

AFFORDABLE HOUSING STATEMENT

Land north of the A3102, Melksham

December 2025



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1 Introduction

- 1.1 This Affordable Housing Statement accompanies and supports an outline planning application for a residential development submitted by Bloor Homes South West (the Applicant) on land north of the A3102, Melksham.
- 1.2 The submitted planning application seeks outline planning permission for:

“...residential development; public open space including formal play space and allotments; sustainable drainage systems and associated infrastructure; a 100 place nursery and access points for pedestrians and cyclists. All matters are reserved except for access, the principal point of access is to be provided from a new northern arm onto an improved arrangement of the Eastern Way/A3102 roundabout junction and an emergency access onto the A3102”.
- 1.3 As part of the proposed development, new affordable housing is to be provided. Policy 43 of the Core Strategy and its supporting text requires that affordable housing be provided at a rate of no less than 30% (net) for sites of five or more dwellings in Melksham.
- 1.4 However, the Applicant is aware that the emerging Local Plan, which has reached Examination stage, proposes that for sites of ten or more dwellings, 40% of the housing proposed should be affordable housing. Despite the Local Planning Authority acknowledging that the emerging Plan should, at the time of writing, be afforded limited weight in the decision-making process, the Applicant is proposing that the development will provide 40% affordable housing.
- 1.5 This Statement provides an overarching explanation of the affordable housing element of the proposed development, the framework provided by relevant tiers of planning policy and the scheme's compatibility with Development Plan policy and other material considerations. In terms of its structure, it comprises:
 - Section 2: provides contextual information relating to national planning policy regarding affordable housing;
 - Section 3: explains the existing and emerging Development Plan policy relating to affordable housing and identifies other material considerations;
 - Section 4: describes the proposed affordable housing; and
 - Section 5: provides a summary.

2 National planning policy relating to affordable housing

- 2.1 A long-established planning principle is that a community's need for affordable housing is a material planning consideration which may be taken into account when deciding planning applications. The provision of affordable housing is a 'benefit' of the development which should be accorded significant weight. It is not 'mitigating' an impact arising from the development; it is addressing a pre-existing need.

NATIONAL PLANNING POLICY FRAMEWORK

- 2.2 The National Planning Policy Framework (NPPF) was updated in December 2024. Paragraphs 7 to 10 explain the purpose of the planning system as a means of achieving sustainable development, with paragraph 8 identifying the three dimensions of sustainable development, namely: social, economic and environmental, which are interdependent and need to be pursued in mutually supportive ways.

- 2.3 The social dimension is described in the following terms:

"a social objective – 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; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being."

- 2.4 Paragraph 61 confirms that the Government's objective is to significantly boost the supply of homes. To achieve this, it is important that the needs of groups with specific housing requirements are addressed.

- 2.5 Paragraph 63 states that:

"...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); families with children; looked after children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes."

- 2.6 Paragraph 64 states that:

"Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required (including the minimum proportion of Social Rent homes required), and expect it to be met on-site unless:

- a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and*
- b) the agreed approach contributes to the objective of creating mixed and balanced communities."*

- 2.7 Paragraph 66 states 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 The government's definition of affordable housing is set out in Annex 2 of the NPPF. The definition is:

"Affordable housing: 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) Social Rent: meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent; (b) the landlord is a registered provider; and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision.

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

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

d) Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement."

- 2.9 Footnote 90 confirms that this definition should be read in conjunction with relevant policy contained within the Affordable Homes Update Written Ministerial Statement, published on 24 May 2021, although, as noted in Footnote 31, the minimum 25% delivery requirement for First Homes no longer applies.

FIRST HOMES

- 2.10 As stated above, in May 2021, a Written Ministerial Statement was issued concerning First Homes, and the Government's Planning Practice Guidance (PPG) was updated.

- 2.11 The PPG states that First Homes are a specific type of discount market sales housing, which for the purposes of planning, should be considered as being affordable housing. In effect, Footnote 90 of the NPPF confirms that despite the alterations made to the December 2024 version of the NPPF, First Homes remains a form of discount market sales affordable housing.

- 2.12 The Guidance¹ states that First Homes should:

- be discounted by a minimum of 30% against the market value of the unit;

¹ PPG, First Homes, Paragraph: 002 Reference ID: 70-002-20210524.

- be sold to a person meeting the First Homes eligibility criteria;
- on their first sale, have a restriction registered on the Title to ensure that the discount (as a percentage of market value) and certain other restrictions are passed on at each subsequent title transfer; and
- outside Greater London, the first sale must be no higher than £250,000, after the discount has been applied.

2.13 In addition, it is also stated that the landowner should enter into a Section 106 planning obligation that: (a) secures the delivery of the First Homes; and (b) ensures that a legal restriction is registered onto the First Home's title on its first sale². Developers are required to obtain a valuation from a registered valuer acting in an independent capacity, which should be undertaken in accordance with the RICS' red-book valuation guidance for new build homes, in order to establish the open market valuation³.

2.14 A purchaser, (or if a joint purchase, all the purchasers) of a First Home should be first time buyers and not have a combined annual income exceeding £80,000 in the tax year immediately preceding the purchase⁴.

2.15 Initially, there was a requirement for a minimum of 25% of all affordable housing units secured through developer contributions to be First Homes, but Footnote 31 of the NPPF now confirms that:

"The requirement to deliver a minimum of 25% of affordable housing as First Homes, as set out in 'Affordable Homes Update' Written Ministerial Statement dated 24 May 2021, no longer applies. Delivery of First Homes can, however, continue where local planning authorities judge that they meet local need."

SUMMARY

2.16 As discussed below, there exists an established affordable housing need in Wiltshire. National planning policy expects for this provision to be made on-site unless an off-site contribution is robustly justified and helps to create mixed and balanced communities. There is also an expectation that the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures.

2.17 In terms of First Homes, the 2024 version of the NPPF confirms that the requirement for 25% of all affordable housing to be First Homes no longer applies. That said, the delivery of First Homes can continue, where local planning authorities judge that they meet a local need.

² PPG, First Homes, Paragraph: 003 Reference ID: 70-003-20211223.

³ PPG, First Homes, Paragraph: 006 Reference ID: 70-006-20210524.

⁴ PPG, First Homes, Paragraph: 007 Reference ID: 70-007-20210524.

3 Local planning policy and other material considerations

THE WILTSHIRE CORE STRATEGY

- 3.1 The Wiltshire Core Strategy was formally adopted on 20th January 2015. It forms part of the Development Plan for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004.

Affordable housing quantum and tenure

- 3.2 Core Policy 43 (Providing affordable homes) and its supporting text establishes that on sites of five or more dwellings in Melksham, affordable housing provision of at least 30% (net) will be sought. This provision should be delivered without public subsidy, unless otherwise agreed by the Council. Tenure will be negotiated on a site-by-site basis. All affordable housing will be subject to an appropriate legal agreement with the Council.
- 3.3 The Policy also requires affordable housing provision to be dispersed throughout a development and to be designed to be of a high quality, so as to be indistinguishable from other development. In determining the level of integration that can be achieved, consideration will be given to the practicalities of management and maintenance associated with the proposal, whilst still ensuring affordability, particularly in developments of maisonettes.

MELKSHAM NEIGHBOURHOOD PLAN

- 3.4 The second Neighbourhood Plan for Melksham was made in August 2025. It covers the period 2020 to 2038. Policy 6 requires developments to:
- deliver rented and owner-occupied homes in a tenure-blind mix, design and layout;
 - increase the supply of affordable housing, in conformity with adopted Wiltshire Council affordable housing policy; and
 - address particular local issues of affordability and demand for affordable homes for first time buyers and local households on below average incomes, which includes the provision of First Homes at a discount of up to 40% of open market value, where it is commercially viable (our emphasis).

EMERGING DEVELOPMENT PLAN

- 3.5 As required by the NPPF, the Wiltshire Local Plan is currently being reviewed. It has reached Examination stage. Relevant emerging policy relating to the provision of affordable housing is set out below.
- 3.6 Policy 76 (Providing affordable homes) confirms that in areas that are not designated as rural areas, affordable housing provision of at least 40% will be required on sites of 10 or more dwellings, or 0.5ha (the lower threshold applies). Only in exceptional circumstances will a commuted sum be sought.
- 3.7 The provision of affordable housing may vary on a site-by-site basis, taking into account evidence of local need, mix of affordable housing, and, where appropriate, the viability of development. All affordable housing will be subject to an appropriate legal agreement. This level of provision should be delivered with nil public subsidy.
- 3.8 The tenure mix on all sites will normally be 65% affordable rent, 10% shared ownership and 25% first homes.

- 3.9 Affordable housing should be distributed across the whole site in small clusters and their appearance and parking should be indistinguishable from other development.
- 3.10 Policy 78 (Meeting Wiltshire's housing needs) confirms that new housing, both market and affordable, should: (1) be well designed to address local housing needs through a range of differing types, tenures and sizes of homes, in order to create mixed and balanced communities; (2) meet the Nationally Described Space Standard (NDSS) and be built to building regulations M4(2) standard; and (3) provide for a minimum 7% of all housing on site to building regulations M4(3) standard.

OTHER MATERIAL CONSIDERATIONS

Wiltshire's Interim Position Statement on First Homes

- 3.11 The Interim Position Statement concerning First Homes was published in June 2022. Its purpose is to set out the Local Planning Authority's interim approach to the implementation of the Government's First Homes policy, prior to the adoption of the Local Plan Review. Paragraph 14 of the Statement confirms that in advance of the adoption of the Local Plan Review, the First Homes policy will be applied as a material planning consideration.
- 3.12 Paragraph 18 confirms that the main requirements for all major developments incorporating First Homes will be:
- A minimum of 25% of affordable housing units should be First Homes. This will be as a proportion of the affordable housing requirement, although this should now be read in the context of Footnote 31 of the December 2024 version of the NPPF.
 - The First Homes should be physically indistinguishable from market homes in terms of their quality and size.
 - The First Homes units should be discounted by a minimum of 30% against market values. The discount should remain in perpetuity and be secured through a planning obligation.
 - The first sale price, after the application of the discount, should not be more than £250,000.
 - The units must be sold to first-time buyers with a combined household income of less than £80,000.
 - The units must be advertised and made exclusively available for the first three months for people meeting the Council's local connection criteria.
 - Other than in exceptional circumstances, First Homes should be provided on site.
 - The following tenure split will be sought in the interim period, prior to the adoption of the Local Plan Review:
 - Affordable Rent: 60%;
 - First Homes: 25%; and
 - Shared Ownership: 15%.
 - A mix of 1, 2 and 3 bed homes will reflect needs and sit within the First Homes price cap. The indicative First Homes mix is proposed to be:
 - 1 bed flats: 15%;
 - 2 bed flats: 15%;
 - 2 bed houses: 50%;
 - 3 bed houses: 20%; and
 - 4 bed houses: need will depend on the location.

- Notwithstanding the above, there is acknowledgement that the First Homes mix for a site should be adjusted to take account of local circumstances.

Housing affordability

- 3.13 Since the start of the Core Strategy's plan period, 37,606 dwellings have been completed over 18 monitoring years. This equates to an annual average completion rate of 2,089 homes, which is an annual average completion rate that is 11 homes fewer than the Core Strategy's minimum annual average housing requirement (a minimum of 2,100 homes per annum).
- 3.14 Despite an average annual completion rate that is only modestly lower than the Core Strategy's annual average housing requirement, housing affordability in Wiltshire has worsened since 2006. Information published by the Office for National Statistics confirms that the median house price to median gross annual workplace-based earnings ratio in Wiltshire has worsened from 8.57 in 2006 to 8.87 in 2024, with a five year mean over the past five-year period of 9.62. Consequently, the policy framework provided by the Core Strategy has resulted in a quantum of residential development that has not made it easier for residents to access housing; indeed, in Wiltshire, housing affordability and the housing crisis has worsened.

The need for affordable housing

- 3.15 As set out within the Core Strategy Inspector's Report, evidence of the need for affordable housing within Wiltshire was set out in the 2011 Strategic Housing Market Assessment, undertaken by Fordham Research. The Strategic Housing Market Assessment concluded that the annual affordable housing need within Wiltshire was, at that time, approximately 1,360 dwellings. Over the 20-year plan period, this would have equated to 27,200 affordable homes, which would have been 65% of the overall minimum housing requirement.
- 3.16 The Core Strategy Inspector noted that, based on this evidence, that there was a *"significant need for affordable housing. Indeed, the level of need appears so high that its delivery is not feasible based on historic completion rates for all housing or realistic projections."*
- 3.17 Given this conclusion, paragraph 6.42 of the Core Strategy confirms that the strategy would deliver approximately 13,000 affordable homes over the plan period (650 affordable homes per annum). Consequently, the level of affordable housing to be delivered by the Core Strategy was set at a level to meet under 48% of the identified affordable housing need (i.e. the needs of one in every two households in need of affordable housing would not be met by the Plan).
- 3.18 However, information provided to LRM Planning by the Local Planning Authority has demonstrated that over the period 2009 to 2024, the average annual delivery rate of affordable housing has been 604 affordable dwellings per annum. This is an average annual completion rate that is 46 fewer affordable homes than was planned for in the Core Strategy. Cumulatively, over the same 15-year period, 691 fewer affordable homes have been provided than was planned for. Taken against the identified need for affordable housing stated in the 2011 Strategic Housing Market Assessment, the shortfall would be 11,341 affordable homes (gross).
- 3.19 The most up-to-date assessment of the need for affordable housing is provided within the Wiltshire Local Housing Needs Assessment Update (February 2023). It confirms that there remains a significant need for affordable housing within Wiltshire over the longer-term.

SUMMARY

- 3.20 Local planning policy and guidance as it relates to affordable housing is set out above. It has informed the Applicant's approach to affordable housing as part of the proposed development. The Applicant's affordable housing proposals, which are explained in the following section, will make a meaningful contribution to increasing the supply of affordable housing within Wiltshire, for which there remains a significant need.

4 The Applicant's affordable housing proposals

4.1 The Applicants' affordable housing proposals are set out in Table 1 below, as well as in Appendix 1 and 2. They respond to the existing and emerging Development Plan policy relevant to the application site.

TABLE 1: APPLICANT'S AFFORDABLE HOUSING PROPOSALS

TOPIC	AFFORDABLE HOUSING PROPOSALS
Quantum	40% affordable housing. This is a higher quantum than is required by the existing Development Plan (Core Policy 43 of the Core Strategy). The quantum reflects emerging planning policy requirements.
Tenure	The proposed development includes the following tenure mix (with rounding): – Affordable rent: 64%; – Shared ownership: 13%; and – First Homes: 24%. Whilst it could be argued that the First Homes provision is modestly lower than local guidance requires, the guidance was written prior to the publication of the 2024 version of the NPPF, which no longer requires a minimum of 25% of the affordable housing to be First Homes.
Mix and Location	It is proposed that a scheme to identify the mix and location of affordable homes is submitted at the detailed planning stage. However, it is expected that the location will seek to ensure that affordable housing is distributed across the development in a manner that is tenure blind in terms of its design, build quality, appearance, materials and location.
Accessibility	Whilst not a requirement of the adopted Development Plan, all affordable homes, bungalows, and certain ground-floor maisonettes, will be designed to meet at least the Part M4(2) (accessible and adaptable dwellings) standards of the Building Regulations, with the exception of first floor maisonettes. Additionally, a number of affordable rent homes will be designed to meet Part M4(1) standards (first floor maisonettes) and the more stringent Part M4(3) (wheelchair user dwellings) standards.
Rent caps	The affordable rented housing will be subject of rent controls which will require a rent of no more than 80% of the local open market rent at the time of the letting.

Phasing	The following affordable housing phasing is proposed: • no more than 50% of the open market dwellings should be occupied prior to the completion of 50% of the affordable homes; and • no more than 75% of the open market dwellings should be occupied prior to the completion of 100% of the affordable homes.
Eligibility	The affordable rent and shared ownership housing will only be let to an individual that meets the requirements of Wiltshire Council's allocation policy⁵ and who is unable to afford open market housing (rent or sale). The First Homes will be advertised in accordance with the Interim Position Statement on First Homes – the Applicant will market the First Homes. The local connection criteria detailed in Appendix 1 of the document will apply for the first three months from when a First Home is marketed. If a suitable buyer is not found (i.e. the home is not reserved), the eligibility will revert to a national geography. The local connection criteria will be disapplied for the circumstances listed at paragraph 25 of the Interim Position Statement on First Homes.

PLANNING OBLIGATION

- 4.2 The Applicant proposes that a planning obligation is entered into to secure the above affordable housing proposals.

⁵ https://www.homes4wiltshire.co.uk/Data/Pub/PublicWebsite/ImageLibrary/Allocation%20Policy_%20Jan2023_FINAL.pdf

5 Summary

- 5.1 This Affordable Housing Statement accompanies an outline planning application submitted by Bloor Homes South West on land north of the A3102, Melksham.
- 5.2 A long-established planning principle is that a community's need for affordable housing is a material planning consideration which may properly be taken into account in deciding planning applications.
- 5.3 As part of the proposed development, new affordable housing is to be provided. It is proposed that 40% of the total number of homes provided will be affordable housing. This is a greater level of affordable housing than is required by the current Development Plan.
- 5.4 The Applicant intends that the affordable housing element of the scheme is secured by a planning obligation and the submission of an affordable housing scheme in respect of location and mix of units.
- 5.5 It is evident that the affordable housing element of the scheme primarily reflects the NPPF, which is a material planning consideration, as well as large elements of the existing and emerging Development Plan and other material considerations.
- 5.6 The scheme's contribution to meeting the need for affordable housing is a material benefit that should properly be afforded substantial weight in the determination of the submitted application.

***LRM Planning
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CARDIFF OFFICE

22 Cathedral Road, Cardiff, CF11 9LJ
02920 349737

admin@lrmp planning.com
lrmp planning.com

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EXETER OFFICE

Winslade Manor, Manor Drive, Clyst St Mary,
Exeter EX5 1FY, 01392 690060



Registered Office: Nyewood Court, Brookers Road, Billingshurst RH14 9RZ
Registered in England and Wales No 08618388 VAT Reg No 196 5837 49



RTPI
Chartered Town Planner