5 times the annual wage of Wiltshire's workplace employees and the age of the first time buyer was 38. There are currently over 10,000 individuals on the Council's housing waiting list"*.

3.8 Strategic Objective 3 relates to providing everyone with access to a decent, affordable home, which one of the key outcomes is that *"the strategy will have made significant progress towards addressing the shortfall in affordable homes across Wiltshire through ensuring all new schemes of five or more houses deliver appropriate on site affordable housing provision"* (page 30).

3.9 The Spatial Strategy makes provision for growth of at least 42,000 new homes from 2006 to 2026.

3.10 Core Policy 1 'Settlement Strategy' identifies Malmesbury as a Market Town and Milbourne is a Small Village (Core Policy 13). The site is located to the east of Malmesbury adjacent to existing residential development within Milbourne. Development at Small Villages will be limited to that needed to help meet the housing needs of settlements to improve employment opportunities, services and facilities.

3.11 The Delivery Strategy is set out in Core Policy 2, which seeks to make provision for at least 42,000 homes between 2006 and 2026.

3.12 The site lies within the Malmesbury Community Area which includes the Market Town of Malmesbury and the Small Village of Milbourne (the site is located between the two). Core Policy 13 identifies that within this area, over the plan period (2006 – 2026), approximately 1,395 new homes will be provided, of which about 885 should occur at Malmesbury, with the approximate 510 remaining homes provided for in the rest of the Community Area.

3.13 **Core Policy 43 'The provision of Affordable Housing'** is the pertinent policy relation to provision of affordable housing. It states that on sites of five or more dwellings, affordable housing provision of at least 30% (net) will be provided within the 30% affordable housing zone and at least 40% (net) will be provided on sites within the 40% affordable housing zone. 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 scheme viability. Tenure will be negotiated on a site-by-site basis to reflect the nature of the development and local needs.

3.14 Paragraph 6.42 of the supporting text (page 242) notes that *"it is anticipated that this strategy will deliver approximately 13,000 affordable homes within the plan period".* This equates to an average of 650 affordable homes per annum over the 20 year plan period (2006-2026).

3.15 In terms of the affordable housing zone relevant to the site, Inset Map 1: Malmesbury, identifies the site as falling within a 40% Affordable Housing Zone.

3.16 **Core Policy 45 'Meeting Wiltshire's Housing Needs'** requires that new affordable housing addresses local housing need incorporating a range of different types, tenures and sizes of homes to create mixed and balanced communities.

3.17 Paragraph 6.51 states that *"all people should have access to a good home irrespective of their personal circumstances. That means providing an appropriate range of dwellings in terms of size and price".*

Wiltshire Housing Site Allocations Plan (2020) (CD1.2)

3.18 The Wiltshire Housing Allocations Plan was adopted in February 2020. This allocates sites for development pursuant to the Core Strategy's overall housing targets.

3.19 The Malmesbury Community Area is located within the North and West Wiltshire Housing Market Area ("HMA"). The Site Allocations Plan establishes that in this HMA a minimum of 24,740 dwellings are expected to be provided between 2006 and 2026 (table 4.1, page 16). The Plan establishes that in Malmesbury, there is an indicative requirement for some 885 new dwellings over the 20 year period (Table 4.10, page 21).

3.20 It is critical to note however, that the indicative requirement for 885 homes identified in the Site Allocations Plan does not represent a cap on future housing delivery. This approach was advocated by the Inspector presiding over the planning appeal at Westwells Road, Corsham (**CD7.20**) who stated that the *"disaggregation to community areas is not intended to be so prescriptive it is to be inflexible in terms of delivery the housing requirement for each HMA"* (paragraph 17).

3.21 Therefore, although Table 4.10 of the Site Allocations Plan shows that taking account of completions and development commitments, Malmesbury has already met the indicative target, this shouldn't be seen as a means of resisting future development proposals.

Malmesbury Neighbourhood Plan 2014 – 2026 (Made 2015) (CD1.3)

3.22 The Neighbourhood Plan covers the area of three Parishes – Malmesbury, St. Paul Malmesbury Without Parish (where the site is located) and Brokenborough.

3.23 The Neighbourhood Plan allocates five sites for housing in Malmesbury Town, which are estimated to deliver 270 dwellings up to 2026, this includes 50 dwellings which will be extra care mixed tenure units for people over the age of 55 (paragraph 1.1.3, page 13). Opportunities to build within designated small villages of Milbourne and Corston will be investigated, at a proportion, not exceeding nine dwellings in total for each village.

3.24 The issues identified include a lack of supportive/specialised housing for older people especially affordable accommodation; a need for smaller homes for first time or single householders and couples; a *"significant shortage of housing in the area available on intermediate tenure (shared ownership and equity loan, low cost homes for sale or rent)".*

3.25 Policy 4 requires planning applications for new housing, including conversions, must be tested against the current evidence of local demand and supply from sources including Wiltshire Council population forecasts, the Social Housing Register, the Strategic Housing Market Assessment and the most recent Neighbourhood Survey.

Other material considerations

Wiltshire Local Plan – Pre-Submission Draft 2020-2038 (Regulation 19) (September 2023) (CD2.1)

3.26 Wiltshire Council submitted the Wiltshire Local Plan to the Secretary of State for independent examination on 28 November 2024 and is targeting adoption towards the end of 2025.

3.27 Wiltshire's Local Plan has been described as a Local Plan Review and has been produced against an updated evidence base, making provision for land across the County to provide for the homes and employment needs of Wiltshire from 2020 to 2038.

3.28 Draft Policy 76 'Providing Affordable Homes' requires affordable housing of at least 40% (net) on sites of 10 or more dwellings in areas that are not designated as rural areas (as shown on Figure 5.1 of the Draft Local Plan; the appeal site does not fall within this area). It is noted that 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.

3.29 In terms of tenure, draft Policy 76 sets out that the tenure mix on all sites will normally be 65% affordable housing for rent, 10% shared ownership and 25% First Homes.

Supplementary Planning Documents

Revised Wiltshire Planning Obligations SPD (2016) (CD2.14)

3.30 The SPD identifies that, *"one of the key issues facing Wiltshire is the provision of new housing to help meet the needs of its communities"* and that *"securing the provision of new affordable housing in all developments will be given a high priority in terms of planning obligations"* (my emphasis) (paragraph 4.2).

Interim Position Statement First Homes (June 2022) (CD2.18)

3.31 The purpose of the Statement was to set out the Council's interim approach to the implementation of the Government's First Homes policy prior to the completion of the review of affordable housing policies as part of the Local Plan Review. It might be adjusted in the interim period once evidence for the Local Plan Review and practice is more established.

3.32 In the interim period, prior to adoption of the Wilshire Local Plan, the First Homes policy will be applied as a material consideration. For major residential developments incorporating First Homes this means a minimum of 25% affordable housing unts on-site mush be First Homes, this will be as a proportion of the 30%/40% affordable housing requirement.

3.33 It sets out that the Wiltshire Core Strategy allows some flexibility in the tenure split to be sought so the evidence in the Strategic Housing Market Assessment (SHMA) 2011 is considered relevant and used in current decision making. This recommends a tenure split of 60% Affordable Rent and 40% Shared Ownership.

3.34 Considering the above, the tenure split to be sought in the interim period, prior to provision of more detailed needs data through the Local Plan Review should be 60% Affordable Housing, 15% Shared Ownership and 25% First Homes.

Corporate Documents

3.35 The Council's corporate documents identify the delivery of affordable housing as a high corporate priority of Wiltshire. These include the following documents:

- People, Places and Priorities: Wiltshire Community Plan 2011-2026;
- Wiltshire Homeless Prevention Strategy 2019-2024; and
- Wiltshire Council Ending Rough Sleeping Plan 2024-2025.

3.36 Information and quotes from each of the documents are referred to throughout this evidence.

Summary and Conclusions

3.37 The relevant Development Plan in respect of affordable housing for Wiltshire currently comprises Wiltshire Core Strategy (January 2015) and Malmesbury Neighbourhood Plan (made February 2015).

3.38 The evidence set out in this section clearly highlights that within adopted policy, emerging policy and a wide range of other plans and strategies, providing affordable housing has long been established as, and remains, a key issue which urgently needs to be addressed within Wiltshire.

3.39 The appeal proposals provide an affordable housing contribution which meets the requirements of 40%, Core Policy 43.

3.40 The delivery of up to 37 affordable homes at the appeal site will make a significant contribution towards the annual affordable housing needs of Wiltshire, particularly when viewed in the context of past rates of affordable housing delivery which is considered in more detail in Section 4 of my evidence.

Affordable Housing Needs

Section 4

Introduction

4.1 This section explores the affordable housing needs identified in the adopted Development Plan and its associated evidence base, as well as more recent assessments of affordable housing need in order to provide a comprehensive understanding of formally identified affordable housing needs across Wiltshire.

The Development Plan and Evidence Base

4.2 The adopted Wiltshire Core Strategy seeks 30% or 40% affordable housing provision is made from qualifying developments within the identified zones (Policy Core Strategy 43).

4.3 Furthermore, the supporting text at paragraph 6.42 explains, it is anticipated that 13,000 affordable dwellings would be delivered in Wiltshire over the Core Strategy period.

4.4 This would equate to 650 affordable dwellings per annum over the 20 year period (2006 – 2026). Furthermore, it also equates to a pro-rata total of 11,050 affordable dwellings over the 17 years since the formation of Wiltshire Council in 2009/10, and the end of the Core Strategy period in 2025/26.

4.5 This figure of 13,000 affordable homes is a clear indication within the Development Plan of the level of affordable housing that the Council reasonably expected would be achieved and facilitated by the Core Strategy.

4.6 It should be noted that the figure of 13,000 affordable dwellings does not appear to relate to any particular assessment of affordable housing need. For example (and as discussed below), the Strategic Housing Market Assessment (2011), which informed the preparation of the Core Strategy, identified a much higher level of affordable housing need.

4.7 In the absence of a defined affordable housing target figure in adopted and/or emerging policy, it is important to consider the objectively assessed need for affordable housing within the more recent assessments of local housing need, the most recent being the Wiltshire Local Housing Needs Assessment Update (February 2023).

Housing Market Assessments

4.8 Wiltshire Council has published four Housing Market Assessments over the course of the past 14 years. These are summarised in turn below.

Wiltshire Strategic Market Assessment (2011) (CD2.19)

4.9 The Strategic Housing Market Assessment (2011) ("SHMA") informed the preparation of the Core Strategy and has been tested through the Examination of that Plan.

4.10 The 2011 SHMA identified an annualised affordable housing need for **1,360 affordable dwellings per annum over the 15 year period from 2011/12 to 2025/26,** as summarised at paragraph 10.16 (page 138) of the SHMA. Paragraph 10.16 also remarked that *"if production could reach an average of 1,000 new affordable homes over the next 15 years then the market would become more balanced and there would be very little housing need in the County at the end of the plan period".*

Swindon and Wiltshire Strategic Housing Market Assessment Report of Findings (March 2017) (CD2.20)

4.11 The Joint SHMA was prepared as part of the evidence base for the emerging Wiltshire Local Plan.

4.12 Table 53 (page 68) identifies that the affordable housing for Wiltshire (based on migration trends 2004-14 and including unmet need for housing in 2016 and future need for 2016-2036) was 14,376 households. This equates to a need for **719 net affordable dwellings per annum**.

4.13 However, paragraph 3.114 notes that the identified need is based on a relatively stringent assessment of affordability and that given the assessment focuses on only those households with the most acute housing needs, the affordable housing need identified should be considered as a minimum.

Swindon Borough Council and Wiltshire Council Local Housing Needs Assessment (LHNA) 2019 (April 2019)

4.14 The joint LHNA reviews the housing need for Swindon and Wiltshire based on a more recent evidence base using analysis that reflected (the then) current national policy. However, it does not provide any update on the identified need for affordable housing.

Wiltshire Local Housing Needs Assessment Update: Volume Two – Establishing the need for all types of housing (February 2023) (CD2.21)

4.15 Whilst previous housing need studies had been jointly commissioned by Swindon and Wiltshire, as the Swindon Local Plan is being developed separately and following consultation on the emerging Wiltshire Local Plan, Wiltshire Council committed to undertaking further work to review its overall housing need.

4.16 The Local Housing Needs Assessment (LHNA) Update is split into two volumes. Volume One established the local housing need in Wiltshire over the 18-year period 2020-2038. Volume Two supplements the key outputs from volume one, providing further details on the needs for different types of housing, including affordable housing.

4.17 It is worth noting that this LHNA utilises a different percentage of household's income being spent on housing as part of determining the extent of households in need of affordable housing, than previous studies. This is discussed further at paragraphs 4.23-4.25. Furthermore, the LHNA was prepared to support the emerging Local Plan which is still yet to be formally examined.

4.18 Paragraph 2.6 notes that it is evident that real house prices in Wiltshire increased substantially in the period 2001-2008 and have been consistently higher than England prices since then.

4.19 Paragraph 4.4 highlights that due to changes in the definition of affordable housing, the assessment of affordable housing need now needs to consider both those who cannot afford to rent and those households who can afford to rent but would like to buy.

4.20 Paragraph 4.75 (page 40) concludes that the analysis identified that around 10,451 households will require affordable housing over the Plan period 2020-38. This total includes 5,179 households unable to afford affordable rent without housing benefit, 1,883 households who are able to afford affordable rent without housing benefit, but unable to afford market rents, and 3,389 households who aspire to home ownership and require some form of discounted home ownership.

4.21 This equates to a need for **581 affordable dwellings per annum between 2020/21 and 2037/38.**

Summary and Conclusions

4.22 Wiltshire Council has published a number of affordable housing needs figures over the years, which are summarised below:

a. The Core Strategy sets out a target of **650 affordable dwellings per annum** between 2006 and 2026.

b. The 2011 SHMA identified an annualised affordable housing need for **1,360 affordable dwellings per annum** over the fifteen years from 2011/12 to 2025/26, although this is based upon dated inputs.

c. The 2017 SHMA identifies a need for **719 affordable dwellings per annum** of the twenty years between 2017/18 and 2035/36.

d. The 2023 LHNA identifies a need for **581 affordable dwellings per annum** over the eighteen years between 2020/21 and 2037/38.

4.23 It is important to note that at a recent appeal in Wiltshire (Land to the west of Semington Road, Melksham (September 2024))[2] (**CD7.23**), the Inspector presiding over the appeal concluded that with regards to the affordable housing need identified in the 2023 LHNA that:

"This latter figure utilises a higher percentage of a household's income to be spent on housing, which could have the effect of more households not being counted in need. There is a much higher figure of 10,450 since the Wiltshire Strategic Housing Assessment (2011), albeit it was accepted by the appellant this is based on a dated assessment of need. I find that both these figures need to be treated with caution and so I place more reliance on the Core Strategy target and the SHMA 2017".

4.24 I provided evidence at this inquiry and specifically recall the Inspector asking me which figure I would rely upon. My response was that the Development Plan has primacy and I therefore placed reliance upon the Core Strategy. The Inspector appears to have endorsed my view.

[2] APP/Y3940/W/24/3343787

4.25 Notwithstanding the Inspectors conclusions, for completeness, the following Section analyses the delivery of affordable housing against each of the four affordable housing need figures set out above.

Affordable Housing Delivery

Section 5

Introduction

5.1 This section of the Statement analyses the delivery of affordable housing in Wiltshire Council. It highlights significant shortfalls in meeting identified needs, illustrating a pressing need for a substantial increase in affordable housing provision across the District.

Past Affordable Housing Delivery

5.2 Figure 5.1 illustrates the delivery of affordable housing ("AH") in Wiltshire since the formation of the Council as a Unitary Authority in 2009/10.

Continues overleaf

Figure 5.1: Gross Additions to Affordable Housing Stock, 2009/10 to 2023/24

Monitoring Year	Total Housing Completions (Net)	Additions to AH stock (Gross)	Gross affordable additions as a %age of total completions
2009/10	1,657	564	34%
2010/11	2,077	648	31%
2011/12	1,779	626	35%
2012/13	1,725	711	41%
2013/14	2,249	645	29%
2014/15	2,118	635	30%
2015/16	1,746	412	24%
2016/17	2,690	433	16%
2017/18	2,428	593	24%
2018/19	2,699	752	28%
2019/20	1,799	621	35%
2020/21	1,926	556	29%
2021/22	1,862	688	36%
2022/23	2,425	643	27%
2023/24	1,825	532	29%
Totals	**31,005**	**9,059**	**29%**
Avg. Pa.	***2,067***	***604***	

Source: Freedom of Information Response ("FOI") February 2025

5.3 Between 2009/10 and 2023/24, a total of 31,005 dwellings were delivered in Wiltshire Council, equivalent to 2,067 per annum. Of these, 9,059 dwellings were affordable tenures, equivalent to 604 per annum. This equates to 29% gross affordable housing delivery.

5.4 However, it is important to note that the gross affordable completions figure does not take into account any losses from the affordable housing stock through demolitions nor through Right to Buy ("RtB") sales from existing Council and Registered Provider ("RP") affordable housing stock.

5.5 At a national level over two million households have exercised their Right to Buy since it was introduced in 1980. In her Written Ministerial Statement of 30 July 2024, the incoming Deputy Prime Minister observed that Right to Buy sales have not been matched by the rate of replacements, making it harder for Councils to accommodate households in need:

"Over the last five years, there has been an average of 9,000 council Right to Buy sales annually, but only 5,000 replacements each year. Right to Buy provides an important route for council tenants to be able to buy their own home. But the discounts have escalated in recent years and councils have been unable to replace the homes they need to move families out of temporary accommodation."

5.6 Figure 5.2 below calculates the affordable housing delivery per annum over the same period, net of Right to Buy sales. The sale of 674[3] affordable dwellings over this period equates to 7% of the gross affordable housing completions of 9,059 affordable dwellings over the 15-year period.

[3] 350 + 324 = 674 dwellings

Figure 5.2: Net of Right to Buy Additions to Affordable Housing Stock, 2009/10 to 2023/24

Monitoring Period	Total housing completions (Net)	Additions to AH Stock (Gross)	LPA Acquisitions	LPA RtB sales	RP RtB sales	Additions to AH Stock (Net of RtB)	Additions to AH Stock (Net of RtB) as a %age of total completions
	A	***B***	***C***	***D***	***E***	***F*** ***(B + C) - (D + E)***	***G*** ***(F / A) X 100***
2009/10	1,657	564	n/a	4	n/a	560	34%
2010/11	2,077	648	n/a	10	n/a	638	31%
2011/12	1,779	626	n/a	5	10	611	34%
2012/13	1,725	711	n/a	19	20	672	39%
2013/14	2,249	645	n/a	38	48	559	25%
2014/15	2,118	635	n/a	41	35	559	26%
2015/16	1,746	412	n/a	24	22	366	21%
2016/17	2,690	433	n/a	41	31	361	13%
2017/18	2,428	593	0	36	28	529	22%
2018/19	2,699	752	0	31	31	690	26%
2019/20	1,799	621	5	31	13	582	32%
2020/21	1,926	556	12	18	11	539	28%
2021/22	1,862	688	9	7	56	634	34%
2022/23	2,425	643	1	33	15	596	25%
2023/24	1,825	532	0	12	4	516	28%
Total	**31,005**	**9,059**	**27**	**350**	**324**	**8,412**	**27%**
Avg. Pa.	***2,067***	***604***	***5***	***23***	***25***	***561***	

*Source: FOI Response (February 2025) and MHCLG Live Tables. *Data not available for RP RtB sales prior to 2011/12*

5.7 Figure 5.2 demonstrates that on average between 2009/10 and 2023/24, the Council has added 561 affordable dwellings per annum net of Right to Buy sales and additions from acquisitions, equivalent to 27% of the total average number of net housing completions. This figure is likely to fall even further if demolitions to existing stock were to be accounted for.

5.8 The above evidence clearly demonstrates that Right to Buy sales are depleting the affordable housing stock across Wiltshire.

5.9 The impact of losses as a result of Right to Buy was acknowledged by the Inspector presiding over the appeal at land at the site of the former North Worcestershire Golf Club Ltd, Hanging Lane, Birmingham which was allowed in July 2019 (**CD7.18**). Paragraph 14.108 of the Inspector's Report sets out that:

"Mr Stacey's unchallenged evidence shows that only 2,757 new affordable homes were provided in the City over the first 6 years of the plan period. This represents less than half of the target provision and a net increase of only 151 affordable homes if Right to Buy sales are taken into account. On either measure there has been a very low level of provision against a background of pressing and growing need for new affordable homes in Birmingham" (my emphasis).

5.10 This was later endorsed by the Secretary of State who stated that the 800 family homes, including up to 280 affordable homes is a benefit of significant weight.

5.11 The seriousness of the impact was considered in an article in the Independent newspaper in June 2020 which is attached at **Appendix JS4.**

5.12 The article reports that *"two-thirds of the Council homes sold off under Right to Buy are still not being replaced by new social housing despite a promise by the Government, official figures show".* It goes on to discuss the national picture, explaining that *"housing charities warned that enough "desperately needed" genuinely affordable housing is simply not being built, with an overall net loss of 17,000 homes this year from social stock. Since the policy was updated in 2012-13, 85,645 homes have been sold through the policy, but only 28,090 built to replace them, statistics from the Ministry of Housing, Communities and Local Government show".*

5.13 The article goes on to quote Jon Sparkes, who was the chief executive at homelessness charity Crisis at the time. He remarked that *"these statistics demonstrate just how serious the current housing crisis is. What few social homes that are available are largely being removed from the market as part of Right to Buy, and the supply is not being replenished in line with this. People in desperately*

vulnerable circumstances are being left with dwindling housing options as a consequence of our threadbare social housing provision".

5.14 The article also notes that a significant proportion of homes sold under the Right to Buy (for instance, around 40% of apartments) have gone on to be let in the private rented sector – in other words, what was once affordable housing is now being let out at full market rates. The article notes that *"previous studies have shown that around 40 per cent of flats sold under the policy since the 1980s have ended up in the hands of private landlords, who let the homes out to private tenants at higher rates. The proportion is thought to be even higher in areas of high housing pressure like London".*

5.15 It is important, therefore, that gains and losses to affordable housing stock through the Right to Buy and acquisitions are taken into account to reflect the actual level of affordable houses available.

5.16 The comments of Crisis underline the serious effect this is having upon the supply of affordable homes and for those people in housing need. For the purposes of subsequent analysis, the net of Right to Buy figures have been applied.

Affordable Housing Delivery Compared to Affordable Housing Needs

5.17 Figure 5.3 illustrates net of Right to Buy affordable housing delivery compared to the affordable housing target of 650 net affordable dwellings per annum, as stated within Core Policy 43 of the Wiltshire Core Strategy, from the formation of the Wiltshire Council Unitary Authority in 2009/10 to 2023/24.

Figure 5.3: Net of Right to Buy Additions to Affordable Housing Stock vs Target Identified in Core Policy 43, 2009/10 to 2023/24

Monitoring Year	Additions to AH Stock (Net of RtB)	CP43 AH Target (Net)	Annual Surplus / Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2009/10	560	650	-90	-90	81%
2010/11	638	650	-12	-102	98%
2011/12	611	650	-39	-141	94%
2012/13	672	650	+22	-119	103%
2013/14	559	650	-91	-210	86%
2014/15	559	650	-91	-301	86%
2015/16	366	650	-284	-585	56%
2016/17	361	650	-289	-874	56%
2017/18	529	650	-121	-995	81%
2018/19	690	650	+40	-955	106%
2019/20	582	650	-68	-1,023	90%
2020/21	539	650	-111	-1,134	83%
2021/22	634	650	-16	-1,150	98%
2022/23	596	650	-54	-1,204	92%
2023/24	516	650	-134	-1,338	81%
Total	**8,412**	**9,750**	**-1,338**		**86%**
Avg. Pa	***561***	***650***	***-89***		

Source: FOI Response (February 2025); Wiltshire Core Strategy 2015 Core Policy 43

5.18 Since the formation of the Wiltshire Unitary Authority in 2009/10, affordable housing completions (net of Right to Buy) have averaged just 561 net affordable dwellings per annum, against a need of 650 net affordable dwellings per annum. A shortfall of -1,338 affordable dwellings has arisen over the 15-year period, equivalent to an average annual shortfall of -89 affordable dwellings.

5.19 Therefore, in the 15-year period, the Core Strategy affordable housing target has only been achieved twice.

5.20 As demonstrated by Figure 5.3, delivery of only 8,412 affordable homes net of Right to Buy over the period means that just 86% of identified affordable housing needs were met. Put another way 14% of households in need of an affordable home were let down by the Councils inability to deliver.

5.21 Figure 5.4 illustrates net of Right to Buy affordable housing delivery compared to the affordable housing need figure of 1,360 net affordable dwellings per annum, as calculated by the 2011 SHMA over the period 2011/12 to 2025/26.

Figure 5.4: Net of Right to Buy Additions to Affordable Housing Stock vs Need Identified in 2011 SHMA, 2011/12 to 2023/24

Monitoring Year	Additions to AH Stock (Net of RtB)	2011 SHMA AH Need (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2011/12	611	1,360	-749	-749	45%
2012/13	672	1,360	-688	-1,437	49%
2013/14	559	1,360	-801	-2,283	41%
2014/15	559	1,360	-801	-3,039	41%
2015/16	366	1,360	-994	-4,033	27%
2016/17	361	1,360	-999	-5,032	27%
2017/18	529	1,360	-831	-5,863	39%
2018/19	690	1,360	-670	-6,533	51%
2019/20	582	1,360	-778	-7,311	43%
2020/21	539	1,360	-821	-8,132	40%
2021/22	634	1,360	-726	-8,858	47%
2022/23	596	1,360	-764	-9,622	44%
2023/24	516	1,360	-844	-10,466	38%
Total	**7,214**	**17,680**	**-10,466**		**41%**
Avg. Pa	***555***	***1,360***	***-805***		

Source: FOI Response (February 2025); 2011 SHMA

5.22 Since the start of the 2011 SHMA period in 2011/12, affordable housing completions (net of Right to Buy) have averaged just 555 net affordable dwellings per annum, against a need of 1,360 net affordable dwellings per annum. A shortfall of -10,466 affordable dwellings has arisen over the 13-year period, equivalent to an average annual shortfall of -805 affordable dwellings.

5.23 As demonstrated by Figure 5.3, delivery of only 7,214 affordable homes net of Right to Buy over the period means that just 41% of identified affordable housing needs were met. Put another way 59% of households in need of an affordable home were let down by the Councils inability to deliver.

5.24 Figure 5.5 illustrates net of Right to Buy affordable housing delivery compared to the affordable housing need figure of 719 net affordable dwellings per annum, as calculated by the 2017 SHMA over the period 2016/17 to 2036/37.

Figure 5.5: Net of Right to Buy Additions to Affordable Housing Stock vs Need Identified in 2017 SHMA, 2016/17 to 2023/24

Monitoring Year	Additions to AH Stock (Net of RtB)	2017 SHMA AH Need (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2016/17	361	719	-358	-358	50%
2017/18	529	719	-190	-548	74%
2018/19	690	719	-29	-577	96%
2019/20	582	719	-137	-714	81%
2020/21	539	719	-180	-894	75%
2021/22	634	719	-85	-979	88%
2022/23	596	719	-123	-1,102	83%
2023/24	516	719	-203	-1,305	72%
Total	**4,447**	**5,752**	**-1,305**		**77%**
Avg. Pa	***556***	***719***	***-163***		

Source: FOI Response (February 2025); 2017 SHMA

5.25 Since the start of the 2017 SHMA period in 2016/17, affordable housing completions (net of Right to Buy) have averaged just 556 net affordable dwellings per annum, against a need of 719 net affordable dwellings per annum. A shortfall of -1,305 affordable dwellings has arisen over the 8-year period, equivalent to an average annual shortfall of -163 affordable dwellings.

5.26 As demonstrated by Figure 5.5, delivery of only 4,447 affordable homes net of Right to Buy over the period means that just 77% of identified affordable housing needs were met. Put another way 23% of households in need of an affordable home were let down by the Councils inability to deliver.

5.27 Figure 5.6 illustrates net of Right to Buy affordable housing delivery compared to the affordable housing need figure of 581 net affordable dwellings per annum, as calculated by the 2023 LHNA over the period 2020/21 to 2037/38.

Figure 5.6: Net of Right to Buy Additions to Affordable Housing Stock vs Need Identified in 2023 LHNA, 2020/21 to 2023/24

Monitoring Year	Additions to AH Stock (Net of RtB)	2023 LHNA AH Need (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2020/21	539	581	-42	-42	93
2021/22	634	581	53	11	109
2022/23	596	581	15	25	103
2023/24	516	581	-65	-40	89
Total	**2,285**	**2,324**	**-39**		**98%**
Avg. Pa	***571***	***581***	***-10***		

Source: FOI Response (February 2025); 2023 LHNA and MHCLG Live Tables

5.28 Since the start of the 2023 LHNA period in 2020/21, affordable housing completions (net of Right to Buy) have averaged 571 net affordable dwellings per annum, against a need of 581 net affordable dwellings per annum. A shortfall of -39 affordable dwellings has arisen over the 4-year period, equivalent to an average annual shortfall of -10 affordable dwellings.

5.29 As can be seen against each of the assessments there has been a constant shortfall in the delivery of affordable housing over the assessed time periods.

5.30 As part of the FOI request, clarification was sought on the affordable housing data for both the St Paul Malmesbury Without and Malmesbury Civil Parish. However, TKP were informed that the information was not available at this level. Instead affordable housing completions were provided for the Malmesbury Community Area (which the site falls within), but there was no corresponding data provided for overall housing completions (broken down on a year by year basis) to enable any comparison to be made. This information has been requested but at the time of writing this clarification

had not been received. The appellants reserve the right to update the appeal, if and when the data becomes available.

Summary and Conclusions

5.31 The above evidence demonstrates that across Wiltshire Council, the delivery of affordable housing has persistently fallen short of meeting identified needs.

5.32 In the 15-year period since the formation of the Wiltshire Council Unitary Authority in 2009/10, net of Right to Buy affordable housing delivery represented just 27% of overall housing delivery, equating to just 561 affordable dwellings per annum.

5.33 A shortfall is identified when actual levels of delivery are compared to the need figures provided by each of the Councils published housing market assessments.

5.34 Against the 650 net affordable dwellings per annum target figure stated by Core Policy 43 within the Wiltshire Core Strategy, over the 15-year period from 2009/10 to 2023/24 a shortfall of -1,338 affordable dwellings accrued, with 86% of the target being met.

5.35 Against the 1,360 net affordable dwellings per annum need figure calculated by the 2011 SHMA, over the 13-year period since 2011/12, a shortfall of -10,466 affordable dwellings accrued, with just 41% of identified needs being met.

5.36 Against the 719 net affordable dwellings per annum need figure calculated by the 2017 SHMA, over the eight-year period since 2016/17, a shortfall of -1,305 affordable dwellings accrued, with just 77% of needs being met.

5.37 Finally, against the 581 net affordable dwellings per annum need figure calculated by the 2023 LHNA, over the four-year period since 2020/21, a shortfall of -39 affordable dwellings has accrued.

5.38 It is clear that a ‘step change’ in affordable housing delivery is needed now in Wiltshire Council to address these shortfalls and ensure that the future authority-wide needs for affordable housing can be met.

5.39 In light of the identified level of need there can be no doubt that the delivery of up to 37 affordable dwellings on the appeal site will make an important contribution to the affordable housing needs of Wiltshire Council.

Future Supply of Affordable Housing

Section 6

Introduction

6.1 This section of the evidence considers the future supply of affordable housing across Wiltshire in comparison with identified needs.

The Future Supply of Affordable Housing

6.2 I have analysed the Council's latest published Five-Year Housing Land Supply ("5YHLS") trajectory which is contained in Council's Housing Land Supply Statement June 2024 (the "HLSS). My analysis of the trajectory is set out at **Appendix JS5.**

6.3 The June 2024 HLSS is the Council's most recently published complete 5YHLS trajectory. Since the publication of the HLSS, the Council issued a Housing Topic Paper in November 2024 as part of the emerging new Local Plan, to update evidence on housing need and supply. Therefore, alongside the data from the 2024 HLSS, the Housing Topic Paper also identifies new commitments (of 50 dwellings or more) that were permitted or allocated beyond the base date of the HLSS (1 April 2023) up to 31 August 2024.

6.4 However, the Housing Topic Paper at paragraph 3.3 specifically explains that when calculating the deliverable supply for the purposes of 5YHLS it is not current practice to also include commitments after the base date as this could distort the quantity of supply in the five year period as completions and lapsed permissions that have also occurred after the base date have not been removed from the supply.

6.5 I concur with this view, as it would in effect be introducing new supply without removing completions and/or lapsed consents. This would be akin to a 6 year supply, in favour of the Council.

6.6 Therefore, the 5YHLS calculations for the future delivery of affordable housing referred to in this Statement solely reflects those set out in the 2024 HLSS and do not include any of the additional commitments noted in the Housing Topic Paper for the very reason set out above. I, of course, acknowledge those newly consented sites, will deliver some affordable homes, but until their inclusion in an updated Housing Land

Supply Statement cannot be considered now, in the context of the analyse presented below.

6.7 It is also worth noting, that since the publication of the 2024 HLSS, the Council's housing land supply has been assessed at a Public Inquiry for an appeal at Land off Storridge Road, Westbury[4]. The Inspector presiding over this appeal concluded that the Council's housing land supply position of 8,193 dwellings over the five-year period should be reduced by 477 dwellings from the windfall allowance and a further 187 homes from the disputed supply sites. This results in a reduced supply of 7,529 dwellings.

6.8 However, for the purposes of this assessment, the trajectory in the HLSS has been used, but it is important to highlight that this actually presents a more favourable position than if the lower 5YHLS position established through the recent appeal decision was used. Therefore, any shortfall identified will actually be more severe if it was to be based on the revised supply position agreed at appeal.

6.9 The Council anticipates that it has a total supply of 8,193 dwellings over the five-year period from 2023/24 to 2027/28 (set out at Table 2a at page 12 of the HLSS) from the following sources of supply:

a. Small sites with planning permission (fewer than 10 dwellings) which are set out as a combined figure within the trajectory at Appendix 1 of the HLSS;

b. Major planning permissions, which are listed individually within the trajectory;

c. Allocated sites without planning permission (including Neighbourhood Plan sites) which are also listed individually within the trajectory (but may be below the 10-dwellings site size threshold);

d. Windfall allowances for:

   i. Small greenfield sites;

   ii. Small brownfield sites; and

   iii. Large brownfield sites.

6.10 For the purposes of this evidence, future affordable housing delivery has been calculated using sites included in the supply which are permitted for 10+ dwellings as they fall within the NPPF paragraph 65 threshold for affordable housing contributions.

[4] APP/Y3940/W/24/3340811

Sites below 10 dwellings have been excluded as there is no basis in national policy to secure affordable housing on sites smaller than this threshold. Although paragraph 65 of the NPPF allows authorities to apply a lower threshold of five dwellings in Designated Rural Areas, the adopted Core Strategy does not take this approach.

6.11 Similarly, I have not assumed any affordable housing delivery from the 'small sites' windfall allowances, since this comprises smaller sites that fall outside the scope of Policy CP43. However, the trajectory includes a windfall allowance for 'large brownfield' sites which may fall under the scope of CP43 and I have assumed the upper affordable housing requirement of 40% from this element of the windfall allowance.

6.12 As larger sites often deliver housing across several phases and over an extended timeframe, a 'pro-rata' estimate of affordable housing contributions for the five-year period has been applied.

Council's Position

6.13 My analysis (**Appendix JS5**) reveals that, based upon the Council's estimates of delivery from sites within its trajectory, there is a likely pipeline supply of 1,712 gross affordable homes over the next five years from 2023/24 to 2027/28, equivalent to **an average of 342 affordable dwellings per annum**.

6.14 Figure 6.1 calculates the potential shortfall over the next five years, against the 2023 LHNA affordable housing need figure, assuming an average of 342 gross affordable dwellings per annum will be delivered in this period. It shows that **a shortfall of -1,169 dwellings will arise by the end of 2027/28**.

Figure 6.1: Projected Affordable Housing Completions Compared with LHNA 2023 Identified Needs

Monitoring Period	Additions to AH Stock (Net of RtB)		LHNA 2023 Net Affordable Housing Need per annum	Surplus / shortfall	Cumulative shortfall
	Actual	Projected (Based on Council's trajectory)			
2020/21	539	-	581	-42	-42
2021/22	634	-	581	+53	+11
2022/23	596	-	581	+15	+26
2023/24*	-	342	581	-239	-213
2024/25	-	342	581	-239	-452
2025/26	-	342	581	-239	-691
2026/27	-	342	581	-239	-930
2027/28	-	342	581	-239	-1,169
Total	**1,769**	**1,712**	**4,648**	**-1,169**	

*Source: HLSS June 2024; LHNA 2023; see also Figure 5.6 above. *Although affordable housing completions for 2023/24 are already known (see Section 5 of this Hearing Statement) the average over five years of the trajectory period has been applied for the purposes of this exercise.*

6.15 The Council's 5YHLS future supply figure derived from the analysis falls far short of the 581 dwellings per annum figure identified in the LHNA 2023.

6.16 However, in light of the recent appeal decision in Melksham (**CD7.7**) where the Inspector placed more reliance on the Core Strategy and SHMA 2017 affordable housing needs, figure 6.2 below calculates the potential shortfall against the SHMA 2017. The Core Strategy period only runs until 2026, whereas the 2017 SHMA identifies the need up to 2035/36, therefore, this why figure 6.2 utilises the 2017 SHMA need figure as opposed to the Core Strategy.

Figure 6.2: Projected Affordable Housing Completions Compared with 2017 SHMA Identified Needs

Monitoring Period	Additions to AH Stock (Net of RtB)		2017 SHMA Net Affordable Housing Need per annum	Surplus / shortfall	Cumulative shortfall
	Actual	Projected (Based on Council's trajectory)			
2020/21	539	-	719	-180	-180
2021/22	634	-	719	-85	-265
2022/23	596	-	719	-123	-388
2023/24*	-	342	719	-377	-765
2024/25	-	342	719	-377	-1,142
2025/26	-	342	719	-377	-1,519
2026/27	-	342	719	-377	-1,896
2027/28	-	342	719	-377	-2,273
Total	**1,769**	**1,712**	**5,752**	**-2,273**	

*Source: HLSS June 2024; SHMA 2017; see also Figure 5.5 above. *Although affordable housing completions for 2023/24 are already known (see Section 5 of this Hearing Statement) the average over five years of the trajectory period has been applied for the purposes of this exercise.*

6.17 The Council is unable to meet its affordable housing needs over the next five years between 2023/24 and 2027/28, against both affordable housing need figures.

6.18 At best, the 2024 HLSS trajectory shows the Council can deliver 342 gross affordable dwellings per annum over the next five years. Against the 2023 LHNA, this will result in an accumulated shortfall of -1,169 affordable dwellings by the end of the 2027/28 monitoring period. Although when assessed against the 2017 SHMA, this results in an even greater accumulated shortfall of -2,273 affordable dwellings by the end of the same monitoring period. However, as set out previously, the Council has accepted that the 5YHLS position in the 2024 HLSS should be reduced. Therefore, the shortfall in affordable housing delivery over the next five years will actually be more severe than that set out above.

6.19 Consequently, there is a substantial need for more affordable housing now. In light of the Council's inadequate record of affordable housing delivery and the volatility of future affordable housing delivery there can be no doubt that the provision of up to 37 affordable dwellings on this site to address the County-wide needs of Wiltshire should be afforded **substantial weight** in the determination of this appeal.

Affordability Indicators

Section 7

Introduction

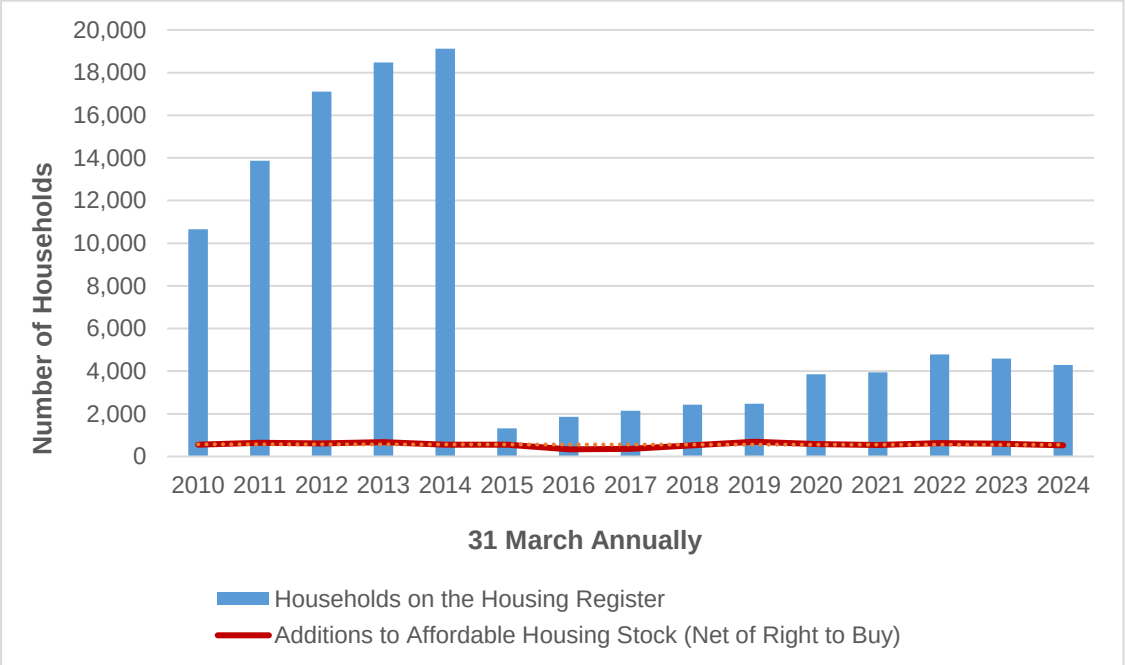
7.1 The PPG recognises the importance of giving due consideration to market signals as part of understanding affordability. It is acknowledged that this is in the context of plan making.

Housing Register

7.2 The Council's Freedom of Information response (**Appendix JS2**) confirms that on 31 March 2024 there were 4,285 households on the Housing Register.

7.3 Figure 7.1 provides a comparative analysis of the number of households on the Housing Register on 31 March each year and affordable housing delivery (net of Right to Buy) in the corresponding monitoring year ending on 31 March across Wiltshire Council since the formation of Wiltshire Council in 2009/10.

Figure 7.1: Number of Households on the Housing Register Compared with Additions to Affordable Housing Stock (Net of Right to Buy), 2009 to 2024



Source: MHCLG Open Data

7.4 As Figure 7.1 clearly illustrates, affordable housing delivery **has failed to keep pace with identified need on the housing register by a considerable margin for every single year in Wiltshire Council since 2010**. Therefore, the limited amount of additions to affordable housing stock cannot be the resultant factor in the reduction on households on the Housing Register, which is discussed further below.

7.5 Footnote 4 of MHCLG[5] Live Table 600 highlights that:

> *"The introduction of choice-based approaches in 2003, where applicants have more choice about where they live, contributed to a rise in the number of households on housing registers. The Localism Act 2011 then contributed to a decrease in the number of households housing registers, as it allowed local authorities to set their own qualification criteria."*

7.6 Evidently the result of the Localism Act is that many local authorities, including Wiltshire Council, have been able to exclude applicants already on Housing Register waiting lists who no longer meet the new narrower criteria but who are still in need of affordable housing.

[5] Ministry of Housing, Communities and Local Government

7.7 Following the changes brought about by the Localism Act, Wiltshire Council published a revised Housing Allocations Scheme in 2015, which received further revisions in 2018, 2020, 2021 and 2023. It is notable that drops in the number of households on the Housing Register, particularly in 2015, correspond with the dates of these changes.

7.8 Whilst restricting the entry of applicants on to the Housing Register may temporarily reduce the number of households on the waiting list, this does not reduce the level of need, it merely displaces it.

7.9 The ability of Local Authorities to set their own qualification criteria in relation to Housing Registers was recognised by the Planning Inspector presiding over an appeal at Oving Road, Chichester **(CD7.17)** in August 2017, where I gave evidence. In assessing the need for affordable housing in the district, and in determining the weight to be attached to the provision of affordable housing for the scheme which sought to provide 100 dwellings; the Inspector acknowledged at paragraph 63 of their report that:

> "*The provision of 30% policy compliant affordable houses carries weight where the Council acknowledges that affordable housing delivery has fallen short of meeting the total assessed affordable housing need, notwithstanding a recent increase in delivery. With some 1,910 households on the Housing Register in need of affordable housing, in spite of stricter eligibility criteria being introduced in 2013 there is a considerable degree of unmet need for affordable housing in the District. Consequently, I attach substantial weight to this element of the proposal"* (my emphasis).

7.10 Furthermore, in the appeal at Oxford Brookes University Campus at Wheatley **(CD7.19),** where I also gave evidence, Inspector DM Young asserted at paragraph 13.101 of their report that in the context of a lengthy housing register of 2,421 households:

> "*It is sometimes easy to reduce arguments of housing need to a mathematical exercise, but each one of those households represents a real person or family in urgent need who have been let down by a persistent failure to deliver enough affordable houses*" (my emphasis).

7.11 The Inspector went on to state at paragraph 13.102 that:

> "*Although affordable housing need is not unique to this district, that argument is of little comfort to those on the waiting list*" before concluding that "*Given the importance attached to housing delivery that meets the needs of groups with*

specific housing requirements and economic growth in paragraphs 59 and 80 of the Framework, these benefits are considerations of substantial weight".

7.12 In undertaking the planning balance, the Inspector stated at paragraph 13.111 of their report that:

"*The Framework attaches great importance to housing delivery that meets the needs of groups with specific housing requirements. In that context and given the seriousness of the affordable housing shortage in South Oxfordshire, described as "acute" by the Council, the delivery of up to 500 houses, 173 of which would be affordable, has to be afforded very substantial weight*".

7.13 In determining the appeal, the Secretary of State concurred with these findings, thus underlining the importance of addressing needs on the Housing Register, in the face of acute needs and persistent under delivery. In my opinion the numbers on LPA's housing register remains high.

7.14 It is important to note that the Housing Register is only part of the equation relating to housing need. The housing register does not constitute the full definition of affordable housing need as set out in the NPPF – Annex 2 definitions i.e. social rented, other affordable housing for rent, discounted market sales housing and other affordable routes to home ownership including shared ownership, relevant equity loans, other low-cost homes for sale and rent to buy, provided to eligible households whose needs are not met by the market.

7.15 In short, there remains a group of households who fall within the gap of not being eligible to enter the housing register but who also cannot afford a market property and as such are in need of affordable housing. It is those in this widening affordability gap who, I suggest, the Government intends to assist by increasing the range of affordable housing types in the NPPF.

7.16 The Franklands Drive Secretary of State appeal decision in 2006 **(CD7.14)** underlines how the Housing Register is a limited source for identifying the full current need for affordable housing. At paragraph 7.13 of the Inspector's report the Inspector drew an important distinction between the narrow statutory duty of the Housing Department in meeting priority housing need under the Housing Act, and the wider ambit of the planning system to meet the much broader need for affordable housing.

7.17 As such, the number of households on the Housing Register will only be an indication of those in priority need and whom the Housing Department have a duty to house. But it misses thousands of households who are in need of affordable housing, a large proportion of whom will either be living in overcrowded conditions with other households or turning to the private rented sector and paying unaffordable rents.

7.18 In summary, irrespective of the fluctuations in the total number of households on the Housing Register, Figure 6.1, demonstrates that the total number of households on the Housing Register have steadily climbed since 2015 (when the Council's revised Housing Allocation Scheme was published) up to 2022, where they have marginally declined in 2023 and 2024.

7.19 Evidently, the result of the Localism Act is that many Local Authorities, including Wiltshire, have been able to exclude applicants already on the Housing Register who no longer meet the new narrower criteria bit who are still in need of affordable housing.

Waiting Times for Housing

7.20 The Council's Freedom of Information responses (**Appendix JS2**) show that successful applicants for affordable housing face lengthy waits for an affordable home in Wiltshire.

7.21 Figure 7.2 illustrates that, based on the dwelling size, successful applicants in the 2023/24 period experienced average waiting times ranging from 2 years to 3 years 6 months for an affordable home.

Figure 7.2: Housing Register Average Waiting Times, Wiltshire - March 2023 and March 2024

Type of affordable property	Average Waiting Time (31 March 2023)	Average Waiting Time (31 March 2024)	Change
1-bedroom	2 years 1 month	2 years 4 months	+ 3 months
2-bedroom	2 years 0 months	2 years 3 months	+ 3 months
3-bedroom	2 years 5 months	2 years 11 months	+ 6 months
4-bedroom	2 years 8 months	3 years 4 months	+ 8 months
5-bedroom	3 years 6 months	4 years	+ 6 months
6-bedroom	3 years 5 months	4 years 7 months	+ 1 year 2 months

Source: Freedom of Information response (May 2024)

7.22 Strikingly, **the average waiting time for every size of affordable dwelling has increased between 2023 and 2024.**

7.23 It is crucial to note that these figures represent averages, implying that some households may have been waiting even longer than the indicated times. Additionally, these statistics only capture the waiting times for successful applicants, typically those in the highest priority need. Households with less urgent needs can anticipate significantly lengthier waiting periods.

Housing Register Bids and Lettings

7.24 Figure 7.3 below demonstrates average number of bids per property in St Paul Malmesbury Without Civil Parish (where the site is located) and the neighbouring Malmesbury Civil Parish over the 2023/24 monitoring period for a range of types of affordable property.

Figure 7.3: Bids Per Property in Wiltshire, April 2023 to March 2024

Type of Affordable Property	St Paul Malmesbury Without Civil Parish		Malmesbury Civil Parish	
	No. of Properties Advertised	Average Bids per Property	No. of Properties Advertised	Average Bids per Property
1-bed affordable dwelling	2	143	14	87
2-bed affordable dwelling	1	30	17	48
3-bed affordable dwelling	1	54	3	45
4+ bed affordable dwelling	0	0	2	66

Source: Freedom of Information response (February 2025)

7.25 Figure 7.3 demonstrates that between 1 April 2023 to 31 March 2024 there were an average of 143 bids per 1-bed affordable dwelling put up for let in the St Paul Malmesbury Without Parish, 30 average bids per 2-bed affordable dwelling, and 54 average bids per 3-bed affordable dwelling. There were no bids on 4+ bed affordable dwellings, because none were advertised. This is all in the context that just 4 properties were advertised in total, with hundreds of bids received.

7.26 With regard to the neighbouring Malmesbury Parish area, Figure 7.3 indicates an average of 87 bids per 1-bed affordable dwellings, 48 bids per 2-bed affordable dwellings, 45 bids per 3-bed affordable dwelling and 66 bids per 4-bed affordable dwelling.

7.27 Again, in the neighbouring parish there were just 36 properties advertised in total, with hundreds of bids in total. For every successful letting, there are clearly tens, if not hundreds of households who have missed out and are left waiting for an affordable home. Evidently, there is a clear and pressing need for affordable homes within both the St Paul Malmesbury Without and Malmesbury Civil Parishes, and this is not being met.

Temporary Accommodation

7.28 The FOI response highlights that on 31 March 2024, there were 125 households housed in temporary accommodation by the district.

7.29 MHCLG homelessness data indicates that 49 households in Temporary Accommodation (39%) were households with children. The Council has a responsibility to house these households. Two of these households with children had been housed in temporary accommodation for more than a year.

7.30 Not only does this mean that those in need of affordable housing are being housed in temporary accommodation, which is unlikely to be suited to their needs, but they may also be located away from their support network, at significant cost to local taxpayers.

7.31 The Councils FOI indicates that Wiltshire spent £99,111 on temporary accommodation between 1 April 2023 and 31 March 2024.

7.32 It is notable that there is a lack of discussion within the Councils own corporate documents on the negative impacts of temporary accommodation, with its only mention being within the Wiltshire Homeless Prevention Strategy 2019 – 2024, with a number of priority actions being to increase the availability of temporary accommodation spaces.

7.33 The *"Bleak Houses: Tackling the Crisis of Family Homelessness in England"* report published in August 2019 by the Children's Commissioner found that temporary accommodation presents serious risks to children's health, wellbeing, and safety, particularly families in B&Bs where they are often forced to share facilities with adults engaged in crime, anti-social behaviour, or those with substance abuse issues.

7.34 Other effects include lack of space to play (particularly in cramped B&Bs where one family shares a room) and a lack of security and stability. The report found (page 12) that denying children their right to adequate housing has a "*significant impact on many aspects of their lives*".

Homelessness

7.35 MHCLG statutory homelessness data shows that in the 12 months between 1 April 2023 and 31 March 2024, the Council accepted 689 households in need of homelessness prevention duty[6], and a further 869 households in need of relief duty[7] from the Council. This is a total of 1,558 households.

7.36 The foreword of the Councils own Homelessness Prevention Strategy 2019 to 2024 outlines that:

> *"Due to being a large rural County we often find that there is not the right type and size of affordable housing in the right area to meet the needs of homeless families. The private rented sector has an important part to play in offering solutions homelessness. We will continue to secure more affordable, decent homes and ensuring that the people moving into them have the resources and support to keep their home"*. (My emphasis).

7.37 Page 3 of the Homeless Prevention Strategy discusses the causes of homelessness:

> *"People become homeless for lots of different reasons. There are social causes of homelessness, such as lack of affordable housing, poverty, unemployment and life events that cause individuals to become homeless."*

7.38 It is made clear on page 3 that the main causes of homelessness in Wiltshire is termination of assured shorthold tenancies (cause of 31% of accepted homelessness cases in Wiltshire), asked to leave by family and friends and relationship breakdown, while it also confirms that: *"in Wiltshire we have a significant number of households who remain at risk of becoming homeless*".

7.39 Page 4 is clear that *"homeless prevention and relief cases have increased in Wiltshire by 14% since 2014, when nationally they have noted a decline of 6%"*. It also states that:

> *"We have a small private rented sector and rents are amongst the highest in the region. Local Housing Allowance levels (2 bed in Salisbury £623) are much lower than the median rent (£725) which makes finding affordable private rented accommodation difficult. Our owner-occupied sector is larger than*

[6] The Prevention Duty places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homelessness. The prevention duty applies when a Local Authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.
[7] The Relief Duty requires housing authorities to help people who are homeless to secure accommodation. The relief duty applies when a Local Authority is satisfied that an applicant is homeless and eligible for assistance.

average and house prices are high. Average house price in Wiltshire in June 17 [2019] *was £277,813[8]"*.

7.40 Despite the high rate of homelessness in Wiltshire, the strategic vision of the Strategy is to: *"prevent homelessness and where homelessness cannot be avoided help people secure and keep a suitable home"*.

7.41 Five priorities are set out to achieve this vision, one of which is: *"to identify and prevent homelessness at the earliest possible stage"*. Despite this, MHCLG data shows that the Council currently have higher levels of relief duty being accepted by the Council than prevention duty, which suggests that more people are being acknowledged by the Council at crisis point rather than when homelessness could potentially have been prevented.

7.42 The Wiltshire Council Ending Rough Sleeping Plan 2024 – 2025 also sets out the challenge facing the Council in terms of homelessness, at page 10, it states:

> *"There are limited move on accommodation options available to rough sleepers who are rough sleeping and in our emergency/short-term accommodation. Due to the rising rents in the private rented sector, it is difficult for us to identify affordable accommodation for rough sleepers as the LHA does not represent current rent. The demand of social housing outweighs the supply, so this is not a quick and reliable route to accommodating rough sleepers in a timely manner."*

7.43 Within challenge number 4 of the report, mentioned on page 12, the Council highlights that they have a: *"heavy reliance on hotels due to geographical size of county and lack of immediately available short-term/long-term accommodation"*. Of the same challenge, Action 1 states that: *"if opportunities are identified, leasing from private rented landlords or RP to utilise increase accommodation available for rough sleepers."*

7.44 Furthermore a 2017 report by the National Audit Office ("NAO") found that *"The ending of private sector tenancies has overtaken all other causes to become the biggest single driver of statutory homelessness in England."*

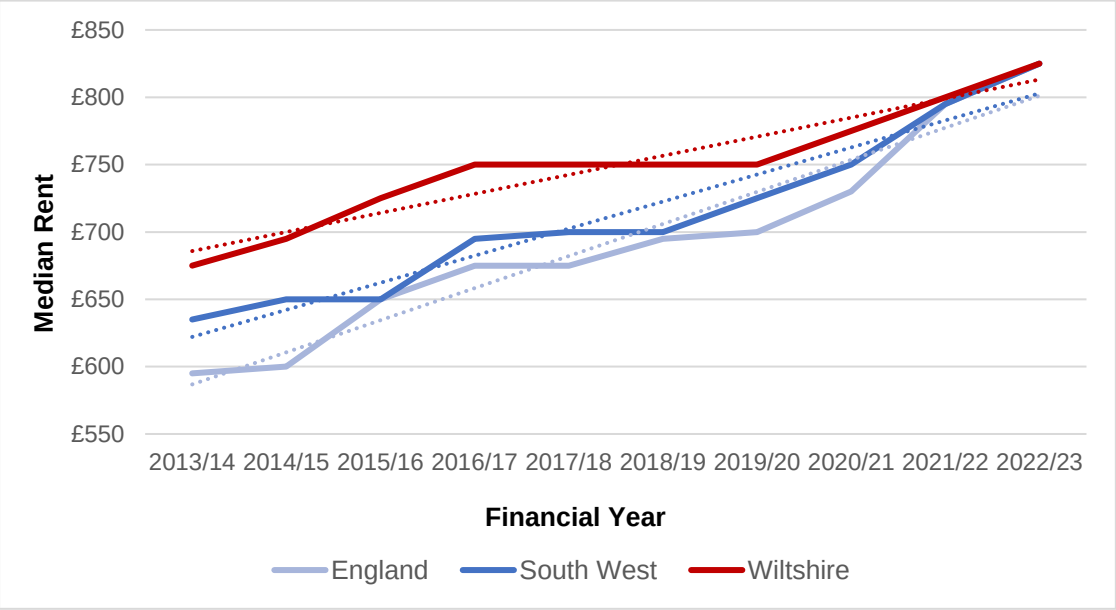
[8] Please note that median house prices in Wiltshire in 2024 stood at £315,000. See Figure 6.7 of this Statement for a detailed breakdown of the Councils median house prices over time.

7.45 It is for this reason that the Private Rented Sector ("PRS") is not a suitable substitute for affordable housing and does not have an equivalent role in meeting the housing needs of low-income families. It is highly pertinent that in the NPPF, PRS housing is not included within the Annex 2 definition of affordable housing.

Private Rental Market

7.46 Valuation Office Agency ("VOA") and Office for National Statistics ("ONS") data (first produced in 2013/14) show that median private rents in Wiltshire stood at £825 per calendar month ("pcm") in 2022/23. This represents a 22% increase from 2013/14 where median private rents stood at £675 pcm.

Figure 7.4 Median Private Sector Rents, 2013/14 to 2022/23



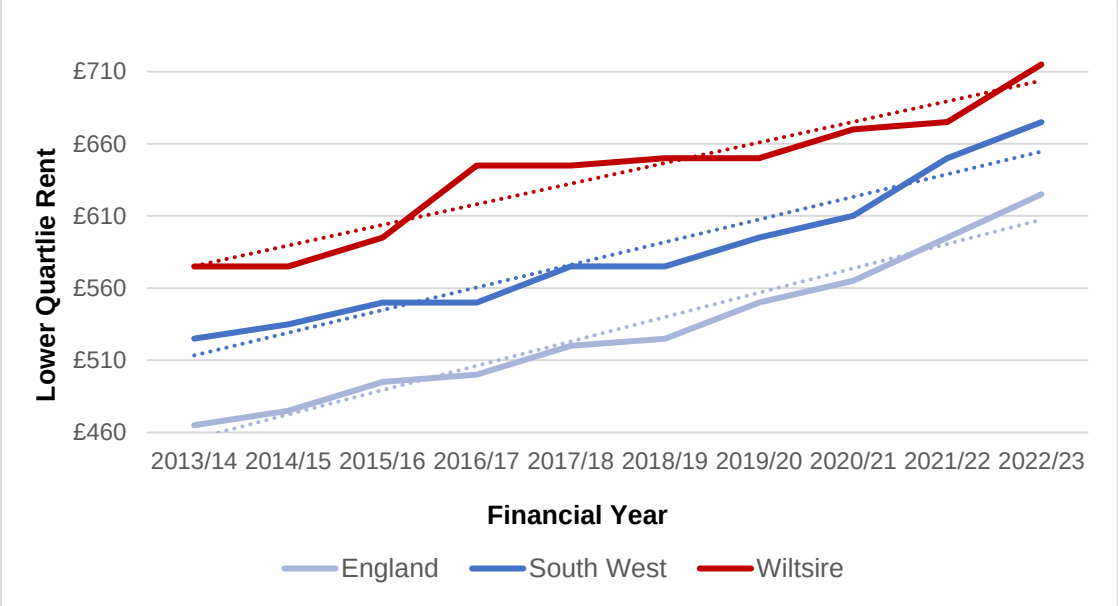
Source: VOA and ONS.

7.47 A median private rent of £825 pcm in 2022/23 is equal to the comparable regional and national figure, which have caught up to the historically higher levels of median rent in previous years. It should also be noted that since the start of the 2023 LHNA period in 2020/21 median rents in Wiltshire have increased by 6%.

7.48 Lower quartile private sector rents are representative of the 'entry level' of the private rented sector and include dwellings sought by households on lower incomes.

7.49 The average lower quartile monthly rent in Wiltshire in 2022/23 was £715 pcm. This represents a 24% increase from 2013/14 where average lower quartile monthly rents stood at £575 pcm.

Figure 7.5: Lower Quartile Private Sector Rents, 2013/14 to 2022/23



Source: VOA and ONS.

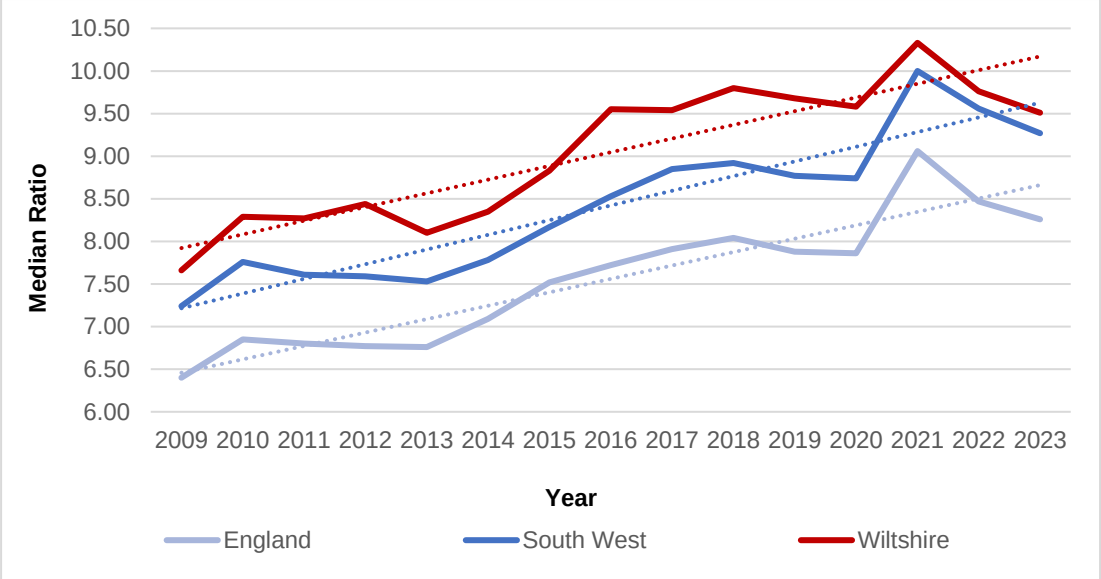
7.50 A lower quartile rent of £715 pcm in 2022/23 is 6% higher than the South West figure of £675 pcm and 14% higher than the national figure of £625 pcm. It should also be noted that since the start of the 2023 LHNA period in 2020/21 lower quartile rents in Wiltshire have increased by 7%.

7.51 It is important to note that VOA/ONS rental data is calculated using all transaction data i.e., existing lets as well a new lets over the period. The data is therefore not necessarily representative of the cost of renting for new tenants in Wiltshire.

Median House Prices

7.52 The ratio of median house prices to median incomes in Wiltshire now stands at **9.51**, a 24% increase since the formation of Wiltshire Council as a Unitary Authority in 2009 where it stood at 7.66. A ratio of 9.51 in Wiltshire stands significantly above the national median of 8.26 (+15%) and also above the South West median of 9.27 (+3%).

Figure 7.6: Median Workplace-Based Affordability Ratio comparison, 2009 to 2024

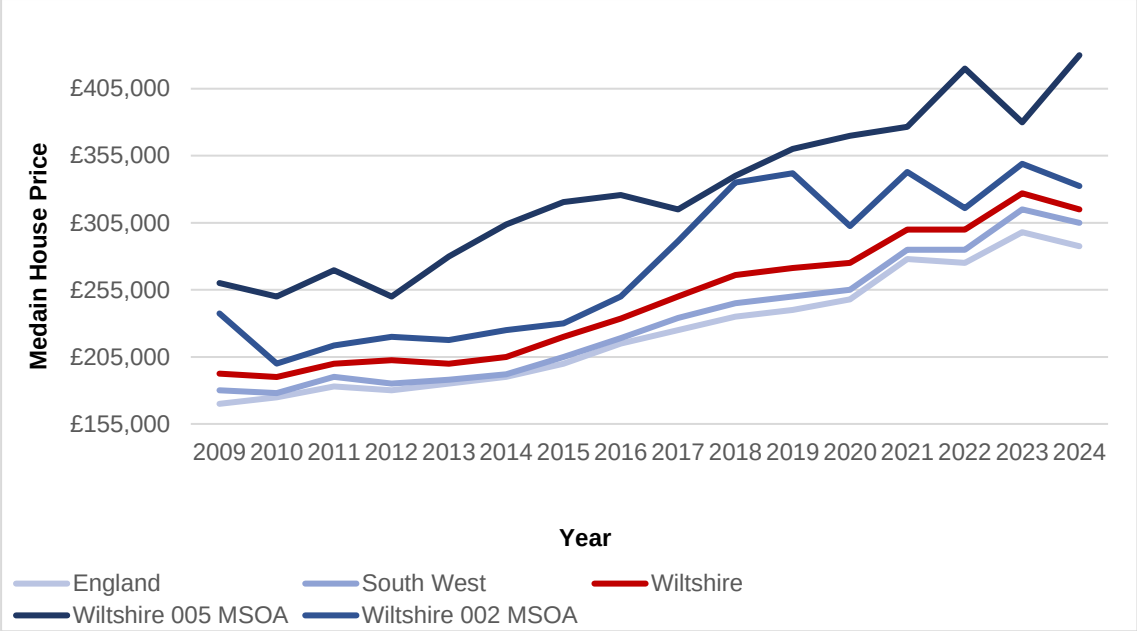


Source: ONS.

7.53 It is also worth noting that a figure of 8 times average incomes was described as a problem by the former Prime Minister in the foreword to the White Paper entitled 'Fixing our broken housing market'. Here, the affordability ratio is some 19% higher than that.

7.54 Figure 7.7 illustrates the median house sale prices for England, the South West, Wiltshire Council, Wiltshire 005 MSOA (where the site is located), the Wiltshire 002 MSOA (adjacent to the site containing Malmesbury). It demonstrates that they have increased dramatically between the formation of Wiltshire Council as a Unitary Authority 2009 and 2024.

Figure 7.7: Median House Price Comparison, 2009 to 2024



Source: ONS.

7.55 The median house price across Wiltshire has risen by 70% from £192,500 in 2009 to £315,000 in 2024. This figure is some 10% higher than the national figure of £287,500, which has seen an increase of 75% over the same period and 4% higher than the South West figure of £305,000 which has seen an increase of 75% over the same period. It should also be noted that since the start of the 2023 LHNA period in 2020 median house prices in Wiltshire have increased by 19%.

7.56 Figure 7.7 also compares the median house sale prices in the Wiltshire 005 MSOA (where the site is located), the Wiltshire 002 MSOA (adjacent to the site containing Malmesbury) with Wiltshire and the South West. It demonstrates that they have increased dramatically between the formation of Wiltshire Council Unitary Authority in 2009 and 2024.

7.57 The median house price across 005 MSOA (where the site is located) has risen by 65% from £260,000 in 2009 to £430,000 in 2024. This figure is 37% higher than the Wiltshire figure of £315,000, (which has seen an increase of 64% over the period) and 41% higher than the South West figure of £305,000 (which has seen an increase of 69% over the period). The median house price in the MSOA where the site is located is 29% higher in 2024 than the neighbouring MSOA which includes Malmesbury itself.

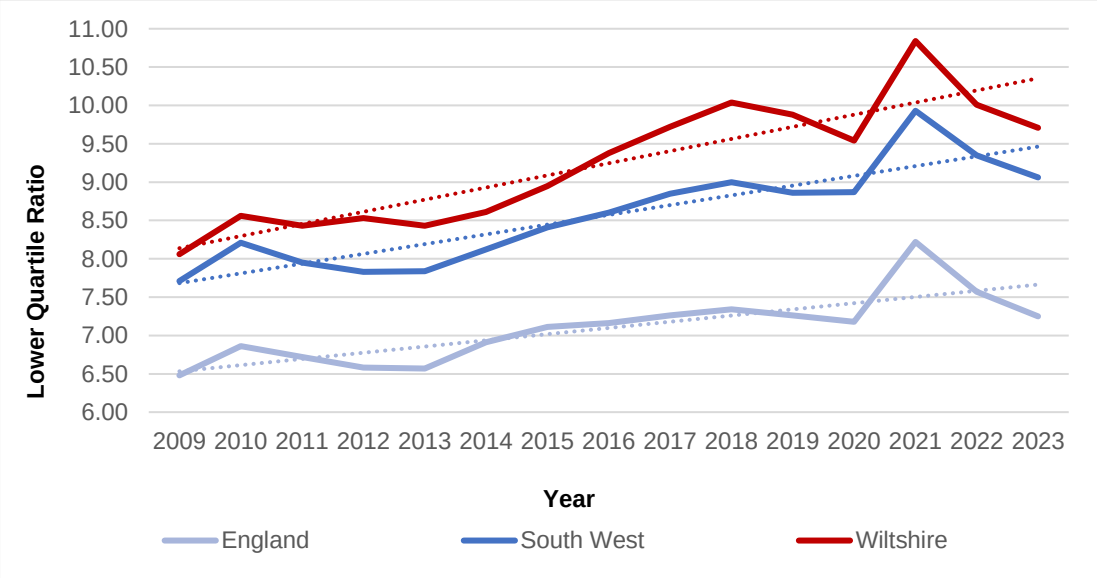
Lower Quartile House Prices

7.58 For those seeking a lower quartile priced property (typically considered to be the 'more affordable' segment of the housing market), the ratio of lower quartile house price to incomes in Wiltshire in 2023 stood at **9.71,** a 20% increase since the formation of Wiltshire Unitary Authority in 2009 when it stood at 8.06.

7.59 This means that those on lower quartile incomes in Wiltshire Council, seeking to purchase a lower quartile priced property, now need to find almost 10 times their annual income to do so.

7.60 Once again it remains the case that the ratio in Wiltshire stands substantially above the national average of 7.25 (+34 %) and significantly above the South West average of 9.06 (+7%). It follows that housing in this area is significantly unaffordable for a significant part of the local population.

Figure 7.8: Lower Quartile Workplace-Based Affordability Ratio comparison, 2009 to 2023

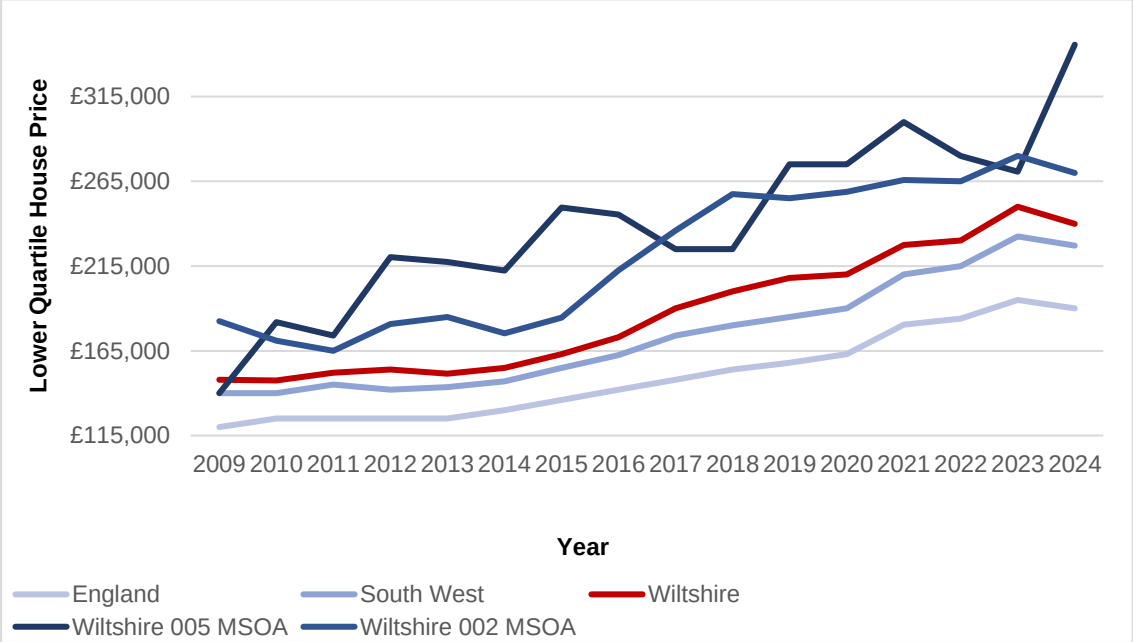


Source: ONS.

7.61 It is also worth noting that mortgage lending is typically offered on the basis of up to 4.5 times earnings (subject to individual circumstances). Here, the affordability ratio is some 101% higher than that.

7.62 Figure 7.9 illustrates the lower quartile house sale prices for England, the South West, Wiltshire Council and the Wiltshire 005 MSOA (where the site is located), the Wiltshire 002 MSOA (adjacent to the site containing Malmesbury). It demonstrates that they have increased dramatically between the formation of Wiltshire Unitary Authority in 2009 and 2024.

Figure 7.9: Lower Quartile House Prices, 2009 to 2024



Source: ONS.

7.63 The lower quartile house price across Wiltshire has risen by 62% from £147,999 in 2009 to £240,000 in 2024. This compares to also a 62% increase across the South West and a national increase of 58% over the same period.

7.64 In 2024 lower quartile house prices in Wiltshire (£240,000) were 6% higher than across the South West (£227,000) and 26% higher than the national figure (£190,000). It should also be noted that since the start of the 2023 LHNA period in 2020 lower quartile house prices in Wiltshire have increased by 14%.

7.65 Figure 7.9 also compares the lower quartile house sale prices in the Wiltshire 005 MSOA (where the site is located), the Wiltshire 002 MSOA (adjacent to the site containing Malmesbury) with Wiltshire and the South West. Once again it demonstrates that they have increased dramatically between the formation of the Wiltshire Unitary Authority in 2009 and 2024.

7.66 The lower quartile house price across Wiltshire 005 MSOA (where the site is located) has risen by 93% from £140,000 in 2009 to £345,625 in 2024. This figure is 44% higher than the Wiltshire figure of £240,000, (which has seen an increase of 62% over the period) and 52% higher than the South West figure of £227,000 (which has also seen an increase of 62% over the period). The lower quartile house price in Wiltshire 005 MSOA is 28% higher than the lower quartile house price in the neighbouring Wiltshire 002 MSOA (which includes Malmesbury).

7.67 The importance of providing affordable tenures in high value areas for housing was recognised by the Planning Inspector presiding over an appeal in the same Authority also within Malmesbury at Land at Filands Road/Jenner Lane (page 17, paragraphs 78-79) **(CD7.1)** in January 2022. In considering the provision of affordable housing at the site and the weight to be attached to this provision the Inspector set out the following at paragraphs 78 and 79 of the decision:

> *"78. The proposed affordable housing would not be as cheap, either to rent or buy, as housing in some other parts of Wiltshire, because Malmesbury is a relatively high value area for housing. However, the housing would meet all policy requirements in terms of amount, mix, and type of provision. Both Appeals A and C would offer affordable housing products as defined by national and local planning policy. I do not diminish the weight to be provided to this provision because such housing might be even cheaper in a theoretical location elsewhere.* ***In fact, that Malmesbury is a relatively high value area for housing adds more weight to the need for affordable housing products****.*
>
> *79. Evidence has been provided that there is more affordable housing either already provided or committed for Malmesbury than the identified need. However, that need is as identified in a Development Plan that is out-of-date in relation to housing, and there is an overall identified shortfall in Wiltshire as a whole. I therefore place* ***substantial positive weight*** *on the proposed provision of affordable housing in Appeals A and C. The slightly reduced provision in Appeal C, after taking account of the nursery land, is of no material difference in this regard"* (my emphasis).

7.68 The lower quartile house price in 2022, the year of the above appeal decision where the area was already noting as being high value, across Wiltshire 005 MSOA was £279,950. This has since risen to £345,625 in 2024, an increase of 23%. This demonstrates that affordability in the MSOA has got worse since the provision of affordable housing in the Malmesbury area was given substantial positive weight by an Inspector back in 2022[9].

Summary and Conclusions

7.69 As demonstrated through the analysis in this section, affordability across Wiltshire Council has been, and continues to be, in crisis.

7.70 House prices and rent levels in both the median and lower quartile segments of the market have been increasing whilst at the same time the stock of affordable homes is failing to keep pace with the level of demand. This only serves to push buying or renting in Wiltshire Council out of the reach of more and more people.

7.71 Analysis of market signals is critical in understanding the affordability of housing. It is my opinion that there is an acute housing crisis in Wiltshire Council, with a lower quartile house price to average income ratio of 9.71.

7.72 Market signals indicate a worsening trend in affordability in Wiltshire Council and also within the 005 MSOA where the site is located. By any measure of affordability, this is an authority in the midst of an affordable housing crisis, and one through which urgent action must be taken to deliver more affordable homes.

[9] APP/Y3940/W/21/3278256

The Weight to be Attributed to the Proposed Affordable Housing Provision

Section 8

8.1 The NPPF is clear at paragraph 32 that policies should be underpinned by relevant up-to-date evidence which is adequate and proportionate and considers relevant market signals.

8.2 Paragraph 61 of the NPPF sets out the Government's clear objective of *"significantly boosting the supply of homes"* before explaining that *"The overall aim should be to meet an area's identified housing need"*.

8.3 Furthermore, paragraph 62 requires that *"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance."* (My emphasis).

8.4 The NPPF requires local authorities at paragraph 63 to assess and reflect in planning policies the size, type and tenure of housing needed for different groups, *"including those who require affordable housing"*.

8.5 The Government attaches weight to achieving a turnaround in affordability to help meet affordable housing needs. The NPPF is clear that the Government seeks to significantly boost the supply of housing, which includes affordable housing.

8.6 As set out in the previous chapters in this Hearing Statement, there are significant social and economic consequences for failing to meet affordable housing needs at both national and local authority level. Wiltshire is no exception to this.

8.7 **The appeal scheme will provide a policy compliant level of up to 37 affordable dwellings on site comprising 40% affordable housing**, 60% of which are proposed as affordable housing for rent (up to 22 units), 16% are proposed as shared ownership dwellings (up to six dwellings) and the remaining 24% are proposed as First Homes (up to nine dwellings).

8.8 The wider social and economic benefits of affordable housing per se are commonly recognised.

8.9 As set out in Section 2 of this evidence, the benefit of affordable housing is a strong material consideration in support of development proposals. As set out in **Appendix JS1** the consequences of failing to sufficient levels of affordable homes are significant, and impact on real people in real need now.

Benefits of the proposed Affordable Housing at the Appeal Site

8.10 The proposed 40% affordable housing meets the requirements of adopted Core Strategy Policy 43. It should be noted that these policies were drafted to capture a benefit rather than to ward off harm or needed in mitigation.

8.11 This was reflected in the Case Officer's Report for the refused application **(CD5.2),** which notes on page 32 *"the provision of affordable housing at a policy compliant level (assuming that an agreement securing such could be delivered) is also a benefit to be afforded positive weight".*

8.12 This fact is also acknowledged by the Inspectors presiding over an appeal on land off High Street, Sutton Benger, Chippenham in January 2025 **(CD7.10)** and two appeals on land to the west of Langton Road, Norton **(CD7.16)** in September 2018.

8.13 The Inspector in the Chippenham appeal concluded at paragraph 47 that:

> *"The delivery of housing would also include 40% affordable housing which would ensure an appropriate mix of units to meet a variety of accommodation needs. This is an aspect which also attracts great weight".*

8.14 With regards to the Norton appeal, the Inspector was clear at paragraph 72 of their decision that:

> *"On the other hand, in the light of the Council's track record, the proposals' full compliance with policy on the supply of affordable housing would be beneficial. Some might say that if all it is doing is complying with policy, it should not be counted as a benefit but the policy is designed to produce a benefit, not ward off a harm and so, in my view, compliance with policy is beneficial and full compliance as here, when others have only achieved partial compliance, would be a considerable benefit".* (my emphasis).

8.15 The affordable housing benefits of the appeal scheme are therefore:

a. Policy compliant offer of 40% (up to 37 dwellings) of the scheme provided as affordable housing;

b. An addition of up to 22 affordable homes for rent;

c. An addition of up to six shared ownership homes;

d. An addition of up to nine First Homes;

e. A deliverable scheme which provides much needed affordable homes;

f. Which provide better quality affordable homes with benefits such as improved energy efficiency and insulation; and

g. Greater security of tenure than the private rented sector.

8.16 In my opinion **these benefits are substantial and a strong material consideration weighing heavily in favour of the proposal.**

8.17 An appeal that considers the issue of benefits is the development for 71 dwellings, including affordable provision at 40%, equal to 28 affordable dwellings on site at Hawkhurst in Kent **(CD7.21)**. In critiquing the Council's views regarding the affordable housing benefits of the scheme, the Inspector made the following comments:

> *"The Council are of the view that the housing benefits of the scheme are 'generic' and would apply to all similar schemes. However, in my view, this underplays the clear need in the NPPF to meet housing needs and the Council's acceptance that greenfield sites in the AONB are likely to be needed to meet such needs. Further, I agree with the appellant that a lack of affordable housing impacts on the most vulnerable people in the borough, who are unlikely to describe their needs as generic."* (Paragraph 118)

8.18 The recipients of up to 37 homes here will not describe their needs as generic.

8.19 Considering the authority's past poor and lamentable record of affordable housing delivery, high and rising numbers of households on the housing register, there can be no doubt in my mind that the provision of up to 37 affordable dwellings on this site should be afforded **substantial weight** in the determination of this appeal.

Relevant Secretary of State and Appeal Decisions

8.20 The importance of affordable housing as a material consideration has been reflected in several Secretary of State ("SoS") and appeal decisions.

8.21 Of particular interest is the amount of weight which has been afforded to affordable housing relative to other material considerations; many decisions recognise affordable housing as an individual benefit with its own weight in the planning balance.

8.22 Brief summaries of appeal decisions relevant to this appeal are provided below. Including several appeals in Wiltshire from recent years, at which the topic of affordable housing has been considered in detail. I, and several of my colleagues, have provided evidence to several of these appeals. It has commonly been accepted by the Council and Inspectors that affordable housing should carry substantial weight in the planning balance.

Appeal Decision: Land west of Semington Road, Melksham (Phase 1) (May 2022) – CD7.22

8.23 This appeal decision concerns the first phase of development at Land West of Semington Road, comprising 50 affordable dwellings. I gave evidence to the Inquiry.

8.24 Paragraphs 70 to 77 at pages 10 and 11 discuss in depth the implications of the scheme in addressing housing need. Of particular note is paragraph 70, which records that both the Appellant and the Council agree that the affordable housing carried substantial weight in the planning balance.

8.25 Paragraph 72 highlights the importance of market signals as "*further evidence of the levels of housing stress*". This includes high number of Housing Register applicants, homelessness and waiting times. I consider that the position has changed little since 2022.

8.26 At paragraph 77, the Inspector concludes that "*there is a pressing need for affordable housing*". In undertaking the planning balance and arriving at his conclusions, the Inspector notes at paragraph 99 that "*despite the achievement of housing requirements for Melksham, delivering affordable housing remains a pressing need for the whole Council. The fact that the Council has specific requirements for community areas has still resulted in a need to increase substantially the supply of land for affordable housing"* and that the Council's action plan did not commit additional resources to tackle the matter.

Appeal Decision: Land west of Semington Road, Melksham (Phase 2) (September 2024) – CD7.23

8.27 This decision (already referred to in Section 4) relates to the second phase of development following on from the previous appeal and similarly proposes 100% affordable housing (53 dwellings).

8.28 At paragraph 35, the Inspector concludes:

"*In conclusion, the provision of 100% of units as affordable housing would not only considerably exceed the figure set out in Core Policy 43, but it would also have the greater benefit of enabling provision for those who would not be able to obtain general market housing, as shown by the affordability indicators. It attracts significant weight in favour of the proposal*".

Appeal Decision: Land at Western Way, Melksham (November 2023) – CD7.7

8.29 This decision concerns a scheme close to the Semington Road, Melksham site above. I provided written evidence to the Inquiry, which was unchallenged by Wiltshire Council who declined to defend the appeal.

8.30 At paragraph 49 at page 8 of the decision, the Inspector summarises the benefits of the scheme. He states that "*in support of the appeal proposal the appellant has set out a range of benefits it would bring, including […] a contribution towards the Council's affordable housing requirement*". The Inspector goes on to attribute "*substantial*" weight to the benefit.

Appeal Decision: Westwells Road, Corsham (April 2021) – CD7.15

8.31 This appeal decision, where I gave evidence, considered the shortfall of affordable housing in Wiltshire, with the Inspector noting the shortfalls in affordable housing against identified needs. The Inspector recognises that whilst the proposed affordable housing would be no more than that required under Core Strategy Policy CP43, that should not read as somehow diminishing the benefits of the proposed affordable housing:

"*The UU secures 30% of the proposed homes as affordable housing, with a 60/40 split of affordable rented to social rented provision. The Council is not currently meeting its targets for affordable housing provision, with a shortfall of 489 homes, or 23% against its objectively assessed need. The provision of 24 affordable units as part of the proposed development would help to redress this. <u>The provision only complies with Policy CP43 of the CS, rather than exceeding it, but this does not dimmish the fact that the proposal would result in the provision of 24 much needed affordable homes</u>. The Council has stated that the conflict with Policies CP1 and CP2 reduces the weight to be applied to the provision of affordable housing. However, as set out above, I place limited weight on the conflict with these policies. <u>I therefore attach substantial position weight to the proposed provision of affordable housing</u>*" (my emphasis).

Appeal Decision: Land off Coate Road, Devizes (May 2023) – CD7.4

8.32 Paragraph 57 of the decision is clear that:

"Although the S106 Agreement would provide a policy compliant level and mix of affordable housing, this needs to be viewed in the context of an identified and long-term pressing need for affordable housing in Wiltshire. The proposal should be delivered within the next five years based on the evidence before me, and I consider the delivery of affordable homes carried ***substantial weight*** *given the need and the site's location on the edge of Devizes"* (my emphasis).

8.33 Some of the key points highlighted from these examples are that:

- Affordable housing is an important material consideration;
- The importance of unmet need for affordable housing being met immediately;
- Planning Inspectors and the Secretary of State have attached substantial weight to the provision of affordable housing; and
- Even where development proposals are in outline, this doesn't dimmish the valuable contribution that these schemes can make to the delivery of much needed housing.

Summary and Conclusion

8.34 There is a wealth of evidence to demonstrate that there is a national housing crisis in the UK affecting many millions of people who are unable to access suitable accommodation to meet their housing needs.

8.35 What is clear is that a significant boost in the delivery of housing, and in particular affordable housing, in England is essential to arrest the housing crisis and prevent further worsening of the situation.

8.36 Market signals indicate a worsening trend in affordability across Wiltshire and by any measure of affordability, this is an authority amid an affordable housing emergency, and one through which urgent action must be taken to deliver more affordable homes.

8.37 Against the scale of unmet need and the lack of suitable alternatives in the private rented sector across Wiltshire, there can be no doubt that the provision of up to 37 affordable homes will make a substantial contribution. In light of the evidence it is considered that this contribution should be afforded **substantial weight** in the determination of this appeal.

Appendix JS1

Consequences of Failing to Meet Affordable Housing Needs

Consequences of Failing to Meet Affordable Housing Needs

Appendix JS1

Introduction

1.1 The National Housing Strategy[1] sets out that a thriving housing market that offers choice, flexibility and affordable housing is critical to our social and economic wellbeing.

1.2 A debate took place in the House of Commons on 24 October 2013 concerning the issue of planning and housing supply. Despite the debate taking place over a decade ago the issues remain, and the commentary is sadly still highly pertinent to the issues surrounding affordable housing in Wiltshire Council.

1.3 The former Planning Minister, Nick Boles, provided a comprehensive and robust response to the diverse concerns raised, emphasising the pressing need for more housing, and in particular affordable housing across the country. He opened by stating:

> *"I need not start by underlining the scale of the housing crisis faced by this country, the extent of the need for housing or the grief and hardship that the crisis is visiting on millions of our fellow citizens."*

1.4 When asked to clarify the word "*crisis*" by the MP for Tewkesbury, Nick Boles, commented that in the past year the percentage of first-time buyers in England who were able to buy a home without their parents' help had fallen to the lowest level ever, under one third. He also commented that the first-time buyer age had crept up and up and was now nudging 40 in many parts of the country. He stated that the crisis "*is intense within the south-east and the south, but there are also pockets in parts of Yorkshire*".

[1] Laying the Foundations: A Housing Strategy for England (November 2011)

1.5 In response to questions, Nick Boles reaffirmed that:

> *"Housing need is intense. I accept that my hon. Friend the Member for Tewkesbury (Mr Robertson) does not share my view, but many hon. Members do, and there are a lot of statistics to prove it".*

1.6 He went on to say: "*It is not unreasonable, however, for the Government to tell an authority, which is representing the people and has a duty to serve them, "Work out what's needed, and make plans to provide it". That is what we do with schools. We do not tell local authorities, "You can provide as many school places as you feel like"; we say, "Provide as many school places as are needed". We do not tell the NHS, "Provide as many GPs as you feel you can afford right now"; we say, "Work out how many GPs are needed." The same is true of housing sites: we tell local authorities, "Work out how many houses will be needed in your area over the next 15 years, and then make plans to provide them."*

1.7 Mr Boles' full response highlighted the Government's recognition of the depth of the housing crisis and continued commitment to addressing, in particular, affordable, housing needs. The final quote above also emphasised the importance of properly assessing and understanding the needs; and planning to provide for them.

1.8 Mr Boles indicates that there are "*a lot of statistics to prove it*". My evidence in this Statement sets out an array of statistics, which I consider demonstrates that the crisis remains as prominent now as it did in 2013.

1.9 Moving forward over a decade and a new Government, we see even more alarming comments from the Housing Minister, Matthew Pennycook. On 20 November 2024, the Minister addressed the Housing, Communities and Local Government Committee: He began with a powerful reminder:

> *"We have a generation now completely locked out of home ownership as a result of the steadily expanding gap between average house prices and average earnings. We have millions of low to middle-income households forced into insecure, unaffordable and far too often substandard private rented housing. We have 1.3 million people languishing on social housing waiting lists. To our utter shame as a nation—I say this everywhere I go—more than 150,000 homeless children right now are living in temporary accommodation. That is the price we have paid for not being serious about house building rates*."

1.10 He went on to say:

> *It is not just the lives it blights; it is also the impact on our economy. We are all suffering. The public services we rely on, for example, are harmed by the fact that we are consuming ever larger amounts of public money in the form of the rapidly rising housing benefit bill. The situation that we are in also hampers economic growth and productivity. It constrains the ability of our great towns and cities to realise their full potential. We are taking decisive action to tackle the housing crisis and boost economic growth.*

Consequences of Failing to Meet Affordable Housing Need

1.11 This section highlights some of the evidence gathered in recent years demonstrating the significant consequences of failing to meet affordable housing needs.

1.12 In August 2019 the Children's Commissioner produced a report titled *"Bleak Houses: Tackling the Crisis of Family Homelessness in England"* to investigate the impact of homelessness and in particular the effect of this upon children.

1.13 The report identified that family homelessness in England today is primarily a result of structural factors, including the lack of affordable housing and recent welfare reforms[2].

1.14 It stated that the social housing sector has been in decline for many years and that between the early 1980s and early 2010s, the proportion of Britons living in social housing halved, because of losses to stock through the Right to Buy and a drop in the amount of social housing being built.

1.15 The research found that the decline in social housing has forced many households, including families, into the private rented sector. High rents are a major problem: between 2011 and 2017 rents in England grew 60% quicker than wages. It stated that "*Simply put, many families cannot afford their rent. It is telling that over half of homeless families in England are in work".*

1.16 The report particularly focused on the effect on children. The report revealed that many families face the problem of poor temporary accommodation and have no choice but to move out of their local area, which can have a *"deeply disruptive impact on family life"*. This can include lack of support (from grandparents for example) and travel costs.

[2] The Children's Commissioner Report references a National Audit Office Report titled 'Homelessness' (2017) which concludes that government welfare reforms since 2011 have contributed towards homelessness, notably capping, and freezing Local Housing Allowance.

1.17 It found that a child's education can suffer, even if they stay in the same school, because poor quality accommodation makes it difficult to do homework and that younger children's educational development can also be delayed.

1.18 Temporary accommodation also presents serious risks to children's health, wellbeing, and safety. This is particularly so for families in B&Bs where they are often forced to share facilities with adults engaged in crime, anti-social behaviour, or those with substance abuse issues.

1.19 Other effects include lack of space to play (particularly in cramped B&Bs where one family shares a room) and a lack of security and stability. The report found (page 12) that denying children their right to adequate housing has a "*significant impact on many aspects of their lives*".

1.20 More recently, in May 2021, Shelter published its report "*Denied the Right to a Safe Home – Exposing the Housing Emergency*" which sets out in stark terms the impacts of the affordable housing crisis. The report affirms that affordability of housing is the main cause of homelessness (page 15) and that *"we will only end the housing emergency by building affordable, good quality social homes"* (page 10).

1.21 In surveying 13,000 people, the research found that one in seven had to cut down on essentials like food or heating to pay the rent or mortgage. In addition, over the last 50 years the average share of income young families spend on housing has trebled. The following statements on the impacts of being denied a suitable home are also made in the report:

> *"Priced out of owning a home and denied social housing, people are forced to take what they can afford – even if it's damp, cramped, or away from jobs and support networks."* (Page 5)
>
> *"… people on low incomes have to make unacceptable sacrifices to keep a roof over their head. Their physical and mental health suffers because of the conditions. But because of high costs, discrimination, a lack of support, and fear of eviction if they complain to their landlord, they are left with no other option."* (Page 5)
>
> *The high cost of housing means the private-rented sector has doubled in size over the last 20 years. [..] Most private rentals are let on tenancies of 6 to 12 months, and renters can be evicted for no reason because of section 21. This creates a permanent state of stress and instability.* (Page 6)

If you live in an overcrowded home, you're more likely to get coronavirus. If you live in a home with damp and black mould on the walls, your health will suffer. (Page 9)

"14% of people say they've had to make unacceptable compromises to find a home they can afford, such as living far away from work or family support or having to put up with poor conditions or overcrowding" (Page 12)

"Spending 30% of your income on housing is usually the maximum amount regarded as affordable. Private renters spend the most, with the average household paying 38% of their income on rent, compared to social renters (31%) and owner-occupiers (19%)." (Page 14)

"19% of people say their experiences of finding and keeping a home makes them worry about the likelihood they will find a suitable home in the future." (Page 15)

"Families in temporary accommodation can spend years waiting for a settled home, not knowing when it might come, where it might be, or how much it will cost. It's unsettling, destabilising, and demoralising. It's common to be moved from one accommodation to another at short notice. Meaning new schools, long commutes, and being removed from support networks. Parents in temporary accommodation report their children are 'often unhappy or depressed', anxious and distressed, struggle to sleep, wet the bed, or become clingy and withdrawn." (Page 25)

"Landlords and letting agents frequently advertise properties as 'No DSS', meaning they won't let to anyone claiming benefits. This practice disproportionately hurts women, Black and Bangladeshi families, and disabled people." (Page 29)

"The situation is dire. A lack of housing means landlords and letting agents can discriminate knowing there is excess demand for their housing." (Page 30)

1.22 Shelter estimate that some 17.5 million people are denied the right to a safe home and face the effects of high housing costs, lack of security of tenure and discrimination in the housing market (Page 32).

1.23 The Report concludes (page 33) that for change to happen, "*we must demand better conditions, fight racism and discrimination, end unfair evictions, and reform housing benefit. But when it comes down to it, there's only one way to end the housing emergency. **Build more social housing**"* (emphasis in original)**.**

1.24 In April 2022 Shelter published a further report titled *"Unlocking Social Housing: How to fix the rules that are holding back building*". The first paragraph of the Executive Summary is clear that:

> *"Our housing system is broken. Across the country, renters are stuck in damp, crumbling homes that are making them sick. Private renters are forced to spend more than 30% of their income on rent. As a result, nearly half have no savings. Desperate parents fighting to keep a roof over their heads are forced to choose between rent and food."*

1.25 The Executive Summary goes on to state that "**An affordable and secure home is a fundamental human need**" (emphasis in original) noting that one in three of us don't have a safe place to call home and that finding a good-quality home at a fair price is impossible for so many people.

1.26 At page 6 the report considers the impacts of the Government plans to scrap developer contributions (Section 106 – s106) and replace it with a flat tax called the 'infrastructure levy'. It states that:

> *"This would mean that developers no longer build social housing on site, in return for planning permission, but instead pay a tax to the local council when they sell a home. The unintended consequence could add yet more barriers to social housebuilding and spell the end of mixed developments where social tenants live alongside private owners."* (My emphasis).

1.27 In considering the impact of the PRS the report highlights at page 7 that nearly half of private renters are now forced to rely on housing benefit to pay their rent – *"That's taxpayer money subsidising private landlords providing insecure and often poor-quality homes."* The paragraph goes on to note that:

> *"The lack of social housing has not just pushed homeownership out of reach, it's made it nearly impossible for working families to lead healthy lives and keep stable jobs. Poor housing can threaten the life chances and educational attainment of their kids. If we want to level up the country, we must start with home."*

1.28 Regarding temporary accommodation ("TA") the report notes on page 10 that the number of households living in such accommodation has nearly doubled over the last decade and the cost to the taxpayer has gone through the roof. The page also notes that *"TA cost councils £1.45bn last year (2020/21). 80% of this money went to private letting agents, landlords or companies."*

1.29 Page 11 goes on to highlight that *"Of the nearly 100,000 households living in TA, more than a quarter (26,110) of these households are accommodated outside the local authority area they previously lived in."* This means that *"Families have been forced to endure successive lockdowns in cramped, unhygienic, and uncertain living conditions, away from jobs, family, and support networks."*

1.30 The page goes on to conclude that *"As a result, the national housing benefit bill has grown. Tenants' incomes and government money is flowing into the hands of private landlords, paying for poorer quality and less security.* ***There are now more private renters claiming housing benefit than ever before****."* (emphasis in original).

1.31 Page 9 is also clear that *"Since 2011, freezes to Local Housing Allowance (housing benefit for private renters) and blunt policies like the benefit cap have been employed to limit the amount of support individuals and families can receive. As a result, many thousands of renters' housing benefit simply doesn't meet the cost of paying the rent*."

1.32 In considering the consequences of this page 12 notes that *"With fast growing rents, mounting food and energy bills, and a dire shortage of genuinely affordable social housing, these policies have failed to curb the rising benefits bill. Instead, they have tipped people into poverty, destitution and homelessness."*

1.33 Finally, page 21 is clear that:

> *"For the over 1 million households on housing waitlists across England, who in the current system may never live with the security, safety, and stability that a good quality social home can provide, reforms cannot come any faster. Access to good housing affects every aspect of one's life and outcomes like health, education, and social mobility. More to the point, the outcomes and holistic wellbeing of an individual or an entire household is not only meaningful for their trajectory, but also contributes to the threads of society by helping people contribute to their communities.*
>
> *The evidence is clear, the financial requirements to own one's home are out of reach for many. And many will spend years stuck in a private rented sector that's not fit for purpose. The answer is clear: build many more, good quality social homes for the communities that so desperately need them."* (My emphasis).

1.34 The consequences of failing to provided enough affordable homes were also recognised by the Inspector in a recent decision in Mole Valley where I provided affordable housing evidence. Inspector McGlone was clear at paragraph 88 of his decision that:

"The consequences of not providing enough affordable homes affect people. Being able to access good housing has a bearing upon everyday life and there are socio-economic effects such as financial security and stability, physical and mental health, decreased social mobility and adverse effects on children's education and development. In Mole Valley the number of people on the housing register has risen, there are increasing affordability ratios and people are paying significantly over 30% of their income on rent."

1.35 It is also pertinent to highlight that Wiltshire Council themselves recognise the consequences of failing to meet affordable housing needs, including their Homeless Prevention Strategy which is clear at page 3 that a lack of affordable housing is a contributing factor to homelessness.

1.36 Page 10 of the Wiltshire Council Ending Rough Sleeping Plan 2024 – 2025 is clear that *"due to the rising rents in the private rented sector, it is difficult for us to identify affordable accommodation for rough sleepers as the LHA does not represent current rent. The demand of social housing outweighs the supply"*.

The Cost of Living Crisis

1.37 On 8 March 2024, the House of Commons published its 'Rising Cost of living in the UK' briefing report[3] which highlights the affordability of goods and services for households.

1.38 The briefing report details at Section 5.1 that *"47% of adults in Great Britain reported an increase in their cost of living in February 2024 compared to a month ago."*. Moreover, Section 5.1 further specifies that *"64% of those who reported a rise in the cost of living between 14 and 25 February 2024 said they are spending less on non-essentials as a result, while 45% reported using less energy at home and 40% report cutting back on essentials like food shopping. 3% were being supported by a charity, including food banks."*

1.39 Additionally, page 45 of the House of Commons report recognises that renting in the private sector is becoming more unaffordable to people receiving benefits.

1.40 Shelter published a briefing report in September 2022 titled 'Briefing: Cost of Living Crisis and the Housing Emergency' which further explains the private rented sector problem on page one:

[3] Source: https://commonslibrary.parliament.uk/research-briefings/cbp-9428/

> *"LHA which determines the amount of housing benefit private renters receive has been frozen since March 2020 while private rents have risen 5% in England – and even more in some parts of the country. The freeze has left low-income private renters in an incredibly precarious position. 54% of private renters claiming housing benefit have a shortfall to their rent."* (My emphasis).

1.41 The Shelter briefing sets out that low-income households (including those at risk of homelessness) have no choice but to turn to the private rented sector due to a severe shortage of affordable housing, and concludes on page two that *"the only sustainable solution is to address the causes of the housing emergency by investing in truly affordable social homes"*.

The Cost of Temporary Accommodation

1.42 In my opinion the cost of temporary accommodation is an important material consideration in the determination of this appeal.

1.43 BBC News reported on 13 October 2023 that English Councils spent more than £1.7bn on temporary accommodation for homeless people in the 2022/23 financial year. In my opinion this is a significant cost arising primarily as a consequence of a lack of affordable housing to adequately house people in need.

1.44 The article highlighted that the figure, published by the Ministry of Housing, Communities and Local Government ("MHCLG"), has increased by around 9% from the previous year. B&B accommodation alone in 2022/23 accounted for almost £500m in gross costs, increasing by a third on the previous year.

1.45 Shelter's chief executive Polly Neate was quoted in the article, stating that the amount spent on temporary accommodation was not only *"outrageous, but it's also illogical"*. She went on to say that:

> *"We simply can't keep throwing money at grim B&Bs and hostels instead of focusing on helping families into a home. [..]*
>
> *This decision combined with the decades of failure to build enough social homes has meant that families can't find anywhere affordable to live and as a result are forced into homelessness in cramped and unsuitable temporary accommodation, often miles away from their children's schools and support networks."* (Emphasis added)

1.46 Inside Housing reported in October 2023 that homelessness in England is continuing to increase, with figures published in July 2023 showing the number of people in temporary accommodation was at a record high and that the number of children in this situation is also at the highest level since records began in 2004.

1.47 On the 5 March 2024 MHCLG published data on the age of children under ten in temporary accommodation. The study found that there were 86,945 children under the age of ten living in temporary accommodation at the 30 June 2023, with 19,430 of these children less than 12 months old.

1.48 The Inside Housing article also highlighted that the growing cost of temporary accommodation is putting local authorities' budgets under strain. It noted that that Hastings Borough Council recently faced bankruptcy, partly due to its large expenditure on temporary accommodation, which had risen to £5.6m per year, compared with £730,000 in 2019.

1.49 The report added that London councils are expected to overspend on temporary accommodation by £90m this year.

1.50 In December 2023, ITV News reported that almost one in five council leaders in England expect to issue Section 114 notices[4] in 2024.

1.51 On the 23 January 2024, ITV News reported that the increasing cost of housing homeless people in temporary accommodation is putting local authorities on the brink of financial ruin.

1.52 The ITV News article added that according to homelessness charity Crisis, some 298,430 households approached their local council for homelessness support in the past year. Jasmine Basran, head of policy and campaigns at Crisis, said:

> *"Crippling financial pressures from rising living costs, unaffordable rents and a severe lack of social homes is forcing more and more people into homelessness." (Emphasis added)*

1.53 The ITV News article continued, adding that Eastbourne Borough Council ("EBC") is currently spending 49p of every £1 on temporary accommodation for homeless people. Stephen Holt, the leader of EBC said ministers must "recognise the gravity of this situation" and work out how to resolve it "before it is too late", adding that:

[4] A section 114 notice means the council cannot make new spending commitments and must meet within 21 days to discuss what to do next.

"Simply put, without government intervention to tackle the tremendous cost of temporary accommodation and homelessness, the next step for many councils of all stripes is emergency budgets and section 114 notices."

1.54 A further article from Inside Housing on 24 January 2024 reported that the surge in spending on temporary accommodation could spell the "end of local government".

1.55 The article highlighted that Councillors from across the political spectrum had expressed serious concerns over temporary accommodation spending at an emergency meeting in Westminster on 23 January 2024 where more than 50 local leaders met to discuss the "national crisis" caused by the cost of temporary accommodation.

1.56 I agree that the cost of housing people in affordable housing is spiralling out of control. I also agree with Polly Neate that, "*We simply can't keep throwing money at grim B&Bs and hostels instead of focusing on helping families into a home."*

Summary and Conclusions

1.57 Evidently, the consequences of failing to meet affordable housing needs in any local authority are significant. Some of the main consequences of households being denied a suitable affordable home have been identified as follows:

- A lack of financial security and stability;
- Poor impacts on physical and mental health;
- Decreased social mobility;
- Negative impacts on children's education and development;
- Reduced safety with households forced to share facilities with those engaged in crime, anti-social behaviour or those with substance abuse issues;
- Being housed outside social support networks;
- Having to prioritise paying an unaffordable rent or mortgage over basic human needs such as food (heating or eating); and
- An increasing national housing benefit bill.

1.58 These harsh consequences fall upon real households, and unequivocally highlight the importance of meeting affordable housing needs. These are real people in real need. An affordable and secure home is a fundamental human need, yet households on lower incomes are being forced to make unacceptable sacrifices for their housing.

1.59 I am strongly of the opinion that a step change in the delivery of affordable housing is needed now.

1.60 The acute level of affordable housing need in Wiltshire Council coupled with worsening affordability, will detrimentally affect the ability of people to lead the best lives they can. The National Housing Strategy requires urgent action to build new homes, acknowledging the significant social consequences of failure to do so.

Appendix JS2

Freedom of Information Responses dated 7 May 2024, 5 and 6 February 2025

Dear Lisa Luong

Freedom of Information Request Case ID CAS-2761

Thank you for your request for information received on 05/04/2024, in which you asked for the following information:

The total number of households on the Council's Housing Register at 31 March 2024.

1. *The average waiting times at 31 March 2024 for the following types of affordable property across the Authority:*

    a. *1-bed affordable dwelling;*

    b. *2-bed affordable dwelling;*

    c. *3-bed affordable dwelling; and*

    d. *A 4+ bed affordable dwelling.*

2. *The average waiting times at 31 March 2023 for the following types of affordable property across the Authority:*

    a. *1-bed affordable dwelling;*

    b. *2-bed affordable dwelling;*

    c. *3-bed affordable dwelling; and*

    d. *A 4+ bed affordable dwelling.*

3. *The total number of households on the Council's Housing Register at 31 March 2024 specifying the following locations as their preferred choice of location:*

Location	***Household Preferences (31 March 2024)***
Warminster North & Rural Ward	
Warminster Parish	

4. *The number of properties advertised, and the average number of bids per property over the 2023/24 monitoring period for the following types of affordable property in the locations listed below:*

Type of affordable property	*Warminster North & Rural Ward*		*Warminster Parish*	
	Number of properties advertised	*Average Bids per Property*	*Number of Properties advertised*	*Average Bids per Property*
1-bed affordable dwelling				
2-bed affordable dwelling				
3-bed affordable dwelling				
4+ bed affordable dwelling				

5. *Any changes the Council has made to its Housing Register Allocations Policy since 2011 including:*

- *The date they occurred;*
- *What they entailed; and*
- *Copies of the respective documents*

6. *The total number of social housing dwelling stock at 31 March 2024 in the following locations:*

Location	***Total Social Housing Stock (31 March 2024)***
Warminster North & Rural Ward	
Warminster Parish	

7. *The number of social housing lettings in the period between 1 April 2022 and 31 March 2023; and between 1 April 2023 and 31 March 2024 in the following locations:*

Location	***Social Housing Lettings***	
	1 April 2022 to 31 March 2023	***1 April 2023 to 31 March 2024***
Warminster North & Rural Ward		
Warminster Parish		

8. *The number of households on the Housing Register housed in temporary accommodation within and outside the Wiltshire Council region on the following dates:*

Households in Temporary Accommodation	***31 March 2023***	***31 March 2024***
Households Housed within Wiltshire Council		
Households Housed outside Wiltshire Council		
Total Households		

9. *The amount of money spent on temporary accommodation per household within the Wiltshire Council region over the following periods:*

    - *1 April 2023 to 31 March 2024.*

10. *The amount of money spent on temporary accommodation per household outside the Wiltshire Council region over the following periods:*

    - *1 April 2023 to 31 March 2024.*

11. *The number of NET housing completions in the Wiltshire Council region broken down on a per annum basis for the period between 2000/01 and 2023/24.*

12. *The number of NET affordable housing completions in the Wiltshire Council region broken down on a per annum basis for the period between 2000/01 and 2023/24.*

13. *The number of NET housing completions in Warminster North & Rural Ward and Warminster Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.*

14. *The number of NET affordable housing completions in Warminster North & Rural Ward and Warminster Parish broken down on a per annum basis for the period between 2000/01and 2023/24.*

Under the Freedom of Information Act 2000 (the Act) the Council is obliged to:

• Let you know whether we hold the information you have requested
• Provide you with the requested information, if held, (subject to any exemptions to disclosure that may apply)

I can confirm that the council holds some of the information you requested which is as follows and attached to this email. We have not provided some of the requested information because we don't hold it.

Housing Register

1. The total number of households on the Council's Housing Register at 31 March 2024. **- 4285**

2. The average waiting times at 31 March 2024 for the following types of affordable property across the Authority:

a. 1-bed affordable dwelling;

b. 2-bed affordable dwelling;

c. 3-bed affordable dwelling; and

d. A 4+ bed affordable dwelling.

Please see table below:

Bed Size	Overall Current Waiting Time
1 Bed	**2 years 4 months**
2 Bed	**2 years 3 months**
3 Bed	**2 years 11 months**
4 Bed	**3 years 4 months**
5 Bed	**4 years 0 months**
6 Bed	**4 years 7 months**

3. The average waiting times at 31 March 2023 for the following types of affordable property across the Authority:

a. 1-bed affordable dwelling;

b. 2-bed affordable dwelling;

c. 3-bed affordable dwelling; and

d. A 4+ bed affordable dwelling.

Please see table below:

Bed Size	Overall Current Waiting Time
1 Bed	**2 years 1 months**
2 Bed	**2 years 0 months**

3 Bed	**2 year 5 months**
4 Bed	**2 years 8 months**
5 Bed	**3 years 6 months**
6 Bed	**3 years 5 months**

4. The total number of households on the Council's Housing Register at 31 March 2024 specifying the following locations as their preferred choice of location:

Location	**Household Preferences (31 March 2024)**
Warminster North & Rural Ward	**26 (the rest of the Warminster Community Area)**
Warminster Parish	**174**

5. The number of properties advertised, and the average number of bids per property over the 2023/24 monitoring period for the following types of affordable property in the locations listed below:

Type of affordable property	Warminster North & Rural Ward		Warminster Parish	
	Number of properties advertised	Average Bids per Property	Number of Properties advertised	Average Bids per Property
1-bed affordable dwelling	**1**	**82**	**21**	**120**
2-bed affordable dwelling	**7**	**24**	**25**	**79**
3-bed affordable dwelling	**1**	**70**	**14**	**102**
4+ bed affordable dwelling	**0**	**0**	**3**	**84**

6. Any changes the Council has made to its Housing Register Allocations Policy since 2011 including: -
    - The date they occurred;
    - What they entailed; and
    - Copies of the respective documents

Any changes made to the allocation policy would have been approved through Cabinet and therefore all documents can be found online: Browse meetings - Democratic Services - Wiltshire Council The latest policy is attached and also confirms on the front page the dates of all changes made.

Social Housing Stock

7. The total number of social housing dwelling stock at 31 March 2024 in the following locations: **- Information not held. We don't hold the data of social housing in the different areas as this is held by the individual housing providers. We do however have the information from the 2011 census (but this is now extremely old). This confirmed that there were 1004 social housing dwellings in the Warminster area board area. The new census data could be checked for latest details, but 'Housing' does not hold this information**

Location	**Total Social Housing Stock (31 March 2024)**
Warminster North & Rural Ward	**Information not held**
Warminster Parish	**Information not held**

Social Housing Lettings

8. The number of social housing lettings in the period between 1 April 2022 and 31 March 2023; and between 1 April 2023 and 31 March 2024 in the following locations:

Location	**Social Housing Lettings**	
	1 April 2022 to 31 March 2023	**1 April 2023 to 31 March 2024**
Warminster North & Rural Ward	**16**	**9**
Warminster Parish	**50**	**50**

Temporary Accommodation

9. The number of households on the Housing Register housed in temporary accommodation within and outside the Wiltshire Council region on the following dates:

The figures below are how many applicants are in our Temporary Accommodation, however not necessarily on the housing register with an active application.

Households in Temporary Accommodation	**31 March 2023**	**31 March 2024**
Households Housed within Wiltshire Council	**179**	**125**
Households Housed outside Wiltshire Council	**0**	**0**
Total Households	**179**	**125**

10. The amount of money spent on temporary accommodation per household within the Wiltshire Council region over the following periods:

- 1 April 2023 to 31 March 2024. **- Total spend £99,111**

11. The amount of money spent on temporary accommodation per household outside the Wiltshire Council region over the following periods:

- 1 April 2023 to 31 March 2024. **- Zero**

Housing Completions

12. The number of NET housing completions in the Wiltshire Council region broken down on a per annum basis for the period between 2000/01 and 2023/24. – **Please see information in attached spreadsheet**

13. The number of NET affordable housing completions in the Wiltshire Council region broken down on a per annum basis for the period between 2000/01 and 2023/24. - **Information not available. The period that the data requested from is 2000/01, however, data is not available prior to the creation of Wiltshire Council in 2009.**

Net figures are requested. Wiltshire Council doesn't monitor disposals (this is monitored by the Regulator of Social Housing).

Figures are requested for Warminster North & Rural Ward and Warminster Parish. However, the data is not collated in this way.

However, to aid you in your enquiry, we have provided figures for the Total Affordable Housing Completions from 2009 for the Warminster Community Area

Total Affordable Housing Completions from 2009

	2009-10	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
Warminster Community Area	0	51	48	11	65	13	8	12	0	7	28	24	0	32	57
Wiltshire Total	564	648	626	711	645	635	412	433	593	752	621	556	688	643	532

14. The number of NET housing completions in Warminster North & Rural Ward and Warminster Parish broken down on a per annum basis for the period between 2000/01 and 2023/24. **Please see information in attached spreadsheet**

15. The number of NET affordable housing completions in Warminster North & Rural Ward and Warminster Parish broken down on a per annum basis for the period between 2000/01and 2023/24. **Please see response for question 13**

Information supplied under the Act may be subject to protection under the Copyright, Designs and Patents Act 1988. You may use the information we have provided in response to your request under the terms of the Open Government Licence.

If you are dissatisfied with the response to your request you can ask for a review of the handling of your request for information. Details of the complaints procedure are below.

Regards,
Karen

Information Governance Team
Legal and Governance
Wiltshire Council
InformationGovernance@wiltshire.gov.uk

Freedom of Information Complaints and Review Procedure

Any person who has requested information from Wiltshire Council which has been dealt with under the Freedom of Information Act is entitled to make a complaint and request an internal review of the handling of their request if they are dissatisfied with the response they have received.

Requests for review of a Freedom of Information requests should be made, in writing, which includes email, to:

Freedom of Information and Records Lead
Information Governance Team
Legal and Governance
Wiltshire Council
InformationGovernance@wiltshire.gov.uk

Please include the Case ID number, the date of your request and details of why you are asking for a review. Requests for a review should be brought to our attention within 40 calendar days of our response to your request.

Any request for a review will be acknowledged in writing confirming the reasons for the review.

The review will be allocated to someone who is independent of the original decision. The person conducting the review will set a target date for a response with the intention to complete the review within 20 working days. In more complex cases the review may take up to 40 working days.

The reviewer will conduct a full review of the handling of the request for information and the decisions taken, including decisions taken about where the public interest lies in respect of exempt information where applicable. The review enables a re-evaluation of the case taking into account any matters raised by the requester.

On completion of the review the reviewer will contact the requester with the result of the review. If the requester is still dissatisfied with the council's handling of their request they should contact the Information Commissioners Office (ICO). The ICO can be contacted using the following details:

Information Commissioners Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel; 0303 123 1113 (local rate)
01625 545 745 (national rate)
Email; icocasework@ico.org.uk

From: Information Governance <InformationGovernance@wiltshire.gov.uk>
Sent: Friday, April 5, 2024 2:52 PM
To: Lisa Luong <lisa.luong@tetlow-king.co.uk>
Subject: FOI CAS-2761 - Housing Data

Dear Lisa Luong

Freedom of Information Request Case ID CAS-2761

Thank you for your request for information received on 05/04/2024 in which you asked for the following information:

1. The total number of households on the Council's Housing Register at 31 March 2024.

2. The average waiting times at 31 March 2024 for the following types of affordable property across the Authority:

a. 1-bed affordable dwelling;

b. 2-bed affordable dwelling;

c. 3-bed affordable dwelling; and

d. A 4+ bed affordable dwelling.

3. The average waiting times at 31 March 2023 for the following types of affordable property across the Authority:

a. 1-bed affordable dwelling;

b. 2-bed affordable dwelling;

c. 3-bed affordable dwelling; and

d. A 4+ bed affordable dwelling.

4. The total number of households on the Council's Housing Register at 31 March 2024 specifying the following locations as their preferred choice of location:

Location	**Household Preferences (31 March 2024)**
Warminster North & Rural Ward	
Warminster Parish	

5. The number of properties advertised, and the average number of bids per property over the 2023/24 monitoring period for the following types of affordable property in the locations listed below:

Type of affordable property	Warminster North & Rural Ward		Warminster Parish	
	Number of properties advertised	Average Bids per Property	Number of Properties advertised	Average Bids per Property
1-bed affordable dwelling				
2-bed affordable dwelling				
3-bed affordable dwelling				
4+ bed affordable dwelling				

6. Any changes the Council has made to its Housing Register Allocations Policy since 2011 including:

- The date they occurred;
- What they entailed; and
- Copies of the respective documents

7. The total number of social housing dwelling stock at 31 March 2024 in the following locations:

Location	**Total Social Housing Stock (31 March 2024)**
Warminster North & Rural Ward	
Warminster Parish	

8. The number of social housing lettings in the period between 1 April 2022 and 31 March 2023; and between 1 April 2023 and 31 March 2024 in the following locations:

Location	**Social Housing Lettings**	
	1 April 2022 to 31 March 2023	**1 April 2023 to 31 March 2024**
Warminster North & Rural Ward		
Warminster Parish		

9. The number of households on the Housing Register housed in temporary accommodation within and outside the Wiltshire Council region on the following dates:

Households in Temporary Accommodation	**31 March 2023**	**31 March 2024**
Households Housed within Wiltshire Council		
Households Housed outside Wiltshire Council		
Total Households		

10. The amount of money spent on temporary accommodation per household within the Wiltshire Council region over the following periods:

    - 1 April 2023 to 31 March 2024.

11. The amount of money spent on temporary accommodation per household outside the Wiltshire Council region over the following periods:

    - 1 April 2023 to 31 March 2024.

12. The number of NET housing completions in the Wiltshire Council region broken down on a per annum basis for the period between 2000/01 and 2023/24.

13. The number of NET affordable housing completions in the Wiltshire Council region broken down on a per annum basis for the period between 2000/01 and 2023/24.

14. he number of NET housing completions in Warminster North & Rural Ward and Warminster Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.

15. The number of NET affordable housing completions in Warminster North & Rural Ward and Warminster Parish broken down on a per annum basis for the period between 2000/01and 2023/24.

Your request is being processed under the provisions of the Freedom of Information Act 2000 and you will receive a response within 20 working days of receipt of your request.

Kind Regards

Megan

Senior Administrative Officer

Legal, Democracy and Governance

Wiltshire Council

InformationGovernance@wiltshire.gov.uk
Tel: 0300 456 0100 (Customer Services)

From: Lisa Luong <lisa.luong@tetlow-king.co.uk>
Sent: Friday, April 5, 2024 1:42 PM
To: Information Governance <InformationGovernance@wiltshire.gov.uk>
Cc: Annie Gingell <Annie.Gingell@tetlow-king.co.uk>
Subject: Freedom of Information Request - Housing Data

> You don't often get email from lisa.luong@tetlow-king.co.uk. Learn why this is important

Dear Sir/Madam,

Can you please provide the following data in line with the provisions of the Freedom of Information Act.

Questions 1 to 11 of this request relate to data held by the Housing Department.

Questions 12 to 15 of this request relate to data held by the Planning Department.

Housing Register

1. The total number of households on the Council's Housing Register at 31 March 2024.

2. The average waiting times at 31 March 2024 for the following types of affordable property across the Authority:

    a. 1-bed affordable dwelling;
    b. 2-bed affordable dwelling;
    c. 3-bed affordable dwelling; and
    d. A 4+ bed affordable dwelling.

3. The average waiting times at 31 March 2023 for the following types of affordable property across the Authority:

    a. 1-bed affordable dwelling;
    b. 2-bed affordable dwelling;
    c. 3-bed affordable dwelling; and

d. A 4+ bed affordable dwelling.

4. The total number of households on the Council's Housing Register at 31 March 2024 specifying the following locations as their preferred choice of location:

Location	**Household Preferences (31 March 2024)**
Warminster North & Rural Ward	
Warminster Parish	

5. The number of properties advertised, and the average number of bids per property over the 2023/24 monitoring period for the following types of affordable property in the locations listed below:

Type of affordable property	Warminster North & Rural Ward		Warminster Parish	
	Number of properties advertised	Average Bids per Property	Number of Properties advertised	Average Bids per Property
1-bed affordable dwelling				
2-bed affordable dwelling				
3-bed affordable dwelling				
4+ bed affordable dwelling				

6. Any changes the Council has made to its Housing Register Allocations Policy since 2011 including:

- The date they occurred;
- What they entailed; and
- Copies of the respective documents

Social Housing Stock

7. The total number of social housing dwelling stock at 31 March 2024 in the following locations:

Location	Total Social Housing Stock (31 March 2024)
Warminster North & Rural Ward	
Warminster Parish	

Social Housing Lettings

8. The number of social housing lettings in the period between 1 April 2022 and 31 March 2023; and between 1 April 2023 and 31 March 2024 in the following locations:

Location	Social Housing Lettings	
	1 April 2022 to 31 March 2023	1 April 2023 to 31 March 2024
Warminster North & Rural Ward		
Warminster Parish		

Temporary Accommodation

9. The number of households on the Housing Register housed in temporary accommodation within and outside the Wiltshire Council region on the following dates:

Households in Temporary Accommodation	31 March 2023	31 March 2024
Households Housed within Wiltshire Council		
Households Housed outside Wiltshire Council		
Total Households		

10. The amount of money spent on temporary accommodation per household within the Wiltshire Council region over the following periods:

    - 1 April 2023 to 31 March 2024.

11. The amount of money spent on temporary accommodation per household outside the Wiltshire Council region over the following periods:

    - 1 April 2023 to 31 March 2024.

Housing Completions

12. The number of NET housing completions in the Wiltshire Council region broken down on a per annum basis for the period between 2000/01 and 2023/24.

13. The number of NET affordable housing completions in the Wiltshire Council region broken down on a per annum basis for the period between 2000/01 and 2023/24.

14. The number of NET housing completions in Warminster North & Rural Ward and Warminster Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.

15. The number of NET affordable housing completions in Warminster North & Rural Ward and Warminster Parish broken down on a per annum basis for the period between 2000/01and 2023/24.

Glossary of Terms

Housing Register	The housing register is a waiting list of households in a given authority area who are eligible and in need of an affordable home.
Affordable Property	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 b) Starter Homes c) Discounted market sales housing; and d) Other affordable routes to home ownership.[1]
Housing Completion	A dwelling is counted as completed when construction has ceased, and it becomes ready for occupation. This includes new build dwellings, conversions, changes of use and redevelopments. Housing completions should be provided as net figures.
Net	Net refers to total (gross) figures minus any deductions (for example, through demolitions).
Monitoring Period	From 1 April in any given calendar year through until 31 March in the following calendar year.
Prevention Duty	The prevention duty applies when a local authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.
Relief Duty	The relief duty applies when a local authority is satisfied that an applicant is homeless and eligible for assistance.
Parish	The smallest unit of local government.
Ward	A division of a city or town, for representative, electoral, or administrative purposes.

[1] As defined by Annex 2 of the National Planning Policy Framework (2023) which can be viewed here.

I look forward to hearing from you. If there are any issues with providing any of the data, then please get in touch.

Kind regards,

Lisa Luong BSc (Hons) MSc

Planner

TETLOW KING PLANNING

E: lisa.luong@tetlow-king.com **T:** 0117 9561916 **M:** 07933 821572 **W:** tetlow-king.co.uk

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Jemma Hutchinson

From: Information Governance <InformationGovernance@wiltshire.gov.uk>
Sent: 06 February 2025 11:14
To: Liam Webster
Cc: Amy James
Subject: RE: CAS-4410-FOI - Housing Data
Attachments: CAS-4410.csv

Dear Liam

Thank you for your e-mail.

Please accept my sincere apologies for the error with the incorrect attachment being issued as part of your response. Please find attached the correct spreadsheet which contains the data for questions 12, 14 and 16.

Kind regards

Karen
Information Governance Officer
Legal & Governance
Wiltshire Council
E-mail: informationgovernance@wiltshire.gov.uk

From: Liam Webster <liam.webster@tetlow-king.co.uk>
Sent: 06 February 2025 10:41
To: Information Governance <InformationGovernance@wiltshire.gov.uk>
Cc: Amy James <amy.james@tetlow-king.co.uk>
Subject: RE: CAS-4410-FOI - Housing Data

Dear Karen,

Freedom of Information Request Case ID CAS-4410

Thanks for sending the below response to our FOI request, I note the attached spreadsheet in answer to questions 12 and 16 appears to be incorrect as this shows unrelated s106 detail rather than housing completions? It also has a different FOI code (4408) in the title so I believe this has been attached in error – would you please be able to send the correct spreadsheet?

Many thanks,
Liam

Liam Webster BA (Hons) MSc MRTPI
Senior Planner
TETLOW KING PLANNING

Unit 2, Eclipse Office Park, High Street, Staple Hill, Bristol, BS16 5EL
T: 0117 9561916 **M**: 07545 076850 **W:** tetlow-king.co.uk

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From: Information Governance <InformationGovernance@wiltshire.gov.uk>
Sent: 05 February 2025 16:04
To: Liam Webster <liam.webster@tetlow-king.co.uk>
Subject: RE: CAS-4410-FOI - Housing Data

Dear Liam Webster

Freedom of Information Request Case ID CAS-4410

Thank you for your request for information received on 08/01/2025, in which you asked for the following information:

Housing Register

1. *The total number of households on the Council's Housing Register at 31 March 2024.*

2. *The average waiting times at 31 March 2024 for the following types of affordable property across the Authority:*

    a. *1-bed affordable dwelling;*
    b. *2-bed affordable dwelling;*
    c. *3-bed affordable dwelling; and*
    d. *A 4+ bed affordable dwelling.*

3. *The average waiting times at 31 March 2023 for the following types of affordable property across the Authority:*

    a. *1-bed affordable dwelling;*
    b. *2-bed affordable dwelling;*
    c. *3-bed affordable dwelling; and*
    d. *A 4+ bed affordable dwelling.*

4. *The total number of households on the Council's Housing Register at 31 March 2024 specifying the following locations as their preferred choice of location:*

Location	***Household Preferences (31 March 2024)***
St Paul Malmesbury Without Civil Parish	
Malmesbury Civil Parish	

5. *The number of properties advertised, and the average number of bids per property over the 2023/24 monitoring period for the following types of affordable property in the locations listed below:*

Type of affordable property	***St Paul Malmesbury Without Civil Parish***		***Malmesbury Civil Parish***	
	Number of properties advertised	***Average Bids per Property***	***Number of properties advertised***	***Average Bids per Property***
1-bed affordable dwelling				

2-bed affordable dwelling				
3-bed affordable dwelling				
4+ bed affordable dwelling				

6. *Any changes the Council has made to its Housing Register Allocations Policy since 2011 including:*

- *The date they occurred;*
- *What they entailed; and*
- *Copies of the respective documents*

Social Housing Stock

7. *The total number of social housing dwelling stock at 31 March 2024 in the following locations:*

Location	***Total Social Housing Stock (31 March 2024)***
St Paul Malmesbury Without Civil Parish	
Malmesbury Civil Parish	

Social Housing Lettings

8. *The number of social housing lettings in the period between 1 April 2022 and 31 March 2023; and between 1 April 2023 and 31 March 2024 in the following locations:*

Location	***Social Housing Lettings***	
	1 April 2022 to 31 March 2023	***1 April 2023 to 31 March 2024***
St Paul Malmesbury Without Civil Parish		
Malmesbury Civil Parish		

Temporary Accommodation

9. *The number of households on the Housing Register housed in temporary accommodation within and outside the Wiltshire Council region on the following dates:*

useholds in Temporary Accommodation	***March 2023***	***March 2024***
Households Housed within Wiltshire Council		
Households Housed outside Wiltshire Council		
Total Households		

10. *The amount of money spent on temporary accommodation per household within the Wiltshire Council region over the following periods:*
    - *1 April 2023 to 31 March 2024.*
11. *The amount of money spent on temporary accommodation per household outside the Wiltshire Council region over the following periods:*
    - *1 April 2022 to 31 March 2023.*

Housing Completions

12. *The number of NET housing completions in the Wiltshire Council region broken down on a per annum basis for the period between 2000/01 and 2023/24.*

13. *The number of NET affordable housing completions in the Wiltshire Council region broken down on a per annum basis for the period between 2000/01 and 2023/24.*

14. *The number of NET housing completions in St Paul Malmesbury Without Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.*

15. *The number of NET affordable housing completions in St Paul Malmesbury Without Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.*

16. *The number of NET housing completions in Malmesbury Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.*

17. *The number of NET affordable housing completions in Malmesbury Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.*

Under the Freedom of Information Act 2000 (the Act) the Council is obliged to:

• Let you know whether we hold the information you have requested
• Provide you with the requested information, if held, (subject to any exemptions to disclosure that may apply)

I can confirm that the council holds some of the information you requested which is as follows and attached to this email. We have not provided some of the requested information because we don't hold it. Some of the information is also exempt from disclosure by **Section 21**. Section 21 of the Act removes the obligation to provide you with the information as it is reasonably accessible to you by other means. Section 21 is an absolute exemption meaning no public interest test is necessary.

Housing Register

1. The total number of households on the Council's Housing Register at 31 March 2024. - **4285**

2. The average waiting times at 31 March 2024 for the following types of affordable property across the Authority:

    e. 1-bed affordable dwelling;
    f. 2-bed affordable dwelling;
    g. 3-bed affordable dwelling; and
    h. A 4+ bed affordable dwelling.

Please see detail in table below:

Bed Size	Average waiting times at 31/03/2024
1 Bed	2 years 1 months
2 Bed	2 years 0 months
3 Bed	2 year 5 months
4 Bed	2 years 8 months
5 Bed	3 years 6 months
6 Bed	3 years 5 months

3. The average waiting times at 31 March 2023 for the following types of affordable property across the Authority:

e. 1-bed affordable dwelling;
f. 2-bed affordable dwelling;
g. 3-bed affordable dwelling; and
h. A 4+ bed affordable dwelling.

Please see detail in table below:

Bed Size	Average waiting times at 31/03/2023
1 Bed	2 years 4 months
2 Bed	2 years 3 months
3 Bed	2 years 11 months
4 Bed	3 years 4 months
5 Bed	4 years 0 months
6 Bed	4 years 7 months

4. The total number of households on the Council's Housing Register at 31 March 2024 specifying the following locations as their preferred choice of location:

Location	Household Preferences (31 March 2024)
St Paul Malmesbury Without Civil Parish	0
Malmesbury Civil Parish	49

5. The number of properties advertised, and the average number of bids per property over the 2023/24 monitoring period for the following types of affordable property in the locations listed below:

Type of affordable property	St Paul Malmesbury Without Civil Parish		Malmesbury Civil Parish	
	Number of properties advertised	Average Bids per Property	Number of properties advertised	Average Bids per Property
1-bed affordable dwelling	2	143	14	87
2-bed affordable dwelling	1	30	17	48
3-bed affordable dwelling	1	54	3	45
4+ bed affordable dwelling	0	0	2	66

6. Any changes the Council has made to its Housing Register Allocations Policy since 2011 including:

- The date they occurred;
- What they entailed; and
- Copies of the respective documents

This information is exempted by virtue of Section 21. A copy of the policy can be found online: Wiltshire Council Allocations Policy - Wiltshire

The policy was amended in September 2020, November 2021 and January 2023. Links to the relevant cabinet meetings are as follows:
Cabinet February 2020: Agenda and minutes - Democratic Services - Wiltshire Council

Cabinet January 2023: Agenda and minutes - Democratic Services - Wiltshire Council

Social Housing Stock

7. The total number of social housing dwelling stock at 31 March 2024 in the following locations: - **Information not held. We don't hold the data of social housing in the different areas as this is held by the individual housing providers.**

Location	Total Social Housing Stock (31 March 2024)
St Paul Malmesbury Without Civil Parish	
Malmesbury Civil Parish	

Social Housing Lettings

8. The number of social housing lettings in the period between 1 April 2022 and 31 March 2023; and between 1 April 2023 and 31 March 2024 in the following locations:

Location	Social Housing Lettings	
	1 April 2022 to 31 March 2023	1 April 2023 to 31 March 2024
St Paul Malmesbury Without Civil Parish	**3**	**0**
Malmesbury Civil Parish	**19**	**33**

Temporary Accommodation

9. The number of households on the Housing Register housed in temporary accommodation within and outside the Wiltshire Council region on the following dates:

useholds in Temporary Accommodation	March 2023	March 2024
Households Housed within Wiltshire Council	**179**	**125**
Households Housed outside Wiltshire Council	**0**	**0**
Total Households	**179**	**125**

10. The amount of money spent on temporary accommodation per household within the Wiltshire Council region over the following periods:
    - 1 April 2023 to 31 March 2024. - **Total spend £99,111**
11. The amount of money spent on temporary accommodation per household outside the Wiltshire Council region over the following periods:
    - 1 April 2022 to 31 March 2023. - **0 (zero)**

Housing Completions

12. The number of NET housing completions in the Wiltshire Council region broken down on a per annum basis for the period between 2000/01 and 2023/24. **Please see attached spreadsheet**

13. The number of NET affordable housing completions in the Wiltshire Council region broken down on a per annum basis for the period between 2000/01 and 2023/24. - **Information not held. This is because**

the Council only holds records since the creation of Wiltshire Council in 2009. In order to assist you with your request however, we have provided the number of Affordable Housing units that have been delivered since 2009 below:

	2009-10	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21
Wiltshire	564	648	626	711	645	635	412	433	593	752	621	556

Please note that the numbers provided are total completions and have not been adjusted to take account of disposals (e.g. through Right to Buy). Disposals are monitored separately by the Regulator of Social Housing.

14. The number of NET housing completions in St Paul Malmesbury Without Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24. - **Please see attached spreadsheet**

15. The number of NET affordable housing completions in St Paul Malmesbury Without Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24. – **Information not held. Data is not collated on a parish basis and the Council only holds records since the creation of Wiltshire Council in 2009. However to assist you with your request, details regarding the Affordable Housing completions for the Malmesbury Community Area are as follows:**

	2009-10	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21
Malmesbury Community Area	20	14	5	0	0	19	10	22	54	14	4	4

Please note that the numbers provided are total completions and have not been adjusted to take account of disposals (e.g. through Right to Buy). Disposals are monitored separately by the Regulator of Social Housing.

16. The number of NET housing completions in Malmesbury Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.- **Please see attached spreadsheet**.

17. The number of NET affordable housing completions in Malmesbury Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24**. Information not held. Data is not collected on a parish basis and the council only holds records since the creation of Wiltshire Council in 2009. However to assist you with your request, Affordable Housing completions for the Malmesbury Community Area are as follows:**

	2009-10	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21
Malmesbury Community Area	20	14	5	0	0	19	10	22	54	14	4	4

Information supplied under the Act may be subject to protection under the Copyright, Designs and Patents Act 1988. You may use the information we have provided in response to your request under the terms of the Open Government Licence.

If you are dissatisfied with the response to your request you can ask for a review of the handling of your request for information. Details of the complaints procedure are below.

Regards,
Karen

Information Governance Team
Legal and Governance
Wiltshire Council
InformationGovernance@wiltshire.gov.uk

Freedom of Information Complaints and Review Procedure

Any person who has requested information from Wiltshire Council which has been dealt with under the Freedom of Information Act is entitled to make a complaint and request an internal review of the handling of their request if they are dissatisfied with the response they have received.

Requests for review of a Freedom of Information requests should be made, in writing, which includes email, to:

Freedom of Information and Records Lead
Information Governance Team
Legal and Governance
Wiltshire Council
InformationGovernance@wiltshire.gov.uk

Please include the Case ID number, the date of your request and details of why you are asking for a review. Requests for a review should be brought to our attention within 40 working days of our response to your request.

Any request for a review will be acknowledged in writing confirming the reasons for the review. The review will be allocated to someone who is independent of the original decision. The person conducting the review will set a target date for a response with the intention to complete the review within 20 working days. In more complex cases the review may take up to 40 working days.

The reviewer will conduct a full review of the handling of the request for information and the decisions taken, including decisions taken about where the public interest lies in respect of exempt information where applicable. The review enables a re-evaluation of the case taking into account any matters raised by the requester.

On completion of the review the reviewer will contact the requester with the result of the review. If the requester is still dissatisfied with the council's handling of their request they should contact the Information Commissioners Office (ICO). The ICO can be contacted using the following details:

Information Commissioners Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel; 0303 123 1113 (local rate)
01625 545 745 (national rate)
Email; icocasework@ico.org.uk

From: Information Governance <InformationGovernance@wiltshire.gov.uk>
Sent: 09 January 2025 13:03
To: Liam Webster <liam.webster@tetlow-king.co.uk>
Subject: RE: Freedom of Information Request - Housing Data

Dear Liam Webster

Freedom of Information Request Case ID CAS-4410

Thank you for your request for information received on 08/01/2025 in which you asked for the following information:

Housing Register

1. *The total number of households on the Council's Housing Register at 31 March 2024.*

2. *The average waiting times at 31 March 2024 for the following types of affordable property across the Authority:*

    a. *1-bed affordable dwelling;*
    b. *2-bed affordable dwelling;*
    c. *3-bed affordable dwelling; and*
    d. *A 4+ bed affordable dwelling.*

3. *The average waiting times at 31 March 2023 for the following types of affordable property across the Authority:*

    a. *1-bed affordable dwelling;*
    b. *2-bed affordable dwelling;*
    c. *3-bed affordable dwelling; and*
    d. *A 4+ bed affordable dwelling.*

4. *The total number of households on the Council's Housing Register at 31 March 2024 specifying the following locations as their preferred choice of location:*

Location	***Household Preferences (31 March 2024)***
St Paul Malmesbury Without Civil Parish	
Malmesbury Civil Parish	

5. *The number of properties advertised, and the average number of bids per property over the 2023/24 monitoring period for the following types of affordable property in the locations listed below:*

Type of affordable property	***St Paul Malmesbury Without Civil Parish***		***Malmesbury Civil Parish***	
	Number of properties advertised	***Average Bids per Property***	***Number of properties advertised***	***Average Bids per Property***
1-bed affordable dwelling				
2-bed affordable dwelling				
3-bed affordable dwelling				
4+ bed affordable dwelling				

6. *Any changes the Council has made to its Housing Register Allocations Policy since 2011 including:*

    - *The date they occurred;*
    - *What they entailed; and*
    - *Copies of the respective documents*

Social Housing Stock

7. *The total number of social housing dwelling stock at 31 March 2024 in the following locations:*

Location	***Total Social Housing Stock (31 March 2024)***
St Paul Malmesbury Without Civil Parish	
Malmesbury Civil Parish	

Social Housing Lettings

8. *The number of social housing lettings in the period between 1 April 2022 and 31 March 2023; and between 1 April 2023 and 31 March 2024 in the following locations:*

Location	***Social Housing Lettings***	
	1 April 2022 to 31 March 2023	***1 April 2023 to 31 March 2024***
St Paul Malmesbury Without Civil Parish		
Malmesbury Civil Parish		

Temporary Accommodation

9. *The number of households on the Housing Register housed in temporary accommodation within and outside the Wiltshire Council region on the following dates:*

useholds in Temporary Accommodation	***March 2023***	***March 2024***
Households Housed within Wiltshire Council		
Households Housed outside Wiltshire Council		
Total Households		

10. *The amount of money spent on temporary accommodation per household within the Wiltshire Council region over the following periods:*
    - *1 April 2023 to 31 March 2024.*
11. *The amount of money spent on temporary accommodation per household outside the Wiltshire Council region over the following periods:*
    - *1 April 2022 to 31 March 2023.*

Housing Completions

12. *The number of NET housing completions in the Wiltshire Council region broken down on a per annum basis for the period between 2000/01 and 2023/24.*

13. *The number of NET affordable housing completions in the Wiltshire Council region broken down on a per annum basis for the period between 2000/01 and 2023/24.*

14. *The number of NET housing completions in St Paul Malmesbury Without Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.*

15. *The number of NET affordable housing completions in St Paul Malmesbury Without Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.*

16. *The number of NET housing completions in Malmesbury Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.*

17. *The number of NET affordable housing completions in Malmesbury Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.*

Your request is being processed under the provisions of the Freedom of Information Act 2000 and you will receive a response within 20 working days of receipt of your request.

Kind regards,
Freya

Information Governance Officer
Information Governance Team
Democracy, Governance and Customer Services

Wiltshire Council

Email: InformationGovernance@wiltshire.gov.uk
Web: www.wiltshire.gov.uk
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From: Liam Webster <liam.webster@tetlow-king.co.uk>
Sent: 08 January 2025 16:02
To: Information Governance <InformationGovernance@wiltshire.gov.uk>
Cc: Amy James <amy.james@tetlow-king.co.uk>
Subject: Freedom of Information Request - Housing Data

You don't often get email from liam.webster@tetlow-king.co.uk. Learn why this is important

Dear Sir / Madam,

I hope this email finds you well. I write to you to make a request under the Freedom of Information Act 2000 in respect of housing matters in St Paul Malmesbury Without Civil Parish, and Malmesbury Civil Parish, as well as the Wiltshire Council area.

Please see below the FOI request. Please let me know if you have any queries or require any clarification; I look forward to hearing from you within the relevant timescales.

Confirmation of receipt would be greatly appreciated.

Freedom of Information Request

Questions 1 to 11 of this request relate to data held by the Housing Department.
Questions 12 to 17 of this request relate to data held by the Planning Department.

Housing Register

1. The total number of households on the Council's Housing Register at 31 March 2024.

2. The average waiting times at 31 March 2024 for the following types of affordable property across the Authority:

    a. 1-bed affordable dwelling;
    b. 2-bed affordable dwelling;
    c. 3-bed affordable dwelling; and
    d. A 4+ bed affordable dwelling.

3. The average waiting times at 31 March 2023 for the following types of affordable property across the Authority:

    a. 1-bed affordable dwelling;
    b. 2-bed affordable dwelling;
    c. 3-bed affordable dwelling; and
    d. A 4+ bed affordable dwelling.

4. The total number of households on the Council's Housing Register at 31 March 2024 specifying the following locations as their preferred choice of location:

Location	Household Preferences (31 March 2024)
St Paul Malmesbury Without Civil Parish	
Malmesbury Civil Parish	

5. The number of properties advertised, and the average number of bids per property over the 2023/24 monitoring period for the following types of affordable property in the locations listed below:

Type of affordable property	St Paul Malmesbury Without Civil Parish		Malmesbury Civil Parish	
	Number of properties advertised	Average Bids per Property	Number of properties advertised	Average Bids per Property
1-bed affordable dwelling				
2-bed affordable dwelling				
3-bed affordable dwelling				
4+ bed affordable dwelling				

6. Any changes the Council has made to its Housing Register Allocations Policy since 2011 including:

    - The date they occurred;
    - What they entailed; and
    - Copies of the respective documents

Social Housing Stock

7. The total number of social housing dwelling stock at 31 March 2024 in the following locations:

Location	Total Social Housing Stock (31 March 2024)
St Paul Malmesbury Without Civil Parish	
Malmesbury Civil Parish	

Social Housing Lettings

8. The number of social housing lettings in the period between 1 April 2022 and 31 March 2023; and between 1 April 2023 and 31 March 2024 in the following locations:

Location	Social Housing Lettings	
	1 April 2022 to 31 March 2023	1 April 2023 to 31 March 2024
St Paul Malmesbury Without Civil Parish		
Malmesbury Civil Parish		

Temporary Accommodation

9. The number of households on the Housing Register housed in temporary accommodation within and outside the Wiltshire Council region on the following dates:

useholds in Temporary Accommodation	March 2023	March 2024
Households Housed within Wiltshire Council		
Households Housed outside Wiltshire Council		
Total Households		

10. The amount of money spent on temporary accommodation per household within the Wiltshire Council region over the following periods:
    - 1 April 2023 to 31 March 2024.
11. The amount of money spent on temporary accommodation per household outside the Wiltshire Council region over the following periods:
    - 1 April 2022 to 31 March 2023.

Housing Completions

12. The number of NET housing completions in the Wiltshire Council region broken down on a per annum basis for the period between 2000/01 and 2023/24.

13. The number of NET affordable housing completions in the Wiltshire Council region broken down on a per annum basis for the period between 2000/01 and 2023/24.

14. The number of NET housing completions in St Paul Malmesbury Without Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.

15. The number of NET affordable housing completions in St Paul Malmesbury Without Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.

16. The number of NET housing completions in Malmesbury Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.

17. The number of NET affordable housing completions in Malmesbury Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.

Glossary of Terms

Housing Register	The housing register is a waiting list of households in a given authority area who are eligible and in need of an affordable home.
Affordable Property	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 b) Starter Homes c) Discounted market sales housing; and d) Other affordable routes to home ownership.[1]
Housing Completion	A dwelling is counted as completed when construction has ceased, and it becomes ready for occupation. This includes new build dwellings, conversions, changes of use and redevelopments. Housing completions should be provided as net figures.
Net	Net refers to total (gross) figures minus any deductions (for example, through demolitions).
Monitoring Period	From 1 April in any given calendar year through until 31 March in the following calendar year.
Prevention Duty	The prevention duty applies when a local authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.
Relief Duty	The relief duty applies when a local authority is satisfied that an applicant is homeless and eligible for assistance.
Parish	The smallest unit of local government.
Ward	A division of a city or town, for representative, electoral, or administrative purposes.

I look forward to hearing from you. If there are any issues with providing any of the data then please get in touch.

Kind regards,
Liam Webster

Liam Webster BA (Hons) MSc MRTPI
Senior Planner
TETLOW KING PLANNING

Unit 2, Eclipse Office Park, High Street, Staple Hill, Bristol, BS16 5EL
T: 0117 9561916 **M**: xxxxxxxxxxxxxx **W:** tetlow-king.co.uk

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disclosure of personal financial information by means of e-mail any such request should be confirmed in writing by contacting Wiltshire Council.

[1] As defined by Annex 2 of the National Planning Policy Framework (2024) which can be viewed here.

Jemma Hutchinson

From: Information Governance <InformationGovernance@wiltshire.gov.uk>
Sent: 05 February 2025 16:04
To: Liam Webster
Subject: RE: CAS-4410-FOI - Housing Data
Attachments: CAS-4408.xlsx

Dear Liam Webster

Freedom of Information Request Case ID CAS-4410

Thank you for your request for information received on 08/01/2025, in which you asked for the following information:

Housing Register

1. *The total number of households on the Council's Housing Register at 31 March 2024.*

2. *The average waiting times at 31 March 2024 for the following types of affordable property across the Authority:*

    a. *1-bed affordable dwelling;*
    b. *2-bed affordable dwelling;*
    c. *3-bed affordable dwelling; and*
    d. *A 4+ bed affordable dwelling.*

3. *The average waiting times at 31 March 2023 for the following types of affordable property across the Authority:*

    a. *1-bed affordable dwelling;*
    b. *2-bed affordable dwelling;*
    c. *3-bed affordable dwelling; and*
    d. *A 4+ bed affordable dwelling.*

4. *The total number of households on the Council's Housing Register at 31 March 2024 specifying the following locations as their preferred choice of location:*

Location	***Household Preferences (31 March 2024)***
St Paul Malmesbury Without Civil Parish	
Malmesbury Civil Parish	

5. *The number of properties advertised, and the average number of bids per property over the 2023/24 monitoring period for the following types of affordable property in the locations listed below:*

Type of affordable property	***St Paul Malmesbury Without Civil Parish***	***Malmesbury Civil Parish***

	Number of properties advertised	Average Bids per Property	Number of properties advertised	Average Bids per Property
1-bed affordable dwelling				
2-bed affordable dwelling				
3-bed affordable dwelling				
4+ bed affordable dwelling				

6. *Any changes the Council has made to its Housing Register Allocations Policy since 2011 including:*

- *The date they occurred;*
- *What they entailed; and*
- *Copies of the respective documents*

Social Housing Stock

7. *The total number of social housing dwelling stock at 31 March 2024 in the following locations:*

Location	Total Social Housing Stock (31 March 2024)
St Paul Malmesbury Without Civil Parish	
Malmesbury Civil Parish	

Social Housing Lettings

8. *The number of social housing lettings in the period between 1 April 2022 and 31 March 2023; and between 1 April 2023 and 31 March 2024 in the following locations:*

Location	Social Housing Lettings	
	1 April 2022 to 31 March 2023	1 April 2023 to 31 March 2024
St Paul Malmesbury Without Civil Parish		
Malmesbury Civil Parish		

Temporary Accommodation

9. *The number of households on the Housing Register housed in temporary accommodation within and outside the Wiltshire Council region on the following dates:*

useholds in Temporary Accommodation	March 2023	March 2024
Households Housed within Wiltshire Council		
Households Housed outside Wiltshire Council		
Total Households		

10. *The amount of money spent on temporary accommodation per household within the Wiltshire Council region over the following periods:*
    - *1 April 2023 to 31 March 2024.*
11. *The amount of money spent on temporary accommodation per household outside the Wiltshire Council region over the following periods:*
    - *1 April 2022 to 31 March 2023.*

Housing Completions

12. *The number of NET housing completions in the Wiltshire Council region broken down on a per annum basis for the period between 2000/01 and 2023/24.*

13. *The number of NET affordable housing completions in the Wiltshire Council region broken down on a per annum basis for the period between 2000/01 and 2023/24.*

14. *The number of NET housing completions in St Paul Malmesbury Without Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.*

15. *The number of NET affordable housing completions in St Paul Malmesbury Without Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.*

16. *The number of NET housing completions in Malmesbury Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.*

17. *The number of NET affordable housing completions in Malmesbury Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.*

Under the Freedom of Information Act 2000 (the Act) the Council is obliged to:

• Let you know whether we hold the information you have requested
• Provide you with the requested information, if held, (subject to any exemptions to disclosure that may apply)

I can confirm that the council holds some of the information you requested which is as follows and attached to this email. We have not provided some of the requested information because we don't hold it. Some of the information is also exempt from disclosure by **Section 21**. Section 21 of the Act removes the obligation to provide you with the information as it is reasonably accessible to you by other means. Section 21 is an absolute exemption meaning no public interest test is necessary.

Housing Register

1. The total number of households on the Council's Housing Register at 31 March 2024. - **4285**

2. The average waiting times at 31 March 2024 for the following types of affordable property across the Authority:

    e. 1-bed affordable dwelling;
    f. 2-bed affordable dwelling;
    g. 3-bed affordable dwelling; and
    h. A 4+ bed affordable dwelling.

Please see detail in table below:

Bed Size	Average waiting times at 31/03/2024
1 Bed	2 years 1 months
2 Bed	2 years 0 months
3 Bed	2 year 5 months

4 Bed	2 years 8 months
5 Bed	3 years 6 months
6 Bed	3 years 5 months

3. The average waiting times at 31 March 2023 for the following types of affordable property across the Authority:

    e. 1-bed affordable dwelling;
    f. 2-bed affordable dwelling;
    g. 3-bed affordable dwelling; and
    h. A 4+ bed affordable dwelling.

Please see detail in table below:

Bed Size	Average waiting times at 31/03/2023
1 Bed	2 years 4 months
2 Bed	2 years 3 months
3 Bed	2 years 11 months
4 Bed	3 years 4 months
5 Bed	4 years 0 months
6 Bed	4 years 7 months

4. The total number of households on the Council's Housing Register at 31 March 2024 specifying the following locations as their preferred choice of location:

Location	Household Preferences (31 March 2024)
St Paul Malmesbury Without Civil Parish	0
Malmesbury Civil Parish	49

5. The number of properties advertised, and the average number of bids per property over the 2023/24 monitoring period for the following types of affordable property in the locations listed below:

Type of affordable property	St Paul Malmesbury Without Civil Parish		Malmesbury Civil Parish	
	Number of properties advertised	Average Bids per Property	Number of properties advertised	Average Bids per Property
1-bed affordable dwelling	2	143	14	87
2-bed affordable dwelling	1	30	17	48
3-bed affordable dwelling	1	54	3	45
4+ bed affordable dwelling	0	0	2	66

6. Any changes the Council has made to its Housing Register Allocations Policy since 2011 including:

    - The date they occurred;

- What they entailed; and
- Copies of the respective documents

This information is exempted by virtue of Section 21. A copy of the policy can be found online: Wiltshire Council Allocations Policy - Wiltshire

The policy was amended in September 2020, November 2021 and January 2023. Links to the relevant cabinet meetings are as follows:
Cabinet February 2020: Agenda and minutes - Democratic Services - Wiltshire Council
Cabinet January 2023: Agenda and minutes - Democratic Services - Wiltshire Council

Social Housing Stock

7. The total number of social housing dwelling stock at 31 March 2024 in the following locations: - **Information not held. We don't hold the data of social housing in the different areas as this is held by the individual housing providers.**

Location	Total Social Housing Stock (31 March 2024)
St Paul Malmesbury Without Civil Parish	
Malmesbury Civil Parish	

Social Housing Lettings

8. The number of social housing lettings in the period between 1 April 2022 and 31 March 2023; and between 1 April 2023 and 31 March 2024 in the following locations:

Location	Social Housing Lettings	
	1 April 2022 to 31 March 2023	1 April 2023 to 31 March 2024
St Paul Malmesbury Without Civil Parish	3	0
Malmesbury Civil Parish	19	33

Temporary Accommodation

9. The number of households on the Housing Register housed in temporary accommodation within and outside the Wiltshire Council region on the following dates:

useholds in Temporary Accommodation	March 2023	March 2024
Households Housed within Wiltshire Council	179	125
Households Housed outside Wiltshire Council	0	0
Total Households	179	125

10. The amount of money spent on temporary accommodation per household within the Wiltshire Council region over the following periods:
    - 1 April 2023 to 31 March 2024. - **Total spend £99,111**
11. The amount of money spent on temporary accommodation per household outside the Wiltshire Council region over the following periods:

- 1 April 2022 to 31 March 2023. - **0 (zero)**

Housing Completions

12. The number of NET housing completions in the Wiltshire Council region broken down on a per annum basis for the period between 2000/01 and 2023/24. **Please see attached spreadsheet**

13. The number of NET affordable housing completions in the Wiltshire Council region broken down on a per annum basis for the period between 2000/01 and 2023/24. - **Information not held. This is because the Council only holds records since the creation of Wiltshire Council in 2009. In order to assist you with your request however, we have provided the number of Affordable Housing units that have been delivered since 2009 below:**

	2009-10	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	202 21
Wiltshire	564	648	626	711	645	635	412	433	593	752	621	556

Please note that the numbers provided are total completions and have not been adjusted to take account of disposals (e.g. through Right to Buy). Disposals are monitored separately by the Regulator of Social Housing.

14. The number of NET housing completions in St Paul Malmesbury Without Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24. - **Please see attached spreadsheet**

15. The number of NET affordable housing completions in St Paul Malmesbury Without Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24. – **Information not held. Data is not collated on a parish basis and the Council only holds records since the creation of Wiltshire Council in 2009. However to assist you with your request, details regarding the Affordable Housing completions for the Malmesbury Community Area are as follows:**

	2009-10	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2 2
Malmesbury Community Area	20	14	5	0	0	19	10	22	54	14	4	4

Please note that the numbers provided are total completions and have not been adjusted to take account of disposals (e.g. through Right to Buy). Disposals are monitored separately by the Regulator of Social Housing.

16. The number of NET housing completions in Malmesbury Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.- **Please see attached spreadsheet**.

17. The number of NET affordable housing completions in Malmesbury Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24**. Information not held. Data is not collected on a parish basis and the council only holds records since the creation of Wiltshire Council in 2009. However to assist you with your request, Affordable Housing completions for the Malmesbury Community Area are as follows:**

	2009-10	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	20 21
Malmesbury Community Area	20	14	5	0	0	19	10	22	54	14	4	4

Information supplied under the Act may be subject to protection under the Copyright, Designs and Patents

Act 1988. You may use the information we have provided in response to your request under the terms of the Open Government Licence.

If you are dissatisfied with the response to your request you can ask for a review of the handling of your request for information. Details of the complaints procedure are below.

Regards,
Karen

Information Governance Team
Legal and Governance
Wiltshire Council
InformationGovernance@wiltshire.gov.uk

Freedom of Information Complaints and Review Procedure

Any person who has requested information from Wiltshire Council which has been dealt with under the Freedom of Information Act is entitled to make a complaint and request an internal review of the handling of their request if they are dissatisfied with the response they have received.

Requests for review of a Freedom of Information requests should be made, in writing, which includes email, to:

Freedom of Information and Records Lead
Information Governance Team
Legal and Governance
Wiltshire Council
InformationGovernance@wiltshire.gov.uk

Please include the Case ID number, the date of your request and details of why you are asking for a review. Requests for a review should be brought to our attention within 40 working days of our response to your request.

Any request for a review will be acknowledged in writing confirming the reasons for the review. The review will be allocated to someone who is independent of the original decision. The person conducting the review will set a target date for a response with the intention to complete the review within 20 working days. In more complex cases the review may take up to 40 working days.

The reviewer will conduct a full review of the handling of the request for information and the decisions taken, including decisions taken about where the public interest lies in respect of exempt information where applicable. The review enables a re-evaluation of the case taking into account any matters raised by the requester.

On completion of the review the reviewer will contact the requester with the result of the review. If the requester is still dissatisfied with the council's handling of their request they should contact the Information Commissioners Office (ICO). The ICO can be contacted using the following details:

Information Commissioners Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel; 0303 123 1113 (local rate)
01625 545 745 (national rate)
Email; icocasework@ico.org.uk

From: Information Governance <InformationGovernance@wiltshire.gov.uk>
Sent: 09 January 2025 13:03
To: Liam Webster <liam.webster@tetlow-king.co.uk>
Subject: RE: Freedom of Information Request - Housing Data

Dear Liam Webster

Freedom of Information Request Case ID CAS-4410

Thank you for your request for information received on 08/01/2025 in which you asked for the following information:

Housing Register

1. *The total number of households on the Council's Housing Register at 31 March 2024.*

2. *The average waiting times at 31 March 2024 for the following types of affordable property across the Authority:*

    a. *1-bed affordable dwelling;*
    b. *2-bed affordable dwelling;*
    c. *3-bed affordable dwelling; and*
    d. *A 4+ bed affordable dwelling.*

3. *The average waiting times at 31 March 2023 for the following types of affordable property across the Authority:*

    a. *1-bed affordable dwelling;*
    b. *2-bed affordable dwelling;*
    c. *3-bed affordable dwelling; and*
    d. *A 4+ bed affordable dwelling.*

4. *The total number of households on the Council's Housing Register at 31 March 2024 specifying the following locations as their preferred choice of location:*

Location	***Household Preferences (31 March 2024)***
St Paul Malmesbury Without Civil Parish	
Malmesbury Civil Parish	

5. *The number of properties advertised, and the average number of bids per property over the 2023/24 monitoring period for the following types of affordable property in the locations listed below:*

Type of affordable property	***St Paul Malmesbury Without Civil Parish***		***Malmesbury Civil Parish***	
	Number of properties advertised	***Average Bids per Property***	***Number of properties advertised***	***Average Bids per Property***
1-bed affordable dwelling				
2-bed affordable dwelling				

3-bed affordable dwelling				
4+ bed affordable dwelling				

6. *Any changes the Council has made to its Housing Register Allocations Policy since 2011 including:*

   - *The date they occurred;*
   - *What they entailed; and*
   - *Copies of the respective documents*

Social Housing Stock

7. *The total number of social housing dwelling stock at 31 March 2024 in the following locations:*

Location	***Total Social Housing Stock (31 March 2024)***
St Paul Malmesbury Without Civil Parish	
Malmesbury Civil Parish	

Social Housing Lettings

8. *The number of social housing lettings in the period between 1 April 2022 and 31 March 2023; and between 1 April 2023 and 31 March 2024 in the following locations:*

Location	***Social Housing Lettings***	
	1 April 2022 to 31 March 2023	***1 April 2023 to 31 March 2024***
St Paul Malmesbury Without Civil Parish		
Malmesbury Civil Parish		

Temporary Accommodation

9. *The number of households on the Housing Register housed in temporary accommodation within and outside the Wiltshire Council region on the following dates:*

useholds in Temporary Accommodation	***March 2023***	***March 2024***
Households Housed within Wiltshire Council		
Households Housed outside Wiltshire Council		
Total Households		

10. *The amount of money spent on temporary accommodation per household within the Wiltshire Council region over the following periods:*
    - *1 April 2023 to 31 March 2024.*
11. *The amount of money spent on temporary accommodation per household outside the Wiltshire Council region over the following periods:*
    - *1 April 2022 to 31 March 2023.*

Housing Completions

12. *The number of NET housing completions in the Wiltshire Council region broken down on a per annum basis for the period between 2000/01 and 2023/24.*

13. *The number of NET affordable housing completions in the Wiltshire Council region broken down on a per annum basis for the period between 2000/01 and 2023/24.*

14. *The number of NET housing completions in St Paul Malmesbury Without Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.*

15. *The number of NET affordable housing completions in St Paul Malmesbury Without Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.*

16. *The number of NET housing completions in Malmesbury Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.*

17. *The number of NET affordable housing completions in Malmesbury Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.*

Your request is being processed under the provisions of the Freedom of Information Act 2000 and you will receive a response within 20 working days of receipt of your request.

Kind regards,
Freya

Information Governance Officer
Information Governance Team
Democracy, Governance and Customer Services

Wiltshire Council

Email: InformationGovernance@wiltshire.gov.uk
Web: www.wiltshire.gov.uk
Follow Wiltshire Council

From: Liam Webster <liam.webster@tetlow-king.co.uk>
Sent: 08 January 2025 16:02
To: Information Governance <InformationGovernance@wiltshire.gov.uk>
Cc: Amy James <amy.james@tetlow-king.co.uk>
Subject: Freedom of Information Request - Housing Data

You don't often get email from liam.webster@tetlow-king.co.uk. Learn why this is important

Dear Sir / Madam,

I hope this email finds you well. I write to you to make a request under the Freedom of Information Act 2000 in respect of housing matters in St Paul Malmesbury Without Civil Parish, and Malmesbury Civil Parish, as well as the Wiltshire Council area.

Please see below the FOI request. Please let me know if you have any queries or require any clarification; I look forward to hearing from you within the relevant timescales.

Confirmation of receipt would be greatly appreciated.

Freedom of Information Request

Questions 1 to 11 of this request relate to data held by the Housing Department.
Questions 12 to 17 of this request relate to data held by the Planning Department.

Housing Register

1. The total number of households on the Council's Housing Register at 31 March 2024.

2. The average waiting times at 31 March 2024 for the following types of affordable property across the Authority:

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    b. 2-bed affordable dwelling;
    c. 3-bed affordable dwelling; and
    d. A 4+ bed affordable dwelling.

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    c. 3-bed affordable dwelling; and
    d. A 4+ bed affordable dwelling.

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Location	Household Preferences (31 March 2024)
St Paul Malmesbury Without Civil Parish	
Malmesbury Civil Parish	

5. The number of properties advertised, and the average number of bids per property over the 2023/24 monitoring period for the following types of affordable property in the locations listed below:

Type of affordable property	St Paul Malmesbury Without Civil Parish		Malmesbury Civil Parish	
	Number of properties advertised	Average Bids per Property	Number of properties advertised	Average Bids per Property
1-bed affordable dwelling				
2-bed affordable dwelling				
3-bed affordable dwelling				
4+ bed affordable dwelling				

6. Any changes the Council has made to its Housing Register Allocations Policy since 2011 including:

    - The date they occurred;
    - What they entailed; and
    - Copies of the respective documents

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7. The total number of social housing dwelling stock at 31 March 2024 in the following locations:

Location	Total Social Housing Stock (31 March 2024)
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Malmesbury Civil Parish	

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Location	Social Housing Lettings	
	1 April 2022 to 31 March 2023	1 April 2023 to 31 March 2024
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Malmesbury Civil Parish		

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Households Housed within Wiltshire Council		
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Total Households		

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15. The number of NET affordable housing completions in St Paul Malmesbury Without Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.

16. The number of NET housing completions in Malmesbury Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.

17. The number of NET affordable housing completions in Malmesbury Civil Parish broken down on a per annum basis for the period between 2000/01 and 2023/24.

Glossary of Terms

Housing Register	The housing register is a waiting list of households in a given authority area who are eligible and in need of an affordable home.
Affordable Property	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 b) Starter Homes c) Discounted market sales housing; and d) Other affordable routes to home ownership.[1]
Housing Completion	A dwelling is counted as completed when construction has ceased, and it becomes ready for occupation. This includes new build dwellings, conversions, changes of use and redevelopments. Housing completions should be provided as net figures.
Net	Net refers to total (gross) figures minus any deductions (for example, through demolitions).
Monitoring Period	From 1 April in any given calendar year through until 31 March in the following calendar year.
Prevention Duty	The prevention duty applies when a local authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.
Relief Duty	The relief duty applies when a local authority is satisfied that an applicant is homeless and eligible for assistance.
Parish	The smallest unit of local government.
Ward	A division of a city or town, for representative, electoral, or administrative purposes.

I look forward to hearing from you. If there are any issues with providing any of the data then please get in touch.

Kind regards,
Liam Webster

Liam Webster BA (Hons) MSc MRTPI
Senior Planner
TETLOW KING PLANNING

Unit 2, Eclipse Office Park, High Street, Staple Hill, Bristol, BS16 5EL

T: 0117 9561916 **M**: xxxxxxxxxxxxxx **W:** tetlow-king.co.uk



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[1] As defined by Annex 2 of the National Planning Policy Framework (2024) which can be viewed here.

	NET COMP	2000/01	2001/02	2002/03	2003/04	2004/05	2005/06	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
Q12	Wiltshire	1790	2089	1552	2330	1899	2132	2071	2662	1885	1657	2077	1779	1725	2249	2118	1746	2690	2428	2699	1799	1926	1862	2425	1825
Q14	Malmesbur	0	1	18	21	28	23	2	136	57	41	35	17	12	3	-2	7	105	103	53	6	42	0	33	96
Q16	St. Paul Ma	0	4	4	6	20	2	4	6	64	27	37	29	10	8	11	5	39	1	3	18	0	1	9	37

Appendix JS3

Relevant Extracts from Planning Practice Guidance

Extracts from Planning Practice Guidance

Appendix JS3

Section	Paragraph	Commentary
Housing and Economic Needs Assessment	006 Reference ID: 2a-006-20241212	This section sets out that assessments of housing need should include considerations of and be adjusted to address affordability. This paragraph sets out that *"an affordability adjustment is applied as housing stock on its own is insufficient as an indicator of future housing need."* This is because: • *housing stock represents existing patterns of housing and means that all areas contribute to meeting housing needs. The affordability adjustment directs more homes to where they are most needed* • *people may want to live in an area in which they do not reside currently, for example to be near to work, but be unable to find appropriate accommodation that they can afford.* *"The affordability adjustment is applied in order to ensure that the standard method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. The specific adjustment in this guidance is set at a level to ensure that minimum annual housing need starts to address the affordability of homes."*
Housing and Economic Needs Assessment	018 Reference ID 2a-01820190220	Sets out that *"all households whose needs are not met by the market can be considered in affordable housing need. The definition of affordable housing is set out in Annex 2 of the National Planning Policy Framework".*
Housing and Economic Needs Assessment	019 Reference ID 2a-01920190220	States that *"strategic policy making authorities will need to estimate the current number of households and projected number of households who lack their own housing or who cannot afford to meet their housing needs in the market. This should involve working with colleagues in their relevant authority (e.g. housing, health and social care departments)"*.
Housing and Economic Needs Assessment	020 Reference ID 2a-02020190220	The paragraph sets out that in order to calculate gross need for affordable housing, *"strategic policy-making authorities can establish the unmet (gross) need for affordable housing by assessing past trends and current estimates of:* • *the number of homeless households;*

		• *the number of those in priority need who are currently housed in temporary accommodation;* • *the number of households in over-crowded housing;* • *the number of concealed households;* • *the number of existing affordable housing tenants in need (i.e. householders currently housed in unsuitable dwellings); and* • *the number of households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration."*
Housing and Economic Needs Assessment	024 Reference ID 2a-02420190220	The paragraph states that "*the total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow based on the plan period".* It also details that: *"An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes."*
Housing Supply and Delivery	022 Reference ID: 68-031-20190722	With regard to how past shortfalls in housing completions against planned requirements should be addressed, the paragraph states: "*The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach)…"*
Housing Needs of Different Groups	001 Reference ID: 67-001-20190722	Sets out the relationship between affordable housing need and overall housing need: *"This need* [for specific groups of people] *may well exceed, or be proportionally high in relation to, the overall housing need figure calculated using the standard method. This is because the needs of particular groups will often be calculated having consideration to the whole population of an area as a baseline as opposed to the projected new households which form the baseline for the standard method."*

Appendix JS4

Right to Buy – Independent New Story (June 2020)

Independent PremiumUK news

Council housing sell-off continues as government fails to replace most homes sold under Right to Buy

Home ownership has fallen since the policy was introduced and flats are ending up in the hands of private landlords, writes **Jon Stone**



Sunday 21 June 2020 09:18

Two-thirds of the council homes sold off under Right to Buy are still not being replaced by new social housing despite a promise by the government, official figures show.

Housing charities warned that enough “desperately needed” genuinely affordable housing is simply not being built, with an overall net loss of 17,000 homes this year from social stock.

Since the policy was updated in 2012-13, 85,645 homes have been sold through the policy, but only 28,090 built to replace them, statistics from the Ministry of Housing, Communities and Local Government show.

Under Right to Buy, the government sells off council housing at discounts of up to £100,000 to tenants.

Despite pitching the policy as a way to get more people on the property ladder, overall home ownership has actually fallen significantly since it was introduced in the 1980s.

Previous studies have shown that around 40 per cent of flats sold under the policy since the 1980s have ended up in the hands of private landlords, who let the homes out to private tenants at higher rates. The proportion is thought to be even higher in areas of high housing pressure like London.

Councils warned ministers when the policy was updated that the steep discounts meant the money would not be enough to replace homes one-to-one, and that the very existence of the policy undermined their ability to finance housebuilding by making it impossible to reliably borrow against future rents.

The government officially committed to replace the extra homes sold due to an increase in discounts in 2012-13, but housing charities say the affordable sector cannot afford to bleed stock at all. The government is still around 7,000 homes short of its own target, which covers construction up to the third quarter of 2016-17 because councils are given three years to replace the sold stock.

Jon Sparkes, chief executive at homelessness charity Crisis, said: “These statistics demonstrate just how serious the current housing crisis is. What few social homes that are available are largely being removed from the market as part of Right to Buy, and the supply is not being replenished in line with this.

“People in desperately vulnerable circumstances are being left with dwindling housing options as a consequence of our threadbare social housing provision. This is all the more worrying considering the rise we expect in people being pushed into homelessness as a result of the pandemic.

“To address this, we need to see the government suspend Right to Buy going forward and prioritisation for social housing being given to people who are homeless so they are able to better access what is currently available. Alongside this, we also need commitment to build significantly more social homes in the coming years to keep in step with demand.

“Ending homelessness in the UK is completely within our grasp, but requires a rethink of existing policies that stand in the way.”

In 2018 Theresa May announced that a long-standing borrowing cap preventing councils from building more homes would be lifting. A survey by the Local Government Association

conducted in March 2019 found that a startling 93 per cent of councils were planning to use the extra headroom.

The Scottish and Welsh governments have already ended Right To Buy, citings its effect on the council housing stock.

Commenting on the Right to Buy figures, Polly Neate, chief executive of the housing charity Shelter, said: “The coronavirus pandemic has drummed into us the importance of having a safe home like nothing before. By the same token it’s made it crushingly clear that not enough people do – including the million-plus households stuck on social housing waiting lists. Many of whom are homeless or trapped in grossly overcrowded accommodation right now.

“Despite being desperately needed, our recent track record on building new social homes is atrocious. There was actually a net loss of 17,000 social homes last year, and as it stands Right to Buy isn’t helping. While some people have benefited from the scheme, the failure to replace the properties sold has deprived many others of a genuinely affordable social home.

“But the status quo can be changed. As the government plots its economic recovery from coronavirus, it could give councils the means they need to replace and build social housing. As well as helping to create jobs and get housebuilding going again, this would offer all those without one, their best shot at a safe home.”

Asked about the figures, a spokesperson for the Ministry of Housing, Communities, and Local Government said: “The government is committed to Right to Buy, which has helped nearly two million council tenants realise their dream of home ownership and get on the property ladder.

“Since 2010 we have delivered more homes for social rent – over 140,000 in total – compared to the number of homes sold under the Right to Buy scheme.”

The ministry’s statement is misleading, however, as the 140,000 figure refers to all social housebuilding rather than those homes built to replace housing sold under Right To Buy using receipts earmarked for this purpose.

Appendix JS5

Five Year Housing Land Supply – Affordable Housing Analysis

TK Ref.	Site reference	Site reference	Settlement / CA Remainder	All Units						AH Units				LPA POSITION		Source
				Permitted Units	Outstanding at April 2023	Units under construction	Completions to date	Losses to date	Projected net dwellings 2023/24 - 2027/28	AH Contribution type	On Site AH %age	Commuted Sum	Gross AH Dwellings Planned	Projected net dwellings 2023/24 - 2027/28	Projected Gross AH Dwellings 2023/24 - 2027/28	
East Wiltshire HMA																
TK-001	21/02122/REM	Drummond Park, Ludgershall SP11 9RT	Tidworth / Ludgershall	412	378	71	34	0	325	On-site	25%	n/a	103	325	81	Officer Report dated 22/07/2021
TK-002	19/11986/FUL	Hales Farm, The Green, Urchfont, SN10 4QU	Devizes CA Remainder	13	13	13	0	0	13	On-site	31%	n/a	4	13	4	Officer Report dated 05/04/2021
TK-003	E16.5090	Home Farm Tidworth Wiltshire	Tidworth / Ludgershall	14	2	2	12	0	2	None - Viability	0%	n/a	0	2	0	S.106 dated 05/05/2017 and Commtitee Report dated 17/11/2016
TK-004	18/04346/REM	Land Adjacent to Empress Way Ludgershall Wiltshire	Tidworth / Ludgershall	80	20	14	60	0	20	On-site	30%	n/a	24	20	6	Officer Report dated 03/06/2019
TK-005	20/06554/FUL	Land At Empress Way, Ludgershall	Tidworth / Ludgershall	190	190	0	0	0	170	On-site	30%	n/a	57	170	51	Committee report dated 10/08/2022
TK-006	PL/2021/07203	Land at Marshall Road, Devizes	Devizes	170	170	0	0	0	130	On-site	30%	n/a	51	130	39	S.106 dated 20/03/2023
TK-007	20/07932/OUT	Land at Sandleaze Farm, Worton, Wiltshire	Devizes CA Remainder	26	26	0	0	0	24	On-site	30%	n/a	8	24	7	Officer Report dated 15/10/2020
TK-008	PL/2021/07576	Land east of Reed Place, Rowde, SN10 2GX	Devizes CA Remainder	10	10	0	0	0	10	On-site	100%	n/a	10	10	10	Officer Report dated 08/08/2022
TK-009	PL/2021/11899	Land off Lavington Lane, Devizes, West Lavington	Devizes CA Remainder	50	50	0	0	0	50	On-site	30%	n/a	15	50	15	Officer Report dated 30/05/2022
TK-010	19/05549/REM	Land off Rabley Wood View Marlborough Wiltshire	Marlborough	39	22	22	17	0	22	On-site	41%	n/a	16	22	9	Officer Report dated 31/07/2020
TK-011	E15.4689	Parnham Coaches 31 Andover Road Ludgershall Andover	Tidworth / Ludgershall	27	24	0	0	0	24	On-site	22%	n/a	6	24	5	Affordable Housing Layout dated June 2019
TK-012	PL/2021/03930	ST PETERS JUNIOR SCHOOL, THE PARADE, MARLBOROUGH	Marlborough	7	15	15	0	0	15	Commuted sum	0%	£107,165.30	0	15	0	S.106 dated 21/07/2022
North and West Wiltshire HMA																
TK-013	21/00286/PNCOU	1-4 Avon Heights, Monkton Hill, Chippenham, SN15 1ER	Chippenham	25	25	0	0	0	25	None - (Change of Use PD rights)	0%	n/a	0	25	0	Officer Report dated 17/02/2021
TK-014	20/06500/FUL	17 Station Hill, Chippenham, SN15 1EQ	Chippenham	13	13	0	0	0	13	On-site	100%	n/a	13	13	13	S.106 dated 30/03/2022
TK-015	21/01148/FUL	26 Fore Street, Trowbridge	Trowbridge	24	24	0	0	0	24	None	0%	n/a	0	24	0	S.106 dated 17/02/2022 and Officer Report dated 17/02/2022
TK-016	PL/2022/01197	3 Lowbourne, Melksham, Wilts, SN12 7DZ	Melksham	17	17	0	0	0	9	None - Below Threshold	0%	n/a	0	9	0	Officer Report dated 06/03/2023
TK-017	20/02213/FUL	Agricutural land, Park Farm, Seend Cleeve, Melksham, SN12 6PX	Melksham CA Remainder	14	11	11	0	0	11	On-site	71%	n/a	10	11	8	S.106 dated 11/06/2021
TK-018	20/09998/FUL	Church Farm, Church Street, Hilperton, Trowbridge, Wiltshire	Trowbridge CA Remainder	14	14	14	0	0	14	On-site	14%	n/a	2	14	2	S.106 dated 17/03/2022 and Officer Report dated 18/03/2022
TK-019	PL/2022/00462	Clarks Mill and Mill House Stallard Street Trowbridge Wiltshire BA14 8HH	Trowbridge	22	20	20	0	0	20	None - Below Threshold	0%	n/a	0	20	0	Officer Report dated 13/09/2022
TK-020	21/02520/REM	Cotswold Community, Ashton Keynes, SN6 6QU	Malmesbury CA Remainder	75	48	0	0	0	48	Commuted sum	0%	£557,563.72	0	48	0	Unilateral Undertaking dated 22/11/2022
TK-021	18/04656/FUL	Courtfield House, Polebarn Road, Trowbridge, BA14 7EG	Trowbridge	20	20	0	0	0	20	Combo (Onsite and Commuted Sum)	5%	£36,000	1	20	1	S.106 dated 11/10/2022
TK-022	20/11517/FUL	Elwood House, Former A429, Stanton St Quintin	Chippenham CA Remainder	12	12	12	0	0	12	On-site	42%	n/a	5	12	5	S.106 dated 07/09/2022
TK-023	20/09696/FUL	Former AB Carter Haulage Contractors, 14 Happy Lane, Ashton Keynes, Wiltshire, SN6 6PN	Malmesbury CA Remainder	10	10	7	0	0	10	On-site	40%	n/a	4	10	4	S.106 dated 07/09/2022
TK-024	18/06223/FUL	Former Commercial Nursery, Barters Farm, High Street, Chapmanslade, Wiltshire, BA13 4AL	Warminster CA Remainder	43	10	10	33	0	10	On-site	28%	n/a	12	10	3	S.106 dated 13/06/2019
TK-025	PL/2021/08100	Former Sydenhams Yard, Bradley Lane, Maiden Bradley, BA12 7JR	Warminster CA Remainder	10	10	10	0	0	10	None - Viability	0%	n/a	0	10	0	Officer Report dated 28/07/2022
TK-026	20/06887/FUL	Gable House, 46 High Street, Malmesbury, SN16 9AT	Malmesbury	14	14	0	0	0	14	Commuted sum	0%	£224,153.80	0	14	0	Housing Enabling Team calculation dated 01/11/2021
TK-027	PL/2021/04070	Ground and First Floor Block C, The Pavilions, Windsor Road, Trowbridge, Wiltshire	Trowbridge	34	34	0	0	0	34	None - (Change of Use PD rights)	0%	n/a	0	34	0	Officer Report dated 26/08/2021
TK-028	20/05942/PNCOU	Ground Floor and 1st Floor Block B, The Pavilions, Windsor Road, Trowbridge	Trowbridge	34	34	34	0	0	34	None - Prior Approval	0%	n/a	0	34	0	Officer Report dated 26/08/2020
TK-029	16/06401/FUL	Land at Backbridge Farm, Malmesbury, Wiltshire	Malmesbury	201	169	0	32	0	169	On-site	40%	n/a	80	169	68	S.106 dated 22/10/2021
TK-030	21/01950/FUL	Land At Broadfield Farm, Great Somerford, SN15 5EL	Malmesbury CA Remainder	21	21	0	0	0	21	On-site	38%	n/a	8	21	8	Unilateral Undertaking dated 17/01/2023
TK-031	19/07095/REM	Land at Burton Hill, Malmesbury	Malmesbury	27	27	16	0	0	27	None (Care)	0%	n/a	0	27	0	Officer Report dated 23/04/2021
TK-032	20/09701/FUL	Land at Elizabeth Way, Hilperton, Trowbridge	Trowbridge	187	187	0	0	0	155	On-site	30%	n/a	56	155	46	S.106 dated 30/06/2022
TK-033	21/01363/OUT	Land at Filands/Jenner Lane, Malmesbury	Malmesbury	148	70	0	0	0	66	On-site	40%	n/a	71	66	26	S.106 dated 16/12/2021
TK-034	N18.6442	Land at Grove Farm Bincknoll Lane Royal Wootton Bassett	Royal Wootton Bassett	10	10	10	0	0	10	On-site	40%	n/a	4	10	4	Housing Enabling Team dated 28/08/2018
TK-035	N16.12493	Land at Hunters Moon Chippenham (phase 1)	Chippenham	140	38	0	102	0	38	On-site	28%	n/a	39	38	11	S.106 dated 15/12/2017
TK-036	N18.0401	Land at Hunters Moon Chippenham (phase 2)	Chippenham	72	2	0	70	0	2	On-site	28%	n/a	20	2	1	Site Layout dated 26/08/2018
TK-037	20/06824/REM	Land at Hunters Moon Chippenham Wiltshire (phase 3)	Chippenham	60	60	60	0	0	60	On-site	28%	n/a	17	60	17	Site Layout dated 14/02/2022
TK-038	PL/2022/01448	Land at Mcdonogh Court Polebarn Road Trowbridge Wiltshire	Trowbridge	18	18	18	0	11	18	None - Below Threshold	0%	n/a	0	18	0	Officer Report dated 11/01/2019
TK-039	20/02250/REM	Land at North Chippenham Hill Corner Road & West of A350 Chippenham	Chippenham	19	19	19	0	0	19	On-site	11%	n/a	2	19	2	Site Layout dated 15/05/2019
TK-040	20/11468/REM	Land at North Chippenham, Hill Corner Road, West of A350, Chippenham	Chippenham	37	37	37	0	0	37	On-site	24%	n/a	9	37	9	Site Layout dated 01/09/2021
TK-041	19/00098/REM	Land at Patterdown Road, Chippenham	Chippenham	72	38	0	34	0	38	On-site	40%	n/a	29	38	15	Site Layout dated 29/07/2018
TK-042	PL/2021/09777	Land at Phase 2, Star Ground, Station Road, Holt, Wiltshire.	Bradford on Avon CA Remainder	10	10	10	0	0	10	On-site	100%	n/a	10	10	10	S.106 dated 29/09/2022
TK-043	PL/2021/09817	Land at Pound Farm, South View, Lyneham	Royal Wootton Bassett & Cricklade CA Remainder	50	50	29	0	0	50	On-site	40%	n/a	20	50	20	S.106 dated 25/11/2020
TK-044	21/01155/OUT	Land at Restrop Road, Purton, Swindon, Wiltshire, SN5 4BP	Royal Wootton Bassett & Cricklade CA Remainder	47	47	0	0	0	47	On-site	40%	n/a	19	47	19	S.106 dated 19/07/2022
TK-045	20/01938/OUT	Land at Semington Road, Melksham, Wilts	Melksham	144	144	0	0	0	144	On-site	30%	n/a	43	144	43	S.106 dated 10/09/2021
TK-046	20/11654/REM	Land at Showell Nurseries, Showell, Chippenham, Wiltshire, SN15 2NU	Chippenham	120	120	0	0	0	70	On-site	40%	n/a	48	70	28	Site Layout dated 15/06/2020
TK-047	N16.4124	Land at Silver Street Calne Wiltshire	Calne	154	33	32	121	0	33	On-site	15%	n/a	23	33	5	S.106 dated 27/02/2018
TK-048	19/07938/REM	Land at St George's Road Semington Wiltshire	Melksham CA Remainder	24	7	7	17	0	7	On-site	30%	n/a	7	7	2	Site Layout dated 22/11/2018
TK-049	20/03487/FUL	Land at Sutton Lane Sutton Benger SN15 4RR	Chippenham CA Remainder	21	21	0	0	0	21	On-site	38%	n/a	8	21	8	Officer Report dated 30/07/2021
TK-050	15/01800/OUT	Land at the proposed West Warminster Urban Extension North of Victoria Road &to the West of Bath Road Comprising approx. 84 hectares Warminster Wilt	Warminster	1,000	855	0	0	0	285	On-site	30%	n/a	300	285	86	Committee Report dated 20/08/2018
TK-051	W17.12194	Land at Westbury Sailing Lake, Station Road, Westbury, Wiltshire,	Westbury	300	66	62	234	0	66	None	0%	n/a	90	66	0	S.106 dated 30/12/2016
TK-052	18/04644/REM	Land East of Spa Road, Melksham, Wiltshire	Melksham	447	101	101	271	0	101	On-site	40%	n/a	134	101	40	Covering Letter dated 17/09/2018
TK-053	21/01111/REM	Land East of Spa Road, Melksham, Wiltshire	Melksham	50	31	28	19	0	31	None	0%	n/a	n/a	31	0	Site Layout dated 13/01/2021
TK-054	20/11601/REM	Land East of Spa Road, Melksham, Wiltshire	Melksham	25	11	11	14	0	11	None	0%	n/a	n/a	11	0	Site Layout dated 24/03/2021
TK-055	W17.1643	Land north of Bitham Park Westbury	Westbury	300	8	8	292	0	8	On-site	30%	n/a	90	8	2	S.106 dated 14/06/2016
TK-056	19/09428/FUL	Land North of Folly Farm Warminster	Warminster	46	33	29	13	0	33	On-site	30%	n/a	14	33	10	S.106 dated 04/02/2021
TK-057	19/08039/VAR	Land North of Hill Corner Road Land Parcel B3 & B5 Chippenham Wiltshire	Chippenham	147	31	31	91	0	31	On-site	20%	n/a	29	31	6	Officer report dated 20/12/2019
TK-058	PL/2022/04343	Land North of Victoria Road & to the West of Bath Road, Phase 1, Land North of Victoria Road, Warminster	Warminster	145	145	69	0	0	145	On-site	30%	n/a	44	145	44	Officer Report dated 03/10/2022
TK-059	PL/2021/05259	Land north of Westbury Road and west of Court Orchard, Bratton	Westbury CA Remainder	35	35	0	0	0	35	On-site	40%	n/a	14	35	14	S.106 dated 17/10/2022
TK-060	19/07647/REM	Land North West of Boreham Mill, Bishopstrow Road	Warminster	34	34	30	0	0	34	On-site	29%	n/a	10	34	10	Committee Report dated 28/10/2020
TK-061	20/09659/FUL	Land off Frome Road, Upper Studley	Trowbridge	50	50	0	0	0	50	On-site	30%	n/a	15	50	15	S.106 dated 12/03/2024
TK-062	PL/2021/08554	Land off of Elizabeth Way, Hilperton, Wiltshire, BA14 7	Trowbridge	151	151	0	0	0	151	On-site	30%	n/a	45	151	45	Officer Report dated 06/05/2021
TK-063	19/05898/OUT	Land off Park Road, Malmesbury, SN16 0QW	Malmesbury	50	50	0	0	0	50	On-site	40%	n/a	20	50	20	Appeal Decision dated 26/09/2022
TK-064	PL/2022/01367	Land off St George's Road, Semington	Melksham CA Remainder	18	18	0	0	0	18	On-site	28%	n/a	5	18	5	S.106 dated 14/08/2023
TK-065	17/07548/FUL	Land off Station Road Westbury Wiltshire	Westbury	87	80	67	7	0	80	On-site	13%	n/a	10	80	10	S.106 dated 31/07/2019
TK-066	19/11569/OUT	Land south of Filands Malmesbury	Malmesbury	71	71	0	0	0	66	On-site	40%	n/a	28	66	26	S.106 dated 28/08/2020
TK-067	19/11601/OUT	Land South of Low Lane Calne Wiltshire SN11 8EQ	Calne	26	26	0	0	0	26	On-site	100%	n/a	26	26	26	S.106 dated 08/06/2021
TK-068	20/11515/OUT	Land South of Sandhole Lane Westbury	Westbury	67	67	0	0	0	67	On-site	30%	n/a	20	67	20	Appeal Decision dated 08/02/2022
TK-069	20/08341/OUT	Land South West of Park Road, Malmesbury, Wiltshire	Malmesbury	26	26	0	0	0	23	On-site	40%	n/a	10	23	9	Committee Report dated 01/12/2021
TK-070	N16.7209	Land to East of Oxford Road, Calne, Wiltshire	Calne	145	31	21	168	0	31	On-site	43%	n/a	60	31	13	S.106 dated 04/08/2016 and Committee Report dated 17/02/2016
TK-071	PL/2021/11051	Land to North West of Folly Farm, Warminster	Warminster	54	54	13	0	0	54	On-site	30%	n/a	16	54	16	S.106 dated 16/05/2022
TK-072	PL/2022/00405	Land to rear of 8 - 13 High Street, Calne, Wiltshire	Calne	39	39	39	0	0	39	Commuted Sum	0%	£375,000	0	39	0	S.106 dated 09/02/2021
TK-073	PL/2021/04960	Land to the east of Storey Mews, Malmesbury, SN16 0FH	Malmesbury	29	29	29	0	0	29	On-site	21%	n/a	6	29	6	S.106 dated 09/05/2018
TK-074	PL/2021/08453	Land to the north of Whychurch Farm and to the south of Filands, Malmesbury	Malmesbury	71	71	0	0	0	71	On-site	40%	n/a	28	71	28	S.106 dated 06/07/2018
TK-075	20/06684/OUT	Land to the south of Chilvester Hill, Calne, Wiltshire SN11 0LR	Calne	32	28	0	0	0	28	On-site	30%	n/a	10	28	8	S.106 dated 10/11/2021
TK-076	20/06808/FUL	Land West of Dartmoor Road, Dartmoor Road, South of A3098, Westbury	Westbury	26	6	6	20	0	6	On-site	30%	n/a	8	6	2	S.106 dated 30/09/2021
TK-077	20/07334/OUT	Land west of Semington Road, Melksham	Melksham	50	50	0	0	0	50	On-site	30%	n/a	15	50	15	Officer Report dated 23/04/2021
TK-078	N16.3515	Langley Park	Chippenham	378	329	0	0	0	133	On-site	4%	n/a	14	133	5	S.106 dated 10/01/2017
TK-079	PL/2021/07384	Lillybrook Residential Home Estate, Lyneham, Chippenham, SN15 4AA	Royal Wootton Bassett & Cricklade CA Remainder	14	9	9	5	0	9	None	0%	n/a	0	9	0	Officer Report dated 06/01/2022
TK-080	21/01331/VAR	Manor Farm, The Street, Grittleton, SN14 6AN	Chippenham CA Remainder	14	14	13	0	0	13	None - Viability	0%	n/a	0	13	0	Housing Enabling Team comments dated 14/08/2018
TK-081	21/01465/REM	Phase 4A, Land at Hunters Moon, Chippenham	Chippenham	4	4	4	0	0	4	On-site	25%	n/a	1	4	1	Housing Enabling Team calculation dated 09/03/2021

TK-082	21/01463/FUL	Phase 5, Land at Hunters Moon, Chippenham	Chippenham	95	95	62	0	0	95	On-site	40%	n/a	38	95	38	S.106 dated 03/04/2022
TK-083	19/11461/REM	Rowden Park - Crest Nicholson South West Phase 2 Patterdown Road Chippenham Wiltshire	Chippenham	64	64	0	0	0	64	On-site	23%	n/a	15	64	15	Site Layout dated 21/01/2021
TK-084	N17.8786	Rowden Park Patterdown Road Chippenham	Chippenham	114	28	22	74	0	28	On-site	25%	n/a	28	28	7	Housing Enabling Team calculation dated 02/09/2017 and Affordable Housing Plan
TK-085	N14.12118	Rowden Park Patterdown Road Chippenham Wiltshire	Chippenham	1,000	687	0	0	0	246	On-site	30%	n/a	300	246	74	S.106 dated 17/03/2017
TK-086	20/02667/VAR	Rowden Park, Patterdown Road, Chippenham	Chippenham	152	135	0	0	0	135	cy compliant (assun	30%	n/a	45	135	40	Housing Officer Comments dated 27/04/2020
TK-087	PL/2021/06001	Rowden Park, Patterdown Road, Chippenham, Wiltshire	Chippenham	114	6	6	6	0	6	On-site	30%	n/a	34	6	2	S.106 dated 23/03/2017
TK-088	N10.4093	Royal Arthur Park, Westwells Road	Corsham	221	45	0	176	0	45	None - Care	0%	n/a	0	45	0	n/a
TK-089	18/03338/FUL	The United Church & Community Buildings Church Street Trowbridge Wiltshire BA14 8DZ	Trowbridge	29	20	20	5	3	20	On-site	3%	n/a	1	20	1	S.106 dated 27/06/2029
TK-090	20/08387/VAR	Timber Yard, Real World Studios, Mill Lane, Box, Corsham, Wiltshire, SN13 8PD	Corsham CA Remainder	20	20	0	0	0	20	On-site	10%	n/a	2	20	2	S.106 dated 03/12/2019
TK-091	PL/2021/07305	Woodlands Social Club Woodland Park Calne SN11 0JX	Calne	19	18	18	0	0	18	None	0%	n/a	0	18	0	Committee Report dated 09/10/2019
TK-092	20/06550/FUL	Woodmead Residential Home, 35 Portway, Warminster, BA12 8QR	Warminster	43	45	45	0	33	45	None (Care)	0%	n/a	0	45	0	S.106 dated 22/12/2022
TK-093	H2.3	Elizabeth Way	Trowbridge	68	68	0	0	0	68	On-site	30%	n/a	20	68	20	S.106 dated 06/03/2024
South Wiltshire HMA																
TK-094	19/11110/FUL	Building Known as Finch House The Old Manor Hospital Wilton Road Salisbury Wiltshire	Salisbury	21	11	11	0	0	11	Commuted sum	0%	£68,250.00	0	11	0	S.106 dated 20/07/2017
TK-95	PL/2022/06171	Castle View Rest Home, 8 Old Castle Road, Salisbury	Salisbury	n/a	16	16	0	14	16	None (Care)	0%	n/a	0	16	0	Officer Report dated 15/01/2024
TK-096	19/07304/REM	Kings Gate Phase 4, West of Archers Gate Development, Amesbury, Wiltshire	Amesbury	299	144	144	155	0	144	On-site	30%	n/a	90	144	43	Site Layout dated 20/08/2018
TK-097	20/11079/FUL	Land Adjacent Quarryfield Industrial Estate Castle Street Mere BA12 6LA	Mere	n/a	38	38	0	0	38	None (Care)	0%	n/a	0	38	0	Officer Report dated 11/07/2022
TK-098	S17.0085	Land at Hillbrush Company Ltd Woodlands Road Mere	Mere	74	32	32	42	0	32	On-site	12%	n/a	9	32	4	Housing Officer Comments dated 01/06/2017
TK-099	PL/2021/09660	Land north of Hilltop Way, Salisbury, Wilts, SP1 3QX	Salisbury	10	10	10	0	0	10	On-site	100%	n/a	10	10	10	Officer Report dated 09/03/2022
TK-100	PL/2021/06594	Land North of Netherhampton Road, Salisbury, Wiltshire	Salisbury	106	106	0	0	0	106	On-site	40%	n/a	42	106	42	Affordable Housing Plan dated 19/01/2022
TK-101	PL/2021/04201	Land previously occupied by Alderbury Football Club , Alderbury	Southern Wiltshire CA Remainder	50	20	20	30	0	20	On-site	22%	n/a	11	20	4	Tenure Plan dated 06/09/2021
TK-102	PL/2021/08735	Land South of Netherhampton Road, Salisbury	Salisbury	234	234	0	0	0	234	On-site	48%	n/a	113	234	112	Site Layout dated 11/07/2022
TK-103	S15.7253	Land to the East of A345 and West of Old Sarum Longhedge Salisbury	Salisbury	673	35	35	610	0	35	On-site	40%	n/a	268	35	14	S.106 dated 21/03/2014
TK-104	20/08160/REM	Land to the East of A345 and West of Old Sarum Salisbury, Wiltshire SP4 6BW	Salisbury	65	47	47	18	0	47	On-site	40%	n/a	26	47	19	S.106 dated 04/03/2020
TK-105	20/08976/REM	Land to the North West of Fugglestone Red and Bemerton Heath Salisbury Wiltshire	Salisbury	166	80	80	86	0	80	None	39%	n/a	64	80	31	Planning Statement dated October 2020
TK-106	20/00337/FUL	South of Rowbarrow	Salisbury	86	86	0	0	0	86	On-site	40%	n/a	34	86	34	Committee Report dated 16/05/2024
TK-107	PL/2022/05365	Stratford Court, Stratford Road, Salisbury, SP1 3JH	Salisbury	n/a	16	0	0	26	16	None (Care)	0%	n/a	0	16	0	Officer Report dated 05/10/2022
TK-108	PL/2022/00855	Tisbury Sports Centre, Weaveland Road	Tisbury	13	13	0	0	0	13	On-site	46%	n/a	6	13	6	Committee Report dated 08/12/2022
TK-109	PL/2021/09292	Yard and Buildings to the rear of Neal Close and Gibbs Close Salisbury	Salisbury	14	14	14	0	0	14	On-site	21%	n/a	3	14	3	Officer Report dated 11/032022
Swindon (within Wiltshire)																
TK-110	PL/2021/11324	Land off the Buffer, Ridgeway Farm Development, Purton Road, Swindon, SN5 4JT	Swindon	n/a	36	36	0	0	36	None (Use Class C2)	0%	n/a	0	36	0	Officer Report dated 10/03/2022
Other Sources of Supply																
TK-111	**n/a**	**Small sites**	**n/a**	**n/a**	**1371**	**428**	**47**	**49**	**1159**	**None - Below Threshold**	**n/a**	**n/a**	**n/a**	**1159**	**n/a**	**Housing Land Supply Statement dated June 2024**
TK-112	**n/a**	**Windfall - brownfield small sites**	**n/a**	**n/a**	**n/a**	**n/a**	**n/a**	**n/a**	**712**	**None - Below Threshold**	**n/a**	**n/a**	**n/a**	**712**	**n/a**	**Housing Land Supply Statement dated June 2024**
TK-113	**n/a**	**Windfall - greenfield small sites**	**n/a**	**n/a**	**n/a**	**n/a**	**n/a**	**n/a**	**409**	**None - Below Threshold**	**n/a**	**n/a**	**n/a**	**409**	**n/a**	**Housing Land Supply Statement dated June 2024**
TK-114	**n/a**	**Windfall - brownfield large sites**	**n/a**	**n/a**	**n/a**	**n/a**	**n/a**	**n/a**	**252**	**Policy compliant (assumed)**	**40%**	**n/a**	**n/a**	**252**	**101**	**Housing Land Supply Statement dated June 2024**
Totals				**10,682**	**7,086**	**1,719**	**2,868**	**87**	**5,661**			**£1,368,132.82**	**3,076**	**8,193**	**1,712**	
Per Annum				**2,136**	**1,417**	**344**	**574**	**17**	**1,132**			**£273,626.56**	**615**	**1,639**	**342**	