

MATTER 2: CONSISTENCY WITH THE WILTSHIRE CORE STRATEGY (WCS)

- 1.1 This matter statement is prepared on behalf of Terra Strategic Ltd in relation to its land interests at land to the west of Semington Road, Melksham. An outline planning application is currently pending for up to 108 dwellings which would be up to 100% affordable homes (reference 18/04650/OUT). A site location plan is attached as **Appendix 1**.

Issue 2: Does the WHSAP make adequate provision to meet housing requirements as set out in the WCS?

Q. 2.1 The WCS contains housing figures at a County, HMA and settlement level. Which is the most appropriate scale at which to consider provision in order to assess consistency with the WCS?

- 1.2 Principally, a fundamental flaw with the WHSAP is that it has been prepared to align with the plan period of the WCS (2006 – 2026). With the plan period commencing in 2006, some 13 years ago, demonstrates that the WHSAP is more retrospective than forward-thinking. Consequently, there are less than seven years remaining in the plan period, which will be even less by the time it is adopted. Accordingly, the WHSAP fails the test of soundness as it is not positively prepared, nor is it consistent with national policy, effective and justified.
- 1.3 The WCS was prepared prior to the NPPF system, despite not being adopted until January 2015. The housing requirement of 42,000 homes was not founded on a NPPF compliant Strategic Housing Market Assessment (SHMA¹), which was confirmed by the Inspector's report. Having reviewed the evidence and on the understanding that a revised SHMA would be forthcoming the Inspector concluded at paragraph 81:
- “Consequently I consider that at this current time the minimum housing figure within the CS should reasonably equate to at least 42,000 homes over the plan period with the flexibility to deliver more.”***
- 1.4 It is clear that the housing requirement confirmed by the Inspector is a compromise based on the understanding that the figure is a minimum and will be subject to early reviewing pending the publication of an up-to-date joint SHMA for Swindon and Wiltshire. The Inspector clearly expressed that the figure is a minimum by using the term 'at least' and emphasised that there should be flexibility to deliver more over the plan period.
- 1.5 Indeed, the Council's commitment to an early partial review of the WCS was a determining factor in the Inspector's report recommending adoption of the WCS subject to main modifications. Wiltshire Council (WC) has failed to progress an early

¹ Wiltshire Council Strategic Housing Market Assessment (December 2011)

<http://www.wiltshire.gov.uk/strategic-housing-market-assessment>

review of the WCS. Consequently, the WHSAP is failing to adequate plan for the future of Wiltshire.

- 1.6 WCS Core Policy 2 establishes the minimum housing requirement of 42,000 homes which is then disaggregated to the three housing market areas (HMAs) and West of Swindon. Focusing housing delivery on a HMA basis seems most appropriate and has been the approach to assessing housing land supply in recent planning appeals.
- 1.7 The concept of disaggregating the requirement further on a settlement and a community area basis hasn't worked as some settlements such as Melksham have successfully delivered homes whereas Trowbridge has underperformed. The exercise of setting housing target and comparing delivery per settlement is not helpful. Settlements that are perceived as having 'over delivered' should not penalised or unduly restrained from further growth because other settlements have not delivered housing. WC's approach runs counter to the NPPF which advocates local plans to be '*sufficient flexibility to adapt to rapid change*' (paragraph 14, NPPF 2012). Consequently, WC is stifling growth by not planning positively or being aspirational in their plan making.
- 1.8 To accord with the NPPF, the focus should be on delivering homes in sustainable locations and limited weight should be given to the indicative housing requirements for each settlement and community area as these were only intended to be an approximate level which should be exceeded.

Q. 2.2 Based on the most up-to-date evidence, what is the residual level of development required to meet the housing requirement identified in the WCS? What component of this is the WHSAP expected to meet?

- 1.9 As a result of the WHSAP following the same retrospective plan period of the WCS, the plan is based on out-of-date evidence that predates the NPPF. In March 2017, a joint SHMA² for Swindon and Wiltshire was published which proposed four new housing market areas: Swindon, Chippenham, Trowbridge and Salisbury. The change in the housing market areas is significant as the boundaries bear no relation to the existing HMAs in the WCS. The North and West HMA (NWHMA) which was the largest in size and represented the largest housing requirement (24,740 homes) is now split between Swindon, Chippenham and Trowbridge. Melksham, a key market town, is situated strategically between Chippenham and Trowbridge is within the Chippenham HMA.
- 1.10 The Joint SHMA identifies the Full Objective Assessed Need for Housing over the 20-year period 2016-36 to be of 73,000 dwellings. The FOAN is split 29,000 dwellings in Swindon (1,450 dwellings per annum) and 44,000 dwellings in Wiltshire (2,200 dpa). With the need in each housing market area being:
 - Chippenham HMA: 22,250 dwellings

² Swindon & Wiltshire Strategic Housing Market Assessment – Report of Findings (March 2017)
<http://www.wiltshire.gov.uk/spp-shma-2017-final.pdf>

- Salisbury HMA: 8,250 dwellings
 - Swindon HMA: 29,000 dwellings
 - Trowbridge HMA: 13,500 dwellings
- 1.11 Based on the SHMA (2017) a significant amount of new homes need to be found in the Chippenham HMA. Melksham as a sustainable town, which is capable of accommodating a significant amount of growth, is therefore ideally placed to accommodate this need.
- 1.12 Nevertheless, WC has chosen to disregard the findings of this more up-to-date evidence base and simply proceed with the outdated housing requirement figure founded in the pre-NPPF SHMA. Consequently, ignoring the wishes of the WCS Inspector, who only found the document sound on the basis that there would be an early review and the housing requirement would be revisited promptly.
- 1.13 Therefore, the suggestion that 2,396 new homes is the residual level of development is unfounded as the housing requirement is out of date and not based on up-to-date evidence. Consequently, the WHSAP fails the test of soundness as it is not positively prepared, nor is it consistent with national policy, effective and justified

Q. 2.3 Are the components of delivery identified in the Plan, including completions, committed developments and windfalls, justified and realistic?

- 1.14 The WHSAP and none of the supporting topic papers provide sufficient detail to explain the component of the housing supply. TKP has asked WC to provide the empirical data that supports their overarching housing land supply figures so it can be interrogated this further. The Council stated in an email that their most up-to-date supply data is contained in the April 2017 Housing Land Supply (HLS) Statement³ (**Appendix 2**), published in March 2018. Contrary to this assertion Topic Paper 3 (TP3), published in July 2018⁴, provides an addendum to the HLS Statement presenting a whole new set of 5YHLS figures.
- 1.15 Unlike the HLS Statement, TP3 does not give a breakdown of the sites used to arrive at its 5YHLS figure. Notably, the windfall allowance for the NWHMA is exceptionally high estimating 2,209 new homes will be secured through unknown development sites; there would appear to be overreliance on windfall sites and WC has not justified their position. Furthermore, Topic Paper 4 (TP4) demonstrates a further set of annualised 5YHLS figures, including the plan allocations, over the remainder of the plan period for each HMA. As with TP3, TP4 offers no indication of which sites these

³ <http://www.wiltshire.gov.uk/spp-housing-land-supply-statement-2017-published-2018-march.pdf>

⁴

<http://www.wiltshire.gov.uk/planningpolicydocument?directory=Wiltshire%20Housing%20Site%20Allocations%20DPD/Submission%20July%202018/Topic%20Papers&fileref=6>

figures are derived from, nor does it provide any evidence of the approach that has been used.

- 1.16 This clearly demonstrates WC must have produced a number of updated trajectories for the WHSAP, post production of the 2017 HLS Statement, but this data has been kept out of the public domain to avoid scrutiny. With the absence of this crucial data it is difficult to adequately respond to this question and therefore it is concluded that the approach is not justified or realistic.

Q. 2.4 In light of the above, does the WHSAP make adequate overall provision to ensure the delivery of the minimum housing requirement as set out in the WCS?

- 1.17 Significantly boosting the supply of homes is a primary objective of both the original and revised NPPF to ensure positive and aspirational plan making. To this end strategic policies should, as a minimum, provide for objectively assessed needs for market and affordable housing, as well as any needs that cannot be met within neighbouring areas.
- 1.18 Therefore, the housing requirement of 42,000 new homes is not a cap to development; it is a minimum level that should be exceeded. WC should be aspirational and should be significantly boosting the supply of homes and planning beyond the minimum housing requirement.
- 1.19 As outlined previously the WHSAP is a retrospective plan and upon adoption it will only have a shelf life of six years. As the housing requirement is a minimum and the community area requirements are only indicative, WC should be maximising opportunities to boost housing supply at sustainable locations such as Melksham.
- 1.20 Furthermore, boosting the supply of affordable homes is key priority for government as set out in the revised National Planning Policy Framework, the Planning Practice Guidance, the National Housing Strategy and the Government's Housing White Paper. Having a thriving active housing market that offers choice, flexibility and affordable housing is critical to our economic and social well-being. It is therefore imperative that all local planning authorities are aspirational and plan for optimum housing growth to address the affordability crisis.
- 1.21 Market signals provide evidence of the unaffordability of Wiltshire's housing market. House prices are a key affordability indicator that illustrates ability to access home ownership. The Home Truths Report 2017/18 for the South West published by the National Housing Federation (NHF) highlights the growing housing crisis in Wiltshire. In 2016/17 the average house price in Wiltshire was £289,993. When compared against average earnings of £26,816 the ratio of house prices to incomes is 10.8. This means that the average value of a property in the area is over ten times the average annual income. To further emphasis the unaffordability of the housing market the report identifies that an income of £66,284 is required for an 80% mortgage which is 250% higher than the average income in the area. A copy of the Home Truths 2017/18 report (NHF) is provided at **Appendix 3**.

- 1.22 Therefore, WC needs to significantly boost the supply of homes to tackle the affordability crisis to provide flexibility, choice and competition in the market. By providing more sites in more sustainable location across the NWHMA would address the affordable crisis.

Q. 2.5 Is the predicted delivery of allocated sites realistic in terms of the contribution they would make through the Plan period?

- 1.23 Further to comments at Q. 2.3, given that the trajectories in the TP3 and TP4 were produced prior to the proposed changes in September 2018 and critically do not provide a site by site breakdown; it is only reasonable to conclude WC is not able to robustly demonstrate the predicted delivery of allocations over the Plan period.

- 1.24 ***Issue 3: Does the distribution of site allocations accord with the spatial strategy in the WCS?***

Q. 3.1 Is the overall distribution of housing allocations consistent with the spatial strategy set out in the WCS?

Q. 3.2 Is the distribution within each HMA consistent with the WCS?

- 1.25 WCS Core Policy 1 (CP1) identifies the most sustainable locations for growth within Wiltshire through the basis of a settlement hierarchy, with the focus for development on the Principal Settlements and Market Towns. The Core Strategy identifies Melksham as a Market Town. The role of Market Towns as sustainable locations for growth is recognised in CP1. The policy states that these locations “*have the potential for significant development that will increase the number of homes in order to sustain and enhance their existing services and facilities*”.

- 1.26 With regard to Melksham’s role in the WCS, it is noted that whilst the examining Inspector determined that the Council’s decision to not identify a strategic allocation for Melksham at the time of adoption was “on balance, warranted”, the Inspector was concerned about housing delivery in the latter part of the plan period. Paragraph 288 of the Core Strategy Inspector’s report states:

“Whilst, in the shorter term, there appears to be sufficient commitments to ensure an adequate supply of housing land for the town, there is a notable degree of uncertainty for the latter part of the plan period. The Council acknowledged in its Position Statement the scope for a Sites DPD to assist in delivering such housing which, given my earlier comments in relation to overall housing numbers for the county, seems to be the most pragmatic and efficient way of complementing the neighbourhood planning process to ensure the provision of sufficient housing to meet identified needs in a timely fashion...”

- 1.27 Now we are in the “latter stages” of the respective plan periods of the WHSAP, it apparent that no sites in Melksham have been allocated. There was an assumption made by the Inspector and WC that the WHSAP would allocate relevant sites to make up local need, which it has failed to do.

- 1.28 Of the 11 market towns identified in WCS CP1, Melksham is one of the largest market towns which has a wide range of services and employment opportunities available to residents making it one of the most sustainable settlements in Wiltshire. Principally, the town has a railway station which connects it directly to Chippenham and Trowbridge, London Bristol and South Wales. Only four of the 11 market towns listed in WCS CP1 have railway stations. For example, large towns such as Calne, Corsham, Devizes and Royal Wootton Bassett do not have railway stations.
- 1.29 As one of the largest market towns Melksham has the potential for significant development that will increase the number of jobs and homes in order to enhance its services and facilities. The Market Town status also means that Melksham has the ability to support sustainable patterns of living in Wiltshire through its current level of activities, services and employment opportunities. Melksham is also strategically located between Chippenham and Trowbridge, to provide a supplementary role to these principal settlements.
- 1.30 Clearly Melksham has significant sustainable credentials and due to its size, its vastly more sustainable than other market towns designated by WCS CP1 such as Devizes, Corsham, and Royal Wootton Bassett. It therefore seems unfair that the Melksham is classified in the same category in the settlement strategy as these less sustainable locations.
- 1.31 There would seem merit in sub-dividing the Market Town classification into major and minor market towns which would separate the larger more sustainable settlements such as Melksham and Warminster from the smaller, less sustainable towns such as Devizes and Royal Wootton Bassett. This would ensure development was concentrated in the most sustainable settlement. Evidently the spatial strategy should be reviewed as part of the impending review of the WCS and this is even acknowledged by WC in the WHSAP paragraph 4.48:
- “A review of the WCS is also the appropriate means to properly consider the performance and longer term prospects of settlements.”***
- 1.32 It is evident that Melksham has been overlooked as a planned location for growth as WC failed to make any strategic allocations in WCS and the WHSAP. Nevertheless, the WHSAP opts to make allocations in large villages such as Hullavington, Yatton Keynell, Bratton which are less sustainable. This approach is contradictory to WCS CP1 and the NPPF which seeks to locate development at the most sustainable locations.
- 1.33 Within the NWHMA, there is an over reliance on Trowbridge to deliver housing with six allocation sites expected to deliver 1500 homes. This equates to three quarters of the 1,400 homes allocated for the NWHMA. To date the delivery of homes in Trowbridge has been poor and the expectation that so many sites will deliver in tandem is unrealistic as developers will not want to flood the market with homes on competing sites.

- 1.34 Consequently, the WHSAP fails the test of soundness as it is not positively prepared, nor is it consistent with national policy, effective and justified.

Q. 3.3 Is the approach set out in Stages 1 and 2 of the site selection process justified?

In particular, has a consistent and justified approach been taken to excluding specific locations from the scope of the exercise, including:

- **Principal Settlements, Market Towns, Local Service Centres and Large Villages;**
- **areas where housing needs in the WCS are indicated to have been met; and**
- **areas with made or emerging Neighbourhood Plans? (* Note, in responding to this question, the Council is requested to provide an up to date assessment of the stage each relevant Neighbourhood Plan is at in its preparation).**

- 1.35 As TKP has emphasised throughout this matter statement, Melksham has been overlooked in WHSAP as there is a perception that it has already delivered sufficient homes in relation to its indicative housing requirement. However, this is not a ceiling for development as acknowledged in Paragraph 4.48 WHSAP:

“Indicative levels of housing for Market Towns are not a ceiling and variations would not seem to present new or significant issues for local infrastructure and environmental capacity. Allocations made in the Plan are made to support the spatial strategy”

- 1.36 It is noted that Melksham doesn't even get a mention in paragraphs 4.44-4.64 which outlines the housing growth strategy for the NWHMA.

Q. 3.4 Are the differences between overall provision identified in the WHSAP and the WCS justified? Should any shortfalls in provision within particular settlements be compensated for with development in other locations?

- 1.37 As outlined previously, TKP has concerns about the over reliance on Trowbridge in the NWHMA which has historically under-delivered housing. The expectation that three quarters of the homes for the NWHMA should come from Trowbridge is unrealistic given its poor delivery of homes in recent years.

- 1.38 Clearly other sustainable towns in NWHMA should help address this shortfall and Melksham is ideally placed to accommodate further growth.

Issue 4: Has the site selection process for housing allocations been soundly based?

Q. 4.1 Have the site allocations been undertaken on a consistent basis having regard to the strategic objectives and policies of the WCS, the policies of the NPPF and the evidence base?

Q. 4.2 Were reasonable alternatives considered and tested? Are the reasons for selecting the preferred sites and rejecting others clear?

- 1.39 Having reviewed all the topic papers the support the WHSAP, there is no clear audit trail to demonstrate how the sites were selected, whether any alternatives were considered or tested.
- 1.40 Paragraph 3.1 of Topic Paper 2 states:
- “The site selection methodology, as a first stage, prioritises the consideration of housing sites at those settlements and areas where land supply needs to be supplemented in order to help meet the distribution and levels of housing provided by the WCS. These locations are termed ‘Areas of Search’.”***
- 1.41 This infers that locations such as Melksham were deliberately disregarded as it was deemed that there was sufficient housing land supply. This a prejudicial judgement. The first stage should have been to consider all sites equally and subsequently discount sites based on a sound methodology.
- 1.42 Our client’s site at Semington Road, Melksham is site 728 in the SHELAA and is identified as having a capacity for 165 homes and being available, achievable, deliverable and developable, enclosed as **Appendix 4**. It is not clear, how the site was subsequently discounted having been considered so positively in the SHELAA.

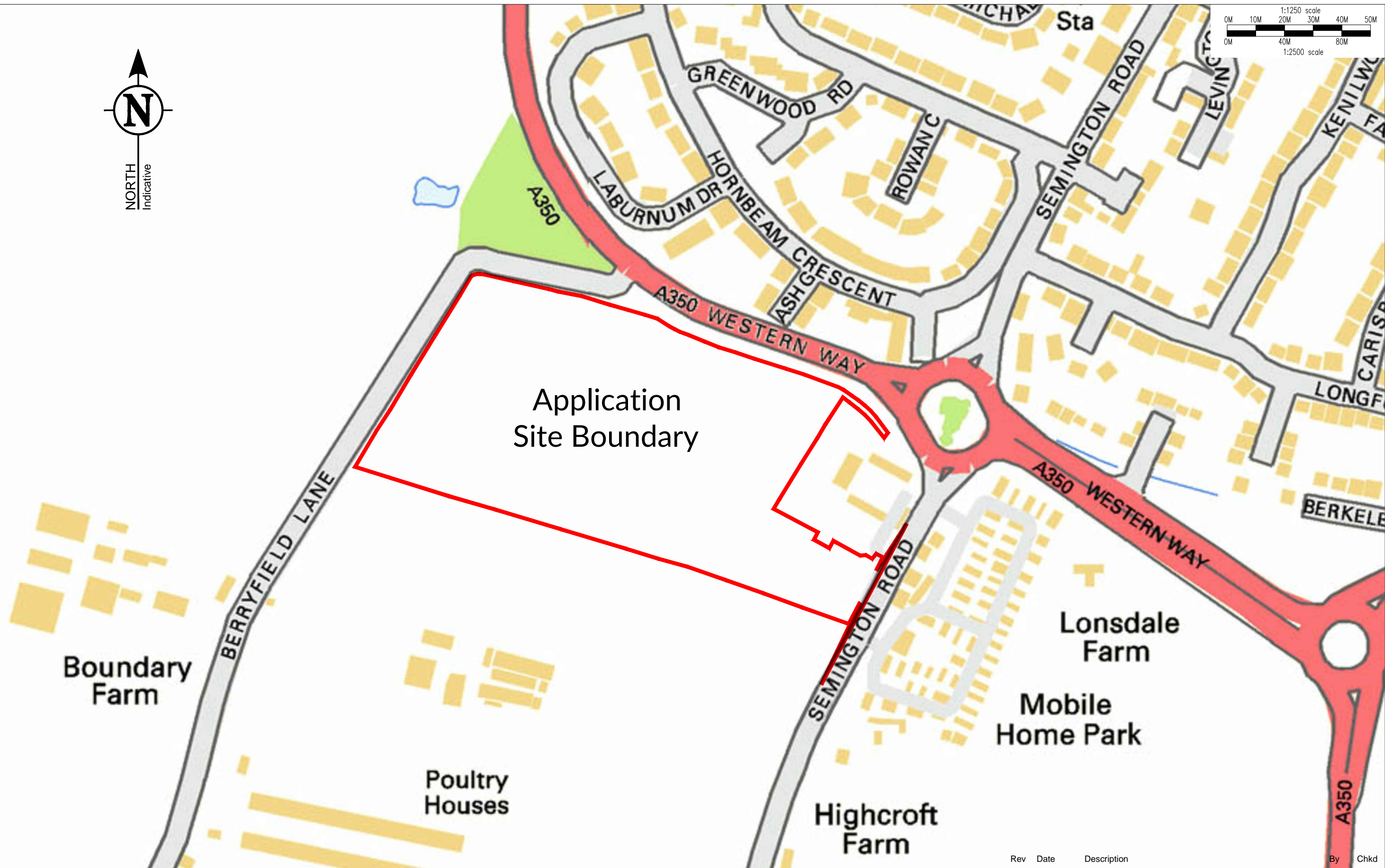
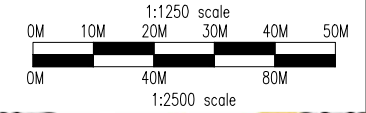
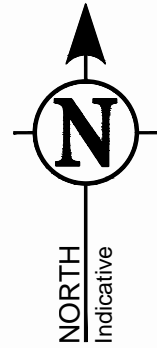
Summary

- 1.43 To conclude, the WHSAP does not meet the tests of soundness as it fails all four tests:
- a) **Positively prepared** – The WHSAP is being prepared on a largely historic plan period (2006-2016) which is not seeking to meet an updated NPPF compliant OAN for Wiltshire;
 - b) **Justified** – The WHSAP does not consider alternatives, nor is there a clear audit trail to the site selection process.
 - c) **Effective** – It is not clear how the WHSAP will deliver over the plan period as no housing trajectories has been provided. There has been an absence of cross-boundary strategic working with other local authorities;
 - d) **Consistent with national policy** – the WHSAP is not NPPF compliant, it does not enable the delivery of sustainable development.

Appendix 1

Site Location Plan






BANNERS GATE
 CIVIL, STRUCTURAL & ARCHITECTURAL DESIGN SERVICES
Cavendish House, 10-11 Birmingham Street, Halesowen, West Midlands B63 3HN
 Tel: 0121 687 1500 Fax: 0121 687 1501
 E-mail: mail@bannersgate.com

Client: 
TERRA
 STRATEGIC

Project: **LAND TO WEST OF SEMINGTON ROAD MELKSHAM**

Drawing Title: **LOCATION PLAN**

Rev	Date	Description	By	Chkd
Scale:	Plot size:	Drawn:	Check:	Date:
1:2500	A3L	HJM	DH	JAN 2017
CAD Ref: E:\Work\16123 - Melksham\Design and Access Statement\Info for DAS\Original Files\AutoCAD Files\16123 - L				
Project no.:			Drawing no.:	
16168			1000	

Appendix 2

Email from Wiltshire Council



From: [Davies, Sophie](#)
To: [Annie Gingell](#)
Subject: WHSAP question
Date: 05 March 2019 16:07:37
Attachments: [image001.png](#)
[image002.png](#)

Hi Annie

Just to confirm that I am unable to update the trajectory figures for this Friday.

I can confirm the most up-to-date published figures are in the HLS 2017.

Kind regards

Sophie Davies
Senior Planning Officer
Economic Development & Planning
Wiltshire Council, County Hall, Bythesea Road, Trowbridge, BA14 8JN

01225 713429
Email: sophie.davies@wiltshire.gov.uk
Web: www.wiltshire.gov.uk
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Appendix 3

Home Truths Report



The housing crisis in the South West

The South West is home to metropolitan cities, historic towns, vast stretches of coastline, national parks and many rural communities, but the region is characterised by the housing crisis. Low and stagnating wages combined with drastically rising house prices mean the South West is one of the most unaffordable regions in the country.

This report provides local data on the housing market in the South West and highlights that:

- The average house price in the South West is £270,054. Regionally, house prices have risen by nearly £14,000 in the last year. House prices in the Cotswolds are nearly 50% higher than the regional average.
- The average house in the South West costs more than 10 times typical earnings and the average family would need a household income of at least £61,700 to afford a mortgage.
- The average cost of renting is over £700 per month, swallowing up around 36% of local incomes and pushing many families into rent poverty.
- More than 20% of all second homes in the UK are located in the South West, increasing prices for local people.
- The region isn't building enough homes. Between 2012 and 2016, there was a shortfall of over 21,000 houses across the South West.

Solving the housing crisis

Housing associations are united by a single purpose – to ensure everyone can live in a good quality home that they can afford.

Last year we built 26% of new homes in England and our ambition is to deliver 120,000 homes a year by 2033.

Housing associations in the South West built over 4,200 homes in 2016-2017, and started a further 4,100. We are exploring innovative means to solve the housing crisis, including through modern methods of construction.

In Bristol, housing associations are working with the city council to provide land and grants for affordable and social housing.

Recent changes in Government policy will help us deliver even more. An extra £2bn investment included a specific commitment to allow new homes to be built for social rent – the first time such funding has been available since 2010.

Certainty over future rents and recognition for supported and sheltered housing are steps in the right direction. The Government must now deliver the final part of the jigsaw: the long-term supply of affordable land. Only then will the right amount of homes, of the right kind, in the right places, be built to meet changing housing needs.

If you share our sense of purpose and ambition, let's work together to end the housing crisis.

Contact

National Housing Federation,
Lion Court, 25 Procter Street,
London WC1V 6NY

020 7067 1010
info@housing.org.uk
#HomeTruths2018

NATIONAL
HOUSING
FEDERATION



Home Truths 2017/18

The housing market
in the South West

South West	Average (mean) house prices in 2016/17 ¹	Mean monthly private sector rents in 2016/17 ²	Mean annual earnings in 2017 ³	Ratio of house prices to incomes ⁴	Income required for 80% mortgage (80% at 3.5x) ⁵	Percent of Housing Benefit claimants in employment ⁶	Unemployment rate 2016/17 ⁷	Five-year shortfall 2012-2016 ⁸	Long-term empty homes ⁹	Second homes ¹⁰	Total housing association affordable homes 2017 ¹¹
England	£288,898	£852	£28,444	10.2	£66,034	24%	4.8%	482,905	200,145	248,747	2,672,026
South West	£270,054	£770	£25,366	10.6	£61,727	23%	3.9%	21,597	18,117	51,440	251,806
Bath and North East Somerset UA	£381,089	£1,190	£27,570	13.8	£87,106	24%	4.2%	n/a	404	778	11,799
Bournemouth UA	£259,365	£792	£25,553	10.2	£59,283	26%	4.2%	2,700	673	3,079	3,949
Bristol, City of UA	£290,197	£1,025	£26,551	10.9	£66,331	22%	4.7%	5,892	876	2,113	12,952
North Somerset UA	£271,631	£731	£27,388	9.9	£62,087	18%	3.1%	3,384	211	506	9,730
Plymouth UA	£184,665	£583	£23,369	7.9	£42,209	20%	5.1%	n/a	678	700	23,383
Poole UA	£333,244	£848	£26,208	12.7	£76,170	28%	3.9%	2,069	462	1,583	3,234
South Gloucestershire UA	£274,777	£929	£27,253	10.1	£62,806	27%	3.3%	n/a	321	183	12,796
Swindon UA	£226,087	£699	£27,258	8.3	£51,677	16%	4.2%	3,041	494	224	5,979
Torbay UA	£210,746	£589	£21,606	9.8	£48,171	22%	5.1%	737	1,079	1,541	5,920
Cornwall UA	£245,305	£648	£22,443	10.9	£56,070	24%	3.7%	2,911	3,230	13,767	23,033
Isles of Scilly UA	£308,125	n/a	n/a	n/a	£70,429	n/a	n/a	n/a	n/a	187	61
Devon	£268,836	£711	£23,499	11.4	£61,448	24%	4.7%	208	2,471	11,842	30,408
East Devon	£294,625	£704	£24,903	11.8	£67,343	27%	3.2%	n/a	393	2,603	2,766
Exeter	£266,880	£869	£22,786	11.7	£61,001	24%	5.7%	331	326	530	4,762
Mid Devon	£237,618	£642	£25,199	9.4	£54,313	21%	3.2%	208	220	249	1,527
North Devon	£245,785	£624	£21,518	11.4	£56,179	24%	3.2%	153	538	1,721	4,753
South Hams	£330,744	£776	£24,939	13.3	£75,599	26%	2.6%	n/a	198	3,896	4,891
Teignbridge	£261,486	£699	£22,802	11.5	£59,768	25%	3.6%	n/a	364	1,333	6,188
Torriford	£224,203	£577	£22,589	9.9	£51,246	21%	4.2%	240	311	985	2,969
West Devon	£253,836	£674	£23,639	10.7	£58,020	25%	2.6%	662	121	525	2,552
Dorset	£311,426	£783	£24,518	12.7	£71,183	25%	2.9%	1,798	1,308	6,623	24,377
Christchurch	£352,319	£878	£26,837	13.1	£80,530	24%	2.9%	610	150	768	2,673
East Dorset	£366,400	£914	£27,066	13.5	£83,749	26%	2.9%	710	214	258	3,260
North Dorset	£283,114	£730	£24,752	11.4	£64,712	25%	2.4%	17	245	429	4,450
Purbeck	£329,563	£843	£20,686	15.9	£75,329	29%	2.7%	n/a	149	1,631	2,622
West Dorset	£307,181	£778	£25,048	12.3	£70,213	25%	2.9%	587	336	2,568	6,937
Weymouth and Portland	£232,266	£657	£21,575	10.8	£53,089	25%	5.3%	n/a	214	969	4,435
Gloucestershire	£278,492	£783	£27,659	10.1	£63,655	23%	3.7%	1,555	2,464	3,700	30,196
Cheltenham	£300,652	£803	£29,900	10.1	£68,721	22%	3.6%	1,670	395	915	2,652
Cotswold	£397,558	£982	£29,843	13.3	£90,870	24%	2.6%	n/a	313	1,623	6,392
Forest of Dean	£225,636	£633	£26,863	8.4	£51,574	20%	4.5%	n/a	465	267	5,213
Gloucester	£191,453	£559	£24,523	7.8	£43,761	23%	4.3%	814	543	124	8,524
Stroud	£287,624	£734	£28,517	10.1	£65,743	22%	2.6%	371	477	517	1,942
Tewkesbury	£273,940	£730	£26,343	10.4	£62,615	25%	3.5%	n/a	271	254	5,473
Somerset	£245,091	£646	£23,702	10.3	£56,021	22%	3.5%	n/a	2,070	3,108	27,445
Mendip	£283,474	£700	£24,045	11.8	£64,794	21%	4.8%	n/a	460	403	6,720
Sedgemoor	£224,919	£625	£24,398	9.2	£51,410	20%	5.5%	215	335	552	3,425
South Somerset	£240,417	£634	£22,157	10.9	£54,953	24%	3.5%	378	595	832	11,638
Taunton Deane	£237,649	£655	£25,360	9.4	£54,320	22%	4.3%	n/a	456	341	3,110
West Somerset	£243,309	£637	£20,457	11.9	£55,614	21%	3.5%	6	224	980	2,552
Wiltshire UA	£289,993	£827	£26,816	10.8	£66,284	25%	3.2%	n/a	1,376	1,506	26,544

1. Office for National Statistics (ONS), small area statistics

2. Valuation Office Agency

3. ONS, Annual Survey of Hours and Earnings

4. ONS, small area statistics and Annual Survey of Hours and Earnings

5. ONS, small area statistics and National Housing Federation own analysis

6. Department for Work and Pensions, Stat Xplore

7. ONS, NOMIS model based estimates

8. Town and Country Planning Association household projections; Ministry for Housing Communities and Local Government (MHCLG) table 253 and Federation own analysis

9. MHCLG, table 615

10. MHCLG, Council Tax base

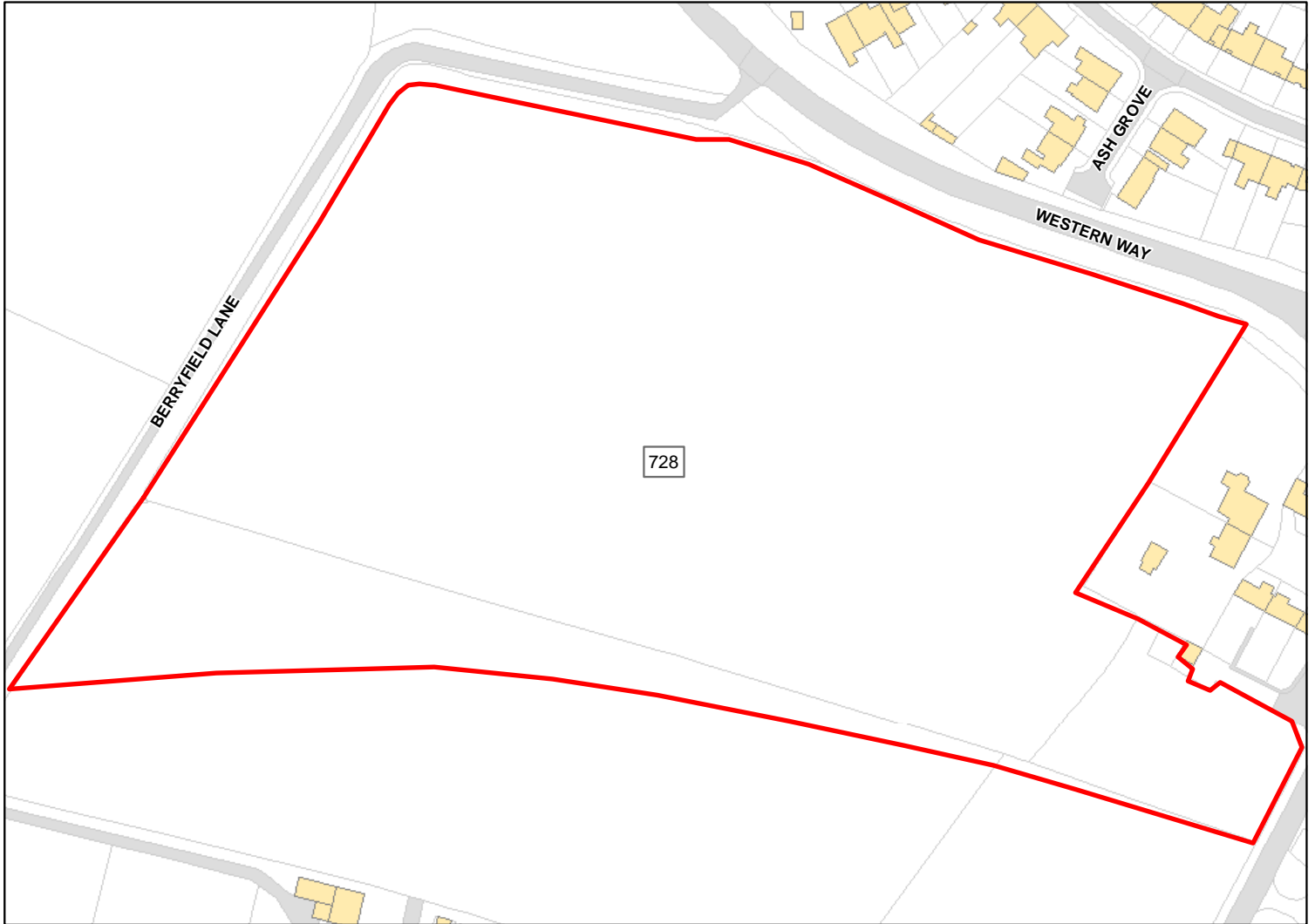
11. Homes England, Statistical Data Return 2017

n/a: not available

Appendix 4

SHELLA Site 728





Site Address: Land to North of Berryfield (Area 3)

Total Area: 5.3913ha HMA: North & West Wiltshire

Suitable Area: 5.3913ha (100.0%) Previous Use: Greenfield

Suitability Constraints*: N/A

All Constraints*: MSA, ALCG1

Suitable: Yes. No suitability constraints. Available: Yes

Achievable: Yes (Residential) Deliverable: Yes

Capacity: 165 Developable: In short-term

*Note: Constraint abbreviations can be found in the SHELAA Methodology Report in Appendices 1 and 2 on pages 14 and 16.